

COPELAND LOCAL DEVELOPMENT FRAMEWORK

South Whitehaven Supplementary Planning Document

Sustainability Appraisal of Draft SPD



October 2012

EXECUTIVE SUMMARY

The European SEA Directive requires that a Sustainability Appraisal be undertaken of any Local Development Document that is produced by a Local Planning Authority. The purpose of this Sustainability Appraisal is to identify in general terms whether the South Whitehaven Supplementary Planning Document (SPD) is likely to move the area towards or away from greater sustainability in the long term.

The Vision, Objectives and Design Principles have been assessed against a set of 17 Sustainability Objectives:

	SA Objective Abbreviation	SA Objective (High Level Objective)
1	Biodiversity	To conserve and enhance biodiversity in Copeland
2	Landscape & Conservation	To protect and enhance place, landscape and buildings of historic, cultural and archaeological value.
3	Water Resources	To maintain and enhance the water quality of Copeland's inland and coastal water and coasts and to sustainably manage water resources
4	Climate Change	To promote adaptation to climate change
5	Flood Risk	To reduce flood risk in Copeland from surface water, rivers, estuaries and sea level change
6	Energy	Increase energy efficiency in the built environment and promote the use of renewable energy sources
7	Land Quality	To promote and improve land quality in Copeland
8	Air Quality	To improve air quality in Copeland
9	Waste & Recycling	To minimise waste production and increase re-use, recycling and recovery rates
10	Services & Facilities	To improve access to services and facilities in Copeland
11	Health & Wellbeing	To improve physical and mental health and well-being of people and reduce health inequalities in Copeland
12	Education & Skills	To improve education, skills and qualifications in the Borough
13	Sustainable Economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth
14	Leisure & Tourism	Support the sustainable development of the sustainable leisure and tourism industry
15	Housing	To improve access to a range of good quality housing that meets the needs of the Copeland community
16	Retail	To maintain, enhance and develop a diversity of retail services in the Borough
17	Transport	To enhance and develop sustainable transport networks in Copeland

Source: Copeland LDF Sustainability Appraisal Scoping Report – prepared by Scott Wilson (September 2009)

Results of the Appraisal

Objectives:

The Objectives are economically sustainable and to a large extent socially sustainable too. There could be issues around the capacity of existing public services. A sentence in the objectives section '*supporting development of existing or new services/facilities if capacity becomes an issue in the short or longer term*' may be helpful.

In terms of environmental sustainability there are a number of potential issues. There is no reference to protecting or enhancing biodiversity on this greenfield site. The addition of a sentence acknowledging the opportunities to enhance biodiversity on such a large site would be useful in this section. There are possibly negative impacts for water resources and waste and recycling also. The addition of a few words to the 4th bullet point in the list of objectives would remedy this. The following is suggested:

'Ensuring all new development meets acceptable standards in terms of architecture, sustainable design (energy efficiency, water efficiency, recycling facilities etc.), landscaping, safety, security and accessibility'

Sections 4 & 5

These sections are generally considered to be sustainable but it is suggested that the text below is added to the appropriate paragraphs in order to improve the document in sustainability terms.

5.22 - Opportunities should be taken to provide high quality areas to benefit both existing and new communities *as well as local wildlife*.

5.24 - Landscaping should assist in protecting the site from the harsh weather conditions which can be experienced in this location. *Existing woodland and hedgerows should be retained, not only to protect dwellings from the prevailing wind, but also to retain existing habitats and wildlife corridors. New hedgerows will be planted around the perimeter of the site in order to mitigate the negative effects of the development on local biodiversity.*

5.25 - Species *used in landscaping* should be appropriate to supporting local biodiversity objectives.

New paragraph: *5.26 – The area of woodland to the south west of the development site will be fenced off to protect this important habitat and any footpaths or cycleways should go around, not through, this woodland. This is important to maintain the biodiversity value of this area for foraging and commuting bats.*

New paragraph: *5.27 – All three of the site layout options (Plans 2, 3 & 4) include two SUDs ponds. It is important that these are included in the development as they provide water storage and will therefore help to prevent flooding on the site, and elsewhere. The ponds will also allow for the natural cleansing of rainwater runoff that may be polluted. In addition, the creation of these aquatic habitats will contribute significantly to the protection and enhancement of biodiversity in the area.*

New paragraphs under the heading '**Other Design Issues**' (?):

*5.29 – **Street Lighting** – Street lighting will be kept to minimum acceptable levels for public safety and security. This approach will be taken in order to keep the carbon footprint of the development as small as possible and also to mitigate the negative effect of the development on the foraging and commuting bat population in the area. The lighting scheme for the site will be designed to avoid as much 'light spill' as possible onto trees and*

hedgerows without compromising on public safety.

*5.30 – **Waste & Recycling facilities** – It will be important to facilitate waste and recycling collection within the development. This may involve the provision of a community waste recycling bank close to the centre of the site. It may also be advantageous to provide an area within the curtilage of each dwelling/block of flats etc. where waste bins, recycling boxes etc. can be stored in a convenient place for waste collection purposes. In the case of longer terraces, it will be appropriate to provide easy access from the back of dwellings to the front, in order to avoid the scenario where waste has to be transferred to collection points through the inside of dwellings.*

It is also noted that there will be planning contributions associated with the development e.g. educational facilities, environmental enhancements within the Woodhouse estate etc. that are not expressed in the draft that has been subject to this Sustainability Appraisal. It is expected that these contributions will also result in positive impacts, particularly in terms of social sustainability.

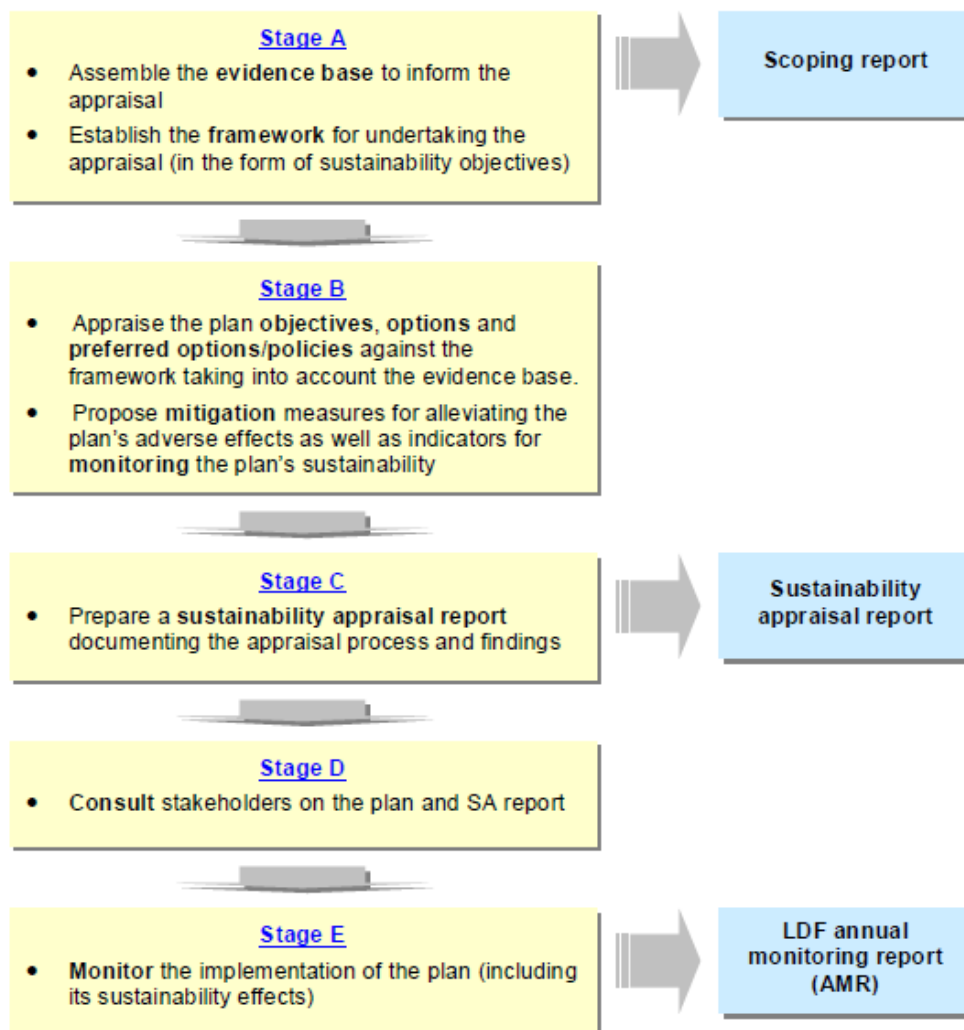
Introduction

This Sustainability Appraisal accompanies the Issues and Options Draft of the South Whitehaven SPD. The purpose of this report is to identify in general terms whether the SPD is likely to move the area either towards or away from greater sustainability in the long term.

Sustainability Appraisal (SA), which is now integrated with Strategic Environmental Assessment (SEA), is a statutory requirement for the preparation of Development Plan Documents and optional for Supplementary Planning Documents. The UK Strategy for Sustainable Development (1999), SEA Directive (2001), Regulations (2004) and ODPM Guidance (2005) advise that the principal topics of concern in any sustainability appraisal will be whether the development proposals would achieve:

- Social progress that recognises the needs of everyone,
- Effective protection of the environment,
- Prudent use of natural resources and
- Maintenance of high and stable levels of economic growth and employment.

The Government's guidance on the Sustainability Appraisal process advocates a 5 stage approach:



Process for Incorporating Sustainability Appraisal into Policy Development

We can see from the flow chart above that the SEA Directive requires the production of an Environmental Report that provides certain information. Table 1 below outlines the information requirements and how these have been met in the Sustainability Appraisal documentation that has been prepared.

Environmental Report Requirements	Document
An outline of the contents, main objectives of the plan or programme and relationship with other plans or programmes	Chapters 2-11, 14 and Appendix 1 of LDF Sustainability Appraisal Scoping Report
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapters 2-12 of LDF Sustainability Appraisal Scoping Report
The environmental characteristics of areas likely to be significant affected.	Chapters 2-12 of LDF Sustainability Appraisal Scoping Report
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive – now superseded by Directive 2009/147/EEC) and 92/43/EEC (Habitats Directive)	Chapter 2 of LDF Sustainability Appraisal Scoping Report
The environmental protection objectives, established at the international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Chapters 2-11 and Appendix 1 of LDF Sustainability Appraisal Scoping Report
The likely significant effects on the environment, including on biodiversity, population, human health, fauna, flora, soil, water, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape and the interrelationship between the above factors	This document
The measures envisaged to prevent, reduce and as fully as possible offset and significant adverse effects on the environment of implementing the plan or programme.	This document
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (including technical deficiencies or lack of know-how) encountered in compiling the required information	Sustainability Appraisal of Preferred Options – Appendix 1
A description of the measures envisaged concerning monitoring in accordance with Article 10.	This document – SA Framework – Table 2
A non-technical summary of the information provided under the above headings	This document – Executive Summary

The Sustainability Appraisal

The SA of the Issues and Options draft of the SPD is based around the Appraisal Framework in Chapter 15 of the Sustainability Appraisal Scoping Report (September 2009). The Framework provides a balanced assessment of potential environmental, social and economic effects relevant to Copeland. It is based on an objectives-led approach whereby the potential impacts of a plan are appraised in relation to a series of objectives for sustainable development.

Table 2 - Sustainability Appraisal Framework for Copeland's LDF.

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
1	Biodiversity	To conserve and enhance biodiversity in Copeland	<p>To ensure that development does not impact upon the condition of sites of biodiversity interest including SSSI and other local and national designations</p> <p>To protect Natura 2000 sites from the adverse impacts of human activity, pollution and coastal erosion</p> <p>To Promote biodiversity provision and enhancement within new development and seek to link these to existing species and habitats.</p>	<ul style="list-style-type: none"> • Number of developments including landscaping schemes to benefit biodiversity • Change in habitats and species rated priority in the BAP • Number of developments including schemes to protect and/or enhance existing biodiversity • Loss of designated habitat
2	Landscape & Conservation	To protect and enhance place, landscape and buildings of historic, cultural and archaeological value.	<p>Protect and enhance features of historical and archaeological importance which contribute to the cultural and tourism offer of the borough, including the LDNP.</p> <p>Ensure that all new development meets high standards in terms of the quality of design, safety, security, and accessibility and relates well to existing development and the public realm.</p> <p>Protect, conserve and enhance the character and quality of all landscapes and townscapes in the borough, especially those that contribute to local distinctiveness, such as the unique maritime history of Copeland.</p>	<ul style="list-style-type: none"> • Number of planning permissions refused on the basis of design • % of new development meeting BREEAM standards • Number of derelict properties • % of Grade 1 and 2* Listed Buildings at Risk • Number of parks with Green Flag status • Number of up to date Conservation Appraisals • Number of refusals due to impact on landscape character/ designation • Permissions granted within an area of landscape designation • Number of TPOs made • Loss of TPOs • Number of S106 enhancements resulting from planning applications • Number of Listed Building enforcement actions.
3	Water Resources	To maintain and enhance the water quality of Copeland's inland and coastal water and coasts and to sustainably manage water resources	<p>Promote sustainable design and construction measures that reduce water consumption and result in decreased run-off of polluted water (including during construction phase).</p> <p>Encourage the allocation and location of new development where water abstraction can occur sustainably.</p> <p>Ensure efficient use and management of water resources throughout the borough.</p>	<ul style="list-style-type: none"> • % of main river water quality classified as good or fair (chemical or biological) under the general quality assessment. • Daily Domestic Water Use (per person) • Number of applications including SUDs • Number of beaches with Blue Flag status.

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
4	Climate Change	To promote adaptation to climate change	<p>Promote new development that minimises the emission of greenhouse gases.</p> <p>Seek to provide a built environment and green infrastructure network that will minimise the impacts on humans and the environment associated with climate change.</p>	<ul style="list-style-type: none"> • Provision of renewable energy in new development • % of development meeting Code for Sustainable Homes standards • Number of planning applications including on-site renewables
5	Flood Risk	To reduce flood risk in Copeland from surface water, rivers, estuaries and sea level change	<p>Ensure new development incorporates SUDS.</p> <p>Avoid development in areas of flood risk and mitigate any residual flood risk through appropriate measures including through design.</p>	<ul style="list-style-type: none"> • Number of approvals contrary to environment agency advice on flooding • Number of approvals incorporating EA advice on flood mitigation guidelines.
6	Energy	Increase energy efficiency in the built environment and promote the use of renewable energy sources	<p>Promote high sustainable design and construction standards for housing and non-housing development, in order to ensure that Copeland meets the Government target for all new residential development being zero carbon by 2016.</p> <p>Clear guidelines and support for the use of renewable energy sources in new and existing developments.</p>	<ul style="list-style-type: none"> • Energy efficiency – the average SAP rating of social housing (1 highly inefficient – 100 highly efficient) • Provision of renewable energy in new development.
7	Land Quality	To promote and improve land quality in Copeland	<p>To protect and enhance soil quality in Copeland</p> <p>Develop brownfield sites where these can support wider sustainability objectives (e.g. reduce travel by car, improve the public realm, avoid loss of biodiversity interest, gardens etc.)</p> <p>Ensure new development will not result in contamination of land and promote the remediation of existing contaminated sites.</p>	<ul style="list-style-type: none"> • % of development on greenfield sites • (Ha) contaminated land reclaimed as Open Space/Natural Green Space or Development. • % of contaminated land reclaimed in total • % of new development on brownfield sites. • % of development on protected open space
8	Air Quality	To improve air quality in Copeland	<p>Seek to reduce the amount of CO2 emissions attributable to the transport sector</p> <p>Reduce the number of journeys made by car in order to reduce the high levels of nitrogen dioxide in areas of traffic congestion in the borough</p> <p>Consider and mitigate the impacts on air quality that might result from specific developments, including major infrastructure projects.</p>	<ul style="list-style-type: none"> • Estimated traffic flows for all vehicle types (million vehicle kilometres) • % of development outside KSC and LSC • CO2 emissions • NO2 emissions • Respiratory related health issues

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			Seek to promote opportunities for incorporating clean and emission free technologies in new development.	
9	Waste & Recycling	To minimise waste production and increase re-use, recycling and recovery rates	<p>Reduce the proportion of waste that goes to landfill in the borough</p> <p>Promote the integration of waste management facilities to enable efficient recycling and energy from waste as part of new developments.</p> <p>Ensure the safe disposal and storage of radioactive waste in the borough.</p> <p>Support the adaptive reuse of buildings where appropriate.</p>	<ul style="list-style-type: none"> • Volume of household waste collected per person per year (kg per head) • Number of new developments incorporating recycling facilities • % household waste collected which is recycled/composted • Number of derelict properties
10	Services & Facilities	To improve access to services and facilities in Copeland	<p>Provide improved physical access to services and facilities on foot, cycle and by public transport, particularly in rural and deprived areas.</p> <p>Secure economic inclusion in the most deprived wards in the borough i.e. access to jobs</p> <p>Ensure that issues of both rural and urban deprivation are considered in development proposals.</p> <p>Support the adaptive reuse of buildings where appropriate.</p>	<ul style="list-style-type: none"> • % of rural households within set distances (either 4km or 2km) of key services. • % of development in KSCs and LSCs • Number of households within 30mins of key service centres by public transport. • Number of planning applications refused on accessibility grounds • % of the population with 20 mins travel time of different sports facility types • Number of households (or proportion of population) with access to broadband
11	Health & Wellbeing	To improve physical and mental health and well-being of people and reduce health inequalities in Copeland	<p>Maintain accessible healthcare facilities throughout Copeland.</p> <p>Promote healthy and active lifestyles through encouraging walking and cycling as well as the provision and improvement of sporting, recreational and community facilities in Copeland.</p> <p>Reduce crime and the fear of crime, by adhering to 'designing out crime' principles in all new development.</p>	<ul style="list-style-type: none"> • Doctor/Patient ratio • Length of cycleway created/maintained • % adults taking part in sport • Number of developments with restriction of opening hours / noise reduction measures • Number of visits to leisure centres • Design out Crime layouts included in application. • % households with one or more person with a limiting long term illness • Childhood obesity figures
12	Education & Skills	To improve education, skills and qualifications in the Borough	<p>Improve linkages between higher education providers and local employers.</p> <p>Encourage educational and training opportunities for all sectors of the population, particularly amongst deprived</p>	<ul style="list-style-type: none"> • The percentage of pupils in schools maintained by the local authority achieving for five or more GCSEs at grades A*-C or equivalent. • % of the population whose highest qualification is a first degree (or

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			communities.	equivalent) <ul style="list-style-type: none"> • % of the population with no or low qualifications • Levels of NVQ attainment
13	Sustainable Economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	<p>Retain existing jobs and create new employment opportunities</p> <p>Promote major employment in Whitehaven and Key Service Centres that can provide access to an available workforce</p> <p>Provide a positive planning framework for exploiting new opportunities in tourism, creative and knowledge based industries and the energy sector, including renewable energy technologies.</p> <p>Maximise the opportunities that the nuclear sector (decommissioning and potential new build reactor) offers, building on skills and expertise in Copeland.</p> <p>Provide support for economic development that is appropriate for rural locations, including small businesses or home based working.</p> <p>Seek to attract employment and training programmes specifically targeted at maintaining and increasing the proportion of young people in the borough.</p>	<ul style="list-style-type: none"> • Amount of land supply available for B1, B2 and B8 uses • Gross floor space of completed retail and leisure • Gross floor space of completed B1, B2 and B8 • Amount of employment land lost to residential development per financial year (in hectares) • Economic activity rate for males and females of working age (expressed as a % of all people of working age) • ONS Annual Population Survey • Proximity of jobs from residences • % change in the number of VAT registered businesses. • Unemployment rate % (male and female) • GVA £ per capita
14	Leisure & Tourism	Support the sustainable development of the sustainable leisure and tourism industry	<p>Improve the quality of supporting infrastructure for tourism in the borough such as accommodation, leisure and cultural facilities.</p> <p>Encourage the use of the boroughs natural and cultural features for tourism development, within their environmental limits.</p>	<ul style="list-style-type: none"> • Visitor numbers • Tourism expenditure in the borough • Tourism expenditure per head
15	Housing	To improve access to a range of good quality housing that meets the needs of the Copeland community	<p>Ensure that all new development meets the lifetime homes standards, in order to meet the needs of an ageing population</p> <p>Seek to develop mixed income communities and flexibility of tenure and housing type in the borough</p> <p>Coordinate housing provision with investment in employment and community services to ensure that settlements</p> <p>Provide decent good quality and affordable housing for all including</p>	<ul style="list-style-type: none"> • % of households rated unfit • Number of unfit dwellings demolished • Number of affordable homes completed • Number of people on housing waiting list • % of housing development incorporating community green space/ children's play areas • Average house price • Income to average house price ratio • % of new homes meeting Lifetime

	SA Objective Abbreviation	SA Objective (High Level Objective)	Locally Distinctive Sub-criteria	Indicators that will be used to Monitor the Effects of the LDF Policies and Allocations
			intermediate and key worker housing in line with housing targets.	Homes standard <ul style="list-style-type: none"> • % of new homes scoring good or very good on Building for Life Standard.
16	Retail	To maintain, enhance and develop a diversity of retail services in the Borough	Protect the shopping and community services function of Key and Local Service Centres Reduce the number of vacant retail properties in Whitehaven and the other smaller service centres in Copeland. Improve the quality of the public realm in order to improve the attractiveness of the service centres to new investment.	<ul style="list-style-type: none"> • Retail hierarchy and ranking • Number of vacant premises • New business start-up / closure rates • Number of new business support initiatives or events • Number of street scene improvement schemes
17	Transport	To enhance and develop sustainable transport networks in Copeland	Improve the provision and quality of bus and rail services in Copeland, particularly in rural areas. Develop and maintain safe, efficient and integrated transport networks within Copeland, with good internal and external links. Reduce car dependency by providing services and facilities accessible by a range of modes of transport. Promote a pattern of development which reduces private vehicle dependency in the location of homes, jobs, leisure and community services.	<ul style="list-style-type: none"> • Methods of travel to work • Vehicle ownership • Distance travelled to work • Number of road accidents • % of development located in KSC and LSC • Number of households within 30 mins of KSC by public transport • Length of cycleways created / maintained (km)

Source: Copeland LDF Sustainability Appraisal Scoping Report – prepared by Scott Wilson (September 2009)

The 17 criteria in the SA Framework are applied below to the South Whitehaven document: to the Aims and Objectives and Chapters 4 and 5, covering the detail of the development.

The assessment has been carried out in order to predict and evaluate the key potential impacts. We can then identify in general terms whether the development is likely to move the area towards or away from greater sustainability in the long term.

Key to tables:

- ++ strongly positive
- + positive
- ~ neutral, no obvious effect
- negative
- strongly negative
- ? uncertainty, impacts not predicted

Aim and Objectives of the SPD

Aims:

'To provide a framework in which new development and projects can support the wider regeneration of Whitehaven through positive contribution to the environment ensuring high quality sustainable design and strong linkages to the existing community.'

Objectives:

- Supporting the development of the HMR areas.
- Providing design guidance for new development, mainly in connection with the proposed urban extension
- Ensuring the integration of new and existing development setting higher standards of urban design, architectural and landscape design
- Ensuring all new development meets acceptable standards in terms of quality of design, landscaping, energy efficiency, safety, security and accessibility
- Encouraging movement by foot and cycle
- Providing linkages which will offer opportunity to access afforded by the proposed landscaping of the former chemical works site, the coastal fringe area and the emerging priorities of the West Whitehaven SPD

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	-	Development of greenfield site. No mention in the aim and objectives of protecting or enhancing biodiversity. Development generally has a negative effect on habitats unless mitigation, compensation and enhancement measures are taken.
2	Landscape & Conservation	+	Ensuring higher standards of design quality in building and landscape design
3	Climate Change	+	Ensuring all new development meets acceptable standards in terms of energy efficiency.
4	Water Resources	-	More dwellings in Whitehaven will put increased pressure on water resources in the borough. This can be mitigated through the design of the development i.e. installing grey water technologies etc.
5	Flood Risk	~/-	It is assumed that the statement, which aims to ensure development meets acceptable standards in terms of quality of design, safety and security, includes preventing flooding. It is important that the development does not contribute to increased flooding outside the site boundary. If this is the case then there should be no impact on flooding. If not, flood risk can be mitigated by installation of SUDs technologies.
6	Energy	+	'Ensuring that all new development meets acceptable standards in terms of energy efficiency.' This statement could be enhanced in sustainability terms if it said 'meets high standards in terms of energy efficiency'.
7	Land Quality	~	No impact anticipated
8	Air Quality	+	One of the objectives is to encourage movement by foot and cycle. Cutting down on the number of short journeys made by car will mitigate the impact of the development on air quality. Improvement of walking and cycling facilities in the general area will give existing residents more

			options for walking and cycling too.
9	Waste & Recycling	-	More development in the area will have a negative impact on waste and recycling. This could be mitigated with the addition of community recycling facilities with the development.
10	Services & Facilities	-	A larger number of homes in this area will put pressure on existing services and facilities in Whitehaven. This could be mitigated with a statement supporting development of services/facilities where capacity issues may arise as a result of this development, in the short or longer term.
11	Health & Wellbeing	+/-	A larger number of homes in this area will put pressure on existing health and leisure services in Whitehaven. This could be mitigated with a statement supporting development of services/facilities where capacity issues may arise as a result of this development, in the short or longer term. Encouraging walking and cycling should have a positive impact and ensuring that all development is safe and secure will also contribute positively.
12	Education & Skills	-/~	A larger number of homes in this area will put pressure on existing education services in Whitehaven. This could be mitigated with a statement supporting development of new or enhancement of existing education services/facilities where capacity issues may arise as a result of this development, in the short or longer term.
13	Sustainable Economy	+	An increased number of people living in the Whitehaven area will of course add to the viability and vitality of Whitehaven's town centre.
14	Leisure & Tourism	+	The development shall have a significant visual impact due to its sheer size. However, if the architecture and landscape design are acceptable there should not be any negative impact on tourism. With regards to leisure (encouraging residents to walk/cycle and ensuring that the area is linked to the site of the former chemical works, and all the leisure opportunities that that site will afford), the impact should be positive.
15	Housing	+	The SPD aims to support the development of a HMR area (Woodhouse Estate). Dwellings are expected to meet acceptable standards in terms of energy efficiency.
16	Retail	+	An increased number of people living in the Whitehaven area will of course add to the viability and vitality of Whitehaven's town centre.
17	Transport	+	The development will encourage people to move around more by foot/bicycle and therefore reduce dependency on the car for very short trips.

The Objectives are economically sustainable and to a large extent socially sustainable too. There could be issues around the capacity of existing public services. A sentence in the objectives section *'supporting development of existing or new services/facilities if capacity becomes an issue in the short or longer term'* may be helpful.

In terms of environmental sustainability there are a number of potential issues. There is no reference to protecting or enhancing biodiversity on this greenfield site. The addition of a sentence acknowledging the opportunities to enhance biodiversity on such a large site would be useful in this section. There are possibly negative impacts for water resources and waste and recycling also. The addition of a few words to the 4th bullet point in the list of objectives would remedy this. The following is suggested:

'Ensuring all new development meets acceptable standards in terms of architecture, sustainable design (energy efficiency, water efficiency, recycling facilities etc.), landscaping, safety, security and accessibility'

Sections 4 – Key Issues and Development Opportunities

Section 5 – Options for the Urban Extension Site

The following is an appraisal of both the above sections which provide the detail of the proposed development.

	Sustainability Objective	Impact	Evidence for judgement
1	Biodiversity	+	Planting species that will support biodiversity. The addition of SUDs ponds will provide an important habitat for a variety of species. It is felt that this will make a positive contribution. Ecological and bat surveys were carried out for the site. In summary these identified that there was the potential for foraging and commuting bats. A number of suggestions were made as regards mitigation. The document should make reference to these mitigation measures such as a lighting strategy, avoiding the removal of woodland and hedgerows and the planting of new hedgerows, fencing off woodland areas and not allowing paths and cycleways that bisect the woodland.
2	Landscape & Conservation	+	The densest parts of the development will be in the centre of the site and the least dense at the outskirts. This will have the benefit of softening the hard edge that is currently present on the south edge of the Woodhouse estate. The site will be landscaped in order to provide shelter from the prevailing wind and provide high quality open space for the enjoyment of current and future residents.
3	Climate Change	+	Creating a development that is permeable to pedestrians will encourage more walking and cycling and therefore impact positively in terms of carbon footprint. The SPD also aims to create a bus permeable development. The layout of the site will be such as to maximise solar gain. There is also a commitment to make the dwelling energy efficient.
4	Water Resources	+	The site layout includes 2 SUDs areas. This will be beneficial in terms of biodiversity, water storage, allowing natural processes to clean polluted water etc. Perhaps a couple of sentences could be added to the document stating the purpose of these ponds and the importance of their inclusion. The document is silent on the matter of water efficient technologies, so it is assumed that the development will meet the minimum standards required in the current Building Regulations.
5	Flood Risk	+	Development of a greenfield site generally has the effect of increasing runoff and causing flooding either on the site or elsewhere. This document includes the possible locations of 2 SUDs ponds that will collect water and mitigate the effect of the development (whilst providing benefits for biodiversity). More should be said about this in the document. See suggested text below.
6	Energy	+	The Objectives section states that all dwellings will meet acceptable standards in terms of energy efficiency. The document does not elaborate on this so it is assumed that the development will meet the minimum standards set out in the current Building Regulations.
7	Land Quality	~	The land is currently greenfield and there is the risk that development on the site could lead to some soil contamination although this should be minor as the development will be residential. Drainage of water into the SuDs ponds will help limit contamination as the ponds will help to clean the runoff.
8	Air Quality	+	The development will bring more cars to the area but the level of permeability to pedestrians and cyclists will help to mitigate this by encouraging people to walk and cycle for very short journeys. Bus

			permeability on the site will also lessen the number of car journeys made and therefore reduce air pollution.
9	Waste & Recycling	-	A development of this size will increase the amount of waste generated. The inclusion of a small community recycling bank may be appropriate. This could be proposed within the document.
10	Services & Facilities	-	A larger number of homes in this area will put pressure on existing services and facilities in Whitehaven. This could be mitigated with a statement supporting development of services/facilities where capacity issues may arise as a result of this development, in the short or longer term.
11	Health & Wellbeing	++	The development aims to provide an environment that encourages walking and cycling and therefore should have a positive impact on health and wellbeing. Each of the suggested layouts aims to create a legible, accessible, safe and pleasant environment with a good supply of public open space (including the potential for allotments). Providing energy efficient homes, so that heating is affordable and fuel poverty is reduced in the area, is also a very positive step. There could be an issue with additional pressure on medical facilities in the area. This could be mitigated with a commitment to support the development of additional or existing facilities should the need arise.
12	Education & Skills	-/+	A larger number of homes in this area will put pressure on existing education services in Whitehaven. The document states that the developers could contribute to existing schools or provide a new school in the area in order to provide improved primary education. However, it does not mention secondary school provision. The document (para 4.04) mentions the use of local apprentices on the building site. This will give a substantial boost to the attainment of valuable skills for local people.
13	Sustainable Economy	++	A larger number of homes in the Whitehaven area will lead to a more vibrant town centre and the viability of local shops in the Woodhouse area should also improve. The document states in para 4.04 that the developer will support local suppliers where possible.
14	Leisure & Tourism	+	Providing an environment that encourages walking and cycling could have a positive impact on leisure for local residents as the environment is more pleasant and easy to move around in. No significant impact on tourism is anticipated. However, the enhancement of biodiversity in the area should support the St Bees SSSI, which is a tourist attraction.
15	Housing	++	The development aims to offer a mix of house types and tenures, from starter homes to more executive housing. This will be very positive for this particular area as it is currently dominated by social housing. Dwellings will be constructed to an acceptable level of energy efficiency. This will reduce fuel poverty in the area and contribute to meeting the needs of some of the more vulnerable members of this community.
16	Retail	+	A larger number of homes in the Whitehaven area will lead to a more vibrant town centre and the viability of local shops in the Woodhouse area should also improve.
17	Transport	++	Making the area more pleasant to walk and cycle in and, in addition, making it accessible to buses, travelling to and from retail and employment centres, will reduce dependency on the car.

It is concluded that the proposed development is generally sustainable. There are potentially negative impacts around waste and recycling and increasing pressures on services and facilities. It is suggested that the flowing text could be added to improve the document in sustainability terms.

Suggested additional text in *blue font*:

5.22 - Opportunities should be taken to provide high quality areas to benefit both existing and new communities *as well as local wildlife*.

5.24 - Landscaping should assist in protecting the site from the harsh weather conditions which can be experienced in this location. *Existing woodland and hedgerows should be retained, not only to protect dwellings from the prevailing wind, but also to retain existing habitats and wildlife corridors. New hedgerows will be planted around the perimeter of the site in order to mitigate the negative effects of the development on local biodiversity.*

5.25 - Species *used in landscaping* should be appropriate to supporting local biodiversity objectives.

New paragraph: *5.26 – The area of woodland to the south west of the development site will be fenced off to protect this important habitat and any footpaths or cycleways should go around, not through, this woodland. This is important to maintain the biodiversity value of this area for foraging and commuting bats.*

New paragraph: *5.27 – All three of the site layout options (Plans 2, 3 & 4) include two SUDs ponds. It is important that these are included in the development as they provide water storage and will therefore help to prevent flooding on the site, and elsewhere. The ponds will also allow for the natural cleansing of rainwater runoff that may be polluted. In addition, the creation of these aquatic habitats will contribute significantly to the protection and enhancement of biodiversity in the area.*

New paragraphs under the heading '**Other Design Issues**' (?):

*5.29 – **Street Lighting** – Street lighting will be kept to minimum acceptable levels for public safety and security. This approach will be taken in order to keep the carbon footprint of the development as small as possible and also to mitigate the negative effect of the development on the foraging and commuting bat population in the area. The lighting scheme for the site will be designed to avoid as much 'light spill' as possible onto trees and hedgerows without compromising on public safety.*

*5.30 – **Waste & Recycling facilities** – It will be important to facilitate waste and recycling collection within the development. This may involve the provision of a community waste recycling bank close to the centre of the site. It may also be advantageous to provide an area within the curtilage of each dwelling/block of flats etc. where waste bins, recycling boxes etc. can be stored in a convenient place for waste collection purposes. In the case of longer terraces, it will be appropriate to provide easy access from the back of dwellings to the front, in order to avoid the scenario where waste has to be transferred to collection points through the inside of dwellings.*

It is also noted that there will be planning contributions associated with the development e.g. educational facilities, environmental enhancements within the Woodhouse estate etc. that are not expressed in the draft that has been subject to this Sustainability Appraisal. It is expected that these contributions will also result in positive impacts, particularly in terms of social sustainability.