

ARNSIDE AND SILVERDALE AONB DEVELOPMENT PLAN DOCUMENT

Sustainability Appraisal/Strategic Environmental
Assessment – Adoption Statement

MARCH 2019



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VERSION CONTROL

Version	Date	Author	Checker	Approver	Changes
1	01/03/2019	Edward Hargreaves	David Hourd	David Hourd	
2	19/03/2019	Edward Hargreaves	David Hourd	David Hourd	Client comments addressed

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1 Introduction

1.1 Background

South Lakeland District Council and Lancaster City Council (the Councils) submitted the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD) (hereafter ‘the Plan’) to the Secretary of State for independent Examination in February 2018 in accordance with Regulation 22 of the Town and Country Planning (T&CP) Regulations 2012¹. Following the examination hearings which were held between 19 and 21 June 2018 and consultation on the Main Modifications to the Plan (held 25 October – 6 December 2018), the Plan was found sound by the Inspector in his report dated 30 January 2019. Lancaster City Council resolved to adopt the Plan on the 13 March 2019 and South Lakeland District Council resolved to adopt the Plan on 28 March 2019. The Plan therefore came into effect as part of both authorities’ respective Development Plans on 28 March 2019.

The Plan will be the first DPD for the Arnside and Silverdale AONB and will guide development in the AONB over the next 15 years (2016-2031). It will identify sites for new housing and employment to contribute towards meeting local needs and will set out planning policies to ensure that development reflects the AONB designation. The Plan complements the Arnside and Silverdale AONB Management Plan 2014 to 2019.

Arcadis UK Limited (‘Arcadis’) was commissioned by the Councils to undertake a Sustainability Appraisal (SA), incorporating Strategic Environment Assessment (SEA), of the Plan. This Adoption Statement is the final output of the SA/SEA process. It describes the way in which the Councils have taken environmental and sustainability considerations and the views of consultees into account in the adopted Plan and fulfils the plan and programme adoption requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive²) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations³).

1.2 Sustainability Appraisal

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, local planning authorities are required to carry out a SA of their local plans (including AONB plans) in order to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of the SEA Directive, and its transposing regulations the SEA Regulations. The term ‘SA’ encompasses SEA and is therefore used to refer to the combined SA/SEA for the remainder of this report.

The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is *“to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment”*.

The National Planning Policy Framework (NPPF)⁴ states that *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives.”*

In this context, SA has played an integral role in the development of the Plan with each main stage of the Plan’s preparation having been integrated with the SA process (see Section 3 for further information).

¹ SI 2012 No. 767 The Town and Country Planning (Local Planning) (England) Regulations 2012.

² Available from <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN> [Accessed October 2018].

³ SI 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ Department for Communities and Local Government (2019) National Planning Policy Framework. Available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Accessed October 2018].

The SA work undertaken in support of the development of the Plan to date can be viewed on the Councils' websites:

www.southlakeland.gov.uk/aonb-dpd

www.lancaster.gov.uk/planning/planning-policy/arnside-and-silverdale-aonb-dpd

1.3 Habitat Regulations

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive')⁵ requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA)), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA).

HRA Screening has been undertaken to determine if the Plan (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. Its findings have been used to influence this SA where appropriate. This process is documented in a separate report submitted to Natural England for approval.

The HRA concluded that the Plan will not have any likely significant effects on the European sites, either alone or in combination.

1.4 Purpose of this Adoption Statement

This Adoption Statement represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Directive and SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- how environmental and sustainability considerations have been integrated into the Plan (Section 2);
- how the results of the SA Reports have been taken into account (Section 2);
- the reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with (Section 2);
- how opinions expressed in response to the consultation on the SA Reports have been taken into account (Section 3); and
- the measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan (Section 4).

⁵ Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment'.

2 How Environmental and Sustainability Considerations Have Been Integrated into the Plan and How the SA Report Has Been Taken into Account

2.1 Overview

The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the area. This should be done whilst considering the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. The key principles of the Plan are:

- To conserve and enhance the landscape, and the natural beauty of the AONB, including landscape character and visual amenity, wildlife, geology, heritage and settlement character;
- To ensure that all development is appropriate and sustainable in its location and design and is of high quality;
- To ensure that planning policy is shaped by effective community engagement;
- To provide sufficient supply and mix of high quality housing to contribute to meeting the needs of the AONB’s communities, with an emphasis on affordable housing and without adverse impact on the landscape character of the AONB;
- To support rural employment and livelihoods, and sustainable tourism;
- To provide the necessary services and infrastructure to support both existing and new development;
- To support the development of a safe and sustainable transport network, including paths and cycleways, to improve connectivity, reduce the need to travel and encourage sustainable forms of transport.

The special character of the AONB requires a different approach to local planning to that outside nationally important landscapes. The Plan is also an important means of implementing the AONB Management Plan⁶ which defines the Special Qualities of the AONB and sets out its vision and objectives. As such, the SA approach was adapted to embed the unique attributes of the Plan.

The principles of sustainable development have been integral to the key decisions made in respect of the policies and proposals of the Plan. The integration of these considerations into the plan making process has principally been achieved through:

- the development of a comprehensive evidence base on topics including housing, employment, retail, transport, landscape, biodiversity, flood risk, climate change and health;
- continuous engagement with key stakeholders and the public on the emerging Plan and related environmental and sustainability matters;
- the consideration of national planning policy and the objectives of other plans and programmes;
- joint working between Lancaster City Council and South Lakeland District council; and
- ongoing assessment including SA as well as HRA.

The purpose of the SA is to integrate sustainability considerations into the Plan and help it to achieve its central goal of conserving and enhancing the natural beauty of the area. This is accomplished through a phased approach to influencing the Plan at key stages throughout its development.

Table 2-1 Overview of Plan Development in Parallel with the SA Process

Plan Stage	Summary of the Accompanying SA Report
Evidence Gathering (2015)	The Scoping Report set the scope and approach of the SA process taking into consideration the review of other relevant programmes, plans and policies, relevant baseline information, and the key sustainability issues and opportunities of the Plan (see Section 2.2)

⁶ Lancaster City Council and South Lakeland District Council (2014) Arnsdale and Silverdale AONB Management Plan.

Plan Stage	Summary of the Accompanying SA Report
Issues and Options (November 2015)	The SA of the Issues and Options appraised the Vision and Objectives, Development Options and Policy Area Options. This stage was a key step in the consideration of reasonable alternatives (see Section 2.3).
Consultation on the Draft Plan (June 2017)	The SA Report at this stage provided a summary of the SA process and documented the findings of the appraisal and its influence on the Plan's development. It was used as a consultation document and issued to statutory bodies, stakeholders and the public for comment (see Section 2.5).
Publication of the Plan (October 2017)	The SA Report that supported the submission of the Local Plan to the Secretary of State provided a comprehensive review of all the SA work undertaken previously taking account of any updates made to the Local Plan in response to previous recommendations.
Main Modifications (October 2018)	The SA Addendum provided an update to the SA of the Publication Version of the Plan taking into account the Main Modifications made in response to the Examination hearings.
Adoption (2019)	This SA Post Adoption Statement brings the process to a close by reflecting on how sustainability has been integrated into the Local Plan development through the SA process.

The National Planning Practice Guidance (NPPG)⁷ specifies five stages to the SA Process as follows:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B: Developing and refining alternatives and assessing effects
- Stage C: Prepare the SA Report
- Stage D: Seek representations on the SA Report from consultation bodies and the public
- Stage E: Post adoption reporting and monitoring

The SA of the Plan was undertaken in accordance with this guidance; the following subsections set out how the SA has influenced the plan at each of these key stages.

2.2 Stage A: Scoping

Scoping represents the initial stage in the SA process for the emerging Plan and sets the scope for the remainder of the process. The output of this stage is a Scoping Report that forms the basis for consultation with statutory bodies.

First, a review of other plans and programmes that may affect the preparation of the Plan was undertaken in order to contribute to the development of both the SA and the Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the Plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Plan.

⁷ Department for Communities and Local Government (2015) Planning Practice Guidance. Available from <http://planningguidance.planningportal.gov.uk/> [Accessed October 2018].

Characterising the environmental and sustainability baseline, issues and context is an essential part of the process. The baseline informs the scope of the assessment by identifying existing problems and opportunities to be considered. The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional, national and international plans, strategies and programmes; and
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), the Office of the Deputy Prime Minister guidance⁸ and the data available for the AONB. Data was also collated for additional socio-economic topic areas including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered.

Establishing the baseline then fed into the identification of key sustainability issues and opportunities which formed the basis for developing a methodological framework (referred to as a SA Framework) to guide the appraisal of the Plan and its components. The SA Framework is made up of objectives and guide questions that are used to appraise the Plan (see Table 2.1).

Table 2-2 SA Objectives and Guide Questions

SA Objectives	Sub-Objectives
1. To ensure there is housing to meet local needs in a manner sensitive to the AONB	<p>To ensure there is enough housing available to contribute to meeting the needs in all areas.</p> <p>To increase the availability of affordable housing.</p> <p>To ensure housing is decent.</p>
2. To improve wellbeing, physical and mental health for all and reduce health inequalities	<p>To reduce health inequalities amongst different groups in the community.</p> <p>To improve access to health and social care services for all through proximity to GP surgeries etc.</p> <p>To improve transport links to GP's surgeries (rail/bus).</p> <p>To promote healthy active lifestyles and access to recreational space.</p> <p>To ensure there is access to greenspace, countryside, public spaces, rights of way, play areas and open coast for people to enjoy.</p> <p>To ensure there are cultural /social/ community facilities and activities for people to enjoy / participate in including access to village halls and civic buildings.</p> <p>To encourage the development of strong and cohesive communities through proximity to existing settlements.</p> <p>To create a healthy and safe working and living environment with low rates of crime and disorder.</p>
3. To improve the level of skills, education and training	<p>To maintain and increase levels of participation and attainment in education for all members of society through access to primary schools, secondary schools and further educational establishments.</p> <p>To improve the provision of education and training facilities.</p> <p>To improve access to and involvement in Lifelong Learning opportunities.</p> <p>To improve access to environmental education.</p>
4. To improve sustainable access to services, facilities, the countryside and open spaces	<p>To ensure public transport services (bus and train) meet the needs of all and development is located in proximity to bus services.</p> <p>To ensure highways infrastructure serves people's transportation needs (including for private vehicular travel, walking and cycling).</p> <p>To ensure public buildings and public spaces are readily accessible to all in including access to village halls and civic buildings.</p> <p>To promote the use of more sustainable modes of transport and reduce dependence on the private car.</p>

⁸ Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive.

SA Objectives	Sub-Objectives
	<p>To improve access to cultural and leisure facilities.</p> <p>To maintain and improve access to essential services and facilities for all including proximity to shops.</p> <p>To promote and facilitate access to, and opportunities to enjoy, the countryside, historic environment and green open space including a range of open space typologies.</p>
<p>5. To diversify and strengthen the local economy in a manner that is sensitive to the AONB</p>	<p>To help create the right economic conditions and infrastructure provision to encourage inward investment.</p> <p>To stimulate the use of local companies, products, services, heritage and culture and provide other forms of community benefit.</p> <p>To encourage indigenous growth of local businesses.</p> <p>To encourage diversification, innovation and entrepreneurship.</p> <p>To help improve the competitiveness and productivity of the local economy.</p> <p>To increase the environmental performance of local companies and their products/services.</p> <p>To support maintenance of the agricultural economy.</p> <p>To provide sustainable tourism.</p> <p>To foster heritage-led regeneration.</p> <p>To optimise the use of previously developed land, buildings and existing infrastructure.</p>
<p>6. To retain and create jobs and ensure the workforce meets local needs</p>	<p>To ensure people are educated, trained and skilled to meet local economic needs.</p> <p>To increase the number, variety and quality of employment opportunities, including those offered by tourism, social enterprise and inward investment.</p>
<p>7. To encourage economic inclusion and access to jobs</p>	<p>To increase access for all to a range of jobs, through improved training, sustainable transport and communication links.</p> <p>To ensure economic development and employment opportunities are distributed evenly and are in areas of greatest need.</p>
<p>8. To protect and improve air quality</p>	<p>To protect and improve air quality</p>
<p>9. To limit and adapt to climate change and increase energy efficiency</p>	<p>To reduce greenhouse gas emissions.</p> <p>To ensure existing buildings have optimal energy efficiencies.</p> <p>To promote the use of more sustainable modes of transport and reduce dependence on the private car.</p> <p>To ensure new developments are able to withstand extreme weather events.</p> <p>To include Green Infrastructure to reduce flood risk and surface water runoff in order to adapt to climate change.</p> <p>To encourage the use of clean, low carbon and energy efficient technologies sensitive to the AONB.</p>
<p>10. To protect and enhance water quality, resources and reduce the risk of flooding</p>	<p>To maintain, and where possible improve the quality and quantity of water resources.</p> <p>To minimise the risk of water pollution from all sources.</p> <p>To promote the wide use of sustainable drainage systems and other flood reduction or defence measures.</p> <p>To promote measures to reduce demand and improve demand management for water.</p> <p>To help reduce pressure on watercourses/water bodies from diffuse pollution such as agricultural waste, fertilizer and run-off from drains and concrete surfaces and point sources such as septic tank discharge.</p> <p>To encourage prudent water usage to reduce pressure on water resources.</p> <p>To align with current or planned sewerage infrastructure provision.</p> <p>To reduce or manage flooding through avoidance of areas of significant risk.</p> <p>To encourage the inclusion of flood mitigation such as SuDS and green infrastructure measures.</p>

SA Objectives	Sub-Objectives
<p>11. To protect and enhance biodiversity and geodiversity</p>	<p>To protect and conserve habitats, species, geological and geomorphological sites, especially where these may be rare, declining, threatened or indigenous.</p> <p>To help ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource.</p> <p>To minimise adverse impacts on species and habitats through new development and human activity.</p> <p>To ensure and enhance continuity and connectivity of ecological networks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species.</p>
<p>12. To protect and enhance landscape, seascape and settlement character and quality</p>	<p>To ensure night skies are dark.</p> <p>To promote high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality.</p> <p>To reduce exposure to noise disturbance.</p> <p>To protect and enhance local landscape quality, local distinctiveness sense of place and character from unsympathetic development and changes in land management.</p> <p>To retain rural nature of the AONB landscape and rural character of the AONB settlements.</p> <p>To maintain the remoteness and tranquillity of rural landscapes.</p> <p>To encourage low-input and organic farming, with environmental stewardship styles of land management.</p> <p>To sustain and extend tree cover, hedgerows, woodlands, and sustainable forestry.</p> <p>To conserve and enhance seascape character.</p> <p>To conserve settlement character.</p> <p>To conserve and enhance landscape features such as drystone walls, in-field trees, limekilns, ponds etc.</p> <p>To conserve views across, into and out of the AONB.</p> <p>To maintain open spaces.</p> <p>To maintain the mosaic of contrasting landscape character types.</p> <p>To encourage the appropriate re-use and improvement of brownfield sites.</p>
<p>13. To protect land and soil and ensure the sustainable use of natural resources</p>	<p>To minimise the loss of greenfield sites, areas of open spaces and amenity, and productive agricultural land.</p> <p>To encourage development of brownfield land in sustainable locations.</p> <p>To ensure that the creation of contaminated land will be avoided.</p> <p>To ensure the quantity and quality of soil resources and function is safeguarded for the future.</p>
<p>14. To manage mineral resources sustainably, minimise waste and encourage recycling</p>	<p>To minimise the extraction, transport and use of primary minerals and encourage the use of recycled material.</p> <p>To promote the use of recycled and secondary materials in construction.</p> <p>Minimise waste and encourage the sustainable use of natural resources by reusing existing buildings where appropriate.</p> <p>Ensure new developments are designed to integrate recycling opportunities and facilities i.e. by having appropriate storage areas for recycling receptacles and proximity to recycling sites</p>
<p>15. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history</p>	<p>To promote a sense of community identity, a sense of place and sense of local history.</p> <p>To encourage social inclusiveness and cohesion, and help continue valued local traditions.</p> <p>To improve and broaden access to, and understanding of local heritage, historic sites, areas and buildings.</p> <p>To provide better opportunities for people to access and understand local heritage and to participate in cultural and leisure activities.</p>
<p>16. To conserve and enhance the historic environment,</p>	<p>To protect and enhance the historic environment, including heritage assets and their setting</p> <p>To conserve and enhance historic landscape character and settlement character.</p>

SA Objectives	Sub-Objectives
heritage assets and their settings	<p>To protect and enhance non-designated assets and landscapes.</p> <p>To sensitively conserve areas of high archaeological and historic landscape importance included historic designated landscapes.</p>
17. To increase the level of participation in democratic processes.	<p>To encourage local people and community groups to become involved in decision making about important aspects of the AONB.</p> <p>To identify members of society, including hard-to-reach groups that may require help to participate fully in the decision-making process.</p> <p>To help communities to understand the decision-making process, their opportunity to influence decisions and how decisions may impact on them.</p> <p>To respect the needs of all communities and future generations.</p>

An appraisal methodology (scoring system) was then developed in order to consistently assess the degree to which Plan options support the SA Framework Objectives. A number of variations of the appraisal methodology were developed to suit the appraisal of the different elements of the Plan, for example the appraisal of policies and the appraisal of site allocations (see Section 3 of the Publication SA Report for further details).

An initial draft of the SA Scoping Report was produced in 2015. The SA Scoping Report was consulted upon for a longer period than the statutory five-week minimum period in November and December 2015. Comments were received from Natural England, the Environment Agency, Historic England, the AONB Unit, and a private town planning firm (see further details of consultation undertaken on the scoping report in Section 3). These comments informed the SA approach and were incorporated into further iterations of the SA.

2.3 Stage B: Assessment of Reasonable Alternatives

2.3.1 Overview

Article 5 (1) of the SEA Directive and SEA Regulation 12 (2) require that “*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*”.

Information to be provided includes “*an outline of the reasons for selecting the alternatives dealt with*” (SEA Directive Annex I (h) and SEA Regulations Schedule 2 (8)) and an overview of types of alternatives considered (development scenarios, site allocations etc.)

The European Commission guidance⁹ on the SEA Directive discusses possible interpretations of handling ‘reasonable alternatives’ as required by Article 5 (1). It states that “*The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme*”.

2.3.2 Spatial Distribution Options

In 2015 an Issues and Options Consultation Discussion Paper was consulted upon. This presented a number of strategic options for the spatial distribution of new development. These are summarised below:

- a. Development sites allocated in primary settlements only + highly restrictive policies for everywhere else limiting any development outside these to exceptional cases only (accompanied by exceptions criteria).
- b. Development sites allocated in primary settlements only + policies to judge each application on its merits for everywhere else but with an assumption that a moderate proportion of new development will be delivered outside of the primary settlements.

⁹ EC (2001) Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment. Available from http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Accessed October 2018].

- c. Development sites allocated in four largest settlements (primary settlements plus Beetham) only + highly restrictive policies for everywhere else limiting any development outside these to exceptional cases only (accompanied by exceptions criteria).
- d. Development sites allocated in four largest settlements (primary settlements plus Beetham) only + policies to judge each application on its merits for everywhere else but with an assumption that a moderate proportion of new development will be delivered outside of these settlements.
- e. Most allocated sites in primary settlements plus some in secondary settlements and highly restrictive policies limiting development to exceptional cases/policies to judge each case on its merits elsewhere.
- f. Most development in four largest settlements, some in smaller villages, some in hamlets or open countryside.

These six Spatial Distribution Options were appraised against the SA Framework Objectives and the output was presented in a table summarising the resulting scores. Commentaries on the economic, social and environmental effects of the options were also provided. This included recommendations for potential mitigation measures to improve the performance of the Spatial Distribution Options against the SA Framework.

The assessment and recommendations were taken into account by the Councils and informed their selection of the Landscape and Development Strategy now presented in the Adoption Version of the Plan. The two strategies are designed to ensure that the primary purpose is at the heart of the overall approach to development in the AONB and to better ensure that new development supports the AONB's primary purpose.

2.3.3 Proposed Site Allocations

In accordance with SEA guidance and regulations, it was ensured that in the assessment of Proposed Site Allocations, that only reasonable alternatives were considered. All the proposed sites were visited by the Councils' Officers and the AONB Manager. Site assessment criteria was developed in consultation with key stakeholders including Parish Councils. These were used to create a Site Assessment Form against which each of the site suggestions were assessed.

Amongst other criteria, the Site Assessment Forms included Exclusion Criteria. The Exclusion Criteria covered factors that, if present, would render a site wholly inappropriate for development regardless of how well the site might perform against other factors. Many of the exclusion criteria used would apply to any site, such as flood risk, whilst some related specifically to the Arnside and Silverdale AONB, such as mitigatable landscape impacts and priority habitat. Any sites to which the Exclusion Criteria applied were ruled out of further consideration.

Any sites that were not ruled out by Exclusion Criteria were subject to further tests and assessment using the other criteria set out on the site assessment form. HRA was also undertaken on all sites to which Exclusion Criteria did not apply. Some sites that had passed the site assessment were then ruled out when new information became available, for example, some owners who had previously submitted their sites for consideration changed their minds and withdrew the sites. Altogether, this assessment left a small number of sites that were considered to have potential for allocation for development. All sites excluded by that point were considered not to represent 'reasonable alternatives' for the purposes of SA and as such, only those sites remaining after these assessments were subject to SA. Furthermore, there were two sites that are not allocated for development because they were excluded from the Plan based on the results of the SA, HRA and consultation responses.

2.3.4 Policy Area Options

A range of alternative Policy Area Options were considered at the Issues and Options stage to inform the selection of the policies to be included in the Plan. This was achieved through issuing a series of questions for consultation which were presented in the Issues and Options Consultation Discussion Paper. Many of the questions can be re-worded in the form of options and are therefore considered to be reasonable strategic alternatives.

The SA of the Policy Area options yielded a large number of recommendations which were taken into consideration by the Councils and used to inform the development of the Plan's policies. These recommendations can be found in the Section 4 of the Issues and Options SA Report.

2.4 Stage C: Refining Alternatives and Assessment of the Draft Plan

The SA process considered the performance of the Plan against each of the SA Framework Objectives, drawing on the baseline information to predict the likely significant effects. Based on the appraisal results the SA made recommendations in order to mitigate for adverse effects or further increase potential beneficial effects. These recommendations were considered by the Councils and taken into consideration in the refining of the alternatives.

2.4.1 Assessment of Site Allocations

The assessment of Site Allocations was undertaken with set of criteria translated from the SA Appraisal Framework. An initial assessment was conducted across this range of criteria, resulting in a summary score for each SA Framework Objective based on the following:

- the worst score would take precedence, so any major negative criterion met would score major negative for the entire SA objective, followed by minor negative;
- if no negative criteria were met, the most positive score would take precedence, so any major positive criterion met would score major positive for the entire SA objective, followed by minor positive; and
- in the absence of the above, an SA Objective would score neutral / negligible.

Each SA objective was then reviewed for mitigation recommendations or other special notes about that allocation, and a residual effect score was assessed. In principle, a score would only be changed if mitigation could be recommended that would likely, or had highly promising potential to, make negative effects neutral or negligible, or would increase neutral or minor positive scores by generating greater net benefits. As such, if an SA objective had both negative and positive scores at the outset, neutralising a negative score would 'bring out' the positive criteria for that SA Framework Objective. This precautionary approach helps to ensure that risks of negative impacts receive appropriate attention.

In order to focus on the central purpose of the AONB (preserving and enhancing the natural beauty of the area), landscape studies were carried out on each of the site allocations which fed into the findings of the SA.

The assessment of each of the Site Allocations led to a range of recommendations aimed to improve the sites' performance against the SA Framework. These recommendations were taken into consideration by the Councils when refining the site allocations for inclusion in the Plan. They will also guide the Councils' decisions on planning applications in the future. The following provides some example recommendations put forward in the SA:

- Development would only occur on the grounds that the developer is able to demonstrate how suitable access can be achieved.
- Existing trees should be retained, and additional planting should be included in the scheme to complement and support adjacent habitats. An appropriate ecological survey of the site and relevant mitigation measures will be needed.
- Minimise the loss of greenfield land, ensure the preservation and considerate reuse of soils and soil quality, and maximise greenspace provision.
- The site contains some woodland and a watercourse, both of which should be protected and sensitively incorporated into any scheme. HRA Screening has determined no likelihood of significant effects following standard best practice approaches such as pollution prevention measures and appropriate ecological surveys to assess the potential impacts upon the designated sites.
- Encourage use of recycled and secondary materials in construction and ensure new developments include recycling opportunities in line with district-wide policies.
- If good vernacular design is incorporated and density is comparable to existing townscape, including retention of field edges etc, it may be possible to successfully incorporate 8 units.
- Do not increase level of modification of the water body at the site and add buffers from hard-standing, 'naturalise' and add habitat where possible. Ensure construction and operational site drainage design protects the water body from run-off. Residential development must avoid Flood Risk Zone 3 areas and all development must provide resilience against flood or surface water.

- Although the site is not within a groundwater Source Protection Zone measures should be taken to protect groundwater within the AONB due to its high sensitivity. Developers should also provide new sewerage systems to prevent adverse effects on the unready inadequate system.

2.4.2 Assessment of Policies

Step 1 of the policy assessment was to conduct an initial filtering exercise of every policy for potential relevance to each SA Objective. This is based on practitioner experience and professional judgement about the relationship between development in general and the matters covered by each SA Objective. Where a policy has been found not to have a significant relationship with an SA Objective, this is justified, and likewise, the potential positive, negative and mitigating roles of policies are explained. ‘Mitigating role’ refers to policies which may alone not have the potential for significant effects, but which have been formulated specifically to deal with the potential significant effects of other policies, or which otherwise do so incidentally.

Step 2 involved an assessment which was then conducted of the draft policies acting in combination on each SA Objective, whilst considering the results of the assessment of proposed allocations. The assessment first considered any initial effects of the policies without mitigating and enhancing policy already in place. The assessment then considered all mitigating and enhancing policy already in place in order to identify the potential effects of policies as they are without SA recommendations and scored the effects of the entire Plan over the short to medium term, and also the long term. The SA has then considered further recommendations both at policy level, and when planning major sites or determining future planning permissions at those sites.

Step 3 of the assessment of draft policies was then to recommend mitigation or enhancement measures. Where recommendations for policy were made, the policies were then assessed for potential residual effects with the recommendations in place. Through this process the SA was able to refine the draft policies and to improve the sustainability performance of the Plan. The following table provides a summary of the recommendations made for each SA topic.

Table 2-3 Policy Assessment Recommendations

SA Topic	Recommendations
Housing	<p>Policy AS01 could be strengthened to ensure that the specific housing requirements of local needs are met to reduce over and under allocations of housing stock in any one given area. This recommendation has now been incorporated into AS01.</p> <p>Policy AS08: Design could act as an enhancing policy for this SA Objective if it were to discuss housing standards in terms of internal design. (At present, it focuses on external design quality.) It could cross-reference other DPDs, as appropriate.</p>
Health	No recommendations were provided for this topic area.
Education	<p>Policy AS10 would benefit from a consolidated reference list of potential infrastructure requirements (including cross-reference to each authority’s Infrastructure Delivery Plan, as is already in the draft DPD), and this should include school expansion (primary and secondary) where required, and further education opportunities. It could also benefit from an additional provision that infrastructure requirements will account for the needs of the wider community, where relevant to that proposal. Such a provision will help ensure that any pre-existing shortfalls are not worsened by new development.</p>
Sustainable Access	<p>As for the SA Objective for ‘Education’, Policy AS10 would benefit from a reference list of potential infrastructure requirements (including cross-reference to each authority’s Infrastructure Delivery Plan, as is already in the draft DPD). Some of the following is mentioned in the supporting text to the policy, but a consolidation into a single list could ensure comprehensive coverage of key areas, including:</p> <ul style="list-style-type: none"> • public transport services (bus and train); • highways infrastructure (including minor works, e.g. access and road safety); • walking and cycling facilities;

SA Topic	Recommendations
	<ul style="list-style-type: none"> • places of worship, village halls and civic buildings (e.g. improvements, extensions); • cultural and leisure facilities; • essential services and facilities; and • sports, recreation and green open space including a range of open space typologies. <p>It could also benefit from an additional provision that infrastructure requirements will account for the needs of the wider community, where relevant to that proposal. Such a provision will help ensure that any pre-existing shortfalls are not worsened by new development.</p>
Local Economy	The Council could include provisions within policy, such as Policy AS09, to support and encourage innovative industries, as well as or in particular innovative solutions to increase the environmental performance of local companies and their products and services.
Retention and Creation of Jobs	The AONB DPD could include provisions within policy to encourage proposals that include training and further education opportunities. A more diverse pool of skills in the AONB may help to sustain and increase the diversity of employment opportunities available.
Air Quality	No recommendations were provided for this topic area.
Climate Change & Energy Efficiency Topic	As per the SA Objective for housing, Policy AS08: Design could act as both a mitigating and enhancing policy for this SA Objective if it were to include aspects related to energy efficiency. Given the scale of growth expected in the AONB, the potential for largescale energy efficiency such as Combined Cooling, Heating and Power (CCHP) schemes is probably negligible, but the Councils may also wish to consider a policy which includes their use in new development of a certain size, or even the potential for District Heating schemes.
Water Quality	<p>As per the SA Objective for housing, Policy AS08: Design could act as both a mitigating and enhancing policy for this SA Objective if it were to include aspects related to water efficiency.</p> <p>Policy AS12 should be amended to more explicitly address the potential direct impacts on water bodies (physical modification), the potential for fluvial flood risk, as well as surface water flood risk. This should include a brief cross-reference to the NPPF for its sequential tests for fluvial flood risk, the need to address any existing fluvial or surface water flood risk issues on or in the vicinity of the site (including on any immediately supporting infrastructure) and also the need to avoid worsening surface water flood risk at any location. It should include a policy which protects water bodies generally and has a presumption against the physical modification of any water body. This could include an expectation that water bodies will be protected by a buffer, ideally of green space, of an appropriate distance from any surface water body – this could be 8 m minimum (subject to local bylaws) to reflect Environment Agency guidance on risks to water bodies in similar applications. An upper range could also be included (e.g. 20 m) in order to ensure that the minimum is only used where a site is particularly constrained.</p> <p>This change would lead to the potential for minor beneficial effects in the long term, by helping to ensure that new development has the potential to address and improve existing flood risk issues.</p>
Minerals	No recommendations were provided for this topic area.
Heritage and Community	Policy AS09 could include provision to encourage developments, including community facilities, that can bring demonstrable benefits to the sense of community identity, sense of place and sense of local history. This may include cultural, arts and leisure developments other than sport and active recreation.
Democratic Processes	As for the SA Objective 4 on 'Sustainable Access', Policy AS10 could benefit from an additional provision that infrastructure requirements will account for the needs of the wider community, where relevant to that proposal. Such a provision will help ensure that any pre-existing shortfalls are not worsened by new development.

2.5 Stage D: Consultation on the SA Report of the Draft Plan with Consultees and the Public

The SA Report and the Draft Plan were consulted upon in accordance with the T&CP (Local Planning) (England) Regulations 2012. Although Stage D was an important stage in the consultation process, the previous rounds of consultation had already shaped and refined the SA approach. As such, very few representations were made on the SA Report during consultation on the Draft Plan. The SA Report was simply updated to provide further clarification on the meaning of ‘sustainable in its location’ in response to a comment.

Consultation with statutory bodies and the public was undertaken throughout the iterative Plan development process. Section 3 describes how the opinions expressed during consultation were taken into account and influenced the development of the Plan throughout the process.

2.6 Stage E: Finalising of the Plan and Monitoring

2.6.1 Finalising the Plan

The Plan was submitted to the Secretary of State via the Planning Inspectorate for public examination in February 2018. Following the Examination hearings in June 2018, a number of Main Modifications to the DPD were proposed to help ensure that the Plan could be found ‘sound’ by the Inspector. Main Modifications are substantive changes to components of the Plan that can alter the meaning of policies and strategies. The purpose of this SA Addendum was to ensure that the social, environmental and economic effects of the proposed Main Modifications are fully assessed and accounted for in the SA.

Following consultation on the Main Modifications and SA Addendum, the Plan was submitted to the Inspector for review. The Inspector’s Report dated 30 January 2019 subsequently found the Plan to be sound subject to inclusion of main modifications and upon receipt of this, the Councils were satisfied that the SA achieved the central goal of striking a good balance between the environmental, economic and social implications of the Plan.

2.6.2 Monitoring

The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any unforeseen, undesirable environmental effects are identified, and remedial action is implemented accordingly. Likewise, it is beneficial to check that the effects (including beneficial ones) occur as predicted by the SA. Section 4 presents the measures to monitor the significant environmental effects associated with the implementation of the Plan.

3 How Opinions Expressed During Consultation Have Been Taken into Account

3.1 Consultation on the Emerging Plan

The development of the Plan has been informed by ongoing public engagement and consultation, in accordance with the T&CP Regulations. The Call for Sites was the first consultation on the development of the Plan. Between 12 December 2014 and 28 February 2015, the Councils invited individuals and organisations to put forward suggestions of sites to be considered for inclusion in the AONB DPD. This was followed by the Site Assessment Methodology that ran between 9 April and 1 May 2015.

Consultation on the Issues and Options took place between 6 November and 18 December 2015. Through this consultation the councils invited comments on the discussion paper that set out the issues that the Plan needed to address and the options for doing so, as well as a series of maps setting out site options suggested during the Call for Sites consultation. This was followed by consultation on the Extra Sites between 29 March and 3 May 2016 during which the councils invited comments on additional suggestions submitted in response to the Issues and Options consultation.

Consultation on the Draft Plan took place between 10 November 2016 and 5 January 2017. This consultation served to seek view on the proposed sites for development or protection and planning policies for the AONB. Between 19 June and 17 July 2017, comments were welcomed on a document which outlined suggestions received through the Draft Plan consultation relating to three sites. This was followed by consultation between 2 November and 14 December 2017, during which representations on the Publication Version of the Plan were sought.

On 28 February 2018, the Councils submitted the Plan to the Secretary of State via the Planning Inspectorate for examination. Following the examination hearings sessions in June, the Councils welcomed comments on a schedule of proposed Main Modifications to the Plan.

Representations received on all the consultations outlined above were taken into account in producing the Adoption Version of the Plan. A summary of the consultation responses at each stage of the Plan development and how they were taken into account is available on the Councils' websites via the following links:

www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/area-of-outstanding-natural-beauty-aonb

www.lancaster.gov.uk/planning/planning-policy/arnside-and-silverdale-aonb-dpd

3.2 Consultation on the SA Reports

3.2.1 Overview

The Plan has also been shaped and influenced by statutory consultation on the SA Reports throughout the Plan development process in line with the SEA regulations. The following SA Reports were prepared and published for consultation at each of the key Plan development stages:

- SA Scoping Report (June 2015)
- SA of Issues and Options (November 2015)
- Draft Consultation Plan SA Report (October 2016)
- Publication SA Report (October 2017)
- SA Addendum of Main Modifications (October 2018)

The SA process commenced with pre-scoping consultation. An SA Scoping Report was then prepared, which underwent statutory consultation over five weeks between 3 June and 8 July 2015. Consultation responses to this report helped to shape the scope and inform the detail of the SA.

The SA of Issues and Options Report published alongside the Councils' Issues and Options document underwent consultation over a six-week period. After the Plan had been refined by these critical rounds of consultation, an SA Report was issued for consultation alongside the Publication Version of the Plan to all the key stakeholders (including statutory consultees and the public) for comment. Following the close of this consultation period, the Councils reviewed the feedback and revised the Plan as appropriate for submission to the Planning Inspectorate.

The opinions expressed throughout the consultation outlined above have informed the scope of the SA, helping to in turn to shape the development of the Plan. The following sub-sections highlight the changes that were made and considerations taken forward in response to consultee comments.

3.2.2 SA Scoping Report Consultation

The SA Framework was amended following receipt of the SA Scoping Report consultation responses from statutory consultees. In 2015, the SA Framework was modified as follows:

- SA Objective for 'air quality' added, as it was previously scoped out;
- Objective added related to 'proximity to services';
- Under the historic environment objective, specific references added to historic setting of heritage assets; and
- Historic environment sub-objectives amended to ensure that they reflect national policy and legislation.

3.2.3 SA Report for Issues and Options Consultation

Comments from consultation on the SA of the Issues and Options led to the following considerations:

- SA Objectives 6 and 7: the largest overall industry in the AONB is tourism, and many people commute out of the AONB for work. Given the importance of the landscape to tourism and the high proportion of out-commuters in the AONB, the economy could be harmed by policy which promotes development outside of the largest settlements, except in exceptional circumstances. Options A, C and E are most protective of the countryside in this respect, and so could be scored as most positive (for reasons above), whereas Options B, D and F could be assessed as both positive and negative for their potential impacts on the countryside, in support of the out-commuting pattern (which is beneficial, as it also draws investment back into the AONB, but not as sensitive as the local tourism industry);
- SA Objective 8: development needs are very limited in rural areas, and so major benefits are unlikely for Options D and E; and
- SA recommendations: given the above, the SA should recommend highly restricted provision in more remote rural areas (rather than "some limited provision"), whereby significant economic benefits are only likely in-service centres. Development needs in smaller settlements and more rural areas can be accommodated through individual planning applications and by passing exceptions tests.

4 Measures to Monitor Significant Environmental Effects

4.1 Introduction

This section provides an outline framework for monitoring the significant effects of implementing the plan. Monitoring is an ongoing process integral to the plan's implementation and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

4.2 Monitoring Framework

The Monitoring Framework has been developed to measure the performance of the plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The Monitoring Framework has been designed to focus mainly on monitoring significant sustainability effects that:

- Would likely lead to a breach of international, national or local legislation, recognised guidelines or standards.
- May give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Were uncertain in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the Plan, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the borough. This enables the measurement of the overall effects of the Plan.

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. Consideration has, therefore, been given to the Monitoring Framework that will be used to monitor delivery of the Plan's policies. The Monitoring Framework that was submitted in support of the Plan is presented in full in the SA Report.

The Annual Monitoring Reports (AMR) for the Councils' Local Plan areas will be the main mechanisms through which the performance of the AONB Plan is monitored as set out in the SA Monitoring Framework. The AMRs will provide an indication of any significant environmental effects which will help to ensure that objectives are met and policies implemented. Where monitoring shows that a policy is not working effectively or key targets and objectives are not being met, remedial action may be taken.

Indicators identified within the Monitoring Framework will be applied in a proportionate and flexible manner, depending on the availability of data. The AMRs will be amended and updated to reflect changes in monitoring requirements identified through the analysis of trends during the Plan's implementation.

5 Summary

This report accompanies the adoption of the Arnsdale and Silverdale AONB DPD and represents the conclusion of the SA process. The development of the Plan has been an iterative process that comprised the following key stages:

- Scoping (2015)
- Issues and Options (2015)
- Draft Consultation Plan (November 2016)
- Submission (February 2018)
- Examination (February 2018 – January 2019)
- Main Modifications (25 October 2018 – 6 December 2018)
- Adoption (March 2019)

SA has played an integral role throughout this process with many of the Plan development stages having been accompanied by an SA Report, or variant of, in order to inform the development of the Plan, fully integrating environmental and sustainability considerations into decision making.

Following receipt of the Inspector's Report dated 30 January 2019 it is concluded that the Councils and Inspector are satisfied that the SA achieved the central goal of striking a good balance between the environmental, economic and social implications of the Development Management policies. Taking into account the findings of the SA and building in recommendations as suggested where relevant, it is concluded the overall cumulative effects of the Plan are positive in terms of ensuring it will contribute to meeting the objectives identified in the SA Framework.

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