



BACKGROUND INFORMATION

Council		
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	Wednesday, 11 September 2013	

The following two documents relate to Agenda Item 12 and are the:

- Habitats Regulations Assessment; and the
- Sustainability Appraisal and Sustainability Assessment

carried out as part of the Morecambe Area Action Planning process.





Habitats Regulations Assessment

Morecambe Area Action Plan

Screening Report

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Lancaster City Council Habitats Regulations Assessment

Morecambe Area Action Plan

Screening Report

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ABBREVIATIONS

AAP	Area Action Plan
cSAC	Candidate Special Area of Conservation
DPD	Development Plan Document
FCS	Favourable Conservation Status
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
pSPA	Potential Special Protection Area
RSPCA	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SPA	Special Protection Area



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1 INTRODUCTION AND PURPOSE

1.1 Introduction

Lancaster City Council is currently preparing its Morecambe Area Action Plan (AAP) as part of its Local Plan. The Local Plan provides guidance for planning within the district of Lancaster. The preparation of the Morecambe AAP, along with the preparation of a Land Allocations Development Plan Document (DPD), Development Management DPD and the Adopted Core Strategy (adopted 2008) will eventually replace the existing Lancaster District Local Plan which was adopted for planning purposes in April 2004.

The Morecambe AAP is a spatial plan for central Morecambe and covers an area that extends the length of the main promenade from the Battery in the west almost to the Town Hall in the east and landward takes in the main central parts of the town (see Figure 2 of Appendix B). The Morecambe AAP provides a framework to facilitate and manage development and change within central Morecambe to 2021 (the period of the Core Strategy). The Morecambe AAP is the document through which the vision and objectives for the area have been developed, considered and co-ordinated for implementation. It identifies key infrastructure projects that will contribute to the regeneration of central Morecambe. It directs investment, provides increased certainty to potential investors, builds confidence and assists the Council in securing funding and facilitating new development. It is acknowledged that economic circumstances will affect the pace of regeneration, however, bringing forward the AAP will ensure that central Morecambe is well placed to capture and benefit from an economic upturn.

This Habitats Regulations Assessment (HRA) screening document has been produced during the preparation of the Morecambe AAP. This approach ensures that the AAP avoids significant adverse impacts on protected sites of international importance.

1.2 Background to the Habitats Regulations Assessment

Under Article 6 of the Habitats Directive (and Regulation 61 of the Habitats Regulations), an assessment is required where a plan or project may give rise to significant effects upon a Natura 2000 site (also known as 'European site').

Adjacent to the Morecambe AAP boundary lies the Morecambe Bay Special Protection Area (SPA), SAC (Special Area of Conservation) and Ramsar site. However, within a 15km radius of the Morecambe AAP boundary there an additional five sites which form part of the Natura 2000 network that could potentially be affected by the Morecambe AAP (European sites are shown on Figure 1 of Appendix B). Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes SACs, designated under the Habitats Directive for their habitats and/or species of European importance, and SPAs, classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.

The requirements of the Habitats Directive are transposed into UK law by means of the Conservation of Habitats and Species Regulations 2010¹.

Paragraph 3, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'.

Paragraph 4, Article 6 of the Habitats Directive states that:

'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'

The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European site. If the Screening (the first stage of the process, see section 2.1 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on site integrity.

1.3 Legislation and Guidance

This HRA screening report has drawn upon the following legislation and guidance:

- The Conservation of Habitats and Species Regulations 2010.
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.

1.4 Update Following Consultation

The Morecambe AAP was released for consultation with the general public and stakeholders, during late 2012 and early 2013. Numerous responses were received and some have resulted in amendments to the document. As a result, it has been necessary to revisit this Habitats Regulations Assessment in light of these changes and assess whether any additionally

¹ SI 2010/490



2 THE HABITATS REGULATIONS ASSESSMENT PROCESS

This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

2.1 Stages in HRA

The requirements of the Habitats Directive comprise four distinct stages:

Stage 1: Screening is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in-combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made.

Stage 2: Appropriate Assessment is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.

Stage 3: Assessment of alternative solutions is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.

Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain. At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

2.2 Applying HRA to the Morecambe AAP

The HRA process should be applied to all policies which could have potential impacts upon a European site.

All policies within the Morecambe AAP should be subject to the process outlined in Section 2.1. The SA process which is being undertaken in parallel to this HRA will also consider effects on European sites in order to avoid potential damaging policies being brought forward.

Screening of the likely significant effects of the policies is provided in Section 4.

2.3 Definition of Significant Effects

The critical part of the HRA screening process is determining whether the Morecambe AAP is likely to have a significant effect on European sites and, therefore, if it will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. A useful definition of significant effects is provided in Welsh planning guidance² which can be drawn upon in this case:

"...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives".

2.4 In-Combination Effects

As outlined in Section 2.1, it is necessary for HRA to consider in-combination effects with other plans and projects. Plans under consideration may range from neighbouring authorities' Local Plan Documents down to sector specific strategic plans on such topics as regeneration. A review has been undertaken of plans and projects with the potential for an in-combination effect with the Morecambe AAP which are listed in Table 2-1.

Table 2-1 Plans and Projects Considered for In-Combination Effects

Authority	Relevant Plan/Project
Government Office for the North West	North West of England Plan - Regional Spatial Strategy to 2021 (Published September 2008) (soon to be abolished).
United Utilities	Water Resources Management Plan (2009).
Environment Agency	The Lune Catchment Abstraction Management Strategy (2004).
Lancashire County Council	Local Transport Plan 2011 – 2021: A Strategy for Lancashire May 2011.
Lancashire County Council	Local Transport Plan 2011-2021: Delivering our Priorities A Draft Implementation Plan for 2011/12 – 13/14 August 2011.
Lancashire County Council	Joint Lancashire Minerals and Waste Development framework Core Strategy (2009) (Site Allocations document in preparation).
Lancaster City Council	Core Strategy (adopted 2008)
Lancaster City Council	Land Allocations DPD (currently in preparation)
Lancaster City Council	Development Management DPD (currently in preparation)
Craven District Council	Saved policies from the 1999 Local Plan (currently preparing their Local Development Plan).
South Lakeland District Council	South Lakeland Core Strategy (adopted October 2010).
Ribble Valley Council	Districtwide Local Plan (Adopted 1998) (Core Strategy in preparation).

 $\frac{\text{http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/403827/40382/860788/Final\ Copy\ Consultation\ Doc1.pd}{\text{f?lang=en}}$

²

Authority	Relevant Plan/Project
Wyre Borough Council	Wyre Borough Local Plan (Adopted 1999) (Core Strategy in preparation).
Various	North West and North Wales - Shoreline Management Plan 2 (2011).
Planning Application	Land at Lawson's Bridge, Scotforth Road, Lancaster: Erection of a new supermarket, construction of a new access and servicing and parking areas, footways, cycling facilities and landscaping. Once completed it would create a retail floorspace of 2,052sqm (tradeable) and 3,230sqm (gross).
Planning Application	Unit 1, Bulk Road, Lancaster - Creation of a Mezzanine floor to create extra retail space within the existing Curry's unit. Once completed this would create extra retail floorspace of 617sqm.
Planning Application	Norman Jackson Ltd, Scotland Road, Carnforth - Outline application for the redevelopment of existing builders yard to provide retail, business and industrial unts and associated car parking. Once completed it would create a retail floorspace of 1,509sqm.
Planning Application	Vuflex, Thetis Road, Lune Industrial Estate, Lancaster - Erection of two new industrial units for Classes B2 & B8 to extend existing business use on site. This would increase the level of employment floorspace by 1,070sqm
Planning Application	Mellishaw North, Mellishaw Lane, Morecambe - Amended access to development site for mixed use development incorporating B1, B2 and B8 uses, four motor dealerships, motor accessories store and fast food outlet. This would create circa 10,000sqm of employment floorspace
Planning Application	Units 41, 43 & 45 Nortgate, White Lund Employment Area - erection of three two storey office buildings. This would create a further 812sqm of employment floorspace.
Planning Application	Land off Scotland Road, Warton - Erection of a proposed new workshop, parts store, display areas and associated landscaping access, car parking and drainage works. This proposal would create 950sqm of employment floorspace.
Planning Application	Hybrid Application for the development of Carnforth Business Park on land off Kellet road, Carnforth for use classes B1, B2 and D1. Full application for the development of plots 1-6, access, new road, infrastructure and landscaping. Outline application for plots 7-16. Once completed this will create 12,855sqm of employment floorspace
Planning Application	Luneside East (Land off Long Marsh Lane), 350 new homes
Planning Application	Nightingale Hall Farm, 164 new homes
Planning Application	Luneside West, 356 new homes
Planning Application	Lancaster Moor Hospital, 440 new homes
Planning Application	Wheatfield Street, 62 new homes
Planning Application	Mossgate, 209 new homes

Authority	Relevant Plan/Project
Planning Application	Former Pontin's Holiday Camp, 579 new homes
Planning Application	Heysham Depot, 39 new homes
Planning Application	Frontierland, Morecambe, 218 new homes
Planning Application	Broadway Hotel, 47 new homes
Planning Application	Halton Mills, 135 new homes
Planning Application	Halton Co-housing scheme, 41 new homes
Planning Application	Moor Platt, 36 new homes
Planning Application	Castle Hotel, 49 Main Street, Hornby, 7 new homes
Planning Application	Sunacre Court, Maple Avenue, Heysham, Morecambe, 6 new homes
Planning Application	Toll Bar Garage, Scotforth Road, Lane, 34 new homes
Planning Application	87-89 Marine Road West, Morecambe, 8 new homes
Planning Application	Police Station, Heysham Road, Heysham, 10 new homes
Planning Application	20 Emesgate Lane, Silverdale, Carnforth, 6 new homes
Planning Application	119 Main Road, Bolton Le Sands, Carnforth, 14 new homes
Planning Application	Cove House, Cove Road, Silverdale, 14 new homes
Planning Application	Elms Hotel, Elms Road, Morecambe, 48 new homes
Planning Application	26 Marine Road West, Morecambe, 5 new homes
Planning Application	98 St Leonards Gate, Lancaster, 9 new homes
Planning Application	Development Site, Land off Ashbourne Road, Lancaster, 27 new homes
Planning Application	Ellel House, Chapel Lane, Galgate, 13 new homes
Planning Application	Land adjacent to the Bungalow, Westcliffe, Morecambe, 8 new homes
Planning Application	Ship Hotel, Main Street, Overton, 5 new homes
Planning Application	North West Water Reservoir, Seymour Grove, Heysham, 9 new homes
Planning Application	8 Back Morecambe Street, Morecambe, 8 new homes
Highways Agency	The proposed Heysham M6 link
-	Large canal corridor retail proposal within the city centre
-	A possible third nuclear power station at Heysham
National Grid	National grid upgrades with potential power lines crossing the district

Only the Local Plans and Core Strategies of districts adjacent to Lancaster's boundary have been examined. It should be noted that in-combination effects only require consideration where the plan or project being assessed has an impact, whether significant or not. A conclusion of 'Zero Effects' negates the possibility of in-combination effects.

2.5 Mitigation Measures

In preparing this report, consideration has been given to potential avoidance and mitigation measures which would serve to avoid adverse effects on the integrity of European sites, for example the provision of specific clauses within the AAP that may prevent effects occurring.

3 THE EUROPEAN SITES

Eight European sites have been identified adjacent to the Morecambe AAP boundary and within 15km. A list of the sites together with their status and location is presented in Table 3-1. Figure 1, Appendix B also shows the locations of the European sites identified in Table 3-1.

Table 3-1 Summary of European Sites

Name of Site	Identification Number	Status	Distance from Morecambe AAP boundary (approximate km)
Morecambe Bay	UK11045	Ramsar	Directly adjacent
Morecambe Bay	UK9005081	SPA	Directly adjacent
Morecambe Bay	UK0013027	SAC	Directly adjacent
Bowland Fells	UK9005151	SPA	Approximately 9.8km south east
Morecambe Bay Pavements	UK0014777	SAC	Approximately 11.3km north east
Calf Hill and Cragg Woods	UK0030106	SAC	Approximately 10.2km south east
Leighton Moss	UK11035	Ramsar	Approximately 10.1km north east
Leighton Moss	UK9005091	SPA	Approximately 10.1km north east

Table 3-2 provides further information regarding the European sites including current conditions, threats and the results of the April 2012 condition survey.

3.1 Conservation Objectives of the European Sites

Under Regulation 35(3) of the Conservation of Habitats and Species Regulations 2010 the appropriate statutory nature conservation body (in this case Natural England) has a duty to communicate the conservation objectives for a European site to the relevant/competent authority responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future;
- Conservation status of typical species is favourable as defined in Article 1(i).

The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future;
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Guidance from the European Commission³ indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

Conservation Objectives for the Morecambe Bay SPA, SAC and Ramsar site were obtained from Natural England's website⁴. They are summarised in Appendix A.

³ Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2000)

⁴ http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sac/northwest.aspx

Table 3-2 European Sites that could be adversely affected by Morecambe's Morecambe AAP

Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012 SSSI Condition Survey
	Habitats	Species		
Morecambe Bay N/A	4 / 2	 Ramsar criterion 4: The site is a staging area for migratory waterfowl including internationally important numbers of passage ringed plover <i>Charadrius hiaticula</i>. Ramsar criterion 5 Assemblages of international importance with peak counts in the winter: 223709 waterfowl Ramsar criterion 6 Species/populations occurring at levels of international importance during the breeding season: Lesser black-backed gull , <i>Larus fuscus graellsii</i> Herring gull, <i>Larus argentatus argentatus</i> Sandwich tern, <i>Sterna (Thalasseus) sandvicensis sandvicensis</i> Species with peak counts in spring/autumn: 	No factors reported adversely affecting the sites ecological character (past, present or potential).	Area favourable 93.81% Area unfavourable but recovering 6.19% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%

 $^{5}\,\mathrm{Taken}$ from Natura 2000 Standard Data Forms (SAC and SPA) and Ramsar Information Sheets.

	ite Name (Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
Common shelduck , Tadorna tador Northern pintall, Anas acuta Common eider, Somateria mollissis mollissima Eurasian oystercatcher, Haematop ostralegus ostralegus Ringed plover, Charadrius hiaticula Grey plover, Pluvialis squatarola Sanderling, Calidris alba Eurasian curlew, Numenius arquata arquata Common redshank, Tringa totanus tetanus Ruddy turnstone, Arenaria interpre interpres Lesser black-backed gull, Larus fur graellsii Species with peak counts in winter Great crested grebe, Podiceps oris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator		Habitats	Species		SSSI Condition Survey
Northern pintail, Anas acuta Common eider, Somateria mollissim Eurasian oystercatcher, Haematop ostralegus ostralegus Ringed plover, Charadrius hiaticula Grey plover, Pluvialis squatarola Sanderling, Calidris alba Eurasian curlew, Numenius arquata arquata Common redshank, Tringa totanus tetanus Ruddy turnstone, Arenaria interpre interpres Lesser black-backed gull, Larus fur graellsii Species with peak counts in winter Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachytrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula Red-breasted merganser, Mergus serrator			Common shelduck , Tadorna tadorna		
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Lesser black-backed gull, Larus fus graellsii Species with peak counts in winter: Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Ruddy turnstone, Arenaria interpres		
Lesser black-backed gull, Larus fus graellsii Species with peak counts in winter: Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula clangula Red-breasted merganser, Mergus serrator			interpres		
graellsii Species with peak counts in winter: Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Lesser black-backed gull, Larus fuscus		
Species with peak counts in winter: Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			graellsii		
Great crested grebe, Podiceps cris cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Species with peak counts in winter:		
cristatus Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Great crested grebe, Podiceps cristatus		
Pink-footed goose, Anser brachyrhynchus Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			cristatus		
Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Pink-footed goose, Anser		
Eurasian wigeon, Anas penelope Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			brachyrhynchus		
Common goldeneye, Bucephala clangula clangula Red-breasted merganser, Mergus serrator			Eurasian wigeon, Anas penelope		
clangula clangula Red-breasted merganser, Mergus serrator			Common goldeneye, Bucephala		
Red-breasted merganser, Mergus serrator			clangula clangula		
serrator			Red-breasted merganser, Mergus		
			serrator		
European golden plover, <i>Pluvialis</i>			European golden plover, Pluvialis		

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Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
	Habitats	Species		
		apricaria apricaria Northern Iapwing, Vanellus vanellus Red knot, Calidris canutus islandica Dunlin, Calidris alpina alpine Bar-tailed godwit, Limosa lapponica lapponica		
Morecambe Bay N/A	N/A	The site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season; Little Tern Sterna albitrons Bar-tailed Godwit Limosa lapponica Golden Plover Pluvialis apricaria The site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: During the breeding season; Herring Gull Larus argentatus Lesser Black-backed Gull Larus fuscus On passage; Ringed Plover Charadrius hiaticula	The site is subject to a wide range of pressures such as land-claim for agriculture, overgrazing, dredging, overfishing, industrial uses and unspecified pollution. However, overall the site is relatively robust and many of those pressures have only slight to local effects and are being addressed thorough Management Plans. The breeding tern interest is very vulnerable and the colony has recently moved to the adjacent Duddon Estuary. Positive management is being secured through management plans for non-governmental organisation reserves, Natural England, Site Management Scheme, and the Morecambe Bay Partnership.	Area favourable 93.81% Area unfavourable but recovering 6.19% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%

Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
	Habitats	Species		(a) 10 10 10 10 10 10 10 10 10 10 10 10 10
		 Over winter; Curlew Numenius arquata Dunlin Calidris alpina alpina Grey Plover Pluvialis squatarola Knot Calidris canutus Oystercatcher Haematopus ostralegus Pink-footed Goose Anser brachyrhynchus Pintail Anas acuta Redshank Tringa totanus Shelduck Tadorna tadoma Turnstone Arenaria interpres The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 seabirds. The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl. 		
Morecambe Bay SAC	Morecambe Bay Annex I habitats that are a primary reason for selection of this site: Estuaries Mudflats and sandflats not covered by seawater at low tide Large shallow inlets and bays Perennial vegetation of stony banks Salicornia and other annuals	Annex II species that are a primary reason for selection of this site: Great crested newt <i>Triturus cristatus</i>	There are a wide range of pressures on Morecambe Bay but the site is relatively robust and many of these pressures have only slight or local effects on its interests. The interests depend largely upon the coastal processes operating within the Bay, which have been affected historically by human activities including coastal protection and flood defence works. Current pressures include fisheries, aggregate extraction, gas exploration, recreation and other activities.	Area favourable 93.81% Area unfavourable but recovering 6.19% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%

Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
	Habitats	Species		
	colonising mud and sand Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes') Fixed dunes with herbaceous vegetation ('grey dunes') *Priority feature Humid dune slacks Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: Sandbanks which are slightly covered by sea water all the time Coastal lagoons *Priority feature Reefs Heefs Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) *Priority feature Dunes with <i>Salix repens</i> ssp. argentea (<i>Salicion arenariae</i>)			
Bowland Fells SPA	N/A	This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the	The expansive blanket bog and heather dominated moorland provides suitable habitat for a diverse range of upland breeding birds. Favourable nature conservation status of the site depends on appropriate	Area favourable 5.50% Area unfavourable but recovering 94.40% Area unfavourable no

Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
	Habitats	Species		
		Directive: During the breeding season; Hen Harrier Circus cyaneus Merlin Falco columbarius This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: During the breeding season; Lesser Black-backed Gull Larus fuscus	levels of sheep grazing, sympathetic moorland burning practice, sensitive water catchment land management practices and ongoing species protection. Since designation as an SPA, many localised problems of over-grazing have been controlled through management agreements or the Countryside Stewardship Scheme. To date approximately 20% of SPA is under Section 15 management agreements and Countryside Stewardship to stimulate heather regeneration in order to produce better moorland for grouse and raptors alike. Burning plans and stocking levels have also been agreed for all other areas of the SPA through Site Management Statements, whilst problems of raptor persecution continues to be addressed by the Royal Society for the Protection of Birds (RSPB) in conjunction with North West Water, Natural England and Lancashire Constabulary.	change 0% Area unfavourable declining 0.10% Area destroyed / part destroyed 0%
Calf Hill and Cragg Woods SAC	Annex I habitats that are a primary reason for selection of this site: Old sessile oak woods with Ilex and Blechnum in the British Isles Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) *Priority feature	N/A	Currently there is limited intervention in landuse/management terms. There is also no immediate need for woodland management in order to safeguard the interest of the site. However, in the long-term it would be desirable to repair some of the walls/fences at the far eastern most end of Calf Hill Wood in order to control sheep grazing from the adjacent fell. In addition, since the canopy of the oak woodland is fairly dense and natural regeneration is quite limited, it would be desirable over the long-term to instigate small-scale selective fellings/silvicultural thinning, whilst felling a small stand of planted larch/pine (<0.5 ha) and replacing it with oak/birch.	Area favourable 100% Area unfavourable but recovering 0% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%

Site Name	Qualifying Features Habitats	Species	Current Conditions and Threats ⁵	Results of April 2012 SSSI Condition Survey
Leighton Moss Ramsar site	N/A	 Ramsar criterion 1 An example of large reedbed habitat characteristic of the biogeogaphical region. The reedbeds are of particular importance as a northern outpost for breeding populations of great bittern Botaurus stellaris, Eurasian marsh harrier Circus aeruginosus and bearded tit Panurus biarmicus. Ramsar criterion 3 The site supports a range of breeding birds including great bittern Botaurus stellaris, Eurasian marsh harrier Circus aeruginosus and bearded tit Panurus biarmicus. Species occurring in nationally important numbers outside the breeding season include northern shoveler Anas clypeata and water rail Rallus aquaticus 	The site is currently vulnerable to sedimentation / siltation and pollution — pesticides / agricultural runoff.	Area favourable 100% Area unfavourable but recovering 0% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%
Leighton Moss R	٧/٧	This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season; Marsh Harrier Circus aeruginosus Over winter;	Leighton Moss is vulnerable to changes in water quality and water levels. The maintenance of a high quality spring fed water supply is important and although there are few opportunities for this to become polluted within the catchment, agricultural run-off from land immediately adjacent to the reserve has been identified as a potential hazard in recent years. Initiatives are currently being initiated to reduce/remove this threat by the EA. The Moss is also susceptible to saline intrusion upstream of its tidal sluice from Morecambe Bay. This is potentially one of	Area favourable 100% Area unfavourable but recovering 0% Area unfavourable no change 0% Area unfavourable declining 0% Area destroyed / part destroyed 0%

Site Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012
	Habitats	Species		
			the most damaging threats to the reserve, there having been three inundations since 1964 caused by gales pushing in unusually high 10 metre tides.	
Morecambe Bay Pavements SAC	Morecambe Bay Annex I habitats that are a primary Pavements SAC reason for selection of the site: Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. Juniperus communis formations on heaths or calcareous grasslands Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) Limestone pavements * Priority feature Tilio-Acerion forests of slopes, screes and ravines * Priority feature Tilio-Acerion forests of slopes, screes and ravines * Priority feature Taxus baccata woods of the British Isles * Priority feature Annex I habitats present as a qualifying feature, but not a primary reason for selection of the site: European dry heaths Calcareous fens with Cladium mariscus and species of the Caricion davallianae * Priority feature	Annex II species that are a primary reason for selection of this site Narrow-mouthed whorl snail Vertigo angustior	The under-grazing of grasslands and decline of traditional cattle grazing is leading to the loss of sward diversity and scrub encroachment problems. Localised overgrazing (sheep-dominated) has impoverished the pavement flora on one of the component sites. A decline of traditional coppice management has reduced the interest of some of the woodland sites. The planting of non-native conifer crops on some of the sites has led to localised declines in condition.	See Appendix C

ite Name	Qualifying Features		Current Conditions and Threats ⁵	Results of April 2012 SSSI Condition Survey
	Habitats	Species		
	 Old sessile oak woods with Ilex and Blechnum in the British Isles 			

4 SCREENING

4.1 Context

The Morecambe AAP includes policies which will assist with determining future planning applications within a defined boundary in Morecambe (see Figure 1 of Appendix B). The AAP supplements the Core Strategy, Land Allocations DPD and the Development Management DPD and provides further detailed policy guidance on a range of planning matters including environmental, social and economic issues. The AAP is of key importance to facilitate the regeneration of Morecambe.

The AAP is applicable to all proposed development in central Morecambe within the AAP boundary.

4.2 Morecambe AAP

The elements of the Morecambe AAP used in the screening assessment are listed in Table 4-1.

Table 4-1 Elements of the Morecambe AAP

Morecambe AAP Policy Groups	Policy Name / Action Set
Spatial Approach	 A focus on quality and good care of all aspects of the environment. The environment at the central seafront protected and further enhanced and animated, with the potential to use and enjoy the seafront environment along its length clearly explained.
	The town centre integrating well with the seafront with as seamless a join between town and seafront as possible to ensure the provision for pedestrians to move between the two areas is made much easier, more pleasant and inviting. As a priority improving connections between the Eric Morecambe statue and Euston Road, between the Midland and the Winter Gardens and by the former Frontierland site.
	 Better places at the seafront for Morecambe to host and stage festivals and events and making that these bring much more to the town.
	 The bay between the Midland and the Battery improved through new sea defences and with new opportunities for enjoyment of the coastal setting including for active recreation.
	 Footfall of visitors on the seafront feeding into the town centre and the town centre becoming an integral element in and asset to the visitor experience.
	 A well defined town centre, comprising the established centre of the Arndale and traditional streets around improved and enhanced, augmented by land to the east of Northumberland Street redeveloped to a clear urban structure.
	The Arndale and area around one anchor to the town centre, the other the Festival Market / Platform / Apollo complex as rejuvenated to make for an indoor entertainment hub.
	 Victoria Street improved and effectively extended west to link through to the Festival Market and so making for a clear axis to the

Morecambe AAP Policy Groups	Policy Name / Action Set
Groups	town centre landward of Marine Road. The seafront headland at the central promenade made Morecambe's lead leisure destination, with a high quality of public realm and relating well to the town centre landward. Uses to include significant leisure / recreation elements complementary to that of the mixed town centre but not competitive with its retail elements. The edge of centre retail park existing south of Central Drive at Morrison's and around relating well to the tighter centre and feeding footfall into it. Development of the former Frontierland site predominantly for housing to help activate central Morecambe with an increased residential population and to improve connectivity for pedestrians to / from the West End. Functionality further supported by improved connections for pedestrians to and from adjacent residential areas (including the West End) so these feed footfall and activity into the centre. Increased pedestrian activity spinning west along an improved seafront and along Marine Road West through to the West End. A welcoming arrival (and pleasant departure) experience including at the railway station and bus halts, for people walking and cycling and for people travelling by motor vehicle with ready, pleasant onward connections for pedestrian routes serving the town centre and helping concentrate footfall and activity in the tighter town centre.
	 Changes to highways and parking arrangements to make traffic circulation more efficient and reduce excess traffic circulation and with parking located and managed in such a way as to feed footfall into the town centre. Good signage for pedestrians throughout central Morecambe with
	 information / interpretation points. Visitor accommodation and including that just outside central Morecambe that is readily found by vehicle and on foot. Well considered, clear signage of vehicle routes to and from Morecambe on all route approaches including via Lancaster and Carnforth and well located long and short stay parking options in central Morecambe.
Managing the Environment	Action Set (AS)1: Managing and maintaining streets and spaces
	AS2: Improving the condition of buildings and encouraging beneficial occupancy
Managing Development	Policy SP1: Key Pedestrian Routes and Spaces
	AS3: Improving Key Routes for Pedestrians and Cyclists
Further encouraging business	Policy SP2: Investment Exemptions
investment and development	AS4: Further encourage business investment and development
Morecambe's Main Seafront and	Policy SP3: Morecambe Main Seafront and Promenade
Promenade	AS5: Central Seafront and Main Beach

Morecambe AAP Policy Groups	Policy Name / Action Set
	Policy DO1: The Battery
	AS6: Western Seafront and Beach
	Policy DO2: Strategic Leisure – Seafront Headland, Central Promenade
	AS7: Seafront Headland, Central Promenade
The Town Centre	Policy SP4: Town Centre
	Policy DO3: The Andale and Area
	Policy DO4: West View
	Policy DO5: Festival Market and Area
	Action Set AS8: The Town Centre
South of the Town Centre	AS9: Edge of Centre Retail Park
	Policy DO6: Former Frontierland Site
Travel and Transport	AS10: Traffic route signage to and from central Morecambe
	AS11: Parking provision and management
	AS12: Bus services
	AS13: Rail services
Marketing to Investors and	AS14: Investor marketing strategy
Visitors	AS15: Visitor marketing strategy

Screening of the Morecambe AAP 4.3

The screening process has been split into two distinct stages, initial screening and detailed screening. The initial screening stage provides a high level screening 'matrix style' assessment to determine if the Morecambe AAP could possibly lead to significant adverse effects on European sites identified in Table 3-1. The purpose of this was to eliminate those sites from the assessment which very clearly would not be affected by the AAP in order to focus on those sites where there was potential or uncertainty. The European sites that were identified to be potentially at risk due to potential development associated with the Morecambe AAP or those sites for which impacts were uncertain, were carried forward into a more detailed screening assessment.

The sections below outline the initial and detailed screening of the Morecambe AAP.

4.3.1 Initial Screening of the Morecambe AAP

The initial screening of the Morecambe AAP is presented in Table 4-2 below.

The overarching AAP policy groups were initially examined to determine their need for further detailed assessment. The notations below were used to indicate if further detailed assessment is required:

✓ Further detailed assessment is required to determine the nature of effects on the European

×	No further assessment is required as no effects are predicted on the European site.

Table 4-2 Initial Screening of the Morecambe AAP Policy Groups

European Sites	Morecamb	e AAP Policy 0	Groups (Furth	Morecambe AAP Policy Groups (Further assessment required: */✓)	equired: ×/√					Comments
	Spatial Approach	Managing the Environment	Managing Development	Encouraging Development and Investment	Seafront	Town Centre	South of the Town Centre	Transport	Marketing	
Morecambe Bay SPA	×	×	>	>	>	>	>	>	×	It is unlikely that elements within the Spatial Approach would lead to significant effects on the European sites due to their high level nature and commitment to co-ordinated management of the natural
Morecambe Bay Ramsar site	×	×	>	>	>	>	>	>	×	environment within Morecambe. Therefore elements of the Spatial Approach are not considered further in the assessment.
Morecambe Bay SAC	×	×	>	>	>	>	>	>	×	Action sets within the Managing the Environment policy group are not considered further in the assessment. This is because AS1 directly seeks to green and enliven the street environment and refresh green space areas, which would only benefit European sites. There is no link between AS2 and the Europeans sites as the action set seeks to protect heritage resources within Morecambe.
										Further assessment is required as to whether policies / action sets within policy groups, Managing Development, Further encouraging business investment and development, Morecambe's Main Seafront and Promenade, The Town Centre, South of the Town Centre and Travel and Transport would lead to significant adverse effects on the Morecambe Bay SPA / Ramsar / SAC due to the designated sites lying directly adjacent to the Morecambe AAP's western boundary and the nature of development the policies are likely to lead to i.e. retail, leisure, employment, transport and housing development. Action sets within the Marketing policy group are not considered further in the assessment as there is no clear link between the European sites and the action sets.
Bowland Fells SPA	×	×	×	×	×	×	×	×	×	The Bowland Fells SPA is located approximately 9.8km south east of the AAP boundary. The qualifying species are Hen Harrier, Merlin and Lesser Black-backed Gull. Although the species within the Bowland Fells are mobile, due to the distance of the SPA from the AAP boundary and the nature of development the AAP is likely to result in, no direct or indirect effects are considered feasible as there are no clear impact pathways.
Morecambe Bay Pavements SAC	×	×	×	×	×	×	×	×	×	The SAC is located approximately 11.3km north east of the AAP boundary. The SAC's qualifying features include hard oligo-mesotrophic waters, semi-natural dry grasslands and scrubland facies, <i>Tilio-Acerion</i> forests of slopes, screes and ravines, limestone pavements, <i>Taxus baccata</i> woods, European dry heaths, calcareous fens with <i>Cladium mariscus</i> and <i>Caricion davallianae</i> , old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> and the narrow-mouthed whort snail. Due to the distance of the SAC from the AAP boundary and the nature of the qualifying features no direct or indirect effects are considered feasible as there are no clear impact pathways.
Calf Hill and Cragg Woods SAC	×	×	×	×	×	×	×	×	×	No effects are predicted on the SAC's qualifying habitats (old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> and alluvial forests) due to the approximate 10.2km distance of the SAC from the AAP boundary. No direct or indirect effects are considered feasible on the SAC as there are no clear impact pathways.
Leighton Moss SPA	×	×	×	×	×	×	×	×	×	The sites are located approximately 10.1km north east of the AAP boundary. No effects are predicted on
Leighton Moss Ramsar site	×	×	×	×	×	×	×	×	×	entier the STA or harbad site as a reson of the worednine AAP as the pair boundary's distance sites make it highly unlikely any proposals would affect the qualifying species (Bittem, Marsh Harrier, Bearded Tit, Shoveler and Water Rail). Although the qualifying species are mobile, they all favour reed bed habitats which are not present within the AAP boundary. No direct or indirect effects are considered feasible on the SPA or Ramsar as there are no clear impact pathways.

Following the initial screening of the Morecambe AAP policies five of the European sites have been screened out of the remainder of this assessment. Table 4-2 shows that a clear impact pathway (either direct or indirect) could not be established for five of the European sites originally identified, hence significant effects from the implementation of the AAP are unlikely. Similarly impact pathways could not be established between the European sites and three of the policy groups.

4.3.2 Detailed Screening of the Morecambe AAP

The detailed screening of the Morecambe AAP is presented in Tables 4-3-4-5 below and is based on the findings of the initial screening exercise.

Policy groups Managing Development, Encouraging Development and Investment, Seafront, Town Centre, South of the Town Centre and Transport as set out in the Morecambe AAP were examined in detail to determine the need for Appropriate Assessment.

The notations below were used to indicate if the policy should be taken forward to the Appropriate Assessment stage:

- ✓ Appropriate Assessment required
- No further assessment required

Table 4-3 Screening the Morecambe AAP: Morecambe Bay SPA

Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
Managing Development	pment			
Policy SP1: Key Pedestrian Routes and Spaces	This policy seeks to facilitate pedestrian movement around Morecambe and ensure that new development relates well to the pedestrian network. Although the Morecambe Bay SPA is located directly adjacent to Morecambe's promenade (a key pedestrian route) the policy would not result in any direct land take within the SPA. The policy is likely to lead to limited new development on previously developed sites, therefore is unlikely to significantly increase surface water run-off.	Although no significant effects were anticipated on the SPA, the policy includes a specific cross reference to the Development Management DPD, stating that new development would be expected to comply with all relevant policy within the Development Management DPD. Policy EN2.1 of the Development Management DPD ensures new development does not lead to an adverse effect on the integrity of a site of international importance for biodiversity either alone or in combination with other plans or projects. The policy also ensures sites that could be functionally linked to European designated wildlife sites are not affected by new development proposals and where necessary require that proposals are accompanied by a project specific HRA Screening Report. The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines, a Construction Environmental Management Plan and the Development Management DPD ensures water resources are protected through resisting developments which would pose an unacceptable threat to surface water and groundwater quantity and quality. This also includes pollution caused by water run-off from developments into nearby waterways. All of which could mitigate adverse effects.	A/A	×

Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
AS3: Improving Key Routes for Pedestrians and Cyclists	The action set seeks to improve the public realm and Greenways within the AAP boundary. Public realm and Greenway improvements would only benefit the qualifying species of the SPA, therefore no effects are anticipated.	N/A	N/A	×
Further Encoura	Further Encouraging Business Investment and Developmen	t en		
Policy SP2: Investment Exemptions	The Morecambe Bay SPA is located directly adjacent to the Morecambe AAP boundary, however, the policy and associated action set	N/A	N/A	×
AS4: Further encourage business investment and development	are likely to lead to development on brownfield land within the existing urban area. Therefore the policy (and action set) would not result in any direct land take within the SPA. No possible impact pathways have been identified and it is very unlikely the qualifying species use the available brownfield sites within Morecambe as they are not considered to contain favourable habitats.	N/A	N/A	×
Morecambe's Ma	Morecambe's Main Seafront and Promenade			
Policy SP3: Morecambe Main Seafront and Promenade	The purpose of the policy and action set is to facilitate development for informal recreation and enjoyment directly adjacent to the SPA. Although the policy seeks to ensure new	The policies state that the council will not permit any proposals that would result in significant adverse effects on Morecambe Bay. Therefore this would offer protection against adverse effects.	N/A	×
AS5: Central Seafront and Main Beach	development is of high quality design there is a risk that over time new recreation facilities and an increase in informal recreation could lead to disturbance of the SPA's qualifying species, as	The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines and a Construction Environmental Management Plan both of which would mitigate against	N/A	×

Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✓)
AS5: Central Seafront and Main Beach	more people may access the beach. However, this is not a current issue for the SPA and assemblages of qualifying interests are located in areas at distance from the immediate shoreline. Risks are therefore considered to be negligible as the SPA is considered to cover a large enough area (see Figure 1 of Appendix B) that facilitating the enjoyment of the bay would not lead to significant effects on the qualifying species. There is the potential for essential coastal defence works to lead to adverse effects on the integrity of the SPA and its qualifying species, particularly through aquatic contamination during construction works.	adverse effects. National legislation and guidance would also prevent inappropriate development within and adjacent to the SPA.	N/A	×
Policy DO1: The Battery	The policy and associated action set seek to facilitate the development of leisure and		N/A	×
AS6: Western Seafront and Beach	recreation facilities (and some retail and food / drink outlets) within the Battery area of Morecambe which is located directly adjacent to the SPA. No direct land take within the SPA is proposed. The SPA supports an internationally important seabird assemblage of at least 20,000 waterfowl therefore an increase in leisure and recreation in the area (including water sports within the SPA) could lead to disturbance of qualifying species within the SPA (although the		N/A	×
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Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✓)
	site is considered to be relatively robust and cover a large enough area for carefully controlled recreation activities to avoid the bird assemblages). Although the policy supports new development on brownfield land there remains an element of risk that new development in this area may lead to the contamination of the SPA, particularly during construction works.			
Policy DO2: Strategic Leisure - Seafront Headland, Central Promenade	It is unlikely that the policy / action set would lead to any significant impacts on the SPA. The policy and action set seek to facilitate low impact leisure development (e.g. multi-games space, crazy golf, outdoor gym etc) over the short to		N/A	×
AS7: Seafront Headland, Central Promenade	medium-term and additional visitor / residential accommodation in the long-term on the brownfield site (located directly adjacent to the SPA). Although no direct land take would be required within the SPA there is a small risk that the SPA may become contaminated during the construction works associated with the visitor / residential accommodation. It is very unlikely that the site is used by the qualifying species outside the designation as the habitats on the site are not considered to be favourable.		N/A	×
The Town Centre	-	_		

Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
Policy SP4: Town Centre	Guiding town centre development to a defined town centre boundary within an existing urban area would not affect the qualifying features of the SPA. Although the allcoation is located approximately 37m from the SPA no impact pathways have been identified and no effects are considered feasible.	N/A	N/A	×
Policy DO3: The Andale and Area	This policy would not affect the qualifying species of the SPA, as the policy would lead to new development within an existing urban area, approximately 95m from the SPA.	N/A	N/A	×
Policy DO4: West View	Policy DO4 is a brownfield allocation situated approximately 65m from the SPA boundary. However, it is unlikely that proposed town centre development would lead to significant adverse effects on the SPA's qualifying species. This is because no possible impact pathways have been identified (the site is situated behind the promenade and Marine Road Central and is a previously developed site (a car park) - therefore is unlikely to significantly increase surface water run-off) and it is very unlikely that the qualifying species use this site as it is not considered to contain favourable habitats.	N/A	N/A	×
Policy DO5: Festival Market and Area	Policy DO5 is a large brownfield allocation located approximately 36m from the SPA boundary. The site is allocated for opportunities for investment and the development of town	N/A	N/A	×

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Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (*/*)
	centre uses. No land take within the SPA would be required, no potential impact pathways are considered feasible (the site is situated behind the promenade and Marine Road Central) and it is very unlikely that the qualifying mobile species use this site as it is not considered to contain favourable habitats.			
Action Set AS8: The Town Centre	AS8 seeks to improve the public realm within Morecambe Town Centre. It includes provisions such as improving road / pavement surfaces, revising traffic arrangements, improving lighting, signage etc. It is very unlikely that any of the provisions set out in the action set would affect the integrity of the SPA as all improvements would be undertaken within an existing urban environment.	N/A	N/A	×
South of the Town Centre	vn Centre			
AS9: Edge of Centre Retail Park	AS9 seeks to improve the appearance and connectivity to the existing retail park south of the town centre. As the action set would lead to very limited development within an existing retail park no effects are considered feasible on the SPA.	N/A	N/A	×
Policy DO6: Former Frontierland Site	Policy DO6: Policy DO6 is a brownfield site located Former Frontierland Site for residential development. Although the site is currently vacant and derelict within close proximity of the SPA it is unlikely that the SPA's	The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines and a Construction Environmental Management Plan both of which would mitigate against	N/A	×

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Morecambe Bay SPA	SPA			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/√)
	qualifying species (although mobile) use the site as it is not considered to contain favourable habitats. In addition, as the allocation is located on previously developed land it is unlikely to significantly increase the risk of surface water run-off entering the SPA.	adverse effects.		
Travel and Transport	sport			
AS10: Traffic route signage to and from central Morecambe	The action sets within this policy group would not lead to any large scale infrastructure improvements within Morecambe. The action sets seek to ensure opportunities to maximise	N/A	N/A	×
AS11: Parking provision and management	the use of sustainable modes of transport are sought in new development and adequate parking provision is provided along with	N/A	N/A	×
AS12: Bus services		N/A	N/A	×
AS13: Rail services		N/A	N/A	×

Table 4-4 Screening the Morecambe AAP: Morecambe Bay Ramsar Site

Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
Managing Development	pment			
Policy SP1: Key Pedestrian Routes and Spaces	This policy seeks to facilitate pedestrian movement around Morecambe and ensure that new development relates well to the pedestrian network. Although the Morecambe Bay Ramsar site is located directly adjacent to Morecambe's promenade (a key pedestrian route) the policy would not result in any direct land take within the Ramsar site. The policy is likely to lead to limited new development on previously developed sites, therefore is unlikely to significantly increase surface water run-off.	Although no significant effects were anticipated on the Ramsar site, the policy includes a specific cross reference to the Development Management DPD, stating that new development would be expected to comply with all relevant policy within the Development Management DPD. Policy EN2.1 of the Development Management DPD ensures new development does not lead to an adverse effect on the integrity of a site of international importance for biodiversity either alone or in combination with other plans or projects. The policy also ensures sites that could be functionally linked to European designated wildlife sites are not affected by new development proposals and where necessary require that proposals are accompanied by a project specific HRA Screening Report. The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines, a Construction Environmental Management Plan and the Development Management DPD ensures water resources are protected through resisting developments which would pose an unacceptable threat to surface water and groundwater quantity and quality. This also includes pollution caused by water run-off from developments into nearby waterways. All of which could mitigate adverse effects.	N/A	×

Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
AS3: Improving Key Routes for Pedestrians and Cyclists	The action set seeks to improve the public realm and Greenways within the AAP boundary. Public realm and Greenway improvements would only benefit the qualifying species of the Ramsar site, therefore no effects are anticipated.	N/A	N/A	×
Further Encoura	Further Encouraging Business Investment and Developmen	=		
Policy SP2: Investment Exemptions	The Morecambe Bay Ramsar site is located directly adjacent to the Morecambe AAP boundary, however, the policy and associated	N/A	N/A	×
AS4: Further encourage business investment and development	action set are likely to lead to development on brownfield land within the existing urban area. Therefore the policy (and action set) would not result in any direct land take within the Ramsar site. No possible impact pathways have been identified and it is very unlikely the qualifying species use the available brownfield sites within Morecambe as they are not considered to contain favourable habitats.	N/A	N/A	×
Morecambe's Ma	Morecambe's Main Seafront and Promenade			
Policy SP3: Morecambe Main Seafront and Promenade	The purpose of the policy and action set is to facilitate development for informal recreation and enjoyment directly adjacent to the Ramsar site. Although the policy seeks to ensure new	The policies state that the council will not permit any proposals that would result in significant adverse effects on Morecambe Bay. Therefore this would offer protection against adverse effects.	N/A	×
AS5: Central Seafront and Main Beach	development is of high quality design there is a risk that over time new recreation facilities and an increase in informal recreation could lead to disturbance of the Ramsar's qualifying species,	The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines and a Construction Environmental Management Plan both of which would mitigate against	N/A	×

Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/√)
AS5: Central Seafront and Main Beach	as more people may access the beach. However, this is not a current issue for the site and assemblages of qualifying interests are located in areas at distance from the immediate shoreline. Risks are therefore considered to be negligible as the site is considered to cover a large enough area (see Figure 1 of Appendix B) that facilitating the enjoyment of the bay would not lead to significant effects on the qualifying species. There is the potential for essential coastal defence works to lead to adverse effects on the integrity of the Ramsar site and its qualifying species, particularly through aquatic contamination during construction works.	adverse effects. National legislation and guidance would also prevent inappropriate development within and adjacent to the Ramsar site.	N/A	×
Policy DO1: The Battery	The policy and associated action set seek to facilitate the development of leisure and		N/A	×
AS6: Western Seafront and Beach	recreation facilities (and some retail and food / drink outlets) within the Battery area of Morecambe which is located directly adjacent to the Ramsar site. No direct land take within the Ramsar site is proposed. The Ramsar site supports an internationally important bird assemblage over winter and during the spring / summer therefore an increase in leisure and recreation in the area (including water sports within the Ramsar site) could lead to disturbance of qualifying species within the Ramsar site (although the site is considered to		N/A	×

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Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (★/✔)
	be relatively robust and cover a large enough area that this would not be an issue). The site is located within Flood Zone 2 and although new development is proposed on brownfield land there remains an element of risk that new development in this area may lead to the contamination of the Ramsar site, particularly during construction works.			
Policy DO2: Strategic Leisure - Seafront Headland, Central Promenade	It is unlikely that the policy / action set would lead to any significant impacts on the Ramsar site. The policy and action set seek to facilitate low impact leisure development (e.g. multigames space, crazy golf, outdoor gym etc) over		N/A	×
AS7: Seafront Headland, Central Promenade	the short to medium-term and additional visitor / residential accommodation in the long-term on the brownfield site (located directly adjacent to the Ramsar site). Although no direct land take would be required within the Ramsar site there is a small risk that the Ramsar site may become contaminated during the construction works associated with new visitor / residential development. It is very unlikely that the site is used by the qualifying species outside the designation as the habitats on the site are not considered to be favourable.		N/A	×
The Town Centre				

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Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✔)
Policy SP4: Town Centre	Guiding town centre development to a defined town centre boundary within an existing urban area would not affect the qualifying species of the Ramsar site. Although the allocation is located approximately 37m from the Ramsar site no impact pathways have been identified and no effects are considered feasible.	N/A	N/A	×
Policy DO3: The Andale and Area	This policy would not affect the qualifying species of the Ramsar site, as the policy would lead to new development within an existing urban area, approximately 95m from the Ramsar.	N/A	N/A	×
Policy DO4: West View	Policy DO4 is a brownfield allocation situated approximately 65m from the Ramsar site boundary. However, it is unlikely that proposed town centre development would lead to significant adverse effects on the Ramsar's qualifying species. This is because no possible impact pathways have been identified (the site is situated behind the promenade and Marine Road Central and is a previously developed site (a car park) - therefore is unlikely to significantly increase surface water run-off) and it is very unlikely that the qualifying species use this site as it is not considered to contain favourable habitats.	N/A	N/A	×
Policy DO5: Festival Market	Policy DO5 is a large brownfield allocation located approximately 36m from the Ramsar site	N/A	N/A	×
A 0000 (40) 1000 C -11-11-11-11	2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			

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Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
and Area	boundary. The site is allocated for opportunities for investment and the development of town centre uses. No land take within the Ramsar site would be required, no potential impact pathways are considered feasible (the site is situated behind the promenade and Marine Road Central) and it is very unlikely that the qualifying mobile species use this site as it is not considered to contain favourable habitats.			
Action Set AS8: The Town Centre	AS8 seeks to improve the public realm within Morecambe Town Centre. It includes provisions such as improving road / pavement surfaces, revising traffic arrangements, improving lighting, signage etc. It is very unlikely that any of the provisions set out in the action set would affect the integrity of the Ramsar site as all improvements would be undertaken on previously developed brownfield land within an existing urban environment.	N/A	N/A	×
South of the Town Centre AS9: Edge of Centre Retail Park the town very limite park no e Ramsar s	AS9 seeks to improve the appearance and connectivity to the existing retail park south of the town centre. As the action set would lead to very limited development within an existing retail park no effects are considered feasible on the Ramsar site.	N/A	N/A	×
Policy DO6: Former	Policy DO6 is a brownfield site located approximately 25m from the Ramsar site and	The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution	N/A	×

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Morecambe Bay Ramsar site	Ramsar site			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✔)
Frontierland Site	allocated for residential development. Although the site is currently vacant and derelict within close proximity of the Ramsar site it is unlikely that the Ramsar's qualifying species (although mobile) use the site as it is not considered to contain favourable habitats. In addition, as the allocation is located on previously developed land it is unlikely to significantly increase the risk of surface water run-off entering the Ramsar site.	Prevention Guidelines and a Construction Environmental Management Plan both of which would mitigate against adverse effects.		
Travel and Transport	port			
AS10: Traffic route signage to and from central Morecambe	The action sets within this policy group would not lead to any large scale infrastructure improvements within Morecambe. The action sets seek to ensure opportunities to maximise	N/A	N/A	×
AS11: Parking provision and management	the use of sustainable modes of transport are sought in new development and adequate parking provision is provided along with	N/A	N/A	×
AS12: Bus services		Y/N	N/A	×
AS13: Rail services		N/A	N/A	×

Table 4-5 Screening the Morecambe AAP: Morecambe Bay SAC

Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✓)
Managing Development	pment			
Policy SP1: Key Pedestrian Routes and Spaces	The policy seeks to facilitate pedestrian movement around Morecambe and ensure that new development relates well to the pedestrian network. Although the Morecambe Bay SAC is located directly adjacent to the Morecambe's promenade (a key pedestrian route) the policy would not result in any direct land take within the SAC. In addition, the policy is likely to lead to limited new development on previously developed sites, therefore unlikely to significantly increase surface water run-off which may pollute the SAC	Although no significant effects were anticipated on the SAC, the policy includes a specific cross reference to the Development Management DPD, stating that new development would be expected to comply with all relevant policy within the Development Management DPD. Policy EN2.1 of the Development Management DPD ensures new development does not lead to an adverse effect on the integrity of a site of international importance for biodiversity either alone or in combination with other plans or projects. The pollution of water courses would be controlled by the Environment Agency's Pollution Prevention Guidelines, a Construction Environmental Management Plan and the Development Management DPD. Policy EN5.3 of the Development Management DPD ensures water resources are protected through resisting developments which would pose an unacceptable threat to surface water and groundwater quantity and quality. This also includes pollution caused by water run-off from developments into nearby waterways. All of which could mitigate adverse effects.	N/A	×
AS3: Improving Key Routes for Pedestrians and Cyclists	The action set seeks to improve the public realm and Greenways within the AAP boundary. No improvements would be undertaken within the SAC, therefore no impact pathways have been identified and no direct / indirect effects are considered feasible on the SAC's qualifying	N/A	N/A	×
Habitate Regulations As	Habitate Bernlations Assessment—Morecambe Area Action Dlan			

Habitats Regulations Assessment—Morecambe Area Action Plan Hyder Consulting (UK) Limited-2212959

Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/✔)
	features.			
Further Encoura	Further Encouraging Business Investment and Development	t en		
Policy SP2: Investment Exemptions	The Morecambe Bay SAC is located directly adjacent to the Morecambe AAP boundary, however, the policy and associated action set	N/A	N/A	×
AS4: Further encourage business investment and development	are likely to lead to development on brownfield land within the existing urban area. Therefore the policy (and action set) would not result in any direct land take within the SAC. No possible impact pathways have been identified and no direct / indirect effects are considered feasible on the SAC's qualifying features.	N/A	N/A	×
Morecambe's Ma	Morecambe's Main Seafront and Promenade			
Policy SP3: Morecambe Main Seafront and Promenade	The purpose of the policy and action set is to facilitate development for informal recreation and enjoyment directly adjacent to the SAC. Although the policy seeks to ensure new	The policies state that the council will not permit any proposals that would result in significant adverse effects on Morecambe Bay. Therefore this would offer protection against adverse effects.	N/A	×
AS5: Central Seafront and Main Beach	development is of high quality design there is a risk that over time new recreation facilities and an increase in informal recreation could lead to increased pressure within the SAC, as more people may access the beach. Recreational pressure is identified on the UK SAC data form as a potential threat to the site. However, the qualifying interests of the site are located at distance from the Morecambe seafront so significant effects are not considered likely as a	Increased recreational pressure within the SAC could be mitigated through good management practice. In addition, the Morecambe Bay SAC is considered to cover a large enough area (see Figure 1 of Appendix B) that facilitating the enjoyment of the bay would not lead to significant effects on the qualifying habitats such as mudflats and sandflats not covered by seawater at low tide. The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution	N/A	×

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Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
AS5: Central Seafront and Main Beach	result of greater use of the beachfront area. There is the potential for essential coastal defence works to lead to adverse effects on the integrity of the SAC and its qualifying species, particularly through aquatic contamination during construction works (although the SAC is considered to be a robust site).	Management Plan both of which would mitigate against adverse effects. National legislation and guidance would also prevent inappropriate development within and adjacent to the SAC.	N/A	×
Policy DO1: The Battery	The policy and associated action set seek to facilitate the development of leisure and		N/A	×
AS6: Western Seafront and Beach	recreation facilities (and some retail and food / drink outlets) within the Battery area of Morecambe which is located directly adjacent to the SAC. No direct land take within the SAC is proposed. However, an increase in leisure and recreation in the area (including water sports within the SAC) may lead to direct impacts on the mudflats and sandflats not covered by seawater at low tide. Although the site is considered to be relatively robust, recreational pressure is identified on the UK SAC data form as a potential threat to the site. However, the qualifying interests of the site are located at distance from the Morecambe seafront so significant effects are not considered likely as a result of greater use of the beachfront area. Although new development is proposed on brownfield land there remains an element of risk that new development in this area may lead to the contamination of the SAC, particularly during		N/A	×

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Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
	construction works.			
Policy DO2: Strategic Leisure - Seafront Headland, Central Promenade	It is unlikely that the policy or action set would lead to any significant impacts on the SAC. The policy and action set seek to facilitate low impact leisure development (e.g. multi-games space, crazy golf, outdoor gym etc) over the short to		N/A	×
AS7: Seafront Headland, Central Promenade	medium-term and additional visitor / residential accommodation in the long-term on the brownfield site (located directly adjacent to the SAC). Although no direct land take would be required within the SAC there is a small risk that the SAC may become contaminated during visitor / residential accommodation construction works.		N/A	×
The Town Centre				
Policy SP4: Town Centre	Guiding town centre development to a defined town centre boundary within an existing urban area would not affect the qualifying features of the SAC. Although the allocation is located approximately 37m from the SAC no impact pathways have been identified and no effects are considered feasible.	N/A	N/A	×
Policy DO3: The Andale and Area	This policy would not affect the qualifying features of the SAC, as the policy would lead to new development within an existing urban area, approximately 95m from the European designation.	N/A	N/A	×

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Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/√)
Policy DO4: West View	Policy DO4 is a brownfield allocation situated approximately 65m from the SAC boundary. However, it is unlikely proposed town centre development would lead to significant adverse effects on the SAC's qualifying features. This is because no possible impact pathways have been identified (the site is situated behind the promenade and Marine Road Central and is a previously developed site (a car park) - therefore is unlikely to significantly increase surface water run-off).	N/A	N/A	×
Policy DO5: Festival Market and Area	Policy DO5 is a large brownfield allocation located approximately 36m from the SAC boundary. The site is allocated for opportunities for investment and the development of town centre uses. No land take within the SAC would be required, no potential impact pathways are considered feasible (the site is situated behind the promenade and Marine Road Central).	N/A	N/A	×
Action Set AS8: The Town Centre	AS8 seeks to improve the public realm within Morecambe Town Centre. It includes provisions such as improving road / pavement surfaces, revising traffic arrangements, improving lighting, signage etc. It is very unlikely any of the provisions set out in the action set would affect the integrity of the SAC as all improvements would be undertaken within an existing urban environment.	N/A	N/A	×

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Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
South of the Town Centre	n Centre			
AS9: Edge of Centre Retail Park	AS9 seeks to improve the appearance and connectivity to the existing retail park south of the town centre. As the action set would lead to very limited development within an existing retail park no effects considered feasible on the SAC.	N/A	N/A	×
Policy DO6: Former Frontierland Site	Policy DO6 is a brownfield site located approximately 25m from the SAC and allocated for residential development. Although the site is currently vacant and derelict within close proximity of the SAC its location on previously developed land make it very unlikely that new development would significantly increase the risk of surface water run-off entering the SAC.	The pollution of water courses would be controlled by adherence to the Environment Agency's Pollution Prevention Guidelines and a Construction Environmental Management Plan both of which would mitigate against adverse effects.	N/A	×
Travel and Transport	port			
AS10: Traffic route signage to and from central Morecambe	The action sets within this policy group would not lead to any large scale infrastructure improvements within Morecambe. The action sets seek to ensure opportunities to maximise	N/A	N/A	×
AS11: Parking provision and management	the use of sustainable modes of transport are sought in new development and adequate parking provision is provided along with appropriate signage.	N/A	N/A	×
AS12: Bus services		N/A	N/A	×

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Morecambe Bay SAC	SAC			
Morecambe AAP Policy	Development and Land Use Change and Potential Effects	Avoidance and Mitigation Potential	In-combination Effects Potential	Appropriate Assessment Required? (≭/≺)
AS13: Rail services		N/A	N/A	×

4.4 In-Combination Effects

The HRA needs to consider not only the strategies and policies within the Morecambe AAP that may lead to significant impacts upon European sites on their own but also those that may have a significant impact in-combination with other plans and projects. These may be spatial planning documents produced by the neighbouring authorities or major developments anticipated within the Lancaster. Table 2-1 outlines relevant plans and projects that were considered in-combination with the Morecambe AAP.

Tables 4-3 to 4-5 identify that the Morecambe AAP would not result in any significant adverse effects upon the European sites identified. Furthermore, it has been determined that the Morecambe AAP will have zero effects upon these sites not merely no significant effects, and as such it would therefore not be possible to result in an in-combination effect with any other plans or projects.

5 CONCLUSION

It has been concluded that the Morecambe AAP is unlikely to have any significant effects on the European Sites identified, either alone or in-combination with other plans or projects. **As such, it is not proposed to undertake Appropriate Assessment.** This conclusion is still valid after the consultation process with the public and stakeholders. The responses received have not resulted in any changes to the conclusions or assessments made within this document.

We seek Natural England's opinion and agreement or otherwise with this conclusion.

Appendix A

Conservation Objectives





European Site Conservation Objectives for Morecambe Bay Special Protection Area Site Code: UK9005081

With regard to the individual species and/or assemblage of species for which the site has been classified ('the Qualifying Features' listed below);

Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.

Subject to natural change, to maintain or restore:

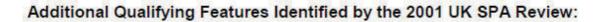
- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The populations of the qualifying features;
- The distribution of the qualifying features within the site.

Qualifying Features:

- A040 Anser brachyrhynchus; Pink-footed goose (Non-breeding)
- A048 Tadorna tadorna; Common shelduck (Non-breeding)
- A054 Anas acuta; Northern pintail (Non-breeding)
- A063 Somateria mollissima; Common eider (Breeding)
- A130 Haematopus ostralegus; Eurasian oystercatcher (Non-breeding)
- A137 Charadrius hiaticula; Ringed plover (Non-breeding)
- A140 Pluvialis apricaria; European golden plover (Non-breeding)
- A141 Pluvialis squatarola; Grey plover (Non-breeding)
- A143 Calidris canutus; Red knot (Non-breeding)
- A149 Calidris alpina alpina; Dunlin (Non-breeding)
- A157 Limosa lapponica; Bar-tailed godwit (Non-breeding)
- A160 Numenius arquata; Eurasian curlew (Non-breeding)
- A162 Tringa totanus; Common redshank (Non-breeding)
- A169 Arenaria interpres; Ruddy turnstone (Non-breeding)
- A183 Larus fuscus; Lesser black-backed gull (Breeding)
- A184 Larus argentatus; Herring gull (Breeding)
- A191 Sterna sandvicensis; Sandwich tern (Breeding)
- A193 Sterna hirundo; Common tern (Breeding)
- A195 Sterna albifrons; Little tern (Breeding)

Waterbird assemblage

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A144 Calidris alba; Sanderling (Non-breeding)
Seabird assemblage



European Site Conservation Objectives for Morecambe Bay Special Area of Conservation Site code: UK0013027

With regard to the natural habitats and/or species for which the site has been designated ('the Qualifying Features' listed below);

Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.

Subject to natural change, to maintain or restore:

- > The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely:
- The populations of qualifying species:
- > The distribution of qualifying species within the site.

Qualifying Features:

- H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
- H1130. Estuaries
- H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
- H1150. Coastal lagoons*
- H1160. Large shallow inlets and bays
- H1170. Reefs
- H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves
- H1310. Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- H1330. Atlantic salt meadows (Glauco-Puccinellietalia maritimae)
- H2110. Embryonic shifting dunes
- H2120. Shifting dunes along the shoreline with Ammophila arenaria ("white dunes"); Shifting dunes with marram
- H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
- H2150. Atlantic decalcified fixed dunes (Calluno-Ulicetea); Coastal dune heathland*
- H2170. Dunes with Salix repens ssp. argentea (Salicion arenariae); Dunes with creeping willow
- H2190. Humid dune slacks
- S1166. Triturus cristatus; Great crested newt
- * denotes a priority natural habitat or species (supporting explanatory text on following page)

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Conservation Objective Comments Morecambe Bay and the Duddon Estuary European Marine Site (SPA, SAC and Ramsar) Regulation 35 Package Subject to natural change, maintain the large shallow In pursuit of the conservation objective for estuaries, the inlets and bays in favourable condition, in particular: relevant and competent authorities for the Morecambe Bay European marine site are advised to manage human activities Intertidal boulder and cobble skear communities within their remit such that they do not result in deterioration or Subtidal boulder and cobble skear communities disturbance to habitats or species, for which the site has been Brittlestar bed communities selected, through any of the following: Intertidal boulder clay communities Removal and/or smothering of embayment habitats. Coastal lagoon communities Physical damage resulting from siltation, abrasion and/or Intertidal mudflat and sandflat communities selective extraction. Pioneer saltmarsh communities Increased synthetic, non synthetic toxic and/or radionuclide contamination. Saltmarsh communities Nutrient and/or organic enrichment. Increases in turbidity. Introduction of microbial pathogens, introduction of nonnative species and/or selective extraction of species for which the site has been selected or which form important food sources for such species. Subject to natural change, maintain the estuaries in Removal and/or smothering of estuarine habitats. favourable condition, in particular: (bullet points for large shallow inlets and bays also relevant) Estuaries Subject to natural change, maintain the mudflats and Removal and/or smothering of intertidal mudflats and sandflats not covered by seawater at low tide sandflats. (intertidal mudflats and sandflats) in favourable (bullet points for large shallow inlets and bays also relevant) condition, in particular: Mud communities Sand communities Eelgrass bed communities Subject to natural change, maintain the sandbanks Removal and/or smothering of sandbanks covered by which are slightly covered by seawater all the time in seawater all the time. favourable condition, in particular: (bullet points for large shallow inlets and bays also relevant) Sandbanks slightly covered by seawater all the Subject to natural change, maintain reefs in favourable In pursuit of the conservation objective for reefs, the relevant condition, in particular: and competent authorities for the Morecambe Bay European marine site are advised to manage human activities within Cobble and boulder skears their remit such that they do not result in deterioration or Mussel beds disturbance to habitats or species, for which the site has been Sabellaria aveolata reefs selected, through any of the following: Removal and/or smothering of reefs. (bullet points for large shallow inlets and bays also relevant) Subject to natural change, maintain the Glasswort In pursuit of the conservation objective for the pioneer Salicornia spp and other annuals colonising mud and saltmarsh, the relevant and competent authorities for sand (pioneer saltmarsh) in favourable condition, in Morecambe Bay European marine site are advised to particular: manage human activities within their remit such that they do not result in deterioration or disturbance to habitats or species

Conservation Objective	Comments
■ The glasswort <i>Salicornia spp</i> communities Subject to natural change, maintain the Atlantic salt	for which the site has been selected, through any of the following: Removal of pioneer saltmarsh habitats. Physical damage resulting from abrasion. Increased synthetic and/or non synthetic toxic contamination and/or radionuclides. Translocation of species. In pursuit of the conservation objective for the saltmarsh, the
meadows Glauco-Puccinellietalia (saltmarsh) in favourable condition, in particular: Low marsh communities Mid marsh communities High marsh communities Transitional high marsh communities	relevant and competent authorities for Morecambe Bay European marine site are advised to manage human activities within their remit such that they do not result in deterioration or disturbance to habitats or species, for which the site has been selected, through any of the following: As above except for the substitution of saltmarsh habitats instead of pioneer saltmarsh habitats.
Subject to natural change, to maintain in favourable condition the habitats of the internationally important populations of regularly occurring bird species listed on Annex 1 of the Birds Directive, in particular: Shingle areas Subject to natural change, to maintain in favourable condition the habitats of the internationally important assemblage of waterfowl and seabirds and the internationally important populations of regularly occurring migratory species, in particular: Intertidal mudflat and sandflat communities Intertidal and subtidal boulder and cobble skear communities Saltmarsh communities Coastal lagoon communities	In pursuit of the conservation objective for habitats supporting internationally important populations of regularly occurring species listed on Annex 1 of the Birds Directive, the relevant and competent authorities for Morecambe Bay European marine site are advised to manage human activities within their remit such that they do not result in deterioration or disturbance to habitats or species, for which the site has been selected, through any of the following: Removal of habitats. Physical damage from abrasion and or selective extraction. Disturbance from noise and/or visual activities. In pursuit of the conservation objective for habitats supporting the internationally important assemblages of waterfowl and seabirds including internationally important populations of regularly occurring migratory species, the relevant and competent authorities for Morecambe Bay European marine site are advised to manage human activities within their remit such that they do not result in deterioration or disturbance to habitats or species, for which the site has been selected, through any of the following: Removal of habitats. Physical damage from selective extraction. Disturbance from noise and/or visual activities. Nutrient and/or organic enrichment and/or changes in thermal regime. Changes in salinity and turbidity. Increased synthetic and/or non synthetic toxic contamination and/or radionuclides.

Appendix B

Figures

Appendix C

Morecambe Bay Pavements SAC - Results of April 2012 SSSI Condition Survey



Morecambe Bay Pavem	ents SAC
SSSI	Results of April 2012 SSSI Condition Survey
Whitbarrow SSSI	Area favourable 34.88%
	Area unfavourable but recovering 61.09%
	Area unfavourable no change 4.03%
	Area unfavourable declining 0%
	Area destroyed / part destroyed 0%
Underlaid Wood SSSI	Area favourable 0%
	Area unfavourable but recovering 88.38%
	Area unfavourable no change 0%
	Area unfavourable declining 11.62%
	Area destroyed / part destroyed 0%
Marble Quarry And Hale	Area favourable 4.99%
Fell SSSI	Area unfavourable but recovering 95.01%
	Area unfavourable no change 0%
	Area unfavourable declining 0%
	Area destroyed / part destroyed 0%
Gait Barrows SSSI	Area favourable 81.52%
	Area unfavourable but recovering 18.48%
	Area unfavourable no change 0%
	Area unfavourable declining 0%
	Area destroyed / part destroyed 0%
Thrang End And Yealand	Area favourable 0%
Hall Allotment SSSI	Area unfavourable but recovering 100%
	Area unfavourable no change 0%
	Area unfavourable declining 0%
	Area destroyed / part destroyed 0%
Hawes Water SSSI	Area favourable 18.20%
	Area unfavourable but recovering 80.98%
	Area unfavourable no change 0.82%
	Area unfavourable declining 0%
	Area destroyed / part destroyed 0%
Middlebarrow SSSI	Area favourable 4.58%
	Area unfavourable but recovering 54.86%
	Area unfavourable no change 0%
	Area unfavourable declining 40.56%
	Area destroyed / part destroyed 0%
Scout and Cunswick Scars	Area favourable 70.92%
SSSI	Area unfavourable but recovering 28.71%
	Area unfavourable no change 0%

Morecambe Bay Pavem	ents SAC
SSSI	Results of April 2012 SSSI Condition Survey
	Area unfavourable declining 0.36%
	Area destroyed / part destroyed 0%
Farleton Knott SSSI	Area favourable 46.71%
	Area unfavourable but recovering 36.35%
	Area unfavourable no change 0%
	Area unfavourable declining 16.94%
	Area destroyed / part destroyed 0%
Hutton Roof Crags SSSI	Area favourable 17.63%
	Area unfavourable but recovering 53.93%
	Area unfavourable no change 3.84%
	Area unfavourable declining 24.60%
	Area destroyed / part destroyed 0%





Lancaster City Council Morecambe Area Action Plan

Sustainability Appraisal and Strategic Environmental Assessment

Sustainability Appraisal Report

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Lancaster City Council Morecambe Area Action Plan

Sustainability Appraisal and Strategic Environmental Assessment

Sustainability Appraisal Report

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Report No 011-WX44644-WXR-03-F

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This report has been prepared for Lancaster City Council in accordance with the terms and conditions of appointment for Sustainability Appraisal and Strategic Environmental Assessment dated 7 June 2012. Hyder Consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.



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Consultation Response Table

Abbreviations

AAP	Area Action Plan
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
cSAC	Candidate SAC
DPD	Development Plan Document
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
LSOA	Lower Super Output Area
pSPA	Potential SPA
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable (urban) Drainage Systems

1 Introduction

1.1 Background to and Purpose of this Report

Lancaster City Council is in the process of preparing its Morecambe Area Action Plan (AAP) Development Plan Document (DPD). The AAP will form part of the Lancaster Local Plan, which, together with the Core Strategy (adopted 2008), Land Allocations DPD (currently in preparation) and Development Management Policies DPD (currently in preparation) will replace the existing Lancaster District Plan that was adopted on 16 April 2004. The AAP and the Core Strategy will form the most important considerations when determining planning applications in central Morecambe.

As part of the AAP preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is being undertaken. The term SA shall be used to refer to the combined SA/SEA for the remainder of this report. This report presents the process and findings of the SA of the AAP.

1.1.1 Background to and Purpose of the AAP

The Morecambe AAP is a spatial plan for central Morecambe and covers an area that extends the length of the main promenade from the Battery in the west almost to the Town Hall in the east and landward takes in the main central parts of the town. The Morecambe AAP provides a framework to facilitate and manage development and change within central Morecambe to 2021 (the period of the Core Strategy). The Morecambe AAP is the document through which the vision and objectives for the area have been developed, considered and co-ordinated for implementation. It identifies key infrastructure projects that will contribute to the regeneration of central Morecambe. It directs investment, provides increased certainty to potential investors, builds confidence and assists the Council in securing funding and facilitating new development. It is acknowledged that economic circumstances will affect the pace of regeneration, however, bringing forward the AAP will ensure that central Morecambe is well placed to capture and benefit from an economic upturn.

The Morecambe AAP includes:

- A Plan Vision and Spatial Approach;
- Four Spatial Policies;
- Six Development Opportunity Policies; and
- 15 Action Sets.

Lancaster City Council has been developing the Morecambe AAP since 2010 and a number of documents have been produced and been subject to SA. Table 1-1 provides a summary of the documents that have been produced, whether they were subject to SA and SEA and when consultation occurred.

Table 1-1 Morecambe AAP Development, the SA Process and Consultation

Morecambe AAP Document	Subject to SA/SEA	Consultation Dates
Draft Scoping	Yes – a draft SA Scoping report was produced by Lancaster City Council in March 2010 and consulted upon alongside the Draft Morecambe AAP Scoping Document.	Monday 22nd March and ended on 26th April 2010

Morecambe AAP Document	Subject to SA/SEA	Consultation Dates
A series of Topic Papers were produced to inform the development of the AAP.	Yes – an updated SA Scoping Report was produced by Lancaster City Council in July 2010. This accompanied a consultation on the Vision and Approach Topic Paper.	Monday 28th June 2010 - 30th August 2010
	Yes – as initial SA of outline options was produced and the results documented in Hyder Report Reference: 009-WX44644-WXR-01. This accompanied a consultation on the Outline Options Narrative Topic Paper	Friday 18 November 2011 - Friday 6 January 2012.
Discrete Investment / Development Options Report	Yes - the options that formed part of this document were appraised and the results documented in Hyder Report Reference: 010-WX44644-WXR-02.	The Discrete Investment / Development Options Report SA Report was not issued for consultation.
Preferred Option Morecambe AAP	Yes - The results of the appraisal are presented	in this SA Report.

Table 1-1 demonstrates that a highly iterative approach has been adopted for the development of the Morecambe AAP with assessments of its sustainability performance having been completed and feedback provided to the plan-makers. This report does not repeat the appraisal results for earlier iterations of the Morecambe AAP in detail, although a summary of findings is provided in Section 3. The purpose of this SA Report is to present the results of the appraisal of the Preferred Option Morecambe AAP dated June 2012.

1.2 Background to and Purpose of the SA Report

SA (incorporating the requirements of the SEA Directive¹) has been undertaken on the Morecambe AAP throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Morecambe AAP and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages (refer to Section 2.2) in which the elements of the Morecambe AAP are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.

This SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the Morecambe AAP. The key aims are to:

- Provide information on the Morecambe AAP and the SA process;
- Present the key existing social, economic and environmental conditions within Morecambe, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;
- Identify, describe and evaluate the likely significant effects of the Morecambe AAP;

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

- Recommend measures to avoid, reduce or offset any potentially significant adverse effects; and
- Propose a monitoring framework that can be used to monitor the identified significant effects.

It is essential that the Preferred Option Morecambe AAP is read in conjunction with this SA Report.

1.3 Structure of this Report

Table 1-2 provides an outline of the contents and structure of this SA Report.

Table 1-2 Contents and Structure of the SA Report

Section of SA Report	Outline Content
Non Technical Summary (separate document)	Summary of the SA process and SA Report in plain English (a legislative requirement).
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to and purpose of the Morecambe AAP and this SA Report, and presents the structure of this SA Report. It also introduces the concept and application of the Habitats Regulations Assessment (HRA) process.
2: The Sustainability Appraisal	This section outlines the legal requirements for the SA, including links with the SEA Directive. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Morecambe AAP (including the SA Framework), together with an overview of the consultation requirements.
3: The Morecambe AAP Alternatives	Outlines the development of alternative options that were considered and appraised as part of the development of the Morecambe AAP.
4: Appraisal of the Preferred Option Morecambe AAP	Presents the appraisal of the individual elements of the Morecambe AAP against the SA Framework including cumulative effects.
5: Monitoring Framework	Provides an outline of the proposed monitoring framework.
6: Next Steps	Identifies the next steps in the SA process, following consultation on this SA Report. Details of how to comment upon this SA Report are also provided.
Appendix A	Analysis of relevant plans, programmes and environmental protection objectives and their relationship/conflicts with the Morecambe AAP and the SA.
Appendix B	Baseline data, a summary of which is presented in Chapter 2.
Appendix C	SA Objective Compatibility.
Appendix D	Appraisal of Spatial Policies and Development Opportunities
Appendix E	Figures
Appendix F	Update following receipt of consultation responses

1.4 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC), candidate Special Area of Conservation (cSAC), Special Protection Area (SPA), potential Special Protection Area (pSPA) and Ramsar site), 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).

The western boundary of Morecambe lies adjacent to the Morecambe Bay SAC, SPA and Ramsar site. A HRA screening exercise is therefore being undertaken in tandem with this SA to determine if the Morecambe AAP (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. This process is documented in a Screening Report that will be submitted to Natural England.

1.5 Update Following Consultation

The Morecambe AAP was released for consultation with the general public and stakeholders, during late 2012 and early 2013. Numerous responses were received and some have resulted in amendments to the document. As a result, it has been necessary to revisit this SA in light of these changes and assess whether any further sustainability impacts are evident.

Appendix F contains a table detailing the consultation responses that have resulted in a change in the Morecambe AAP. The Assessment Matrix contained within Appendix D has been updated to include the amendments completed by Lancaster City Council. These are also reflected in the main body of this SA Report as appropriate. However, the vast majority of the changes are very minor textual amendments and will not result in a change to the conclusions of this report.

2 The Sustainability Appraisal

2.1 Legal Requirements

It is a legal requirement that the Morecambe AAP is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations².

The aim of the SEA is to 'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development' (Article 1 of the SEA Directive).

A combined SA and SEA has been undertaken (hereinafter referred to as SA), as the Morecambe AAP has the potential to have a range of significant sustainability effects (both positive and negative). The SA has been undertaken in accordance with guidance from the Planning Advisory Service (http://www.pas.gov.uk/pas/core/page.do?pageld=152450). In addition, published Government guidance on SEA³ (hereafter referred to as the Practical Guide) has also been followed.

2.2 Stages in the SA Process

Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Morecambe AAP have been appraised using Sustainability Objectives (Table 2-1 provides further detail).

Table 2-1 presents a summary of the key stages of the SA process, together with the SEA Directive requirements for each stage. Reference is given to where the requirements have been addressed within this SA Report.

Table 2-1 Key SEA Directive Requirements

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Morecambe AAP
Stage A: Setting	the context and objectives, establishing the base	line and deciding	g on the scope
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	The environment report should provide information on: "the relationship (of the plan or programme) with other relevant plans and programmes" (Annex 1(a)) "the environmental protection objectives, established at international (European) Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA. An SA Scoping Report was produced by Lancaster City Council which was consulted upon in 2010. During this stage the scope of

² S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

³ ODPM et al. (2005) A Practical Guide to the Strategic Environmental Assessment Directive

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Morecambe AAP
	considerations have been taken into account during its preparation" (Annex 1(e))		the SA for the Morecambe AAP was defined.
A2: Collecting baseline information	aseline "relevant aspects of the current state of the environment		The results of stages A1-A4 are presented in this SA Report.
A3: Identifying sustainability issues and	of the plan or programme' and, 'the environmental characteristics of the areas likely to be significantly affected" (Annex 1(b), (c))	Chapter 2	
problems	"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC" (Annex 1 (c))		
A4: Developing the SA Framework	N/A	Chapter 2	
A5: Consulting on the scope of the SA	The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report. (Article 5.4)	The scope of the appraisal is presented in Chapter 2. A Scoping Report was produced and consulted upon.	
Stage B: Develo	ping and Refining Options and Assessing Effects		
B1: Testing the DPD objectives against the SA Framework B2: Developing the DPD Options	The environment report should consider "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" and give "an outline of the reasons for selecting the alternatives dealt with" (Article 5.1 and Annex I(h)) In the environmental report, "the likely significant effects on	Chapter 3 and Appendix C.	Stage B of the SEA process is linked to the overall production of the Morecambe AAP which includes the development of plan options and the finalisation of the preferred
B3: Predicting the effects of the DPD	the environment of implementing the plan or programme and reasonable alternatives are [to be] identified, described and evaluated" (Article 5.1)		option. There has been a considerable degree of
B4: Evaluating the effects of the DPD			interaction between the plan- making and SA teams during this stage in the process. This
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	Annex I (g) states that it should also include "measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme"		has enabled potential adverse effects of the Morecambe AAP to be avoided / minimised and potential sustainability benefits maximised.
B6: Proposing measures to monitor the significant effects	The Environmental Report should provide information on "a description of the measures envisaged concerning monitoring" (Annex I (i))		Stage B is the primary assessment stage of the SA process and is the main output of this report.

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Morecambe AAP	
of implementing the DPDs				
Stage C: Prepar	ring the Sustainability Appraisal Report			
C1: Preparing the SA Report	Article 5.1 contains the requirement for an environmental report to be produced where an assessment is required. The environmental report "shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication" (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This SA Report represents the required Stage C output.	This SA Report has been produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non Technical Summary is also provided.	
Stage D: Consu	Itation on the Proposed Submission Documents ar	nd the SA Report		
D1: Public participation on the proposed submission documents	Article 6 contains the requirements for the draft plan or programme and the environmental report to be made available to statutory authorities and the public. They should be given an 'early and effective opportunity within time frames to express their opinions' (Article 6.2).	Arrangements for consultation are indicated in Chapter 6.	The SA Report and the Morecambe AAP will be consulted upon in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.	
D2: Appraising significant changes resulting from representations D3: Making decisions and providing information	N/A	N/A	Following the receipt of representations, the SA Report may need to be updated to reflect comments received. The SA Report will need to be updated to accompany the Publication (Regulation 30) version of the Morecambe AAP. It will be essential for the SA Report and the Morecambe AAP to remain consistent.	
Stage E: Monitoring the significant effects of implementing the DPD				
E1: Finalising aims and methods for monitoring E2: Responding to adverse effects	"Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action" (Article 10.1)	Monitoring will commence once the Morecambe AAP has been adopted. A draft monitoring framework is included within Chapter 5 of this SA Report.	Monitoring undertaken for the SA process should feed into the Annual Monitoring Report AMR).	

The following sections detail the activities that have been, and are proposed to be, undertaken at each stage of the SA process. This provides context and background to the SA to date including its agreed scope, the methodology for the appraisal of the Morecambe AAP, and the technical limitations to the appraisal.

2.2.1 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope

Review of Plans, Policies and Environmental Protection Objectives

A review of other plans and programmes that may affect the preparation of the Morecambe AAP was undertaken to identify the relationship between them.

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 Morecambe AAP.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the emerging Morecambe AAP.

The review included documents prepared at international, national, regional (sub-regional) and local scale. These documents cover a broad range of issues, not all of which apply directly to the Morecambe AAP. The key principles of relevant plans, programmes and environmental protection objectives were taken forward to positively influence the direction of the Morecambe AAP. The full review is presented in Appendix A.

Establishing the Baseline

Characterising the environmental and sustainability baseline, issues and context helps to define the SA Framework. It involves the following key elements:

- Characterising the current state of the environment within Morecambe (including social and economic aspects as well as the natural environment); and,
- Using this information to identify existing problems and opportunities which could be considered in the Morecambe AAP where relevant.

The baseline was characterised through the following methods:

- Review of relevant local and sub- regional, plans, policies and environmental protection objectives;
- Data gathering using a series of baseline indicators developed from the SEA Directive topics, the PAS guidance, and the data available for Morecambe; and,
- Consideration of the scope and contents of the Morecambe AAP.

A detailed description of the baseline characteristics of Morecambe is provided in Appendix B, together with any identified data gaps and inadequacies, and is accompanied by constraints plans (see Appendix E). Obtaining these datasets would help to further increase the knowledge

of the areas and therefore the potential impacts of the Morecambe AAP. Such data gaps could potentially be overcome through the use of the monitoring framework.

The baseline data has been used to identify the key sustainability issues and opportunities within Morecambe, a summary of which is presented in the paragraphs below. Although these have been grouped by sustainability topic, many are indirectly or directly linked and are therefore closely related.

Population

- Morecambe has a relatively young population.
- Access to services within Morecambe is good due to the implementation of urban concentration policy.
- There are potential challenges that could arise in the future relating to the type and tenure
 of housing provision on offer in the Morecambe. This is analysed in detail within the
 Lancaster Strategic Housing Market Assessment (2008).

Education and Qualifications

- Educational attainment in Morecambe is generally poor when compared to the district, regional and national levels and should be improved where possible. However, there remains a higher than the district, regional and national percentage of the population in Morecambe with attained level 1 qualification.
- Work-based learning opportunities should be developed further to minimise the number of 16-18 year olds not in education or employment training and increase levels of attainment of qualifications.
- Lancaster District's universities and colleges should be promoted in order to raise educational attainment levels in Morecambe.

Health

- Health in the Morecambe is generally poor with high levels of health deprivation and people living with long-term life limiting illnesses.
- Access to doctor's surgeries within Morecambe is limited and may need to be improved, particularly if large new residential developments are proposed.
- There are opportunities to promote access to outdoor recreational pursuits in open areas and local sporting facilities the Morecambe Bay to benefit the health of the local population.
- There are also opportunities to further promote walking and cycling within Morecambe.

Crime

- Morecambe currently suffers with high levels of crime and crime deprivation when compared to the Lancaster district. However, there has been a reduction in overall crime levels recently.
- Juvenile nuisance and anti-social behaviour is a key source of crime in Morecambe and further work is needed to reduce such problems, although recent initiatives have been successful in reducing such problems.

Water

There may be opportunities to further improve bathing water quality at Morecambe South.

- Areas at risk from flooding should be protected from development that would increase that risk. New developments should be encouraged to use SuDS to manage runoff and further reduce flood risk if appropriate.
- New developments and households within the Morecambe should also be encouraged to minimise water use and to re-use rainwater where possible i.e. grey water recycling systems.
- United Utilities forecast a water deficit in the future which may affect water resources availability for new developments. United Utilities and the Council will need to work together over this issue.

Soil and Land Quality

- Where previously developed sites exist, the aim should be to continue to remediate and re-use them, although this decision should be made on a site-by-site basis as some brownfield sites may now have developed significant biodiversity interests.
- Morecambe has large areas of previously developed land and a large number of vacant / unfit dwellings in the ward of Poulton, therefore opportunities to use brownfield land and to bring dilapidated buildings back into use should be sought.

Air Quality

- In general terms the air quality in Morecambe is good with no designated Air Quality Management Areas (AQMAs).
- Opportunities should be sought to reduce road traffic and promote sustainable transport use to further improve air quality.
- There may be opportunities to reduce travel and distances between homes and employment sites through the Morecambe AAP.

Energy and Climate Change

- Reducing the carbon footprint through energy conservation and efficiency and the promotion of renewable energy sources should be encouraged where possible in the AAP.
- New developments should be encouraged to include sustainable design principles.
- Reducing transport on Morecambe's roads and encouraging more sustainable modes of transport would contribute to reducing the effects of climate change.
- Emissions of CO₂ are generally low in Morecambe, however, opportunities should be sought to maintain/reduce these levels.

Biodiversity Flora and Fauna

- The Morecambe Bay Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar Site are internationally designated sites. The Bay is also designated a Site of Special Scientific Interest (a national designation). These sites (which overlap each other) should be afforded significant protection against any potential adverse effects of development.
- The high quality of the environment provides opportunity to develop recreation and tourism in the Morecambe, although care should be taken to ensure that development is appropriate and does not adversely affect biodiversity resources.

Cultural Heritage

- Morecambe contains a number of cultural heritage features (in particular Conservation Areas and listed buildings) which should be appropriately conserved and enhanced.
- Heritage risks can be reduced by good land management, or by informed planning policies and decisions that take full account of the national importance of historic sites.
- In addition to protecting statutory sites it is important to ensure that the wider historic landscape is protected and also non-designated heritage and archaeological resources.
- Morecambe has a good tourism potential due to the quality of its natural environment which is complemented by its cultural heritage resources.

Landscape/Townscape/Seascape

- It is important for townscape character and quality to be maintained and where possible restored and enhanced.
- Morecambe's high quality seascape is an important resource for attracting visitors and enhancing the quality of life for residents.
- Opportunities should be sought to enhance design and landscaping at the local level to improve the quality of the local environment through improvements to the public realm for example.

Minerals and Waste

- Opportunities should be sought to further improve composting and recycling performance where this is possible through the Morecambe AAP.
- Sustainable sourcing and waste management principles should be promoted for all new developments that occur in within the Morecambe AAP boundary.

Transportation

- Opportunities should be sought to reduce dependence on the private car and increase sustainable modes of transport such as walking and cycling. It will be important to ensure that any new employment sites can be easily accessed by sustainable transport.
- The good road connections to other parts of Lancaster and proximity to the motorway network are both an opportunity and a threat to Morecambe as they could help to encourage inward investment but they also could enable Morecambe's residents to easily commute to neighbouring authorities and areas for employment purposes leading to a leakage of skills and also daily spending from Morecambe.

Economy

- The collapse of the town's role as a traditional English seaside resort is well known.
- Morecambe is massively underperforming in economic terms and this impacts badly in wider ways including on social functioning and the attraction of the town to visitors.
- Attracting new investment has been difficult in recent years.
- Harbour, Heysham North and Poulton wards are identified in the 2010 IMD as being in the bottom 10% nationally for employment deprivation nationally.
- A small number of employers provide a significant amount of the employment.
 Opportunities should be sought to promote diversification and to support new businesses where possible.

- There are further opportunities to capitalise upon Morecambe's tourist attractions and unique selling points to further develop the tourist industry.
- The economic slowdown has affected most parts of the UK and there is a need to ensure that the impacts on residents are reduced and that future needs continue to be met. Diversification of the employment market and provision of attractive employment and business opportunities will be central to this.

Deprivation and Living Environment

- The wards of Poulton, Harbour and Heysham North experience high levels of deprivation and all have wards within the bottom 10% nationally for the index of multiple deprivation and living environment deprivation.
- The wards of Poulton, Harbour and Heysham North are considered to be within the bottom 20% most deprived for income deprivation.
- The wards of Poulton, Harbour and Heysham North are considered to be within the top 20% least deprived for barriers to housing and services deprivation. This indicates that housing affordability is not an issue within Morecambe.
- Engaging with local residents and making sure that they feel the Council keeps them well informed will be essential in creating vibrant communities.
- There may be scope in the future to more actively involve the local community in decision-making which will also enable the Council to understand the needs and desires of the residents which in the long-term could help contribute to the establishment of more sustainable communities.

Housing

- There is a shortage of high quality housing in Morecambe and investment is required to upgrade the significant numbers of unfit and vacant housing.
- Since May 2008, the Government has introduced a mandatory rating against the Code for Sustainable Homes for all new homes. The Code measures the sustainability rating of a new home against categories of sustainable design. The overarching aim is to make the design of homes more sustainable and to carbon emissions. The promotion of the Code for Sustainable Homes and awareness raising about its use and application should be promoted where possible in the AAP.

Scope of the Appraisal

The SA process commenced in March 2010 with the preparation of an SA Scoping Report for the Morecambe AAP, the report contained:

- A review of relevant plans, programmes and environmental protection objectives that could influence the SA and the development of the Morecambe AAP;
- Identification of key sustainability issues and opportunities, together with recommendations for mitigation where required; and
- The development of the SA Framework against which the elements of the Morecambe AAP have been assessed.

Geographical Scope of the Appraisal

The Scoping Report set out the scope and approach to the assessment of the Morecambe AAP. Geographically the scope of this SA comprises the area of Morecambe within AAP boundary. Where effects may indirectly be realised outside of this boundary, these have also been considered in the SA.

Temporal Scope of the Appraisal

The Morecambe AAP sets out the framework for facilitating the determination of future planning applications within Lancaster City Council until 2021 (in line with the period of the adopted Core Strategy).

Topics Covered in the Appraisal

The SA comprises the consideration of the environmental, social and economic effects of the Morecambe AAP. The baseline characterisation has therefore reflected the topics set out in the SEA Directive, but also considers relevant additional social and economic topics as recommended in the PAS SA guidance. Table 2-2 identifies the topics covered, together with their relationship with the topics listed in Annex I of the SEA Directive.

Table 2-2 Topics Covered in the SA and Relevant SEA Directive Topics

Topics covered in the SA	Relevant topics listed in Annex I of the SEA Directive
Population	Population and Human Health
	Material Assets
Education and Qualifications	Material Assets
Health	Population and Human Health
	Material Assets
Crime	Population and Human Health
Water	Water and Soil
Soil and Land Quality	Water and Soil
	Material Assets
Air Quality	Air
Energy and Climate Change	Climatic Factors
Biodiversity, Flora and Fauna	Biodiversity, Flora and Fauna
Cultural Heritage	Cultural heritage and landscape
Landscape	Cultural heritage and landscape
Minerals and Waste	Material Assets
Transportation	Material Assets
Economy	Material Assets
Deprivation and Living Environment	Population and Human Health
	Material Assets
Housing	Material Assets

Annex I of the SEA Directive also requires an assessment of secondary, cumulative and synergistic effects, the results of which are provided in Chapter 4.

The Scoping Consultation

The Scoping Report was issued for public consultation in March 2010, for a five week consultation period. The aim of this was to obtain comment and feedback upon the scope and level of detail of the SA.

It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and the public through availability on the Council's website. The report was subsequently updated following this consultation feedback.

The SA Framework

The SA Framework was developed for all documents within the Local Plan and has been used for the Core Strategy, then updated for use with the Land Allocations and Development Management Policies DPDs. It was not considered necessary to revise this in principle for the Morecambe AAP although some of the guide questions regarding rural issues have been removed in this instance (these are shown as striked-out text in Table 2-3). The SA Framework underpins the assessment methodology and comprises a series of 18 objectives (SA Objectives) against which the Morecambe AAP has been assessed. The SA Objectives are intended to be overarching and aspirational. The SA Objectives address the full cross-section of environmental, economic and social sustainability issues within the Lancaster district.

The SA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities identified. Each of the SA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. These sub-objectives have been considered by the assessors when undertaking the appraisal in order to inform their decision.

The SA Objectives and associated sub-objectives are presented in Table 2-3.

Table 2-3 SA Objectives and Sub-Objectives

SA Objective		Sub-Objectives
S1	To reduce crime, disorder and	S1.1 To reduce levels of crime
	fear of crime and reduce exposure to hazards	S1.2 To reduce the fear of crime
	expectate to mazarde	S1.3 To reduce levels of anti-social behaviour
		S1.4 To encourage safety by design
		S1.5 To reduce exposure to environmental hazards
		S1.6 To reduce exposure to noise disturbance
	To ensure there is housing to meet all needs	S2.1 To ensure there is enough housing available to meet needs in all areas
		S2.2 To increase the availability of affordable housing
		S2.3 To ensure housing is decent
		S2.4 To reduce fuel poverty
S3	To improve physical and mental health for all and reduce health inequalities	S3.1 To reduce health inequalities amongst different groups in the community
		S3.2 To improve access to health and social care services
		S3.3 To promote healthy lifestyles

SA Objective		Sub-Objectives
		S3.4 To ensure there is access to greenspace, countryside, public spaces, rights of way, play areas and open coast for people to enjoy
		S3.5 To ensure there are cultural /social/ community facilities and activities for people to enjoy / participate in
		S3.6 To encourage the development of strong and cohesive communities
S4	To encourage lifelong learning	S4.1 To maintain and increase levels of participation and attainment in education for all members of society
		S4.2 To improve the provision of education and training facilities
		S4.3 To improve access to and involvement in Lifelong Learning opportunities
		S4.4 To improve access to environmental education
S5	To improve sustainable access to basic goods, services and	S5.1 To ensure public transport services (bus and train) meet peoples' needs
	amenities for all groups	S5.2 To ensure highways infrastructure serves peoples' transportation needs (including for private vehicular travel, walking and cycling)
		S5.3 To ensure buildings and public spaces are readily accessible
		S5.4 To promote the use of more sustainable modes of transport and reduce dependence on the private car
		S5.5 To improve access to cultural and leisure facilities
		S5.6 To maintain and improve access to essential services and facilities
		S5.7 To improve access to basic goods, services and amenities in rural areas
EC1	To encourage thriving local	EC1.1 To diversify employment opportunities
	economies	EC1.2 To increase employment opportunities
		EC1.3 To encourage economic growth
		EC1.4 To encourage inward investment
		EC1.5 To ensure sufficient land, buildings and premises are available to accommodate for business start up and growth
		EC1.6 To ensure Infrastructure (including transportation) meets the needs of business
		EC1.7 To encourage rural diversification
EC2	To ensure key economic drivers	EC 2.1 Town and village centres are strong and vibrant
	are strong	EC 2.2 The higher education sector is vibrant
		EC 2.3 The visitor economy is strong

SA Objective		Sub-Objectives
		EC 2.4 The knowledge economy is strengthened
EC3	To ensure the workforce meets	EC 3.1 The labour supply meets local economic needs
	local economic needs	EC 3.2 People are educated, trained and skilled to meet local economic needs
EC4	To encourage economic inclusion	EC 4.1 To reduce levels of unemployment in the areas most at need
		EC4.2 To improve physical accessibility to jobs for those in greatest need
EN1	To limit and adapt to climate	EN 1.1 To reduce greenhouse gas emissions
	change	EN 1.2 To ensure existing buildings have optimal energy efficiencies
		EN 1.3 To ensure new development is low carbon / carbon neutral
		EN 1.4 To promote the use of more sustainable modes of transport and reduce dependence on the private car
		EN 1.5 To reduce or manage flooding
		EN 1.6 To encourage the inclusion of flood mitigation measures such as SuDS
		EN 1.7 To ensure new developments are able to withstand extreme weather events
EN2	To protect and enhance the quality of water features and resources	EN 2.1 To ensure the marine environment is clean and unpolluted
		EN 2.2 To ensure watercourses and impounded waters (including canals) are clean and unpolluted
		EN 2.3 To ensure groundwater is clean and unpolluted
EN3	To protect and enhance biodiversity	EN3.1 To protect and enhance designated sites of nature conservation importance
		EN3.2 To protect and enhance wildlife especially rare and endangered species
		EN 3.3 To protect and enhance habitats and wildlife corridors
		EN3.4 To provide opportunities for people to access wildlife and open green spaces
		EN3.5 To protect and enhance geodiversity
EN4	To protect and enhance landscape and townscape	EN 4.1 To ensure places and views , whether urban or rural, are of distinctive character and quality
	character and quality	EN 4.2 To ensure night skies are dark
		EN 4.3 To promote sensitive design in development
EN5	To ensure the sustainable use of natural resources	EN 5.1 To ensure land not yet developed in the District is safeguarded for the future

SA O	bjective	Sub-Objectives
		EN 5.2 To ensure the quantity and quality of soil resources and function is safeguarded for the future
		EN 5.3 To minimise consumption of the earth's finite primary materials
		EN 5.4 To ensure that contaminated land will be guarded against
		EN 5.5 To ensure that fossil fuel consumption is minimised
		EN 5.6 To encourage development of brownfield land where appropriate
		EN 5.7 To encourage sustainable use of water resources
EN6	N6 To increase energy efficiency and require the use of renewable energy sources	EN 6.1 To increase energy efficiency
		EN 6.2 To increase the use of renewable energy
	chargy courses	EN 6.3 To reduce the use of energy
		EN 6.4 To minimise the use of fossil fuels
EN7	To protect and enhance the	EN7.1 To protect and enhance historic buildings and sites
	historic environment and heritage assets	EN 7.2 To protect and enhance historic landscape/townscape value
EN8	To protect and improve air quality	EN8.1 To protect and improve local air quality
EN9	To minimise waste, increase re-	EN9.1 To increase the proportion of waste recycling and re-use
	use and recycling	EN9.2 To reduce the production of waste
		EN9.3 To reduce the proportion of waste landfilled
		EN9.4 To promote the use of recycled and secondary materials in construction

SA Objective Compatibility

The 18 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Appendix C and summarised below.

A number of areas of compatibility were identified between the SA Objectives, although there were some uncertainties identified which are documented in more detail below.

The compatibility was assessed as uncertain between SA Objective S2 'To ensure there is housing to meet all needs' and also EC1 'To encourage thriving local economies' against the following SA Objectives:

- EN2 To protect and enhance the quality of water features and resources;
- EN3 To protect and enhance biodiversity;
- EN4 To protect and enhance landscape and townscape character and quality;
- EN5 To ensure the sustainable use of natural resources;
- EN6 To increase energy efficiency and require the use of renewable energy sources;

- EN7 To protect and enhance the historic environment and heritage assets; and
- EN9 To minimise waste, increase re-use and recycling.

This is because new development has the potential to adversely affect biodiversity resources through direct land take, landscape and heritage resources from inappropriate siting and water resources through an increase in water consumption and development in the floodplain. In addition new development requires the use of natural resources, raw materials and energy, and can increase pressure upon waste management.

The compatibility of SA Objective EN6 'To increase energy efficiency and require the use of renewable energy sources' was assessed as uncertain against SA Objectives EN3, EN4 and EN7 as renewable energy development could potentially affect biodiversity resources i.e. through bird strike (wind turbines) and adversely affect landscape and heritage resources through inappropriate siting.

These areas of potential conflict were considered when undertaking the appraisal of the Morecambe AAP to ensure that appropriate mitigation was included within the policy wording to address any potential conflicts between new development and protection of the environment.

2.2.2 Stage B: Developing and Refining Options and Assessing Effects

Options Assessment

Following consultation on the Scoping Reports, the policy options for the Morecambe AAP were developed by Lancaster City Council, as set out in Topic Paper 3: Outline Options Narrative Report (November 2011). This document contained an initial set of six policy options to help guide the regeneration of Morecambe, and formed an important step in developing the preliminary set of policy options.

At this stage the policy options did not provide detailed guidance on standards / thresholds and requirements, but rather an essence of the policies the Morecambe AAP would cover and the issues it would ultimately attempt to address. It was the intention that the policy options would be further developed to create a preferred option document (i.e. the Morecambe AAP as it is now), which would set out in more detail those requirements which the developers / applicants will have to consider when preparing planning applications.

A workshop was held on 3 November 2011 to provide feedback on the policy options using the SA Objective topics as a guide. The invited attendees included representatives of Lancaster City Council officer groups, the primary Care Trust, Age UK and Lancaster County Council to provide a range of knowledge.

Following the workshop, a high-level review of the policy options against the SA Objectives was undertaken by way of an initial SA assessment. One table was produced for each policy option, comparing the option against the 18 SA Objectives topics. Positive elements, negative elements and potential mitigation / enhancement of the policy options were identified and recorded in a simple matrix.

The results of this exercise, together with recommendations for improvement, were presented within an Initial SA Report (Initial SA Report, Options Development, Hyder Ref: 009-WX44644-WXR-01). A summary of the recommendations from the options assessment is documented in Chapter 3.

A Further Initial SA Report was then produced in March 2012 based on the discrete investment / development options, which took the options development a stage further. A high-level review of the four discrete investment / development options against the SA Objectives was undertaken by way of a second initial SA assessment. As per the Initial SA Report one table was produced for each discrete investment / development options, comparing the option against the 18 SA Objectives topics. Positive elements, negative elements and potential mitigation / enhancement of the options were identified and recorded in a simple matrix. The results of this exercise, together with recommendations for improvement, were presented within the Further Initial SA Report (Further Initial SA Report, Discrete Investment / Development Options, Hyder Ref: 010-WX44644-WXR-02). A summary of the recommendations from the options assessment is documented in Chapter 3.

Assessing the Effects of the Morecambe AAP

The findings of the options assessments were fed back to the plan-makers. The options were subsequently developed and refined.

The Morecambe AAP has been assessed against the SA Objectives in order to determine the overall sustainability performance of the document. The following elements of the Morecambe AAP have been assessed:

- The Spatial Approach;
- The four Spatial Policies;
- Development Opportunity Policies; and
- 15 Action Sets.

The Plan Vision for the Morecambe AAP was not assessed as it is the same as the regeneration vision as set out in the Core Strategy. The Core Strategy was adopted in July 2008 and subject to SA.

Assessment of the Morecambe AAP Spatial Approach

Good practice guidance recommends that the goals of a plan should be assessed against the SA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The assessment of the Spatial Approach elements of the Morecambe AAP against the SA Objectives was undertaken using a compatibility matrix. Recommendations were suggested to offset or alleviate any potential sustainability conflicts with the Spatial Approach Elements. Section 4.1 presents the SA of the Spatial Approach.

Assessment of the Morecambe AAP

The Morecambe AAP contains a series of policies and action sets designed to guide development in Morecambe. For the purpose of the assessment the policies and action sets within the Morecambe AAP have been grouped together by the overarching heading they fall under within the plan. Table 2-4 presents the groups of policies that have been assessed.

Table 2-4 Morecambe AAP Groups

Morecambe AAP Groups	Policy Name / Action Set
Managing the Environment	AS1: Managing and maintaining streets and spaces
	AS2: Improving the condition of buildings and encouraging beneficial occupancy

Morecambe AAP Groups	Policy Name / Action Set
Managing Development	SP1: Key Pedestrian Routes and Spaces
	AS3: Improving Key Routes for Pedestrians and Cyclists
Further encouraging business investment and development	SP2: Investment Exemptions
	AS4: Further encourage business investment and development
Morecambe's Main Seafront	SP3: Morecambe Main Seafront and Promenade
and Promenade	AS5: Central Seafront and Main Beach
	DO1: The Battery
	AS6: Western Seafront and Beach
	DO2: Strategic Leisure - Seafront Headland, Central Promenade
	AS7: Seafront Headland, Central Promenade
The Town Centre	SP4: Town Centre
	DO3: The Andale and Area
	MAAP Policy DO4: West View
	MAAP Policy DO5: Festival Market and Area
	Action Set AS8: The Town Centre
South of the Town Centre	AS9: Edge of Centre Retail Park
	DO6: Former Frontierland Site
Travel and Transport	AS10: Traffic route signage to and from central Morecambe
	AS11: Parking provision and management
	AS12: Bus services
	AS13: Rail services
Marketing to Investors and	AS14: Investor marketing strategy
Visitors	AS15: Visitor marketing strategy

The Morecambe AAP polices have been assessed against the SA Framework. The assessment has been undertaken using a series of assessment matrices, which have used to document the following:

- Impact whether the effect is positive, negative or neutral when assessed against the objectives;
- Timescale the timescale over which the impact is likely to be realised (i.e. short-term, medium-term or long-term);
- Permanency whether the impact is likely to be reversible or irreversible;
- Certainty the level of certainty of the impact prediction i.e. whether it is low, medium or high.

The notation presented in Table 2-5 was used in the matrices. When undertaking the assessment, the symbols assigned in the matrix were justified in the commentary box along with any uncertainties.

Table 2-5 Notations used in the SA Assessment

Impact	Description	Symbol
Major Positive Impact	The policy contributes to the achievement of the SA Objective and is likely to deliver enhancements.	++
Positive Impact	The policy contributes partially to the achievement of the SA Objective but not completely.	+
No Impact/ Neutral	There is no clear relationship between the policy and/or the achievement of the SA Objective or the relationship is negligible.	0
Negative Impact	The policy partially detracts from the achievement of some elements of the SA Objective.	-
Major Negative Impact	The policy detracts from the achievement of all elements of the SA Objective.	
Uncertain impact – more information required	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level.	?
Positive and Negative Impacts	The policy has a combination of both positive and negative contributions to the achievement of the SA Objective.	+/-

This assessment has enabled the identification of the key sustainability strengths and weaknesses, and the potential areas for improvement. Recommendations are made to offset or alleviate any adverse impacts that have been predicted, or to enhance any opportunities that have been identified.

A summary of the assessment of Preferred Option Morecambe AAP is provided in Section 4.2. The complete results of the assessment are presented in Appendix D.

Mitigation

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Morecambe AAP. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified.

As the Morecambe AAP has been developed in parallel to SA process, mitigation measures have been incorporated on a continual basis.

Appraisal of Cumulative and Synergistic Effects

The SEA Directive requires *inter alia* that cumulative effects should be considered. It stipulates consideration of "the likely significant effects on the environment..." and that "These effects should include secondary, cumulative, synergistic...effects" (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant

effect; or where several individual effects of the plan or programme have a combined effect.

 Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the Morecambe AAP has been inherently considered within the appraisal, the findings of which are presented in Section 4.3.

Appraisal of Transboundary Effects

The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. It is considered there the plan will not have any significant transboundary effects.

Technical Limitations and Uncertainties

During the assessment of the Morecambe AAP, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.

In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.

Finally, the Morecambe AAP essentially acts as a guidance document for the future development of Morecambe. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

2.2.3 Stage C: Preparation of the SA Report

This SA Report presents the findings of the assessment to-date including the information collated in Stage A and during scoping, and documents the entire SA process. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document.

The SA Report also includes a separate NTS.

2.2.4 Stage D: Consultation on the Morecambe AAP and the SA Report

This Preferred Option SA Report has now been issued for consultation alongside the Morecambe AAP to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, Lancaster City Council will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Morecambe AAP being adopted.

2.2.5 Stage E: Monitoring the Significant Effects of Implementing the Morecambe AAP

The SEA Directive requires 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 undesirable environmental effects are identified and remedial action is implemented accordingly.

Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5. Monitoring will be undertaken following adoption of the Morecambe AAP.

3 The Morecambe AAP Alternatives

3.1 Introduction

A requirement of the SEA Directive is to consider "reasonable alternatives taking into account the objective and the geographical scope of the plan or programme" and to "give an outline of the reasons for selecting the alternatives dealt with".

This section outlines the results of the two rounds of SA appraisal undertaken for the Morecambe AAP's alternative options and includes the recommendations made to improve the performance of the AAP.

3.2 Initial Morecambe AAP Options November 2011

As previously stated, Lancaster City Council identified six initial policy options for review (as set out in the Initial SA Report, Options Development (Hyder Ref: 009-WX44644-WXR-01) in November 2011).

The policy options are presented in the following sections.

3.2.1 Strategic Option 1 – Do-Minimum Strategy

Low intervention strategy where the Council would facilitate change, however, they would not deliver it. This is a market-led approach, which will anticipate low levels of change, but be flexible enough to respond to larger levels of investment. The plan will set parameters for development to address key requirements, but allow the private sector to effect change within these. Change is likely to be limited. Policies will generally be permissive. Likely to include:

- Small, incremental improvements to Marine Rd and seafront promenade;
- Visitor marketing plan;
- Programme of seafront festivals;
- Review of car parking management and pricing;
- Five year investment programme in land and buildings through forthcoming Townscape Heritage Initiative;
- Closer working with private partners to increase focus on street and place management
- Commitment to improve housing stock, with limited ability to deliver;
- Focus on securing beneficial development at the Central Promenade Area and/or Winter Gardens; and
- Investing hope into the Heysham / M6 Link Rd, Heysham Nuclear Power Station and on shore facilities to improve the gas transmission network.

3.2.2 Strategic Option 2 – Intervention Strategy

A directed regeneration option providing the optimum conditions for investment, with an aim to give Morecambe a heart. The plan will aim to actively change how Morecambe works to increase general activity, improve the appearance and feel of the town, communicate that the council and community want change for the better, identify investment, development and

business opportunities and set out what people and organisations need to do to deliver the plan. This is likely to include:

- Phased amenity improvements along the seafront to connect the town to the seafront with good pedestrian links;
- Selective interventions to improve access to the beaches;
- Provision of facilities at the Battery to support active recreation uses;
- Transform the look and feel through a scheme of improvements to New Town Square,
 Euston Rd, Victoria St, Peddar St Car Park, Peddar St and Queen St;
- Replace new street signage as appropriate throughout the area;
- Improve facilities at the railway and bus stations, giving clarity on directions and improve the welcoming feeling;
- Remove or remedy eyesores and visual impediments to movement;
- Improve the presentation of the Arndale Centre;
- Widen and diversify community uses at Morecambe Library; and
- Publicise and make available public services in the centre.

3.2.3 Sub-Area Options: Eric & Beach and Arndale / Euston

<u>Eric & Beach -</u> Selective interventions to improve access to the beaches, making more out of the iconic Eric figure and associated heritage as part of the Morecambe offering.

<u>Arndale / Euston -</u> Improvements to the presentation and feel of the two primary retail areas – the Arndale Centre and the Euston Road area via a scheme of improvements

3.2.4 Sub-Area Option: Festival / Winter Gardens

Option A - Mixed-use development with significant commercial/leisure development

Option B – Mixed-use with predominantly residential

3.2.5 Sub-Area Option: Central Promenade

<u>Option A – Phased large scale mixed use development, including large residential, public realm, some retail and a hotel expansion</u>

<u>Option B –</u> Incremental re-use for low key outdoor leisure uses accommodating development (e.g. hotel expansion, public realm)

3.2.6 Sub-Area Option: Frontierland Site

Option A – Mixed-use development with significant commercial/leisure development

Option B – Predominantly residential with limited other uses fronting Marine Road only

3.2.7 Initial Morecambe AAP Options Assessment Results

As previously stated, the options assessment commenced during a workshop held in November 2011with the aim to obtain feedback on the policy options using the SA Objective topics as a

guide. A high-level review of the six policy options against the SA Objectives was undertaken, comparing each option against the 18 SA Objectives.

Table 3-1 summarises the key findings of the policy options assessment, and presents the main recommendations made.

The full Initial Appraisal Tables used to assess the policy options are presented in the Initial SA Report, Options Development (Hyder Ref: 009-WX44644-WXR-01) November 2011.

Table 3-1 Initial Policy Options Assessment Summary

Table 3-1 Initial Po	blicy Options Assessment Summary
Policy Option	Summary of Key SA Recommendations
Strategic Option 1 – Do-Minimum Strategy	The option was not considered strong enough to bring about significant economic change in Morecambe and many uncertainties were identified. As such, the existing sustainability problems identified in Section 2.2.1 are likely to continue. Therefore stronger policy, leadership (from Lancaster City Council) and proposals are required to enhance this option. A 'spearhead' development could help to overcome initial inertia in Morecambe. Recommendations to improve the sustainability performance of the option included:
	The production of development briefs and a stricter policy framework would ensure some of the uncertainties identified regarding the outcomes of this approach are carefully managed. In addition, further proposals could be included to reduce uncertainty and guide development in Morecambe.
	Again as above, the option is not considered strong enough to bring about significant change in Morecambe. Proposals and stronger policy would be required to significantly improve the townscape of Morecambe. Proposals to pedestrianise parts of the town centre would offer benefits to local air quality and improve local streetscapes.
	 Specific policy regarding environmental protection and enhancement would strengthen this option. However, a balance should be achieved so not to deter investment.
Strategic Option 2 – Intervention Strategy	This option provides a far more pro-active strategy which would be better able to deliver the investment required with potential benefits to a number of the economic, social and environmental SA Objectives. Recommendations to improve the sustainability performance of the option included:
	Pedestrianised streets could be identified within the area action plan boundary in order to minimise car traffic within the town centre. In addition to improving signage and movement within Morecambe's town centre, some consideration could be given to sustainable links with the wider area (including the West End).
	The option could go further to design out opportunities for crime through improving street legibility and connectivity.
	The intervention option could include a new 'spearhead' development within the action plan area which to could help encourage investment in the town centre and raise local confidence.
	The option could include a stronger lead and drive from Lancaster City Council (within their limited resources) in order to improve local business confidence. This could be supplemented with local stakeholder consultation in order to agree a way forward for Morecambe.
	The option should include measures to ensure current flooding issues are not exacerbated.
Sub-Area Options:	Eric & Beach and Arndale / Euston
Eric & Beach	The Eric and Beach option does not address traffic issues related to crossing roads which are seen as a current carrier to connectivity in the area. In addition, the option does not encourage connectivity with areas outside the Eric and Beach area. Recommendations to improve the sustainability performance of the option included:

Policy Option Summary of Key SA Recommendations The option should be developed to address the barriers (causes) of a disconnect that exists between the town and the beach. An urban designer could assist with this. Promotion of the National Cycle Route and Lancashire Coastal Way could have health benefits for visitors and locals alike. Connecting these routes with the town centre would also be beneficial. Traffic calming and pedestrian crossing measures across Marine Road to Euston Road may help with connectivity along with a reduction of some on street car parking Marine Road. The option should address current barriers between the town centre and the beach and encourage recreational activities in the Eric and Beach area in the winter along with the peak seasonal summer months. It would be vital to use this to open up access to the town centre. Arndale / Euston Many positive elements were identified in the initial SA assessment; however, a number of issues were also identified. Central Drive acts as a barrier between the residential areas of Morecambe and the primary shopping areas therefore more could be included within the option to address this issue. In addition, vehicular safety issues are not addressed within the option. Recommendations to improve the sustainability performance of the option included: Connectivity should be improved between Euston Road and the Arndale Centre with the rest of Morecambe. Improved signage from the promenade and access from the residential areas would both encourage more people to use the Arndale Centre and Euston Road. The option could include provisions to improve access points particularly by foot. This would offer health benefits for the local population. It could also increase footfall within the shopping areas as they are easier to access. Improved signage from the promenade to the retail centre would also encourage visitors to move into the area rather than staying on the sea front. The option should consider current safety issues associated with road traffic. Connectivity between the residential areas and the promenade should be improved in order to increase spending in the retail areas. This would contribute to a sustainable economy. Seasonal retail business within the shopping areas should be discouraged. **Sub-Area Option: Festival / Winter Gardens** Option A The development of this site would potentially remove the facility currently occupied by a successful Sunday market and associated car parking which would be a loss to the current local economy. There would also be potentially knock-on traffic problems related to the removal of the car park at this site. However, the intention of the action plan is to encourage visitors to remain in the town for longer periods of time through developing a mix of commercial / leisure development. Recommendations to improve the sustainability performance of the option included: Potential crime issues could be mitigated through good design, lighting and choice of uses. Within mixed-use development, there could be an emphasis on providing some office space which may provide jobs for a more highly skilled workforce. Opportunities to retain the Sunday market facility within an accessible, suitable part of the town should be sought (or local relocation) where this option would remove the ability for the market to remain. Additional car parking may be required – further investigation into this may be needed. The conflict with Morrison's car park may need some joint thinking. Potential noise issues can be addressed through design and where necessary, mitigation, e.g. screening, tree planting etc. This option should give consideration to protecting wildlife where appropriate. Measures

could be included within this option to connect the wildlife corridor along the railway with the

Policy Option	Summary of Key SA Recommendations
	coast. This could be achieved for example through tree planting.
	 Policies could be included to maximise sustainable materials use in new development along with minimising energy use.
Option B	 This option is not as strong as Option A economically as it predominantly provides for residential development and less of a commercial focus. Recommendations to improve the sustainability performance of the option included: The potential crime issues could be mitigated through good design and lighting. The potential conflict between residential and commercial uses can be avoided through good design and planning to largely avoid issues arising. There may be a need to introduce some key community facilities into the development to support new residents' needs. Opportunities to retain the Sunday market facility within an accessible, suitable part of the town should be sought where this option would remove the ability for the market to remain. Additional car parking may be required – further investigation into this may be required. The conflict with Morrison's car park may need some joint thinking. Potential noise issues could be addressed through design and where necessary, mitigation, e.g. screening, tree planting etc. This option should give consideration to protecting wildlife where appropriate. Measures could be included within this option to connect the wildlife corridor along the railway with the coast. This could be achieved for example through tree planting along Central. Drive Policies could be included to maximise sustainable materials use in new development along
Cub Area Ontion	with minimising energy use.
	n: Central Promenade
Option A	The option would increase the overall housing availability for the town which would benefit housing quality and stock in Morecambe. Increased activity in the area through an increased population would also increase passive surveillance, which could contribute to a reduction in crime. The option would also make better use of public space, which may offer health benefits. Although many benefits were identified a number of recommendations were also suggested to strengthen the sustainability performance of the option: Controls would most likely be needed on the amount of type of housing introduced and
	ensure that retail development is of the right mix to fill meet current and future intended needs.
	This option could promote safety and education in the Bay i.e. through interpretation boards.
	 Controls would most likely be needed on the amount or type of housing introduced and ensure that retail development does not detract from the town centre as this could lead to adverse effects on the Arndale Centre and Euston Road.
	There is an opportunity to incorporate renewable energy and environmental enhancements as part of large scale development as long as it is compatible with nature conservation interests. The policy could be enhanced to get the best possible scenario from new development.
	 There is also a recommendation that the option be developed with the need to protect the Special Protection Area, with tight controls on the type and scale of development required.
	Appropriate mitigation measures regarding flood risk should be addressed within this option.
Option B	This option would not provide for any residential development, but would increase opportunities for outdoor leisure which contributes towards healthier lifestyles. Public realm improvements would also engage the public and residents, creating a more active area and more opportunities for education i.e. learning about ornithology and local heritage. The options focus on leisure

Policy Option Summary of Key SA Recommendations would also provide opportunities for low cost leisure activities for young people, which would not only create an active lifestyle, but potentially contribute to reducing instances of antisocial behaviour. Although many benefits were identified a number of recommendations were also suggested to strengthen the sustainability performance of the option: There may be an option to plan for leisure development, rather than leaving it to incremental opportunist investment. This may reduce the risk of low skilled, seasonal jobs and also create a stronger investment pull. It would also create a stronger and more cohesive approach. Controls would need to be in place for environmental issues, such that incremental development does not have a build up of significant adverse cumulative impacts. **Sub-Area Option: Frontierland Site** Option A New mixed-use development with significant commercial/leisure development would increase confidence for further economic development i.e. empty derelict sites within an area lower economic confidence. In addition, a successful mixed use development would increase job opportunities for the local population which would help to achieve a thriving economy. Although many benefits were identified a number of recommendations were also suggested to strengthen the sustainability performance of the option: Opportunities should be sought to incorporate areas of greenspace within the derelict site i.e. soft landscaping as there is currently a shortage within the AAP boundary. Additional greenspace would offer health benefits for the local population. Opportunities to encourage the use of sustainable transport should be incorporated into this option. Opportunities should be sought to incorporate development on the Frontierland site to cater for the residents of the Midland Hotel i.e. commercial / leisure development that would encourage them to stay for more than one night. The Midland is an iconic four star hotel that attracts people with a higher disposable income and there are few attractions for them to exploit. There are opportunities for public realm improvements to be incorporated into new development. New areas of greenspace could be created which would benefit local biodiversity resources and address the current shortage within the AAP boundary. Links could also be created between the coast and the wildlife corridor associated with the railway. Option B New residential development on the Frontierland site would increase confidence for further economic development i.e. empty derelict sites within an area lower economic confidence and could be considered more financially viable in the current economic climate providing they can be sold. Although many benefits were identified a number of recommendations were also suggested to strengthen the sustainability performance of the option: Opportunities should be sought in this option to encourage new residents to walk to local Commercial/leisure development that caters for residents of the Midland Hotel could be more beneficial for the area than purely retail. Links to the Arndale Centre and Euston Road should be strengthened. There are opportunities for public realm improvements to be incorporated into new development. New areas of greenspace could be created which would benefit local biodiversity resources and address the current shortage within the AAP boundary.

3.3 Morecambe AAP Discrete Investment / Development Options March 2012

As previously stated, Lancaster City Council identified four discrete investment / development policy options for review (as set out in the Further Initial SA Report, Discrete Investment / Development Options (Hyder Ref: 010-WX44644-WXR-02) in March 2012).

The options are presented in the following sections.

3.3.1 Site 1: Former Frontierland Site

The preferred option for this site includes housing structured by public realm with commercial / leisure uses fronting to part Marine Road <u>or</u> a related option for a retirement village-type development. The alternative option for this site includes mixed use development, structured by public realm with commercial / leisure uses fronting to part Marine Road.

3.3.2 Site 2: Festival Market

The preferred option involves developing the site as an anchor to the town centre and includes the following:

- Redevelopment of part of the building to improve the accommodation and its use/potential and further, augment and activate it with new retail premises fronting to the Flock of Words / Poem Path, to include new retail and food and drink uses; and
- Investment in the market operations and introduction of more innovative management to create a true "festival" market.

There are two alternative options for this site, they include:

- Retaining the existing building format and operation with only limited ongoing investment;
 and
- Disposal of the site for well structured commercial development and proceeds to finance capital costs of a new indoor market operation (no specific building / development options to date identified).

3.3.3 Site 4: Central Promenade

The preferred option for this site includes the following elements:

- a Investment to rejuvenate and refresh the established public realm (Sub-Area 4a) that arcs from the front of the Winter Gardens via the War Memorial round to the Midland:
- **b** Investigate the potential to re-configure and re-work the main area to accommodate a mix of commercial leisure uses and also potentially a bay discovery centre;
- c To make investment and marketing decisions subsequent to the results of such studies; and
- d Pending these retain the ambition for comprehensive (including a refresh 4a but to retain as public realm), mixed use redevelopment (but not predominantly for town centre uses) and in the meantime maintain as existing with investment and improvements as opportunities permit.

The alternative option for this site includes retaining ambition for a comprehensive redevelopment (including a refresh of Sub-Area 4a but to retain as public realm) and, in the meantime, maintain as existing with improvements as opportunities permit.

3.3.4 Site 5: Telephone Exchange Car Park

The preferred option is to redevelop this site for housing. The alternative option for this site is to retain it as a car park with limited investment to improve.

3.3.5 Morecambe AAP Discrete Investment / Development Options Assessment Results

The discrete investment / development options assessment commenced in March 2012. A high-level review of the four options was undertaken which involved, comparing each option against the 18 SA Objectives.

Table 3-2 summarises the key findings of the discrete investment / development options assessment, and presents the main recommendations made.

The full Further Initial Appraisal Tables used to assess the options are presented in the Initial SA Report, Options Development (Hyder Ref: 010-WX44644-WXR-02) March 2012.

Table 3-2 Initial Policy Options Assessment Summary

Options	Summary of Key SA Recommendations
Options	Summary of Key SA necommendations

Site 1: Former Frontierland Site

Preferred Option

This option would contribute to improving local housing stock and could attract new residents to central Morecambe which in the long term could facilitate regeneration. New residential development on the Frontierland site would increase confidence for further economic development i.e. empty derelict sites within an area lower economic confidence and could be considered more financially viable in the current economic climate providing they can be sold. Although many benefits were identified a number of recommendations were also suggested to strengthen the sustainability performance of the option:

- It should be ensured that local services have the capacity to deal with an increased population i.e. schools and health facilities.
- A mix of retirement and other private housing on this site may present a more beneficial option than purely retirement.
- There is a lack of housing with gardens in central Morecambe and a general lack of green space. Therefore public realm improvements should include soft landscaping elements and green space. In addition, providing gardens would increase green space (albeit private) within the AAP boundary, which would also offer environmental and wellbeing benefits to home owners.
- New development on this site should be designed in a way that encourages walking /cycling.
- Residential along with commercial / leisure (along Marine Road) development on this site should be of a high quality and sensitive to the adjacent Conservation Area. There are opportunities to incorporate a high standard of sustainable design and renewable energy technology into new development.
- Opportunities should be sought to ensure commercial/leisure development on areas fronting Marine Road cater for residents of the Midland Hotel as this could be more beneficial for the area than purely retail. Links to the Arndale Centre and Euston Road should also be strengthened.

Options	Summary of Key SA Recommendations
	 Public realm improvements should include green space and soft landscaping as this would benefit local biodiversity resources and address the current shortage within the AAP boundary.
Alternative Option	Mixed-use development would provide a number of benefits as per the preferred option. It has been assumed that this option would provide some residential development therefore would contribute to improving local housing stock, albeit not as significantly as the Preferred Option. Recommendations to improve the sustainability performance of the option included:
	 Opportunities should be sought to incorporate areas of greenspace within the derelict site i.e. soft landscaping as there is currently a shortage within the AAP boundary. Additional greenspace would offer health benefits for the local population.
	Opportunities to encourage the use of sustainable transport should be incorporated into this option.
	 Opportunities to include some quality residential development should be sought as part of this option which provides for a range of needs.
	 As with the Preferred Option, this option should ensure it is well linked to the town centre maximising pedestrian movements, connectivity and legibility together with encouraging walking and cycling.
	Opportunities should be sought to incorporate development on the Frontierland site to cater for the residents of the Midland Hotel i.e. commercial / leisure development that would encourage them to stay for more than one night. The Midland is an iconic four star hotel that attracts people with a higher disposable income and there are few attractions for them to exploit.
	• Mixed used development on this site should be of a high quality and sensitive to the adjacent Conservation Area. There are also opportunities to incorporate a high standard of sustainable design and renewable energy technology.

Site 2: Festival Market

Preferred Option

This option involves improving the existing accommodation and increasing the use of the Festival Market which may bring about more activity and a higher footfall to the area. Increasing activity and footfall would be facilitated by the site's location on the Flock of Words / Poem Path (a key route between the bus station and the promenade) along with the site's links to retail units south of Central Drive, Winter Gardens and Victoria Street. Recommendations to improve the sustainability performance of the option included:

- Potential crime issues could be mitigated through good design, lighting and choice of uses.
- Opportunities could be sought within this option to provide a high quality evening eating and drinking offer, something which is largely unavailable to residents and visitors currently.
- Opportunities should be sought to ensure this site is legible and linked to the town centre.
- Opportunities to enhance the Sunday market facility within this site should be sought.
- Additional car parking may be required further investigation into this may be needed.
- Potential noise issues can be addressed through design and where necessary, mitigation, e.g. screening etc.
- Opportunities could be sought to maximise sustainable materials use in the redevelopment of Festival Market along with incorporating energy efficient technology.
- Development on this site should complement central Morecambe and not detract from other areas. This option may also contribute to reducing spending leakage in Morecambe.
- Opportunities should be sought to ensure development is sensitive and of a high quality design to minimise any adverse impacts on the adjacent Conservation Area and Listed Building.

Options	Summary of Key SA Recommendations
Alternative Option 1	This option does not facilitate any significant changes from the current baseline. Therefore no significant beneficial impacts are anticipated. However, this option does include limited ongoing investment which may represent a more feasible option due to the current economic climate.
Alternative Option 2	This option provides for demolition of the existing Festival Market with, a new well-structured similar development in its place. Due to the current economic climate there are uncertainties relating to whether this option would be feasible. In addition, there is there is an element of uncertainty that the site will be sold and redeveloped in the way the Council requires. Recommendations to improve the sustainability performance of the option included:
	Opportunities could be sought within this option to provide a high quality evening eating and drinking offer (which may also complement the adjacent Platform), something which is largely unavailable to residents and visitors currently.
	Potential crime issues could be mitigated through good design, lighting and choice of uses.
	Temporary relocation of the successful Sunday market facility should be sought within an accessible, suitable part of the town during the demolition and construction works.
	Opportunities should be sought to ensure the development is integrated with the town centre and parking provision is sufficient in a way that it attracts investors.

Site 4: Central Promenade

Preferred Option

The option seeks to make better use of public space through incorporating commercial leisure development and a refreshed public realm which may offer health and well being benefits. In addition, this option may provide opportunities for low cost leisure activities for young people, which would not only promote active lifestyles, but potentially contribute to reducing instances of antisocial behaviour. There would also be the creation of a small number of local employment opportunities through the Bay Discovery Centre and commercial leisure development. Recommendations to improve the sustainability performance of the option included:

- The option should be developed to address the barriers (causes) of a disconnect that exists between the town and the beach. An urban designer could assist with this.
- Traffic calming and pedestrian crossing measures across Marine Road to visitor attractions i.e. winter gardens may help with connectivity along with a reduction of some on street car parking Marine Road.
- Promotion of the National Cycle Route and Lancashire Coastal Way could have health benefits for visitors and locals alike. Connecting these routes with the town centre would also be beneficial. In addition, public realm improvements could promote safety and education in the Bay i.e. through interpretation boards.
- There are opportunities to incorporate measures to reduce hazards associated with the Bay within this option this could be though interpretation boards and through education in the Bay Discovery Centre.
- If new residential development is proposed as part of the comprehensive redevelopment of this area is should be ensured a proportion of homes are affordable and meet a variety of local needs. In addition, it should be ensured there are adequate public services and facilities to facilitate an increase in population.
- Provisions should be included in the option to ensure commercial leisure development and leisure development caters for both the summer months and the winter months.
- Opportunities could be sought to incorporate renewable energy and environmental
 enhancements as part of this development (particularly within the comprehensive
 redevelopment and the Bay Discovery Centre) as long as it is compatible with adjacent
 nature conservation interests. The option could be enhanced to get the best possible
 scenario from new development.

Options	Summary of Key SA Recommendations
	 The option should be developed in a way that protects the adjacent SPA, SAC and Ramsar site with tight controls on the type and scale of development required. Opportunities should be sought to protect areas of open space within this option from inappropriate development.
Alternative Option	This option only provides for a longer term plan for the area compared with the Preferred Option. It does not make active provision for immediate change and would therefore not achieve the same short term benefits. In addition the option does not seek to make better use of public space or incorporate new commercial leisure development. There is uncertainty over whether the long-term ambition will definitely be achieved or not. Recommendations to improve the sustainability performance of the option included:
	 Enhancements and opportunities for this option would be similar to the Preferred Option. Therefore refer to the Preferred Option.
	 Promoting some short-terms, small-scale targeted interventions may help bring more immediate, tangible benefits.
Site 5: Telephone	Exchange Car Park
Preferred Option	This option would contribute to improving local housing stock and could attract new residents to central Morecambe which in the long term could facilitate regeneration. In addition, there is currently a lack of quality housing stock within central Morecambe and research has shown there are health and social benefits that arise from providing high quality housing. Recommendations to improve the sustainability performance of the option included:
	 Controls would most likely be needed on the amount and type of housing introduced. A range of new housing to meet local need should be provided for.
	 Opportunities could be sought to maximise sustainable materials use in this residential along with incorporating energy efficient technology where possible.
	There is a lack of housing in central Morecambe with gardens and a general lack of green space. Therefore opportunities should be sought to provide housing with gardens within the AAP boundary, which would also offer health benefits to home owners and enhance biodiversity.
	 There are opportunities to include public realm improvements within this option. Opportunities should be sought to integrate residential development on this site with adjacent areas through good design.
Alternative Option	This option does not facilitate any significant changes from the current baseline. Therefore no beneficial impacts are anticipated. However, this option includes limited ongoing investment which may represent a more feasible option due to the current economic climate.
	Morecambe currently has a surplus of car parks within the town centre, therefore, this option would not contribute to reducing this problem. Retaining the existing car park would not result in any environmental enhancements associated with new development.

4 Appraisal of the Morecambe AAP – Preferred Option

4.1 Introduction

This section outlines the results of the appraisal of the Morecambe AAP including details of mitigation measures that could be implemented to improve the performance of the Morecambe AAP.

4.2 Spatial Approach Appraisal Findings

The Morecambe AAP contains 18 Spatial Approach elements to deliver the AAP. The Spatial Approach elements include the following:

- 1 A focus on quality and good care of all aspects of the environment.
- The environment at the central seafront protected and further enhanced and animated, with the potentials to use and enjoy the seafront environment along its length clearly explained.
- The town centre integrating well with the seafront with as seamless a join between town and seafront as possible to ensure the provision for pedestrians to move between the two areas is made much easier, more pleasant and inviting. As a priority improving connections between the Eric Morecambe statue and Euston Road, between the Midland and the Winter Gardens and by the former Frontierland site.
- 4 Better places at the seafront for Morecambe to host and stage festivals and events and making that these bring much more to the town.
- The bay between the Midland and the Battery improved through new sea defences and with new opportunities for enjoyment of the coastal setting including for active recreation.
- Footfall of visitors on the seafront feeding into the town centre and the town centre becoming an integral element in and asset to the visitor experience.
- A well defined town centre, comprising the established centre of the Arndale and traditional streets around improved and enhanced, augmented by land to the east of Northumberland Street redeveloped to a clear urban structure.
- The Arndale and area around one anchor to the town centre, the other the Festival Market / Platform / Apollo complex as rejuvenated to make for an indoor entertainment hub.
- 9 Victoria Street improved and effectively extended west to link through to the Festival Market and so making for a clear axis to the town centre landward of Marine Road.
- The seafront headland at the central promenade made Morecambe's lead leisure destination, with a high quality of public realm and relating well to the town centre landward. Uses to include significant leisure / recreation elements complementary to that of the mixed town centre but not competitive with its retail elements.
- The edge of centre retail park existing south of Central Drive at Morrison's and around relating well to the tighter centre and feeding footfall into it.
- 12 Development of the former Frontierland site predominantly for housing to help activate central Morecambe with an increased residential population and to improve connectivity for pedestrians to / from the West End.

- Functionality further supported by improved connections for pedestrians to and from adjacent residential areas (including the West End) so these feed footfall and activity into the centre. Increased pedestrian activity spinning west along an improved seafront and along Marine Road West through to the West End.
- A welcoming arrival (and pleasant departure) experience including at the railway station and bus halts, for people walking and cycling and for people travelling by motor vehicle with ready, pleasant onward connections for pedestrian routes serving the town centre and helping concentrate footfall and activity in the tighter town centre.
- 15 Changes to highways and parking arrangements to make traffic circulation more efficient and reduce excess traffic circulation and with parking located and managed in such a way as to feed footfall into the town centre.
- **16** Good signage for pedestrians throughout central Morecambe with information / interpretation points.
- 17 Visitor accommodation and including that just outside central Morecambe that is readily found by vehicle and on foot.
- Well considered, clear signage of vehicle routes to and from Morecambe on all route approaches including via Lancaster and Carnforth and well located long and short stay parking options in central Morecambe.

Table 4-1 presents the compatibility of the Spatial Approach elements against the SA Objectives.

Table 4-1 Compatibility of the SA Objectives and the Spatial Approach elements

SA Objectives	Spa	tial /	A ppr	oach	Eler	nent	S											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
S1. Crime	0	0	0	✓	0	0	0	0	0	0	0	✓	0	0	0	0	0	0
S2. Housing	0	0	0	0	0	0	0	0	0	0	0	✓	0	0	0	0	0	0
S3. Health	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	0	✓	✓	0
S4. Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	✓	0	0
S5. Sustainable access	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	~	?
EC1. Thriving economies	0	0	0	✓	0	✓	✓	✓	0	0	✓	✓	0	✓	✓	0	✓	✓
EC2. Economic drivers	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	0	✓	✓
EC3. Workforce	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EC4. Economic inclusion	0	0	0	0	0	0	0	0	0	0	0	✓	0	✓	✓	0	0	0
EN1. Climate change	✓	0	✓	0	✓	0	✓	✓	✓	✓	0	✓	✓	✓	?	0	~	?
EN2. Water	✓	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0
EN3. Biodiversity	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EN4. Landscape	✓	0	0	0	0	0	✓	✓	0	>	0	✓	0	0	0	0	0	0
EN5. Natural resources	✓	✓	0	0	0	0	0	0	0	0	0	✓	0	0	0	0	0	0
EN6. Energy efficiency	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EN7. Heritage	✓	0	0	0	0	0	✓	✓	0	✓	0	✓	0	0	0	0	0	0
EN8. Air quality	✓	0	✓	0	0	✓	✓	✓	✓	0	✓	✓	✓	✓	?	0	✓	?
EN9. Waste	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Key

√ = Objectives are compatible

= Objectives are potentially incompatible

0 = There is no link between objectives

? = The link between the objectives is uncertain

Discussion of Appraisal Findings

Each of the Spatial Approach elements were assessed against the SA Objectives in a compatibility matrix to determine their compatibility and to identify any potential areas where new Strategic Objectives need to be established or the existing ones clarified.

On the whole the Spatial Approach elements and the SA Objectives either complemented each other or there were no links between the two. Furthermore, no potential conflicts were identified in the compatibility matrix. However, some areas of uncertainty were identified against Spatial Approach element 15 'Changes to highways and parking arrangements to make traffic circulation more efficient and reduce excess traffic circulation' and 18 'clear signage of vehicle routes to and from Morecambe on all route approaches including via Lancaster and Carnforth' against the following SA Objectives:

- SA Objective S5 'To improve sustainable access to basic goods, services and amenities for all groups';
- SA Objective EN1 'To limit and adapt to climate change'; and
- SA Objective EN8 'To protect and improve air quality'.

Compatibility was assessed as uncertain, as improving traffic circulation and signage into Morecambe from the road network may encourage more people to access / more around the town via private car rather than more sustainable modes of transport. In the long term this may decrease air quality and lead to an increase in transport emissions. Improving traffic circulation around Morecambe would not benefit health in the same was as other Spatial Approach elements as people would not be encouraged to walk / cycle to access goods / services. However, the Spatial Approach elements should be read as a whole and not individually, therefore health, climate change and air quality would all be protected through other elements which promote healthy lifestyles and sustainable access /transport.

Recommendations for Mitigation/Enhancement

No recommendations are proposed to improve the sustainability performance of the Spatial Approach elements.

4.3 Spatial Policies, Development Opportunity Policies and Action Sets Appraisal Findings

The appraisal and findings in this section have been formatted to mirror the layout of Section 3 of the AAP, the Action Plan, with the appraisal under each of the following headings:

- Managing the Environment;
- Managing Development;
- Further Encouraging Business Investment and Development;
- Morecambe's Main Seafront and Promenade;
- The Town Centre:
- South of the Town Centre;
- Travel and Transport; and
- Marketing to Investors and Visitors.

Each of these sections include a mixture of Action Sets, Spatial Policies and Development Opportunity Policies. A commentary has been provided on the Action Sets where appropriate whereas a more detailed appraisal of the Spatial Policies and Development Opportunities has been undertaken using the appraisal matrices in Appendix D. A summary of the results of these appraisals are presented below.

4.3.1 Managing the Environment

Components

This section of the AAP comprises:

- Action Set (AS) 1: Managing and maintaining streets and spaces
- AS2: Improving the condition of buildings and encouraging beneficial occupancy

Discussion of Appraisal Findings

This section does not contain any policies, however, the following commentary has been made regarding the text and Action Sets included.

The Action Sets and supporting text complement the AAP policies by providing further detail on the important aspects of the Town Centre's environment which afford protection and attention overall. These focus on issues such as: appearance, creation of attractive, safe public spaces, traffic management, toilet provision, maintenance and cleanliness of highways and buildings and creating an improved environment for pedestrians and cyclists.

As part of this, special attention is given to the role of landlords in achieving these ambitions, notably in terms of upkeep of their properties. Reference is also provided to the conservation of historic character and the importance of the Conservation Areas. The document also references the possible availability of grant funding through the View for Eric initiative which would also be sued to benefit townscape, heritage, streets and spaces. The improvement programme could also include training and capacity building services.

Overall, it is considered that there are some very important themes and messages in this section which could both be added to and be elevated in importance in the document, perhaps through development of a specific environment policy to cover them. Alternatively, it may be beneficial to identify specific policies or policy groups within the Development Management Policies DPD as especially important for Morecambe's environment, for example:

- Policy EN1 Green Infrastructure (especially with respect to the European Site designations)
- Policy EN2.1 Enhancement of Biodiversity
- Policy EN3 The Historic Environment
- Policy EN4 Adapting and Mitigating Climate Change
- Policy EN5 Integrated Water Management
- Policy CS1 Design of Development

Recommendations for Mitigation/Enhancement

The following further recommendations have been made through the SA process:

- Specific reference could be included to cover the following aspects:
 - AS1 could reference the need to encourage connectivity of a network of green spaces.
 - AS2 could make reference to the need for new buildings to have a high quality of sustainable design including energy efficiency measures.

- AS1 could include a greater focus on the importance of the Town's historic character, listed buildings and Conservation Area, and how it will need to be protected and enhanced.
- Reference to the value and importance of the Morecambe Bay environmental designations (see also recommendations for Policy SP3). For example:

Morecambe is situated immediately adjacent to Morecambe Bay. The Bay is of international significance for wildlife as a result of its important bird populations and marine habitats. As a result, the Bay is designated a Special Area of Conservation, a Special Protection Area, a Ramsar Site and a Site of Special Scientific Interest. Morecambe could provide excellent opportunities for people to appreciate and learn more about the Bay's special characteristics but it is also important that development in Morecambe respects the sensitive nature of the Bay. Further details on this are provided in Spatial Policy 3.

4.3.2 Managing Development

Components

This section of the AAP comprises:

- Spatial Policy (SP) 1: Key Pedestrian Routes and Spaces
- AS3: Improving Key Routes for Pedestrians and Cyclists

Discussion of Appraisal Findings

Table 4-2 Summary performance of the policies within the Managing Development section of the AAP

Performance Against SA Objectives	Commentary
Positive Performance	
S1 Crime S3 Health S5 Access	A key aim of the policy is to encourage much greater movement by pedestrians and cyclists in the Town Centre. It also discusses development that fronts onto or includes this pedestrian network.
EC1 Thriving Economies EC2 Economic Drivers EN 4 Landscape/Townscape	The proposals seek to increase pedestrian presence in the Town Centre and ensure new development fronts key pedestrian routes and spaces. This should help provide active frontages at ground floor level and create good opportunities for passive surveillance from upper levels. These measures should help to reduce opportunities for crime and anti-social behaviour which are currently a problem.
	Similarly, walking and cycling have been shown to be key contributors to encouraging healthy lifestyles and improving activity levels. The policy should therefore contribute to improving health in an area where health levels are poor. It is recognised that there are a number of other factors which are also important.
	Such a network of pedestrian routes should also help contribute towards sustainable access to Town Centre Services although this would be stronger if it also linked to surrounding neighbourhoods.
	The other key area where this policy is beneficial is with regard to encouraging economic development. The policy seeks to encourage a greater circulation of pedestrians in the Town Centre and encourage a higher footfall. By providing this infrastructure, the resulting increase in activity may help to benefit the success of the Town Centre businesses and the economy overall and help to encourage further inward investment. Similarly, this may also encourage a more successful visitor economy by encouraging visitors to explore a wider area of the town on foot. This, however, falls short of aiding economic inclusion by not extending this

Performance Against SA Objectives	Commentary
Positive Performance	
	network to the surrounding neighbourhoods which exhibit high levels of employment deprivation.
	The policy promotes a sustainable form of travel (by foot and by cycle) which does not emit carbon dioxide or adverse air quality emissions. However, whether these measures would encourage people to travel to the Town Centre by sustainable means and effectively reduce car journeys (and associated emissions) is considered unlikely.
	The policy makes reference to the requirements of Policy EC1.3 of the Development Management Policies DPD on Public and Civic Spaces. It also makes a number of recommendations for the design and appearance of development fronting onto or including elements of the network which would indirectly benefit townscape.

Comments on Action Sets and Supporting Text

The key actions are positive and supportive of the policy, in particular it identifies the need to link key routes into surrounding residential areas which is a key recommendation of the SA. This would, however, be stronger if embedded within the policy itself.

Recommendations for Mitigation/Enhancement

The following recommendations would further improve the sustainability performance of the policies:

- The objectives could be achieved more fully if the policy states that the network is also expanded in the future to link with surrounding residential areas and public transport hubs such as the railway station, bus stops etc.
- Measures to better define pedestrian routes could be encouraged to include appropriate tree/shrub planting and help to link areas of green space within the Town, thereby encouraging a network of green infrastructure. Such measures could also be reflected in AS1

4.3.3 Further Encouraging Business Investment and Development

Components

This section of the AAP comprises:

- MAAP SP2: Investment Incentives
- AS4: Further encourage business investment and development

Discussion of Appraisal Findings

Table 4-1 Summary performance of the policies within the Further Encouraging Business Investment and Development section of the AAP

Performance Against SA Objectives	Commentary
Positive Performance	
S1 Crime S3 Health EC1 Thriving economies EC2 Economic drivers EC4 Economic inclusion EN5 Sustainable resources	A key theme of the policy is to encourage economic growth through making Morecambe a more attractive place for investment. The policy seeks to encourage inward investment into Morecambe through preparing a draft Local Development Order (LDO) for the Town Centre and exempting development from certain regulatory and charging requirements in order to facilitate the regeneration of Morecambe. An increase in inward investment in Morecambe over the long-term would facilitate regeneration, economic growth and may reduce currently high crime rates. Increased investment would also result in an increase of new decent homes (of which there is a current shortage) which would offer indirect health benefits. Facilitating regeneration and encouraging new development within Morecambe is likely to bring with it new employment opportunities. This would be particularly beneficial for Morecambe's residents as the area suffers with some of the highest levels of employment deprivation in England.
	The policy is likely to lead to new development on previously developed brownfield land which represents a sustainable use of land resources. In addition, development on brownfield land may also result in the remediation of contaminated land which would benefit soil resources.
Positive and Negative Perfo	ormance
S2 Housing	The policy seeks to facilitate the delivery of new housing within Morecambe through exempting development from Policy SC4.2 (Affordable Housing Requirements) of the Development Management DPD and from making developer contributions via the Community Infrastructure Levy (CIL). Therefore the policy would contribute to ensuing decent new housing is provided within Morecambe (and improving the current poor housing stock). However, affordable housing would not be provide as part of new residential schemes therefore housing that meet the needs of all would not be delivered. Although it should be noted that housing affordability is not currently an issue within Morecambe.

Comments on Action Sets and Supporting Text

The key actions are positive and supportive of the policy; they identify further exemptions which developments within Morecambe would benefit from. The action set would benefit from being included within Policy SP2 as the policy would then provide a comprehensive list of exemptions.

Recommendations for Mitigation/Enhancement

The following recommendation would further improve the sustainability performance of the policy:

It should be ensured that Policy SP2 states that other than the exemptions outlined within policy, development proposals are expected to comply with all other relevant policies within the Local Plan.

4.3.4 Morecambe's Main Seafront and Promenade

Components

This section of the AAP comprises:

- MAAP SP3: Morecambe Main Seafront and Promenade
- AS5: Central Seafront and Main Beach
- MAAP Policy Development Opportunity (DO) 1: The Battery
- AS6: Western Seafront and Beach
- MAAP Policy DO2: Strategic Leisure Seafront Headland, Central Promenade
- AS7: Seafront Headland, Central Promenade

Discussion of Appraisal Findings

Table 4-2 Summary performance of the policies within the Main Seafront and Promenade section of the AAP

Performance Against SA Objectives	Commentary
Positive Performance	
-	The policies seek to make better use of the main seafront and promenade through incorporating open space for recreation and enjoyment along with new leisure facilities which may offer health and wellbeing benefits for residents and visitors alike along with promoting healthy lifestyles. The policies also address current poor connectivity between the seafront and Morecambe Town Centre, through ensuring the integration of the two areas and making sure they are legible and safe for pedestrian movement. Policy DO2 also specifically ensures that new pedestrian crossings are provided which would also improve connectivity and accessibility. The policies would create a small number of local employment opportunities through encouraging new leisure development, hotel development, retail and food development and the construction of a new Bay Discovery Centre. Although employment opportunities created would not be particularly highly-skilled, jobs could be particularly beneficial for youth unemployment and general employment deprivation in Morecambe (both of which are high). General improvements to the look and feel of the main seafront and promenade, in addition to high quality new development including visitor accommodation may enhance the visitor economy in Morecambe and reverse the trend of people staying in the area for a single day. Providing further recreation and leisure actives and holding festivals and events may further enhance the visitor economy and change the day visitor trend. Biodiversity resources would be protected through the policies commitment to not permit any proposals that may result in a significant adverse impact on the environment of the Bay in its integrity as a Natura 2000 site or as a European Marine Site. Further environmental benefits would be realised through Policy SP3's commitment to ensuring the main seafront and promenade are protected from development that would harm the open character of the Bay and its requirements
	to ensure new development is of a high quality design. Both of which would protect townscape character and heritage resources. Policy DO2 provides additional benefits to heritage resources through its requirement that new development
	relates well to heritage assets including the Midland and Winter Gardens Listed

Performance Against SA Objectives	Commentary			
Positive Performance				
	Buildings.			
	Regarding climate change, Policies SP3 and DO1 state that a programme of new coastal defence works over the plan period will be undertaken including a replacement sea wall and a new wave refraction wall which may benefit current flood risk within the 'Battery' area (the area lies within Flood Zone 2). In addition, improving accessibility and connectivity for pedestrians within the main seafront and promenade area to surrounding areas of Morecambe may encourage residents to leave their cars at home and encourage the use of more sustainable modes of transport (and reduce current congestion problems and emissions).			
Positive and Negative Perfo	ormance			
S1 Crime	A central theme of the policies is to increase activity along the main seafront and promenade area which would increase passive surveillance, which may contribute to a reduction in current high levels of crime and opportunities for crime. However, creating new commercial leisure development may also create additional opportunities for antisocial behaviour.			

Comments on Action Sets and Supporting Text

The key actions are positive and supportive of the policy, in particular they identify further enhancements to the seafront and the need to prepare a Management Plan for further improvements and ongoing management. Further enhancements include further investment in public art, new access points for pedestrians accessing the beach, improved seating, coastal defence works and new directional information and interpretation points. The enhancement measures overall would improve the look and feel of the seafront and promenade and improve access to other areas within Morecambe which would benefit the SA Objectives.

AS7 specifically includes a list of uses and activities that may prove appropriate in the short – medium term on the Seafront Headland, Central Promenade site including multi-games space, crazy golf, multi- wheel sports, outdoor gym etc. Policy DO2 may benefit from inclusion of these uses within the actual policy text.

Recommendations for Mitigation/Enhancement

The following recommendations would further improve the sustainability performance of the policies:

- Policy DO2 would benefit from stating that development should relate well to the Town Centre Conservation Area which is also an important heritage asset along with the War Memorial Grade II Listed Structure Building on Marine Road and the adjacent Platform Grade II Listed Building on Marine Road.
- Although Policy SP3 ensures that development would not be permitted if it is likely to lead to adverse effects on the open character of the Bay, it would benefit from a specific reference to ensuring development should relate well to local heritage assets including Conservation Areas and Listed Buildings as this policy takes preference over policies DO1 and DO2.

4.3.5 The Town Centre

Components

This section of the AAP comprises:

MAAP Policy SP4: Town Centre

MAAP Policy DO3: The Andale and Area

MAAP Policy DO4: West View

MAAP Policy DO5: Festival Market and Area

Action Set AS8: The Town Centre

Discussion of Appraisal Findings

Table 4-3 Summary performance of the policies within the Town Centre section of the AAP

Performance Against SA Objectives	Commentary
Positive Performance	
S1 Crime S2 Housing S4 Education S5 Access EC1 Thriving Economies EC2 Economic Drivers EC4 Economic inclusion EN 1 Climate change EN3 Biodiversity EN 4 Landscape/Townscape EN7 Heritage EN8 Air quality	This section of policies focuses on revitalising the underperforming Town Centre. Policy SP4 identifies a Primary Shopping Area and encourages a better defined Town Centre area. Policies DO3-5 identify policy and guidance for three key locations: the Andale, West View and Festival Market areas. SP4 makes provision for residential development in the Town Centre but outside the Primary Shopping Area. Cumulatively the policies promote a consolidated and reinvigorated Town Centre by promoting an improved, more legible environment, focussing on typical Town Centre uses only and improved access. Collectively these should help to encourage inward investment and vitality in the area. The Town Centre is located adjacent to some of the most employment deprived neighbourhoods in the Lancaster. An improved Town Centre offer in terms of employment opportunities may benefit these communities although there is some uncertainty over whether this would definitely happen.
	The strengthening of the Town Centre's function should help essential services to be concentrated in a location that is accessible to a greater range of users, including e.g. those who are less mobile. The Development Opportunity policies would also strengthen the role and viability of these services. Whilst some of the measures to promote pedestrian movements and improve the quality of the environment may benefit health and wellbeing, it is not considered that the extent of change would be significant in this respect. DO3 seeks to improve the setting of Morecambe Library and enable its growth. Indirectly, this may help to provide opportunities for learning. Together with improved levels of investment, regeneration, pedestrian legibility and passive surveillance as promoted through DO3 and DO5, these could contribute to a reduction in crime and fear of crime in an area that currently suffers from this issue. SP4 seeks to consolidate a Primary Shopping Area and better define the Town

Centre. As this area is accessible via public transport, it has potential to contribute to reducing trips by car which in turn may have a small benefit to reducing carbon

Each of the policies in this section work towards a well designed and better defined

and air quality emissions.

Performance Against SA Objectives	Commentary
Positive Performance	
	Town Centre and cross-references are made to other aspects of the AAP and the Development Management Policies DPD in order to encourage good design which would ultimately benefit the existing townscape and Morecambe Conservation Area designation. The Town Centre also includes a number of listed buildings although only DO5 (Festival Market and Area) makes reference to the need to relate well to the Winter Gardens listed building. Whilst DO3 identifies the need to retain and supplement the existing stock of trees for amenity purposes, this is the only aspect of the policies which may contribute to

Comments on Action Sets and Supporting Text

The Action Set (AS8) identifies a number of actions for Marine Road Central, Andale and area, Victoria Street and environs and land west of Northumberland Street.

The majority of the actions relate to improved access, legibility, streetscene and public areas. The actions for the land west of Northumberland Street also include proposals to encourage this area as a leisure and entertainment hub for the Town Centre.

Cumulatively these actions would seek to complement the policies, notably through measures to improve the quality and vitality of the Town Centre and to encourage inward investment. They make specific references to improved lighting, signage and other safety measures to encourage pedestrians and cyclists. The measures overall should also increase the offer of facilities and amenities for residents and visitors which should benefit the SA objectives on access to services as well as economic drivers. Measures proposed to bring St Laurences's Church back to beneficial use are also positive.

It is recommended, however, that a greater reference is made to the historic value of the Town Centres' assets and the need to protect and enhance these, together with collective measures to benefit the Conservation Area.

Recommendations for Mitigation/Enhancement

The following recommendations would further improve the sustainability performance of the policies:

- It is recommended that other policies (perhaps focus in SP4) reference the need for development to complement and not detract from the setting of the Conservation Area and other listed buildings in the Town Centre.
- It is recommended that a reference is made to the Conservation Area and the need for development in these areas to be sensitive to it. It is recommended that a cross reference be included to a policy on sustainable design requirements within the AAP.
- It is recommended that other policies (perhaps focus in SP4) reference the need for development to complement and not detract from the setting of the Conservation Area and other listed buildings in the Town Centre.

4.3.6 South of the Town Centre

Components

This section of the AAP comprises:

- AS9: Edge of Centre Retail Park
- MAAP Policy DO6: Former Frontierland Site

Discussion of Appraisal Findings

Table 4-1 Summary performance of the policies within the South of the Town Centre section of the AAP

Performance Against SA Objectives	Commentary
Positive Performance	
S1 Crime S2 Housing S3 Health S5 Sustainable access EC1 Thriving economies EC2 Economic drivers EC4 Economic inclusion EN4 Landscape EN7 Historic environment	Research has shown there are health and social benefits that arise from high quality housing. In addition, the policy ensures new development includes clear, quality, legible and safe routes for pedestrians (and cyclists) through the site that connect to the seafront, the West End and the adjacent retail park which would benefit health through promoting healthy lifestyles. Further health benefits may arise through the policy's commitment to ensure new development contributes to appropriate improvements to the adjacent seafront and promenade to help meet needs for recreation. The policy would contribute to improving local housing stock which would benefit the current shortage of high quality housing within central Morecambe. However, as per Policy SP2, it is unlikely these new homes would be affordable, although, affordable housing availability is not a current problem within Morecambe Town Centre. Crime deprivation and incidents of anti-social behaviour within central Morecambe
	are among the highest in England. Therefore new residential development on the site with a commercial element along Marine Road West (with active frontages) would improve natural surveillance and may reduce fear of crime.
	A new residential development on the currently derelict former Frontierland site may also act as an economic driver for further investment and economic growth within Morecambe as it would increase developer confidence and may encourage greater inward investment. Further economic growth within Morecambe along with the redevelopment of the former Frontierland site may also contribute to creating a strong and vibrant Town Centre, as new residential development may bring with it new residents to Morecambe which could increase local footfall. New residential development would also provide some short term construction related job opportunities for local residents which would offer minor benefits for local employment deprivation. In addition, some new retail / recreation jobs would be created along Marine Road West which would also benefit employment deprivation. It is likely that new residential development would enhance local townscape character and quality (including the setting of the adjacent West End Conservation
	Area) Frontierland currently appears run down and derelict from the promenade.
Positive and Negative Perfe	ormance
EN1 Climate change EN5 Natural resources	The focus of this policy is to facilitate new development and investment in Morecambe and not specifically to ensure new development is low carbon or has optimal energy efficiencies (consideration is included within Policy EN4.1 -

Performance Against SA Objectives	Commentary
Positive Performance	
EN6 Energy efficiency EN8 Air quality	Sustainable Construction Techniques of the Development Management DPD). However, new residential development on this site is likely to increase traffic movements within Morecambe which may lead to a localised increase in greenhouse gas emissions and adverse effects on local air quality over the long term. Nevertheless, the policy does seek to ensure the site is well connected to surrounding areas via legible pedestrian / cycle routes which may encourage people to use more sustainable modes of transport and reduce the use of the private car.
	Residential development on this previously developed brownfield site represents a sustainable use of land resources and may also result in the reclamation of contaminated land (if any contamination is present) which would benefit soil resources. However, new development requires the use of natural resources and a large residential development on the site would increase the demand of water resources.

Comments on Action Sets and Supporting Text

The Action Set (AS9) relates to Central Drive Retail Park and identifies a number of actions for improving the appearance of the buildings fronting Marine Road West and improving connectivity of the site with the adjacent former Frontier Land site via walking and cycling. Cumulatively these actions would complement Policy DO6. However, they may benefit from being included within the policy in order to provide a comprehensive Development opportunity Policy.

Recommendations for Mitigation/Enhancement

The following recommendations would further improve the sustainability performance of the policies:

- It should be ensured that local health care services within Morecambe have the capacity to deal with a potential increased population resulting from anticipated development on the former Frontierland site.
- Public realm improvements should be sought within new residential development on the site to include green space and soft landscaping as this would benefit local biodiversity resources and address the current shortage within the AAP boundary.
- Although the Local Plan should be read as a whole it is recommended that the policy includes a cross reference to Policy EN4.1 of the Development Management DPD Sustainable Construction Techniques, as there are opportunities to minimise waste and incorporate a high standard of sustainable design and renewable energy technology into new development.
- The design and scale of new development should be mindful and sensitive to the adjacent townscape character and the West End Conservation Area.

4.3.7 Travel and Transport

Components

This section of the AAP comprises:

- AS10: Traffic route signage to and from central Morecambe
- AS11: Parking provision and management
- AS12: Bus services
- AS13: Rail services

Discussion of Appraisal Findings

This section does not contain any policies, however, the following commentary has been made regarding the text and Action Sets included.

This section provides a number of positive actions which would complement the policy framework discussed above. In particular the proposals to improve traffic signage to improve people's journeys into the Town and better define its identity should benefit people's sense of arrival.

Parking provision is usually seen as counter-intuitive to promoting travel by sustainable and low carbon means. However, it is recognised that some parking provision is essential for accessing the town centre and attracting visitors and shoppers alike. The proposals to review parking provision and management are sensible, especially those which seek to locate the majority of parking at the edge of the Town Centre to avoid car parks being at the heart of the Town. Provisions are still made for parking close to facilities/amenities where there is a need, e.g. for disabled users and for short stay.

The provisions of AS12 and 13 on public transport are also beneficial and complementary to the plan as a whole.

Recommendations for Mitigation/Enhancement

The following recommendations are made:

Given the oversupply of parking at present it would seem sensible to rationalise and condense the parking into targeted areas rather than retaining the existing low-density spread across the Town. This rationalisation would still enable no net loss of spaces overall. This would enable some underused car parks to be re-used for more beneficial Town Centre functions or public open space.

It is recommended that further text be included in this section which links to the proposals to encourage pedestrians and cyclists elsewhere in the document.

4.3.8 Marketing to Investors and Visitors

Components

This section of the AAP comprises:

- AS14: Investor marketing strategy
- AS15: Visitor marketing strategy

Discussion of Appraisal Findings

This section does not contain any policies, however, the following commentary has been made regarding the text and Action Sets included.

The Action Sets and supporting text complement the AAP policies by providing further detail on the marketing of Morecambe to both investors and visitors alike. Marketing to investors is seen

as the key to facilitating regeneration and improving Morecambe's economy. The marketing strategy aimed at investors includes using the views out across the bay, Morecambe's rich heritage and relatively low rents and land values as unique selling points in order to encourage inward investment. Successful marketing to investors would benefit the economic SA Objectives. Marketing to visitors also includes using Morecambe Bay and its unique natural environment as a differential selling point in order to encourage more visitors to Morecambe. Key themes of AS15 are to ensure there are sufficient activities within Morecambe for day visitors to stay long enough to eat in the evenings and to convert day visitors into staying visitors. Again successful marketing to visitors would benefit the economic SA Objectives.

Recommendations for Mitigation/Enhancement

No recommendations are considered necessary to strengthen the action sets within this section.

4.4 Appraisal of Cumulative Effects

The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).

The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. There is also the potential for the plan to have cumulative effects with other plans and programmes that are produced by other authorities such as neighbouring local authorities or the Environment Agency. Table 4-7 summarises the cumulative and synergistic impacts of the plan. The approach identifies receptors, for example the economy or the townscape, that may be affected by cumulative impacts.

Table 4-1 Cumulative and Synergistic Effects of the Morecambe AAP

Receptor	Cumulative / Synergistic Effect	Causes	Potential Cumulative Trend
Crime Rates and Fear of Crime	Crime and fear of crime should reduce within the Morecambe in response to wider regeneration initiatives in addition to the AAP provisions.	Cumulative overall regeneration as set out in the Morecambe AAP, the Core Strategy (adopted 2008), Development Management DPD and the Land Allocations DPD would create improved living and working environments and could improve aspirations and indirectly help reduce high crime rates in Morecambe in the long-term. Secure By Design principles should be encouraged within developments.	Positive
Educational Attainment Skills and Training Provision	Levels of educational and skills attainment have the potential to improve in the long term.	An overall improved environmental quality, together with an improved quality of life through social regeneration, would indirectly contribute to improved aspirations. New employment opportunities within Morecambe would help to provide skills training opportunities for local people.	Positive
Health of Morecambe's population	Levels of health and well- being have the potential improve in the long term.	An improved overall environmental quality, together with improved urban renaissance, would positively impact upon the health and wellbeing of the	Positive

Receptor	Cumulative / Synergistic Effect	Causes	Potential Cumulative Trend
		population of Morecambe. Improved access to employment and incomes, together with social regeneration proposals, will improve aspirations and may improve people's ability to afford healthier lifestyles and improve living conditions. Provisions to improve connectivity for pedestrians and cyclists within the Morecambe would encourage increased physical activity and encourage healthier lifestyles. This is proposed in the Morecambe AAP and would link to surrounding areas outside the AAP boundary. Increasing the number of recreational facilities available within Morecambe would also contribute to increasing physical fitness and in turn the health of Morecambe's residents.	
Housing Provision	New housing will be provided which would contribute to meeting local and subregional targets.	The Morecambe AAP provides for residential development on the Former Frontierland site which will reflect local need for high quality new housing. Housing provisions are also outlined within the Core Strategy, Development Management DPD and the Land Allocations DPD. The contribution of residential development towards achieving a more balanced and responsive housing market will be high, as more high quality housing will be available.	Positive
Community cohesion	Community cohesion has the potential to improve within Morecambe.	The Morecambe AAP would contribute to an improved image of Morecambe, and could, in turn, help to raise the aspirations of the local community and generate an increased sense of community cohesion and pride. In addition, the provision of higher quality housing and employment opportunities also have the potential to contribute positively to community spirit and cohesion by creating a location where people want to live and work.	Positive
Access to goods and services	Accessibility for local people and visitors would be improved.	Improved connectivity within Morecambe and to surrounding areas is a key feature of the Morecambe AAP, particularly through the promotion of sustainable modes of transport (i.e. walking and cycling). Cumulatively with the Core Strategy, the Development Management DPD, Lancashire's Local Transport Plan 3 and the delivery of the new M6 link road beneficial effects would be greater.	Positive
Sustainable Economic Growth	The Morecambe AAP would help facilitate employment creation, business development and economic	The Morecambe AAP would contribute to sustainable economic growth, employment provision and economic inclusion. An overall improved environment, together with planning	Positive

Receptor	Cumulative / Synergistic Effect	Causes	Potential Cumulative Trend
	growth.	exemptions enhanced connectivity and housing provision, would help to market Morecambe as a place for investment.	
Economic Inclusion	Promotion of employment in areas of high employment / income deprivation.	General regeneration facilitated by economic development and employment provision within the Morecambe would help to reduce deprivation and reduce unemployment in an area most at need. Improved accessibility within Morecambe as a whole, with improved connectivity, should ensure easy access to employment for all.	Positive
Biodiversity	The Morecambe AAP seeks to ensure protection of biodiversity resources.	The Morecambe AAP and the associated HRA (in addition to Policy EN2.1 of the Development Management DPD) seek to ensure protection of the biodiversity resources with an emphasis on protecting European sites. Provisions to improve accessibility for the local population and public realm improvements could indirectly generate the enhancement of natural areas.	Positive
Townscape Character Heritage Assets	Protection and enhancement of the historic townscape and heritage.	The overall regeneration of Morecambe would positively impact upon the local townscape through an enhanced environmental and built quality which would benefit the Town Centre and West End Conservation Areas. Improved accessibility within Morecambe may reduce the need to travel by private car, which could benefit townscape quality if congestion is reduced.	Positive
Climate Change Energy Efficiency Natural Resources	Potential negative and positive contributions towards climate change. The prudent use of natural resources.	The AAP seeks to locate development on previously developed brownfield land and provide new flood defence measures in the 'Battery' area of Morecambe which would all reduce flood risk and risk of run-off from new development. Natural resources would also be protected through the sustainable use of land resources. However, all new development has the potential to use natural resources, increase pressure upon water and energy resources, and generate increased waste production. There is the potential for the AAP to ensure new development include energy efficient and renewable energy technology.	Positive and negative

Receptor	Cumulative / Synergistic Effect	Causes	Potential Cumulative Trend
Climate Change Air Quality Sustainable Transport	Potential positive effects as a result of promotion of sustainable travel. Potential negative effects of traffic growth.	The concentration of investment, regeneration and new development in Morecambe could potentially lead to increased travel and congestion, which could generate implications upon local air quality and local emissions in the long-term. However, the Morecambe AAP contains a number of provisions for improved connectivity and promotion of sustainable travel, which would help to alleviate some of these potential cumulative impacts.	Positive and negative

5 Monitoring Framework

5.1 Introduction

This section provides an outline monitoring framework and advice for monitoring the significant effects of implementing the Morecambe AAP. Monitoring is a SEA Directive requirement and an ongoing process integral to the implementation of the Morecambe AAP. It 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.

5.2 Approach

The monitoring framework has been developed to measure the performance of the Morecambe AAP 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 significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty 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 Morecambe AAP, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in Morecambe. This enables the measurement of the overall effects of the AAP.

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.

5.3 Existing Monitoring Programmes

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. The Lancaster City Council AMR (2011) identifies a series of indicators that can be used to monitor progress.

5.4 Proposed Monitoring Framework

Table 5-1 provides a framework for monitoring the effects of Morecambe AAP and determining whether the predicted sustainability effects are realised. The framework is structured using the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty;
- A suitable monitoring indicator with a potential source for the data identified; and
- A target (where one has been devised).

The impacts predicted in the SA will not be realised until development occurs through the Morecambe AAP and other related Local Plan documents (e.g. the Core Strategy, the Land Allocations DPD and the Development Management DPD). The monitoring framework presented in Table 5-1 can then be updated to include targets as and when they are developed.

Table 5-1 Proposed Monitoring Framework

SA Objective	Effect to be Monitored	Indicators	Targets (to be refined and developed further once the Plan is adopted)	Source
S1 To reduce crime, disorder and fear of crime and reduce exposure to hazards	Effect of AAP on contributing to a reduction in crime levels.	Number and distribution of wards with Lower Super Outputs Areas (LSOAs) in the bottom 10% most deprived for crime deprivation. Crime rates per 1,000 of the population for key offences. Incidences of disorder Reported violent crime in Central Morecambe Perception of crime (more detailed indicators are required) (AMR, 2011) Potential future monitoring indicators: Number of new initiatives implemented to tackle anti-social behaviour.	Reduce the number of crimes per 1000 population. Reduce the number of wards with LSOAs in the bottom 10% most deprived. Reduce incidences of violent crime. Improve Morecambe as a place with low levels of antisocial, drunk or rowdy behaviour as a problem.	Corporate Plan 2009-2012 Index of Multiple Deprivation 2010 Annual Monitoring Report 2011
S2 To ensure there is housing to meet all needs	Monitor the type, quality, tenure and density of the housing that is delivered within Morecambe as a result of the application of the AAP. Environmental and sustainable construction standards achieved in new housing development should also be monitored.	Percentage of housing stock classified as unfit Location of permissions and completions – previously developed land/Greenfield/urban/rural Number of homeless households (reported) Number of wards in the bottom 10% for living environment deprivation	To balance the housing market to meet customer needs focusing on the supply of good quality housing and improving the condition of accommodation across the Morecambe. Prevent homelessness, repeat homelessness, and the need to use temporary and emergency accommodation by improving access to advice and support. Reduce number of wards with LSOAs in bottom 10% for living environment	Housing Land Monitoring Report 2011 Annual Monitoring Report 2011 Corporate Plan 2012 - 2015 Sustainable Community Strategy, 2008-2011 Lancaster District Homelessness Strategy 2008- 2013 Index of Multiple Deprivation 2010

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SA Objective	Effect to be Monitored	Indicators	Targets (to be refined and developed further once the Plan is adopted)	Source
			deprivation Deliver 100% of all new housing completions on previously developed land.	
S3 To improve physical and mental health for all and reduce health inequalities S5 To improve sustainable access to basic goods, services and amenities for all groups	Monitor levels of health and well-being across the district. The implementation of the plan policies has the potential to improve physical fitness and accessibility through providing opportunities for local residents and visitors to pursue healthy lifestyles. Effects of the plan on accessibility of key services and facilities for Morecambe's population.	Percentage of resident population who consider themselves to be in good health Number of wards with LSOAs in the bottom 10% most deprived for health deprivation Number of LSOAs in the bottom 10% most deprived for barriers to housing and services provision. Amount of new residential development within 1km of 5 basic services (GP, Food Store, Primary School, Bus Stop and Post Office) Life expectancy at birth Standardised mortality ratios GPs per 1,000 population Percentage of population with a long-term limiting illness Public open space per 1,000 population New public space delivered annually Children's playspace delivered annually Distribution of sports facilities	Reduce the number of wards with LSOAs in the bottom 10% most deprived for health deprivation To reduce the number of LSOAs in the bottom 10% most deprived for barriers to housing and services deprivation. Improve the difference in life expectancy between Morecambe and the rest of the Lancaster district. Box and Harrison Nature Conservation Area standard (1ha per 1,000 population) Ensure that there is at least one 20 hectare natural green space site within 2km of people's homes	Index of Multiple Deprivation 2010 Council's PPG17 Study Office of National Statistics Annual Monitoring Report 2011
EC1 To encourage thriving local	The amount of new employment development that	Location of key industries and major employers.	To reduce number of wards with LSOAs in the bottom 10% for	Index of Multiple Deprivation 2010

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SA Objective	Effect to be Monitored	Indicators	Targets (to be refined and developed further once the Plan is adopted)	Source
economies EC2 To ensure key economic drivers are strong EC4 To encourage economic inclusion	occurs in Morecambe, the type of jobs created, the accessibility of the jobs to the most economically deprived and the average rate of pay Amount of new retail development in the centres of Morecambe.	Economic activity rate Employment by sector and occupation Number of wards with LSOAs in bottom 10% most deprived for employment and income deprivation Percentage of working age population claiming jobseekers allowance Employment sqm (gross) by location Retail sqm (gross) by location Zone A rentals in Morecambe Retailer representation in Morecambe	employment and income deprivation. Increase in visitor numbers (day and overnight stays) Recommend that targets are developed once the plan is adopted.	Annual Monitoring Report 2011
EN1 To limit and adapt to climate change EN 8 To protect and improve air quality	Effects on reducing travel and promoting use of sustainable modes of transport. Monitor the effect of the new coastal defence works in the 'Battery' area.	Local rail and bus patronage Cycle / footpath route length Population within 400m of a bus stop on a quality bus route Total CO ₂ emissions per capita per year. Local air quality monitoring results for nitrogen and particulates Complaints re odour/smell Incidences where thresholds for air quality are exceeded Indicators used to monitor the implementation of the Local Transport Plan may also be relevant	To reduce per capita CO ₂ emissions each year. Other targets to be developed	Sustainable Community Strategy, 2008-2011 Annual Monitoring Report 2011
EN3 To protect and	Monitor effects of new	Change in condition of SAC, SPA, Ramsar	Maintain and improve condition of	Natural England

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SA Objective	Effect to be Monitored	Indicators	Targets (to be refined and developed further once the Plan is adopted)	Source
enhance biodiversity	development on biodiversity assets across within Morecambe.	sites Condition of SSSIs (percentage in favourable condition) Area of habitat created	designated sites Increase area of habitat provided across the district Box and Harrison Nature Conservation Area standard (1ha per 1,000 population) Ensure that there is at least one 20 hectare natural green space site within 2km of people's homes	
EN4 To protect and enhance landscape and townscape character and quality EN7 To protect and enhance the historic environment and heritage assets	Integration of new development into the townscape. Positive contribution of new green areas in Morecambe as part of public realm improvements. Protection afforded to Morecambe's heritage assets through application of the plans policies.	Contextual information based upon landscape and townscape character assessments Number and size of Conservation Areas Number of heritage assets on at English Heritage's risk register Loss of existing green space Number of residents involved in heritage projects Hectares of public realm improved	Ensure full protection of Conservation Areas from inappropriate development and seek to improve the character and appearance of the area. (AMR). Ensure no further Listed Buildings are put on the at risk register No loss of existing green space (AMR)	Annual Monitoring Report 2011
EN5 To ensure the sustainable use of natural resources EN6 To increase energy efficiency and require the use of renewable energy sources	New development is likely to increase resource use. Therefore monitor the effect of plan on encouraging initiatives that minimise resource use. Monitor the amount of brownfield land that is used for new developments.	Percentage of housing completions on previously developed land. Percentage of employment development on previously developed land. Number of grey water recycling and water minimisation schemes implemented. Number of sustainable design schemes implemented.	100% new housing to be built on Brownfield sites Other targets to be developed	Annual Monitoring Report 2011

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SA Objective	Effect to be Monitored	Indicators	Targets (to be refined and developed further once the Plan is adopted)	Source
		Incorporation of secondary and recycled materials in new development projects.		

6 Next Steps

This SA Report has now been issued for consultation alongside the Preferred Option Morecambe AAP to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, Lancaster City Council has reviewed the responses and made necessary amendments to the document. This SA report has been updated to reflect these additions.

The Preferred Option Morecambe AAP and the SA Report can still be viewed at the address below:

Lancaster City Council
Regeneration and Planning Service
PO Box 4
Lancaster Town Hall
Dalton Square
Lancaster
LA1 1QR

Alternatively they can be viewed at Lancaster City Council's Planning website:

www.lancaster.gov.uk/planningpolicy

www.lancaster.gov.uk/morecambe aap

The NTS of the SA Report is also available for public inspection free of charge during normal opening times at all libraries within the District.

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Review of Plans, Programmes and Environmental Protection Objectives

Appendix B

Baseline Data

Appendix C

SA Objective Compatibility

Appendix D

Appraisal of Spatial Policies and Development Opportunities

Managing Development

MAAP Policy SP1: Key Pedestrian Routes and Spaces

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S1 To reduce crime, disorder and fear of crime and reduce expose to hazards	SP1: +	Medium to Long- Term Indirect Reversible Medium Certainty	Crime and anti-social behaviour is a significant issue in the Town Centre. The proposals seek to increase pedestrian presence in the Town Centre and ensure new development fronts key pedestrian routes and spaces. This should help provide active frontages at ground floor level and create good opportunities for passive surveillance from upper levels. These measures should help to reduce opportunities for crime and anti-social behaviour.
S2 To ensure there is housing to meet all needs	SP1: 0		Whilst the policy is not focussed on housing provision it makes reference to integration with the development opportunity policies in the AAP which include some residential provision at the Former Frontierland site. No other housing provisions are made in this policy.
S3 To improve physical and mental health for all and reduce health inequalities	SP1: +	Long-Term Indirect Reversible Medium Certainty	A key aim of the policy is to encourage much greater pedestrian movement and also provide opportunities for cyclists. Levels of health are poor in Morecambe and walking and cycling have been shown to be key contributors to encouraging healthy lifestyles and improving activity levels. The policy should therefore contribute to improving health although it is recognised that there are a number of other factors which are also important.
S4 To encourage lifelong learning	SP1: 0		The policy would not have a notable effect on this objective.
S5 To improve sustainable access to basic goods, services and amenities for all groups	SP1: +	Short-Long Term Direct Reversible High certainty	Although it only focuses on links within the Town Centre and seafront areas, the policy seeks to encourage a network of pedestrian and cycle links which would help contribute towards sustainable access to Town Centre Services. The objective could be achieved more fully if the network were also expanded in the future to link with surrounding residential areas and public transport hubs such as the railway station.
EC1 To encourage thriving local economies	SP1: +	Medium-Long Term Direct Reversible High certainty	The policy seeks to encourage a greater circulation of pedestrians in the Town Centre and encourage a higher footfall. By providing this infrastructure, the resulting increase in activity may help to benefit the success of the Town Centre businesses and the economy overall and help to encourage further inward investment.
EC2 To ensure key economic drivers are strong	SP1: +	Medium-Long Term Direct Reversible High certainty	For the reasons described above, a busier Town Centre with higher numbers of pedestrians should help to increase levels of vibrancy. It may also encourage a more successful visitor economy by encouraging visitors to explore a wider area of

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
			the town on foot.
EC3 To ensure the workforce meets local economic needs	SP1: 0		The policy would not have a notable effect on this objective.
EC4 To encourage economic inclusion	SP1: 0		Whilst improving pedestrian and cycle links to Town Centre jobs should provide easy access to employment from neighbouring residential areas which exhibit high levels of employment deprivation, the network is only proposed within the Town Centre and seafront areas. The objective could be partially achieved by expanding the
			network into the surrounding residential neighbourhoods.
EN1 To limit and adapt to climate change	SP1: 0		The policy promotes a sustainable form of travel (by foot and by cycle) which does not emit carbon dioxide. However, whether these measures would encourage people to travel to the Town Centre by sustainable means and effectively reduce car journeys (and associated emissions) is considered unlikely. The network should incorporate public transport hubs such as the railway station, bus stops etc.
EN2 To protect and enhance the quality of water features and resources	SP1: 0		The policy would not have a notable effect on this objective.
EN3 To protect and enhance biodiversity	SP1: 0		The policy would not have a notable effect on this objective. However, measures to better define pedestrian routes could be encouraged to include appropriate tree/shrub planting and help to link areas of green space within the Town, thereby encouraging a network of green infrastructure. Such measures could also be reflected in AS1.
EN4 To protect and enhance landscape and townscape character and quality	SP1: +	Medium-Long Term Direct Reversible High certainty	The policy makes reference to the requirements of Policy EC1.3 of the Development Management Policies DPD on Public and Civic Spaces. It also makes a number of recommendations for the design and appearance of development fronting onto or including elements of the network which would indirectly benefit townscape.
EN5 To ensure the sustainable use of natural resources	SP1: 0		The policy would not have a notable effect on this objective.
EN6 To increase energy efficiency and require the use of	SP1: 0		The policy would not have a notable effect on this objective.

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
renewable energy sources			
EN7 To protect and enhance the historic environment and heritage assets	SP1: 0		The policy would not have a notable effect on this objective.
EN8 To protect and improve air quality	SP1: 0		The policy promotes a sustainable form of travel (by foot and by cycle) which does not create adverse air quality emissions. However, whether these measures would encourage people to travel to the Town Centre by sustainable means and effectively reduce car journeys (and associated emissions) is considered unlikely. The network should incorporate public transport hubs such as the railway station, bus stops etc.
EN9 To minimise waste, increase re-use and recycling	SP1: 0		The policy would not have a notable effect on this objective.

Encouraging Business investment and Development

MAAP Policy SP2: Investment Exemptions

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S1 To reduce crime, disorder and fear of crime and reduce expose to hazards	SP2: +	Medium-Long Term Indirect Reversible Low certainty	A central theme of the policy is to make Morecambe a more attractive place for developers to invest. An increase in inward investment in Morecambe over the long-term would facilitate regeneration and may reduce current high crime rates.
S2 To ensure there is housing to meet all needs	SP2: +/-	Short - Long Term Direct Reversible Medium certainty	The policy seeks to facilitate the delivery of new housing within Morecambe through exempting development from Policy SC4.2 (Affordable Housing Requirements) of the Development Management DPD and from making developer contributions via the Community Infrastructure Levy (CIL). Therefore the policy would contribute to ensuing decent new housing is provided within Morecambe, albeit not affordable housing (although not currently an issue).
S3 To improve physical and mental health for all and reduce health inequalities	SP2: +	Medium-Long Term Indirect Reversible Low certainty	Indirect health benefits would arise through the implementation of this policy as it would result in the provision of new decent homes Morecambe, however, new homes would not meet the needs of all.
S4 To encourage lifelong learning	SP2: 0		There is no specific focus in any of these policies upon lifelong learning and educational development.
S5 To improve sustainable access to basic goods, services and amenities for all groups	SP2: 0		The focus of the policy is not to improve access to basic goods. However, exempting developers from contributing to the CIL within Morecambe may have a localised adverse effect of public transport provision, although effects are likely to be minor. It should be ensured that the policy states that other than the exemptions outlined within SP2, development proposals are expected to comply with all other relevant policies within the Local Plan.
EC1 To encourage thriving local economies	SP2: +	Short - Long Term Direct Reversible Medium certainty	The policy seeks to encourage inward investment into Morecambe through preparing a draft Local Development Order (LDO) for the Town Centre and exempting development from certain regulatory and charging requirements. This is likely to facilitate regeneration and encourage economic growth making Morecambe a more attractive place to invest. All of which would contribute to the achievement of the SA Objective.
EC2 To ensure key economic drivers are strong	SP2: +	Medium- Long Term Indirect Reversible	Exempting new development from certain regulatory requirements and charging requirements in addition to a draft LDO being produced would act as an economic driver and

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
		Medium certainty	may contribute to creating a strong and vibrant Town Centre (as Morecambe would be a more attractive place to invest).
EC3 To ensure the workforce meets local economic needs	SP2: 0		The policy would not have a notable effect on this objective.
EC4 To encourage economic inclusion	SP2: +	Medium- Long Term Indirect Reversible Low certainty	Although not the focus of this policy, regeneration and new development within Morecambe is likely to bring with it new employment opportunities. This would be particularly beneficial for Morecambe's residents as the area suffers with some of the highest levels of employment deprivation in England.
EN1 To limit and adapt to climate change	SP2: 0		The focus of this policy is to facilitate new development and investment in Morecambe and not to ensure new development is low carbon or has optimal energy efficiencies. The majority of Morecambe is protected from flooding by flood defences that follow the coast. Only a small area to the south of the AAP boundary lies in Flood Zone 2 and it is unlikely new development would occur in this area.
EN2 To protect and enhance the quality of water features and resources	SP2: 0		The policy is likely to lead to development on brownfield land within an existing urban environment. Therefore effects on this policy have been assessed as neutral.
EN3 To protect and enhance biodiversity	SP2: 0		The focus of the policy is not to protect biodiversity resources. However, the policy is likely to lead to development on brownfield land. It should be noted that some brownfield sites can be very biodiverse, particularly if the sites have been derelict for long periods of time. It should be ensured that the policy states that other than the exemptions outlined within SP2, development proposals are expected to comply with all other relevant policies within the Local Plan.
EN4 To protect and enhance landscape and townscape character and quality	SP2: 0		The focus of this policy is not to protect townscape character but to encourage new development and facilitate regeneration within Morecambe. Other policies within the AAP do protect local townscape. It should be ensured that the policy states that other than the exemptions outlined within SP2, development proposals are expected to comply with all other relevant policies within the Local Plan.
EN5 To ensure the sustainable use of natural resources	SP2: +	Medium-Long Term Direct Reversible	This policy is likely to lead to new development on previously developed brownfield land which represents a sustainable use of land resources. In addition, development on brownfield land may also result in the reclamation of contaminated land which

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty Medium certainty	Commentary/Mitigation would benefit soil resources.
EN6 To increase energy efficiency and require the use of renewable energy sources	SP2: 0	,	The focus of this policy is to facilitate new development and investment in Morecambe and not to ensure new development maximises energy efficiencies or increases the use of renewable energy technology.
EN7 To protect and enhance the historic environment and heritage assets	SP2: 0		The focus of this policy is not to protect the historic environment but to encourage new development and facilitate regeneration within Morecambe. Other policies within the AAP do protect historic assets. It should be ensured that the policy states that other than the exemptions outlined within SP2, development proposals are expected to comply with all other relevant policies within the Local Plan.
EN8 To protect and improve air quality	SP2: 0		The policy would not have a notable effect on this objective.
EN9 To minimise waste, increase re-use and recycling	SP2: 0		The policy would not have a notable effect on this objective.

Main Seafront and Promenade

MAAP Policy SP3: Morecambe Main Seafront and Promenade MAAP Policy DO1: The Battery MAAP Policy DO2: Strategic Leisure – Seafront, Headland, Central Promenade

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S1 To reduce crime,	SP3: +/-	Medium-Long Term	A central theme of the policies is to increase activity along the
disorder and fear of crime and reduce	DO1: +/-	Indirect Reversible	main seafront and promenade area. Increased activity in the area would increase passive surveillance, which could
expose to hazards	DO2: +/-	Low certainty	contribute to a reduction in current high levels of crime and opportunities for crime. Policy DO2 specifically ensures that new development relates well to the main seafront and promenade with active frontages at the ground floor and good opportunities for passive surveillance from upper floors, which may improve current poor crime levels. Conversely, creating new commercial leisure development may also create additional opportunities for antisocial behaviour.
S2 To ensure there is	SP3: 0		The supporting text to Policy DO2 states that while residential
housing to meet all needs	DO1: 0		development within Morecambe may be beneficial on the situation there are risks that new homes constrain future leisure uses.
	DO2: 0		In addition, the current economic climate makes it largely an unviable option.
S3 To improve physical	SP3: +	Medium-Long Term	The policies seek to make better use of the main seafront and promenade through incorporating open space for recreation and enjoyment which may offer health and wellbeing benefits
and mental health for all and reduce health	DO1: +	Indirect Reversible	
inequalities	DO2: +	Medium certainty	for residents and visitors alike. Policies DO1 and DO2 specifically state that the council would support proposals for leisure uses including water sports (DO2 states indoor leisure uses would also be supported) which would promote healthy lifestyles. New leisure activities would not only promote active lifestyles, but potentially could contribute to reducing instances of antisocial behaviour.
			The promotion of the Way of the Roses coast to coast cycling route with proposed improved facilities and Lancashire Coastal Way could also have health benefits for visitors and locals alike (as provided in the supporting text to Policy DO1). Connecting these routes with the town centre would also be beneficial. In addition, public realm improvements and improved pedestrian connectivity within the policies could promote pedestrian safety and offer health benefits.
S4 To encourage	SP3: 0	Medium-Long Term	Public realm developments such as a potential Bay Discovery
lifelong learning	DO1: 0	Direct Reversible Low certainty	Centre as included within Policy DO2 would engage the public and residents, creating a more active area and more
	DO2: +		opportunities for education i.e. learning about ornithology an local heritage.

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S5 To improve	SP3: +	Medium-Long Term	The policies address between the seafront and Morecambe
sustainable access to basic goods, services	DO1: +	Direct Reversible	Town Centre, ensuring the integration of the two areas and make sure the areas are more accessible (and safe) for
and amenities for all groups	DO2: +	Medium certainty	pedestrians. Policy DO2 also ensures that new pedestrian crossings are provided which would also improve connectivity and accessibility. Policy DO1 specifically ensures that an enhanced seafront is created with improved connections for pedestrians from the seafront to Marine Road West and onto the shore, which would improve accessibility to the underperforming 'Battery'.
EC1 To encourage	SP3: +	Short - Long Term	The policies would create a small number of local employment
thriving local economies	DO1: +	Direct and Indirect Reversible	opportunities through new leisure development, hotel development, retail and food development and the proposed
	DO2: +	Medium certainty	Bay Discovery Centre, although potentially not highly-skilled this could be particularly beneficial for youth unemployment and general employment deprivation in Morecambe (both of which are high). Over the long term, the policies may lead to improved vibrancy, look and feel to the area which in the long term could encourage inward investment.
EC2 To ensure key	SP3: +	Short - Long Term	Improvements to the look and feel of the main seafront and promenade, in addition to high quality new development including visitor accommodation may enhance the visitor
economic drivers are strong	DO1: +	Direct and indirect	
Silong	DO2: +	Reversible Medium certainty	economy in Morecambe and reverse the trend of people staying in the area for a single day. Providing further recreation and leisure actives and holding festivals and events may further enhance the visitor economy and change the day visitor trend.
EC3 To ensure the	SP3: 0		The policies would not have a notable effect on this objective.
workforce meets local economic needs	DO1: 0		
	DO2: 0		
EC4 To encourage	SP3: +	Short - Long Term	Residents in Morecambe suffer with some of the highest
economic inclusion	DO1: +	Direct and indirect Reversible	levels of employment deprivation within England. The policies would create a small number of local employment
	DO2: +	Medium certainty	opportunities through new leisure development, hotel development, retail and food development and the proposed Bay Discovery Centre. Although potentially not highly-skilled the creation of these jobs would benefit the SA Objective and economic deprivation. A key theme of the policies is to improve pedestrian connectivity between the seafront / promenade with Morecambe. Therefore physical accessibility to new employment opportunities would be improved.

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
EN1 To limit and adapt	SP3: +	Short - Long Term	Policies SP3 and DO1 state that a programme of new coastal
to climate change	DO1: +	Direct and indirect Reversible	defence works over the plan period will be undertaken including a replacement sea wall and a new wave refraction
	DO2: +	Medium certainty	wall which may benefit current flood risk within the 'Battery' area (the area lies within Flood Zone 2).
			Improving accessibility and connectivity for pedestrians within the main seafront and promenade area to surrounding areas may encourage residents to leave their cars at home and encourage the use of more sustainable modes of transport.
EN2 To protect and	SP3: 0		The policies would not have a notable effect on this objective.
enhance the quality of water features and	DO1: 0		
resources	DO2: 0		
EN3 To protect and	SP3: +	Short - Long Term	Policy SP3 ensures that the main seafront and promenade are
enhance biodiversity	DO1: +	Direct and indirect	safeguarded as open space for peoples enjoyment and protected from inappropriate development, both of which
	DO2: +	Reversible Medium certainty	would protect biodiversity resources. In addition, improvements to the public realm are likely to benefit biodiversity resources particularly if areas of greenspace are protected. The policies also state that the council will not permit any proposals that may result in a significant adverse impact on the environment of the Bay in its integrity as a Natura 2000 site or as a European Marine Site, which would only benefit biodiversity resources.
EN4 To protect and	SP3: +	Short - Long Term	Townscape character would be protected through Policy SP3's commitment to ensuring the main seafront and promenade are protected from development that would harm
enhance landscape and townscape	DO1: +	Direct Reversible Medium certainty	
character and quality	DO2: +		the open character of the Bay. In addition, the policy states that new development is required to be of a high quality design, which would only benefit the local townscape.
			Policy DO2 ensures new development relates well to the main seafront and promenade and assists with improvements to the public realm. Both of which would benefit local townscape resources. Although, Policy DO1 does not specifically include the protection of townscape resources, Policy SP3 takes precedence over the policies, therefore would ensure that the local townscape character within the 'Battery' is protected from inappropriate development.
EN5 To ensure the sustainable use of natural resources	SP3: 0		The policies would not have a notable effect on this objective.
	DO1: 0		
	DO2: 0		
EN6 To increase	SP3: 0		The policies would not have a notable effect on this objective.

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
energy efficiency and require the use of	DO1: 0		
renewable energy sources	DO2: 0		
EN7 To protect and	SP3: 0	Short - Long Term	Policy DO2 specifically requires that new development relates
enhance the historic environment and	DO1: 0	Direct	well to heritage assets including the Midland and Winter Gardens Listed Buildings which would benefit this SA
heritage assets	DO2: +	Reversible Medium certainty	Objective. The policy would benefit further from stating that development should relate well to the Town Centre Conservation Area which is also an important heritage asset along with the War Memorial Grade II Listed Structure Building on Marine Road and the adjacent Platform Grade II Listed Building on Marine Road. Although Policy SP3 ensures that development would not be permitted if it is likely to adverse effects on the open character of the Bay, it would benefit from a specific reference to ensuring development should relate well to local heritage assets including Conservation Areas and Listed Buildings as this policy takes preference over policies DO1 and DO2. There do not appear to be any heritage assets within the immediate vicinity of the 'Battery' therefore effects have been assessed as neutral.
EN8 To protect and	SP3: +	Medium - Long Term	Improving accessibility and connectivity for pedestrians within
improve air quality	DO1: +	Direct	the main seafront and promenade area to surrounding areas may encourage residents to leave their cars at home and
	DO2: +	Reversible Medium certainty	encourage the use of more sustainable modes of transport (which would benefit air quality).
EN9 To minimise waste, increase re-use and recycling	SP3: 0		The policies would not have a notable effect on this objective.
	DO1: 0		
	DO2: 0		

The Town Centre

MAAP Policy SP4: Town Centre MAAP Policy DO3: The Andale and Area MAAP Policy DO4: West View MAAP Policy DO5: Festival Market and Area

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S1 To reduce crime,	SP4: +	Medium-Long Term	The concentration of retail within a defined town centre areas,
disorder and fear of crime and reduce	DO3: +	Indirect	together with improved levels of investment, regeneration, pedestrian legibility and passive surveillance as promoted
expose to hazards	DO4: ?	Reversible Medium Certainty	through DO3 and DO5 could contribute to a reduction in crime and fear of crime. The proposals for West View, DO4, are,
	DO5: +	,	however, unclear in the document.
S2 To ensure there is	SP4: +	Short-Long Term	SP4 makes provision for residential development in the Town
housing to meet all needs	DO3: 0	Indirect	Centre but outside the Primary Shopping Area.
	DO4: 0	Reversible Medium Certainty	
	DO5: 0	. Modium Containty	
S3 To improve physical	SP4: 0		Whilst some of the measures to promote pedestrian movements and improve the quality of the environment may benefit health and wellbeing, it is not considered that the extent of change would be significant in this respect.
and mental health for all and reduce health	DO3: 0		
inequalities	DO4: 0		
	DO5: 0		
S4 To encourage	SP4: 0	Medium-Long Term	DO3 seeks to improve the setting of Morecambe Library and enable its growth. Indirectly, this may help to provide opportunities for learning.
lifelong learning	DO3: +	Indirect	
	DO4: 0	Reversible Medium Certainty	
	DO5: 0	Thousan Containing	
S5 To improve	SP4: +	Short-Long Term	The strengthening of the Town Centre's function through defining a Primary Shopping Area should help essential services to be concentrated in a location that is accessible to a
sustainable access to basic goods, services	DO3: +	Indirect	
and amenities for all	DO4: +	Reversible Medium Certainty	greater range of users, including e.g. those who are less
groups	DO5: +	,	mobile. The Development Opportunity policies would also strengthen the role and viability of these services. DO5 specifically seeks to contribute to improving amenity, pedestrian safety and severance between Marine Road Central and Festival Market and Area. It is recognised that any changes to parking capacity would need to be evidenced and justified.
EC1 To encourage thriving local	SP4: + DO3: +	Short-Long Term Indirect	Cumulatively the policies promote a consolidated and reinvigorated Town Centre by promoting an improved, more

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
economies	DO4: +	Reversible	legible environment, focus on typical Town Centre uses only
	DO5: +	Medium Certainty	and improved access. The policies also focus on three key development opportunities to anchor the proposals together. Collectively these should help to encourage inward investment and vitality in the area.
EC2 To ensure key	SP4: +	Short-Long Term	For the reasons described above, the policies should
economic drivers are strong	DO3: +	Indirect	cumulatively contribute to improved vitality and vibrancy within the Town Centre.
Strong	DO4: +	Reversible Medium Certainty	the rown ochine.
	DO5: +	Wediam Certainty	
EC3 To ensure the	SP4: 0		The policies are unlikely to have a notable effect on the
workforce meets local economic needs	DO3: 0		available workforce.
economic needs	DO4: 0		
	DO5: 0	1	
EC4 To encourage	SP4: +	Short-Long Term	The Town Centre is located adjacent to some of the most employment deprived neighbourhoods in the Lancaster. An improved Town Centre offer in terms of employment opportunities may benefit these communities although there is some uncertainty over whether this would definitely happen.
economic inclusion	DO3: +	Indirect	
	DO4: +	Reversible Low Certainty	
	DO5: +	Low Gertainty	
EN1 To limit and adapt	SP4: +	Long Term	SP4 seeks to consolidate a Primary Shopping Area and better define the Town Centre. As this area is accessible via public transport, it has potential to contribute to reducing trips by car
to climate change	DO3: 0	Indirect	
	DO4: 0	Reversible Low Certainty	which in turn may have a small benefit to reducing carbon
	DO5: 0	Low Certainty	emissions.
EN2 To protect and	SP4: 0		It is unlikely that water features would be significantly affected
enhance the quality of water features and	DO3: 0	1	by these policies.
resources	DO4: 0	1	
	DO5: 0	1	
EN3 To protect and	SP4: 0	Short-Long Term	Whilst DO3 identifies the need to retain and supplement the
enhance biodiversity	DO3: +	Direct	existing stock of trees for amenity purposes, this is the only aspect of the policies which may contribute to improving
	DO4: 0	Reversible Low Certainty	biodiversity, however small.
	DO5: 0		
EN4 To protect and	SP4: +	Short-Long Term	Each of the policies in this section work towards a well
enhance landscape	DO3: +	Direct	designed and better defined Town Centre and cross-

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
and townscape character and quality	DO4: + DO5: +	Reversible Medium Certainty	references are made to other aspects of the AAP and the Development Management Policies DPD in order to encourage good design which would ultimately benefit the existing townscape and Morecambe Conservation Area designation. It is recommended that a reference is made to the Conservation Area and the need for development in these areas to be sensitive to it.
EN5 To ensure the	SP4: 0		None of the policies in this section specifically cover resource
sustainable use of natural resources	DO3: 0		lt is recommended that a cross reference be included to a
	DO4: 0		policy on sustainable design requirements within the AAP.
	DO5: 0		
EN6 To increase	SP4: 0		None of the policies in this section specifically cover energy
energy efficiency and require the use of	DO3: 0		lt is recommended that a cross reference be included to a
renewable energy sources	DO4: 0		policy on sustainable design requirements within the AAP.
3001003	DO5: 0		
EN7 To protect and	SP4: 0	Short-Long Term	The Town Centre includes the Morecambe Conservation Area
enhance the historic environment and	DO3: 0	Indirect Reversible	and a number of listed buildings. Only DO5 (Festival Market and Area) makes reference to the need to relate well to the
heritage assets	DO4: 0	Medium Certainty	Winter Gardens listed building.
	DO5: +		It is recommended that other policies (perhaps focus in SP4) reference the need for development to complement and not detract from the setting of the Conservation Area and other listed buildings in the Town Centre.
EN8 To protect and	SP4: +	Long Term	SP4 seeks to consolidate a Primary Shopping Area and better
improve air quality	DO3: 0	Indirect Reversible	define the Town Centre. As this area is accessible via public transport, it has potential to contribute to reducing trips by car
	DO4: 0	Low Certainty	which in turn may have a small benefit to reducing adverse air quality emissions.
	DO5: 0		quality Gilliosiolis.
EN9 To minimise	SP4: 0		It is unlikely that waste production and recycling would be
waste, increase re-use and recycling	DO3: 0		significantly affected by these policies.
	DO4: 0		
	DO5: 0		

South of the Town Centre

MAAP Policy DO6: Former Frontierland Site

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
S1 To reduce crime, disorder and fear of crime and reduce expose to hazards	DO6: +	Medium - Long Term Indirect Reversible Medium certainty	Crime deprivation and incidents of anti-social behaviour within central Morecambe are relatively high. Therefore residential development on this site with a commercial element along Marine Road West (with active frontages) would improve natural surveillance and may reduce fear of crime. In addition, the policy would also remove a current derelict site which could be viewed as a hazard.
S2 To ensure there is housing to meet all needs	DO6: +	Short - Long Term Direct Reversible Medium certainty	The policy would contribute to improving local housing stock which would benefit the current shortage of high quality housing within central Morecambe. However, as per Policy SP2, it is unlikely these new homes would be affordable, although, affordable housing availability is not a current problem within Morecambe Town Centre.
S3 To improve physical and mental health for all and reduce health inequalities	DO6: +	Medium - Long Term Indirect Reversible Medium certainty	Research has shown there are heath and social benefits that arise from high quality housing ⁴ . In addition, the policy ensures new development includes clear, quality, legible and safe routes for pedestrians (and cyclists) through the site that connect to the seafront, the West End and the adjacent retail park which would benefit health through promoting healthy lifestyles. Further health benefits may arise through the policy's commitment to ensure new development contributes to appropriate improvements to the adjacent seafront and promenade to help meet needs for recreation. It should be ensured that local health care services within Morecambe have the capacity to deal with a potential increased population resulting from the site.
S4 To encourage lifelong learning	DO6: 0		The policy would not have a notable effect on this objective.
S5 To improve sustainable access to basic goods, services and amenities for all groups	DO6: +	Medium - Long Term Direct Reversible Medium certainty	The policy contributes to the achievement of the SA Objective through ensuring new development facilitates movement within the Frontierland site by providing clear, quality, legible and safe routes for pedestrians (and cyclists) that connect to the seafront, the West End and the adjacent retail park. Improving connectivity would ensure the site is readily accessible and improve access to basic goods and services, particularly for residents within the West End walking to Morecambe Town Centre. The potential improved access to

⁴ http://www.euro.who.int/en/what-we-do/health-topics/environment-and-health/Housing-and-health

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
			basic goods and services may also reduce dependence on the private car.
EC1 To encourage thriving local economies	DO6: +	Short - Long Term Direct Reversible Medium certainty	Residential development on this site and along with retail / leisure development along Marine Road could potentially increase confidence for further economic development in Morecambe and provide a larger local market for goods / services. Empty derelict sites can lower economic confidence; therefore, by developing the site, this could encourage inward investment and economic growth. Residential development would also provide some short-term construction related job opportunities for local residents.
EC2 To ensure key economic drivers are strong	DO6: +	Short - Long Term Direct Reversible Medium certainty	A new residential development on the currently derelict former Frontierland site may act as an economic driver for further investment in Morecambe as it would increase developer confidence. This may also contribute to creating a strong and vibrant Town Centre, as new residential development may bring with it new residents to Morecambe which could increase local footfall.
EC3 To ensure the workforce meets local economic needs	DO6: 0		The policy would not have a notable effect on this objective.
EC4 To encourage economic inclusion	DO6: +	Short Term Direct Reversible Medium certainty	Residential development on the site would provide some short term construction related job opportunities for local residents. This would offer short term minor benefits to local employment deprivation. In addition, some new retail / recreation jobs would be created along Marine Road West which would also benefit employment deprivation.
EN1 To limit and adapt to climate change	DO6: +/-	Medium - Long Term Direct Reversible Medium certainty	The focus of this policy is to facilitate new development and investment in Morecambe and not to ensure new development is low carbon or has optimal energy efficiencies (consideration is included within Policy EN4.1 - Sustainable Construction Techniques of the Development Management DPD). However, new residential development on this site is likely to increase traffic movements within Morecambe which may lead to a localised increase in greenhouse gas emissions over the long term. Nevertheless, the policy does seek to ensure the site is well connected to surrounding areas via legible pedestrian / cycle routes which may encourage people to use more sustainable modes of transport and reduce the use of the private car. The site is not located within a floodplain.
EN2 To protect and enhance the quality of water features and	DO6: 0		The policy would not have a notable effect on this objective.

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation
resources			
EN3 To protect and enhance biodiversity	DO6: 0		Although the site is located on a previously developed site some brownfield sites can be very biodiverse, particularly if the site has been vacant for a long period of time. Therefore the presence / absence of protected / notable species and habitats would need to be investigated further prior to any development.
			Public realm improvements should be sought within new residential development on the site to include green space and soft landscaping as this would benefit local biodiversity resources and address the current shortage within the AAP boundary.
EN4 To protect and enhance landscape and townscape character and quality	DO6: +	Short - Long Term Direct Reversible Medium certainty	It is likely that new residential development would enhance townscape character and quality in the immediate vicinity as currently Frontierland appears run down and derelict from the promenade. However, the design and scale of new development should be mindful and sensitive to the adjacent townscape character.
EN5 To ensure the sustainable use of natural resources	DO6: +/-	Short - Long Term Direct Reversible Medium certainty	Residential development on this previously developed brownfield site represents a sustainable use of land resources. In addition, development on brownfield land may also result in the reclamation of contaminated land (if any contamination is present) which would benefit soil resources.
			New development requires the use of natural resources and a large residential development on the site would increase the demand of water resources.
EN6 To increase energy efficiency and require the use of renewable energy sources	DO6: +/-	Medium - Long Term Direct Reversible Medium certainty	It is inevitable that residential development on the site would increase energy use. However, it should be noted that the Local Plan should be read as whole and the requirements of Policy EN4.1 - Sustainable Construction Techniques of the Development Management DPD would be required to be adhered to which would ensure new development reduces waste. Although the Local Plan should be read as a whole it is recommended that the policy includes a cross reference to Policy EN4.1 - Sustainable Construction Techniques of the Development Management DPD as there are opportunities to incorporate a high standard of sustainable design and renewable energy technology into new development on this site.
EN7 To protect and enhance the historic environment and heritage assets	DO6: +	Short - Long Term Direct Reversible Medium certainty	It is likely that new residential development improvements would enhance the character of the adjacent West End Conservation Area as the site is currently derelict and visually unappealing. However, the design and scale of new development should be mindful and sensitive to the adjacent

Objective	Performance of Policy	Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Commentary/Mitigation West End Conservation Area.
EN8 To protect and improve air quality	DO6: +/-	Medium - Long Term Direct Reversible Medium certainty	New residential development on the Former Frontierland site is likely to increase traffic movements within Morecambe which may exacerbate current congestion problems and lead to a localised increase in emissions over the long term. However, the policy does seek to ensure the site is well connected to surrounding areas via legible pedestrian / cycle routes which may encourage people to use more sustainable modes of transport and reduce the use of the private car.
EN9 To minimise waste, increase re-use and recycling	DO6: 0		Although not the focus of this policy it is inevitable that residential development on the Former Frontierland site would increase waste production. However, it should be noted that the Local Plan should be read as whole and the requirements of Policy EN4.1 - Sustainable Construction Techniques of the Development Management DPD would be required to be adhered to which would ensure new development reduces waste. Although the Local Plan should be read as a whole it is recommended that the policy includes a cross reference to Policy EN4.1 - Sustainable Construction Techniques of the Development Management DPD as there are opportunities to minimise waste produced at the site.

Appendix E

Figures

Appendix F

Consultation Response Table

Appendix F – Summary of Significant Changes following the 2013 Draft MAAP Consultation

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
1	3.2	p.63	Amendment to text to highlight the need for Morecambe to have a unique selling point	No significant changes to sustainability impacts.
				The SA has already identified the benefits of the AAP intention to market Morecambe. The addition to the text supports this.
2	6.1	Section 3.9	Revision of text to include mention of proximity to Lancaster University (p 74)	No significant changes to sustainability impacts.
				The SA has already identified the proximity to Lancaster District's universities and associated educational benefits. The addition to the text supports this.
3	6.3	Revision to Section 3.1	Section 3.1: Amendment includes mention of creating a sheltered area for pedestrians	There are no changes in SP1, therefore the original assessment does not need updating.
		Reworking SP1, SP2, DO2, DO5	SP1 – no changes SP2 – rewording title from investment exemptions to investment incentives Additional bullet added "Exemption from any Community Investment Levy (CIL) or similar that might be introduced consistent with DM Policy CSC7 towards infrastructure provision."	The SA of SP2 already assumes that he CIL may be introduced and has based the assessment upon this. Therefore, the original assessment does not need an update.
			DO2 – addition of "Contributes to improving public realm within the Main Seafront and Promenade and also with reworking that part of Marine Road Central within the Site to improve public amenity and safety for pedestrian crossings and reduce the perceived and	The assessment of DO2 already largely covers this point, extra detail is provided in the update, however, it will not materially affect the conclusions.
			real severance affect (sic) of the highway with the town landward." DO5 – addition of "contribute to reworking that part of Marine Road Central within the Site to improve public amenity and safety for pedestrian crossings and reduce the perceived and	This is covered in the original SA assessment, and this comment provides supporting detail. The Assessment Matrix has been updated to include reference to this extra detail. The impact is already assumed positive for DO5, so there is no overall

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
			real severance affect (sic) of the highway"	change to conclusions.
4	9.2	Revision to Section 3.1, 3.6 & potentially AS8	AS8 – addition of bullets: "Improvements to the environment at Pedder Street to better manage traffic and give more space to pedestrian movement and activity." "Announce Queen and Pedder streets from the seafront and sign the main pedestrian linkages to these"	No significant changes to sustainability impacts. The SA covers phased amenity improvements and improvements to the environmental around Peddar Street. The addition of the bullets adds focus but no further impact on sustainability.
			Slight amendments to text	
5	9.3	Revision to Section 3.1, 3.6 & AS1	Slight amendments to text with reference to heritage and conservation protection, green infrastructure and wider linkages.	No significant changes to sustainability impacts. The SA has previously identified the sustainability benefits of heritage and conservation protection. These additions support the existing conclusions and therefore no changes to the SA are required.
6	9.8	Revisions to text in Sections 2, 3, & 4	Comment requires that the M6 Link and effects on Morecambe should be discussed further in the MAAP.	No significant changes to sustainability impacts
				The update does not include extra detail on the M6 Link, it is therefore taken that the SA will not need to update the assessment in light of this.
7	9.9	Comments noted	Comments that there is a heavy emphasis on gloom emerging from the Risks paragraph (2.4), and that this would likely deter investors into the area.	No significant changes to sustainability impacts The tone of the document is deliberately gloomy as a means of setting the scene. This does not represent a material change
				and will not affect the original assessment.
8	9.10	Revision to text in Section 3	Amendments to paragraph/body text to clarify the role and vision of the town centre.	No significant changes to sustainability impacts
				The changes made to Section 3 focus the points already made.

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
				There will be no amendments needed to the summary text section of the SA.
9	9.15	Revision to text in Section 3, 4 & AS8	Amendments to paragraph/body text and no material amendment to AS8 to cover point raised that the MAAP appears to place too greater emphasis on the car as a means of transport around Morecambe town centre.	No significant changes to sustainability impacts These issues have already been addressed in the original SA, and the slight amendments to the text in Sections 3, 4 & AS8 will not significantly alter the original assessment.
10	9.21			
11	9.25	Revision to text in Section 3.6	Amendments to paragraph/body text in Section 3.6 to strengthen the point that office space would be a useful regeneration factor.	No significant changes to sustainability impacts
				The amendments to the text in Section 3.6 focus the point more accurately and are covered by the assessment in the original SA.
12	9.30	Revision to text in Sections 2 & 3	Amendments to paragraph/body text to make clear the linkage between the conservation and management of the shoreline and the Greater Bay area.	No significant changes to sustainability impacts These issues have already been addressed in the original SA and the addition of the text to Sections 2 and 3 only add clarity to the point. Therefore, this point is covered by the original assessment.
13	12.1	Revision to text in Section 2	Amendments to paragraph/body text Includes changes to Section 2 to describe the marine setting and international designations attributed to it	No significant changes to sustainability impacts Section 4.3.1 of the SA acknowledges the marine habitats and the international importance. It is therefore assumed that the original assessment will not require any changes.
14	13.2	Revision to DO2	Amendment to DO2 to reflect comment. The word 'residential' has been replaced with 'holiday' to ensure that the provision of accommodation is not for permanent residence or individual ownership.	No significant changes to sustainability impacts The slight amendment to the text will not have an effect on the SA. The original assessment is based on visitor accommodation and will

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
				cover the slight change of wording in the MAAP.
15	18.1	Comments noted but no amendments	Comments suggest that the plan would benefit from greater collaborative working with partner organisations.	No significant changes to sustainability impacts
				The MAAP describes throughout that collaborative approaches would benefit the adoption of the plan.
16	19.6	Revision to text in AS7	Amendment to AS7, to include the mention of green spaces in final bullet point.	No significant changes to sustainability impacts
				Recommendations in 4.3.1 (of the SA) set out the potential to encourage connectivity of a green space network. The addition of this text to the MAAP serves to clarify the requirement and not a material change. Therefore it is not deemed to have a significant impact upon the original SA findings.
17	19.8	Comments noted but no amendments made	Would like to see monitoring developed to assess any potential impacts to the internally designated sites at Morecambe Bay.	No amendments to text. This is already covered within Section 4.3.1 of the SA and would therefore the impacts have been covered in the original assessment.
18	20.10	Revision to text in Summary Section	Amendment of paragraph/body text to reflect that the volume of visitors to the seafront is variable, depending on the use and or event. The point is keen to stress that the seafront is not visited by huge numbers of people all the time.	No significant changes to sustainability impacts This is a minor change to the wording of the summary section of the MAAP. The nature of the amendment will not affect the findings of the original SA.
19	20.15	Comments noted but no amendments made	Comment regarding the requirement to reduce car parking charges to encourage visitors.	No amendments to text. Car parking pricing is discussed in the options appraisal section of the SA, therefore any impacts have been covered in the original assessment.
20	20.16	Revision to text in Summary	Amendment of summary paragraph/body text to reflect that there	No significant changes to

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
		Section	is more information to follow in the document.	sustainability impacts
				This is a minor change to the wording of the summary section of the MAAP. The nature of the amendment will not affect the findings of the original SA.
21	20.17	Comment noted	Comments that the aspiration of the plan should be greater.	No amendments to text
22	20.30	Section 3.9	Amendment of paragraph/body text	No significant changes to sustainability impacts
				This is a minor change to the wording of Section 3.9 of the MAAP. The nature of the amendment will not affect the findings of the original SA.
23	20.44	Comments noted but no amendments made	Comment notes that the MAAP does not mention that the Morecambe Bay Partnership is working to implement to the Headlands to Headspace initiative.	No amendments to text of the MAAP.
24	26.1	Comments noted but no amendments made	Amendment of paragraph/body text to include detail of a ring-fenced investment fund to include capital for Central Morecambe and new homes.	No amendments to text of the MAAP.
25	26.5	Revision to text in Section 2	Amendment of paragraph/body text	No significant changes to sustainability impacts
26	26.6	Revision to text in Section 2 and 3.6	Amendment of paragraph/body text to highlight that development should reasonably contribute to improving the pedestrian environment around Victoria,	No significant changes to sustainability impacts The SA covers phased amenity
			Peddar and Queen Streets. No amendments to DO6 as suggested in consultation response document	improvements and improvements to the environment around Peddar Street. The nature of the amendment will not affect the findings of the original SA.
27	26.8	Revision to DO5	Addition of bullet: "contribute to reworking that part of Marine Road Central within the Site to improve public amenity and safety for pedestrian crossings and reduce the perceived and real severance affect (sic) of the highway"	This revision to DO5 has been covered and amended due to consultation response 6.3 (above). The text in the Assessment Matrix has been updated to include extra detail, however, this does not require an update to the assessment

Change Reference	LCC ID REF	Element of the MAAP	Summary of Proposed Changes	Significance of the Change and the Sustainability Impacts
			And "The council accepts that development may well require reductions in parking capacity but will require proposals for this to evidence the likely impacts on parking availability."	conclusion. This revision to DO5 has been included in the updated Assessment Matrix (Appendix D). This provides extra supporting details and will not affect the overall conclusions of the assessment.
28	26.10	Revision to text in Section 3.9	Amendment of paragraph/body text to reflect that the marketing approach employed within the MAAP should be more clearly defined.	No significant changes to sustainability impacts These issues have already been addressed in the original SA, and the slight amendments to the text in Section 3.9 will not significantly alter the original assessment.
29	26.11	No changes to document	This comment relates to the establishment of a dedicated team to drive forward and engage the private sector to deliver on the plan. This has resulted in o changes to document.	No changes to document