



For and on behalf of  
**Skegness Town Council**

**Skegness Neighbourhood Plan  
Sustainability Appraisal  
(incorporating Strategic Environmental Assessment)**

**Prepared by  
Strategic Planning Research Unit  
DLP Planning Ltd  
Sheffield**

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Prepared by:	Kirsten Ward BSc (Hons) MA PhD MRTPI Associate Planner
Checked by:	Alex Roberts BSc (Joint Hons) AssocRTPI Director
Approved by:	Alex Roberts BSc (Joint Hons) AssocRTPI Director
Date: May 2021	Office: Sheffield

### Strategic Planning Research Unit

**V1 Velocity Building  
Ground Floor  
Tenter Street  
Sheffield  
S1 4BY**

**Tel: 01142 289190**

**Broad Quay House (6<sup>th</sup> Floor)  
Prince Street  
Bristol  
BS1 4DJ**

**Tel: 01179 058850**

**4 Abbey Court  
Fraser Road  
Priory Business Park  
Bedford  
MK44 3WH**

**Tel: 01234 832740**

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## **1.0 INTRODUCTION**

### **a) What is Sustainability Appraisal?**

- 1.1 The Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Sustainable development is about ensuring that the needs of everyone can be met now, without compromising the ability of future generations to meet their own needs. Put simply, sustainability looks at balancing a range of competing environmental, social and economic objectives when making decisions about the development and use of land.
- 1.2 The SA process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability Appraisal should be applied as an iterative process informing the development of the plan.
- 1.3 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. However, a qualifying body must demonstrate how its plan or order will contribute to achieving sustainable development. A proportionate approach can be taken to this and preparing a SA is one such approach that can be used.
- 1.4 The Skegness Neighbourhood Plan (the Plan) SA is being carried out to ensure that the policies included in the Plan are sustainable, thereby ensuring they are effective in providing for the current residents of the area, as well as future residents. This SA of the Plan is also being carried out as a means to ensure and demonstrate that the principles of sustainable development as defined by the National Planning Policy Framework (NPPF) have been taken into account in its preparation.
- 1.5 Appraising the Plan will enable the Neighbourhood Plan Steering Group to identify any issues with the Plan that may affect its sustainability. This in turn will allow the Steering Group to address these issues by amending the Plan, ensuring the final document itself contributes to the achievement of sustainable development.
- 1.6 This report sets out the outcomes of the SA of the Skegness Neighbourhood Development Plan. The report will assist in refining the Neighbourhood Plan prior to its submission to East Lindsey District Council.

### **b) What is Strategic Environmental Assessment?**

- 1.7 In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment (SEA). Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This initial assessment process is commonly referred to as a 'screening' assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.8 If it is concluded that strategic environmental assessment is required, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those regulations. The assessment of plans deemed to have a significant environmental impact is also a requirement of the European SEA Directive (2001/42/EC).
- 1.9 One of the basic conditions that will be tested by the independent examiner is whether the

making of the neighbourhood plan is compatible with relevant legal obligations including Strategic Environmental Assessment.

1.10 The scoping stage of the SEA (see section 2(b) below) identified that due to the Skegness Neighbourhood Development Plan including site allocations and being in close proximity to a number of European protected sites, the undertaking of an SEA in accordance with the European Directive has been considered necessary and the elements of this have been incorporated into this SA. The SA process therefore ensures that potential environmental effects are given full consideration alongside social and economic issues.

1.11 The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the neighbourhood plan. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan.

**c) Who has carried out this Sustainability Appraisal?**

1.12 This SA of the Skegness Neighbourhood Plan has been undertaken and produced by DLP Planning working in conjunction with Skegness Town Council, in particular with the Neighbourhood Plan Steering Group.

**d) Structure of the Sustainability Appraisal**

1.13 This SA of the Skegness Neighbourhood Plan is structured as follows:

- **Section 2: The Sustainability Appraisal Process** – This section outlines the process for undertaking SA that we have used, including details of the Scoping exercise that has been carried out.
- **Section 3: Skegness Neighbourhood Plan Context** – This section sets out the broad context and contents of Skegness Neighbourhood Plan that will be examined through the SA process.
- **Section 4: The Sustainability Appraisal Framework** – This section introduces the Sustainability Appraisal Framework that will be utilised to appraise the Skegness Neighbourhood Plan. Using the Core Strategy framework as a template, this section will develop Sustainability Appraisal Objectives suitable for use in appraising the Neighbourhood Plan.
- **Section 5: Vision and Objectives Appraisal** – This section presents the Sustainability Appraisal of the Neighbourhood Plan's Vision and Objectives using the Sustainability Appraisal Framework Objectives set out in Section 4.
- **Section 6: Neighbourhood Plan Policies Appraisal** – This section presents the Sustainability Appraisal of the individual policies contained within the Skegness Neighbourhood Plan using the Sustainability Appraisal Framework Objectives set out in Section 4.
- **Section 7: Sustainability Appraisal of Alternatives** – This section assesses the effects of alternatives to the Skegness Neighbourhood Plan, including the alternative where no Neighbourhood Plan is produced.
- **Section 8: Appraisal of Secondary, Cumulative and Synergistic Effects** – This section assesses the secondary, cumulative and synergistic effects of the Neighbourhood Plan on the sustainability of the Neighbourhood Plan area.
- **Section 9: Monitoring** – This final section of this Sustainability Appraisal details how the SA document will be monitored.

## 2.0 THE SUSTAINABILITY APPRAISAL PROCESS

### a) Overview of the Sustainability Appraisal Progress

2.1 The Sustainability Appraisal process is an ongoing and iterative process. It can be divided into the following stages, as set out in National Planning Practice Guidance (PPG):

- **Stage A: Screening / Scoping** – The initial Screening stage involves consulting the LPA and other relevant consultation bodies in order to determine whether the Neighbourhood Plan is likely to have significant effects and whether a SA / SEA is required. The Scoping stage identifies the scope and level of detail of information to be included in the SA report. It sets out the context, objectives and approach of the assessment and identifies relevant environmental, economic and social issues and objectives. A key aim of the Scoping stage is to ensure that the SA process is proportionate and relevant to the plan being assessed. This stage involves consultation with relevant consultation bodies. The outcomes of the Screening / Scoping stage of the Skegness Neighbourhood Plan are detailed in section 2(b) below.
- **Stage B: Baseline information** – This stage sets out the existing environmental, economic and social characteristics of the area likely to be affected by the Neighbourhood Plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft Neighbourhood Plan. The area likely to be affected may lie outside the designated neighbourhood area and the local planning authority boundary and plan makers may need to obtain information from other local planning authorities. Wherever possible data should be included on historic and likely future trends, including a ‘no Neighbourhood Plan’ or ‘business as usual’ scenario (i.e. anticipated trends in the absence of the Neighbourhood Plan being introduced). This information will enable the potential effects of the implementation of the Neighbourhood Plan to be assessed in the context of existing and potential environmental, economic and social trends.
- **Stage C: Establishing the Sustainability Appraisal Framework** – the SA Framework sets out a series of objectives and indicators against which the Neighbourhood Plan and its likely effects are assessed.
- **Stage D: Developing and refining options (including reasonable alternatives) and assessing the likely effects of the Neighbourhood Plan and alternatives** – the SA needs to identify, describe and evaluate the likely significant effects of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The SA will also consider ways of mitigating adverse effects and maximising beneficial effects.
- **Stage E: Preparing the SA Report** – the SA Report sets out the appraisal process and findings, showing how the necessary requirements have been met as well as recording the wider assessment of environmental, social and economic effects.
- **Stage F: Consulting with stakeholders** – the SA will be consulted on alongside the Neighbourhood Plan. The SA will only need to be modified if changes are made to the Neighbourhood Plan following consultation that would likely give rise to significant effects.
- **Stage G: Monitoring** – the significant effects of implementing the Neighbourhood Plan once adopted should be monitored. This will enable any unforeseen adverse effects to be identified at an early stage and to enable appropriate remedial actions.

### b) Screening / Scoping

2.2 Work on the SA of the Skegness Neighbourhood Plan began in September 2020 with the submission of a request to East Lindsey District Council for a Screening Opinion. In accordance with the Environmental Assessment of Plans and Programmes Regulations

2004 and European Directive 2001/42/EC a Screening Opinion on the need for a Strategic Environmental Assessment (SEA) for the Neighbourhood Plan was subsequently prepared by East Lindsey District Council. Following consultation with Statutory Bodies, including the Environment Agency, Natural England and Historic England, this Screening Opinion (attached at **Appendix 1**) concluded that the Neighbourhood Plan is likely to have significant environmental effects and a full SA is required, incorporating elements of SEA.

- 2.3 Paragraph 5.3 of the Council's Screening Opinion recommended that *"a 'light touch' SA (incorporating SEA) be prepared for the Skegness Neighbourhood Development Plan"*. The report also set out the required scope of the SEA, recommending that special consideration be given to the impacts on flood risk and sites protected internationally for their biodiversity.
- 2.4 Alongside the SEA Screening Opinion, East Lindsey District Council also prepared an Equalities Impact Assessment (EqIA) of the Draft Skegness Neighbourhood Plan and a Stage 1 Habitats Regulations Assessment (HRA). The Stage 1 HRA concluded that Draft Neighbourhood Plan Policy E2 could have significant effects on the Saltfleetby-Theddlethorpe Dunes & Gibraltar Point Special Conservation Area and as such a full 'appropriate assessment'<sup>1</sup> would be required. Draft Policy E2 has since been amended in order to remove the potential for any significant effects on protected habitats and species. East Lindsey District Council has confirmed that an 'appropriate assessment' of the Neighbourhood Plan will therefore not be required.

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<sup>1</sup> A plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended), if it is considered likely to have significant effects on a habitats site. A sustainability appraisal should take account of the findings of an appropriate assessment, if one is undertaken. An appropriate assessment, under the Conservation of Habitats and Species Regulations 2017 (as amended), identifies whether a plan or project is likely to have a significant effect on a habitats site, either alone or in combination with other plans or projects. This assessment must determine whether significant effects on that site can be ruled out on the basis of objective information.

### **3.0 SKEGNESS NEIGHBOURHOOD PLAN CONTEXT**

#### **a) Area Covered**

3.1 The Skegness Neighbourhood Plan covers the neighbourhood area as designated by East Lindsey District Council on the 11<sup>th</sup> August 2016.

#### **b) Contents of the Neighbourhood Plan**

3.2 The Skegness Neighbourhood Plan has been produced in accordance with the Neighbourhood Planning (General) Regulations 2012 and meets the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. The Neighbourhood Plan, alongside the strategic policies in the East Lindsey District Council Core Strategy, seeks to support and direct the development and growth of the area up to 2031.

3.3 This neighbourhood plan contains a series of policies that will deliver the Vision and Objectives identified for Skegness and guide the future development of the town up to 2031. The neighbourhood plan aims to ensure that Skegness develops in a way that supports the livelihood and wellbeing of its residents and visitors, both current and future, whilst preserving and enhancing the character of the town and the wider coastal environment.

3.4 The Neighbourhood Plan will form part of the development plan for East Lindsey District Council, and applications for new development will be required to be in conformity with the Skegness Neighbourhood Plan. This means that it will be considered by Planning Officers in East Lindsey District Council when determining planning applications.

3.5 The Skegness Neighbourhood Plan is structured as follows:

##### **Part 1: A Vision for Skegness**

3.6 The first part of the neighbourhood plan outlines the overarching vision for Skegness that forms the grounding for the neighbourhood plan policies. This includes the following sections:

- Skegness in Context: This section provides an overview of the geographic, historic, environmental, demographic and built environment context for Skegness town.
- Opportunities and Constraints: This section summarises the main opportunities and constraints facing Skegness.
- Vision and Objectives: This section summarises the vision and core objectives for the plan that were developed following the initial public consultation exercise.

##### **Part 2: Neighbourhood Plan Policies and Site Allocations**

3.7 Part 2 of the neighbourhood plan outlines the specific policies for Skegness based around the following policy themes:

- Theme 1: Employment, education and skills
- Theme 2: Tourism and visitor economy
- Theme 3: Skegness town centre
- Theme 4: Transport infrastructure
- Theme 5: Housing
- Theme 6: Community, health and well-being
- Theme 7: Design and environment

3.8 The Neighbourhood Plan also allocates a number of sites for development. These are outlined at the end of Part 2 of the Draft Plan.

3.9 A full list of the Neighbourhood Plan policies is contained in Appendix 1 of the Draft Plan.



### **Part 3: Delivering the Plan**

3.10 The final part of the neighbourhood plan explains how the plan will be delivered and how it will be monitored in the future. This includes the following sections:

- Implementation
- Monitoring and review

## 4.0 THE SUSTAINABILITY APPRAISAL FRAMEWORK

### a) What is the Sustainability Appraisal Framework?

- 4.1 To effectively appraise the Neighbourhood Plan for Skegness, a clear, concise and effective framework is needed; one that addresses all aspects of sustainable development.
- 4.2 In order to assess what options would be most sustainable for the future development of the area, the key sustainability issues affecting the Plan were identified. These have been separated into social, economic and environmental issues, although there is inevitably overlap between them. For example, certain issues, such as climate change, have environmental, economic and social implications.
- 4.3 The key issues identified in this report comprise:
- Social – housing supply; crime and community safety; health and recreation; and provision of social capital.
  - Economic – business development (existing and new) and job creation; site and infrastructure provision; and town and rural centres.
  - Environmental – preventing loss of priority habitats; protection and enhancement of the green infrastructure; protecting the historic environment; minimising flood risk; efficient use of resources; and minimising the impacts of climate change.
- 4.4 These sustainability issues have each been taken into consideration in the production of the Sustainability Appraisal Framework for the Draft Plan, ensuring the Plan itself ultimately addresses all of the issues.

### b) Developing the Neighbourhood Plan Sustainability Appraisal Framework

- 4.5 To ensure continuity with the adopted East Lindsey Core Strategy (2018), this SA for the Draft Neighbourhood Plan will broadly follow the framework as was used for the SA of the Core Strategy. It has been agreed with Planning Officers at East Lindsey Council that this is an acceptable approach. However, several amendments to the framework have been made to reflect the smaller, more localised scale of the Neighbourhood Plan area.
- 4.6 The Sustainability Appraisal Framework developed for East Lindsey District Council's Core Strategy consists of a series of objectives and indicators. These have been devised with regard to both national and regional sustainability objectives and indicators, as well as to the environmental and sustainability issues assessed to be of key importance in East Lindsey. Full information on these and their formulation can be found in the Sustainability Appraisal Scoping Report, which is accessible via the following link:  
<https://www.e-lindsey.gov.uk/article/6331/Sustainability-Appraisal>

### c) Skegness Neighbourhood Plan Sustainability Appraisal Framework

- 4.7 The SA Objectives that will be used to appraise the sustainability of the Neighbourhood Plan for Skegness are as follows.

**Table 1. Sustainability Appraisal Framework**

Skegness Neighbourhood Plan Sustainability Appraisal Framework
1. Protect and enhance the quality and distinctiveness of the areas' biodiversity (native plants and animals) and geodiversity
2. Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment
3. Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses

<b>Skegness Neighbourhood Plan Sustainability Appraisal Framework</b>
4. Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided
5. Promote viable and diverse economic growth that supports communities within the district
6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites
7. Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access
8. Increase reuse and recycling rates and minimise the production of waste
9. Support inclusive, safe and vibrant communities
10. Ensure that local housing needs are met
11. Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments
12. Encourage and provide the facilities and infrastructure for healthy lifestyles
13. Positively plan for, and minimise the effects of, climate change

4.8 Each of the SA Objectives has been matched with detailed decision-making criteria. These criteria comprise the key questions that will be asked of the Draft Plan to ascertain whether or not it works towards achieving the SA objective. These questions can be found on the following page.

**Table 2. SA Objectives and Decision-making Criteria**

Sustainability Appraisal Objectives		Decision-making Criteria: Will the Vision/Objective/Policy....
1	<b>Protect and enhance the quality and distinctiveness of the area's biodiversity (native plants and animals) and geodiversity</b>	<ul style="list-style-type: none"> <li>• Protect and provide opportunities for improving / enhancing sites designated for their nature conservation value / geodiversity value (local and national levels)?</li> <li>• Protect the habitats and species protected by International and UK law?</li> <li>• Help achieve Lincolnshire Biodiversity Action Plan (BAP) targets?</li> <li>• Help to avoid / reduce the loss of / decline in semi natural habitats, agricultural habitats, urban habitats / geological resources?</li> <li>• Conserve species and protect the districts overall biodiversity?</li> </ul>
2	<b>Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment</b>	<ul style="list-style-type: none"> <li>• Protect and provide opportunities to enhance the distinctive landscapes (e.g. Conservation Areas, Lincolnshire Wolds AONB) within the district?</li> <li>• Maintain and, where possible, increase the area of high quality green infrastructure within the district – e.g. woodlands, public rights of way etc?</li> <li>• Prevent aspects / amenity being compromised?</li> <li>• Provide opportunities to enhance the townscapes within the district – e.g. promotion of the repair and re-use of historic buildings?</li> <li>• Maintain and enhance the character / distinctiveness of towns and villages (including conservation areas)?</li> <li>• Protect or enhance known features of historical, archaeological, or cultural interest, including their setting?</li> <li>• Protect areas associated with a known high risk archaeological resource where actual and / or quality / quantity of finds is not known e.g. features associated with buried archaeology?</li> </ul>
3	<b>Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses</b>	<ul style="list-style-type: none"> <li>• Contribute to effective management of water resources (surface and ground waters) via a reduction in water consumption?</li> <li>• Contribute to effective management of water resources (surface waters) via storage of excess precipitation?</li> <li>• Reduce diffuse and point source water pollution (e.g. from STWs, commercial, industrial and agricultural sources) and therefore contribute to 'good ecological status' for all water bodies?</li> <li>• Protect the habitats and species reliant on the water environment e.g. in rivers,</li> </ul>

Sustainability Appraisal Objectives		Decision-making Criteria: Will the Vision/Objective/Policy....
		<p>canals, lakes, ponds and adjacent areas of wetland habitats?</p> <ul style="list-style-type: none"> <li>• Avoid an increase in light pollutants, particularly in more rural areas and the Lincolnshire Wolds AONB?</li> <li>• Protect the best and most versatile agricultural land?</li> </ul>
4	<b>Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided</b>	<ul style="list-style-type: none"> <li>• Will it minimise flood risk to people, property, agricultural land and other assets from rivers and from drainage infrastructure e.g. resulting from intense or prolonged precipitation?</li> <li>• Will it minimise flood risk to people, property, agricultural land and other assets from coastal inundation e.g. via storm surges?</li> <li>• Increase flood risk to people, property, agricultural land and other assets downstream of the proposed development?</li> </ul>
5	<b>Promote viable and diverse economic growth that supports communities within the district</b>	<ul style="list-style-type: none"> <li>• Assist the provision of appropriate land and premises for business activity?</li> <li>• Provide diversity in the economy and encourage sustainable business development?</li> <li>• Support the growth of sectors that offer scope to reduce outcommuting, e.g. to Lincoln, Grimsby and Boston?</li> <li>• Improve access to education and training, and support provision of skilled employees to the economy?</li> <li>• Support vital and viable town centres?</li> <li>• Encourage the rural economy and support farm diversification?</li> <li>• Enable tourism opportunities to be exploited?</li> </ul>
6	<b>Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites</b>	<ul style="list-style-type: none"> <li>• Promote the efficient re-use of land and buildings for new developments and ensure that denser developments are well designed and are associated with good public transport systems to help achieve the most sustainable pattern and types of development?</li> <li>• Protect the best and most versatile agricultural land?</li> </ul>
7	<b>Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access</b>	<ul style="list-style-type: none"> <li>• Improve access to local services, facilities, places of employment and green infrastructure for all residents throughout the district?</li> <li>• Provide improved and sustainable public modes of transport in both urban and rural areas and reduce the need to travel by car?</li> </ul>
8	<b>Increase reuse and recycling rates and</b>	<ul style="list-style-type: none"> <li>• Reduce waste generated as part of all building programmes?</li> </ul>

Sustainability Appraisal Objectives		Decision-making Criteria: Will the Vision/Objective/Policy....
	<b>minimise the production of waste</b>	<ul style="list-style-type: none"> <li>• Reduce household waste?</li> <li>• Increase waste recovery and recycling (domestic, commercial, etc.)?</li> </ul>
<b>9</b>	<b>Support inclusive, safe and vibrant communities</b>	<ul style="list-style-type: none"> <li>• Improve the quality of life for communities by allowing residents to become actively involved in decision making at a local level?</li> <li>• Maintain, enhance and create green infrastructure assets (e.g. green space) across the district accessible to the whole community?</li> <li>• Improve the availability and accessibility of key local services and facilities, including health, education and leisure (shops, post offices, pubs etc.) that also reduce the need to travel?</li> <li>• Promote more diverse and cohesive communities?</li> <li>• Promote and encourage design principles that positively reduce crime and antisocial behaviour?</li> <li>• Reduce the fear of crime, the actual levels of crime, antisocial behaviour</li> </ul>
<b>10</b>	<b>Ensure that local housing needs are met</b>	<ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes, including affordable housing, to meet the identified needs of all sectors of the community?</li> <li>• Enable first time buyers to purchase a home?</li> </ul>
<b>11</b>	<b>Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments</b>	<ul style="list-style-type: none"> <li>• Ensure all new housing incorporates at least some energy saving measures?</li> <li>• Lead to local developments built to a high standard of sustainable design?</li> <li>• Reduce household waste and increase waste recovery and recycling (domestic, commercial, etc.)?</li> <li>• Lead to an increased proportion of energy needs being met from renewable sources e.g. at domestic and commercial scales?</li> </ul>
<b>12</b>	<b>Encourage and provide the facilities and infrastructure for healthy lifestyles</b>	<ul style="list-style-type: none"> <li>• Ensure that adequate health facilities and infrastructure is available for present and future generations?</li> <li>• Ensure health facilities are accessible to all sectors of the community?</li> <li>• Reduce health inequalities across the district?</li> <li>• Promote healthy and active lifestyles?</li> <li>• Maintain, enhance and create green infrastructure assets (e.g. green space, recreation and sports facilities, semi-wild/rural places) across the district accessible to the whole community?</li> </ul>
<b>13</b>	<b>Positively plan for, and minimise the effects of,</b>	<ul style="list-style-type: none"> <li>• Minimise flood risk to people, property, agricultural land and other assets from the</li> </ul>

Sustainability Appraisal Objectives		Decision-making Criteria: Will the Vision/Objective/Policy....
	<b>climate change</b>	<p>sea, from rivers and from surface water drainage infrastructure?</p> <ul style="list-style-type: none"> <li>• Increase flood risk to people, property, agricultural land and other assets downstream of the proposed development?</li> <li>• Contribute to effective management of water resources (surface waters) (e.g. storage of excess precipitation)?</li> <li>• Promote appropriate energy production technologies at the district scale?</li> <li>• Contribute to a reduction in emissions of greenhouse gases within the district?</li> </ul>

4.9 The sections of the Skegness Neighbourhood Plan that are to be appraised (the Vision & Objectives and the Policies) are substantially different, in terms of both content and purpose. It is deemed necessary to adopt a differing approach to measuring the sustainability of these against the SA Objectives. The following criteria were used to assess the level of compatibility of the Draft Plan's Vision, Aim and Objectives:

**Table 3. Criteria used to appraise the Vision & Objectives**

Key	
Compatible	+
Neutral / No Impact	0
Incompatible	-
Uncertain Impact	?

4.10 To make a more thorough assessment of their potential impacts, the Draft Neighbourhood Plan Policies were assessed against more detailed criteria. The appraisal criteria are as follows:

**Table 4. Criteria used to appraise the Neighbourhood Plan Policies**

Key	
Strong Positive Impact	++
Positive Impact	+
Neutral / No Impact	0
Negative Impact	-
Strong Negative Impact	--
Uncertain Impact	?

4.11 Using the SA Objectives and the criteria established above in Tables 3 and 4, the following sections of this report set out the appraisal of the Vision & Objectives, and Policies of the Skegness Neighbourhood Development Plan.



## 5.0 VISION AND OBJECTIVES APPRAISAL

### a) Sustainability Appraisal

- 5.1 The Vision & Objectives contained within the Draft Plan have been produced by the Skegness Neighbourhood Plan Steering Group utilising results obtained through consultation with local residents. The Vision and Objectives are presented below:

#### **Skegness Neighbourhood Plan Vision**

*“Skegness will continue to be a thriving coastal town, expanding upon its well-established tourism and leisure offer, with an increasingly diverse economy. The town will be a desirable place for families to live and prosper and attract visitors throughout the year.”*

#### **Skegness Neighbourhood Plan Objectives**

##### Economy

1. Identify additional employment areas which will cater for emerging sectors within Skegness and the wider region.
2. Attract a university or college campus which would benefit from the town's well-established tourism industry.
3. Identify a suitable location for a transport hub to serve both passengers and goods.

##### Social

4. Attract and retain skilled and professional people and families to the town.
5. Maximise previously developed sites for new housing.
6. Address the redevelopment of B&Bs.
7. Restrict the development of Houses in Multiple Occupation (HMOs) throughout the town.
8. Provide more affordable housing within the town to meet locally identified needs.

##### Retail, Leisure and Tourism

9. Relocate car parking within the town to improve pedestrian circulation and create new development opportunities.
10. Make improvements along the Foreshore.
11. Identify and improve the town “Gateways”.
12. Encourage the re-let of small units in the town centre for retail purposes.
13. Expand the offer of leisure and tourism within Skegness to create an attractive, year-round resort.
14. Ensure that caravan development needs can be met in a sustainable way through the Neighbourhood Development Plan (NDP) period.
15. Pedestrianisation of Lumley Road.

- 5.2 The following table appraises the Vision and each of the Objectives against the Sustainability Appraisal Objectives.

**Table 5. Sustainability Appraisal of Vision & Objectives**

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
Vision	0	+	0	0	+	0	+	0	0	+	0	0	0
Objective 1	0	0	0	0	+	0	0	0	0	0	0	0	0
Objective 2	0	0	0	0	+	0	+	0	0	0	0	0	0
Objective 3	0	0	0	0	+	+	+	0	0	0	0	0	0
Objective 4	0	0	0	0	0	0	0	0	+	0	0	0	0
Objective 5	+	+	+	0	0	+	0	0	0	+	0	0	0
Objective 6	0	+	0	0	+	0	0	0	0	0	0	0	0
Objective 7	0	+	0	0	0	0	0	0	+	+	0	0	0
Objective 8	0	0	0	0	0	0	0	0	0	+	0	0	0
Objective 9	0	+	0	0	0	0	+	0	0	0	0	+	0
Objective 10	0	+	0	0	0	0	0	0	0	0	0	0	0
Objective 11	0	+	0	0	0	0	0	0	0	0	0	0	0
Objective 12	0	+	0	0	+	0	+	0	0	0	0	0	0
Objective 13	0	0	0	0	+	0	+	0	0	0	0	0	0
Objective 14	0	+	0	0	0	0	+	0	+	+	0	0	0
Objective 15	0	+	0	0	0	0	+	0	0	0	0	+	0

**b) Justification**

- 5.3 Following on from the appraisal of the Vision & Objectives above, a reasoned justification is necessary to briefly explain why these elements of the Draft Neighbourhood Plan have been judged as such. In addition to this, issues that have arisen regarding the sustainability of an element of the Plan are discussed, and any required alterations are also suggested below.
- 5.4 As the above table demonstrates, all of the Neighbourhood Plan objectives and Sustainability Appraisal objectives are compatible with one another or have a neutral impact.
- 5.5 **Vision:** By encouraging Skegness to attract visitors throughout the year, the Neighbourhood Plan Vision will assist in enhancing the quality and distinctiveness of the area's landscapes, townscapes and historic environment. The Vision also promotes diverse economic growth. By encouraging Skegness to become a thriving coastal town and a desirable place for families to live, the Vision will help to improve accessibility to amenities, such as tourist attractions, and support local families in meeting their housing needs.
- 5.6 **Objective 1:** By identifying additional employment areas and supporting emerging employment sectors, this objective will assist with promoting viable and diverse economic growth that supports communities within the district.
- 5.7 **Objective 2:** By supporting the development of a university or college campus within the town, this objective will help to support diverse economic growth through the provision of academic and related jobs, and improve accessibility to education facilities within the town.
- 5.8 **Objective 3:** By supporting the development of a transport hub in an appropriate location within the town, this objective will help to support economic growth (by enabling improved access to jobs), minimise loss of greenfield sites (as the hub will likely be located within or near to the town centre) and improve accessibility to key services and facilities.
- 5.9 **Objective 4:** By seeking to attract skilled and professional people to the town, this objective will help to support the development of inclusive and vibrant communities.
- 5.10 **Objective 5:** By seeking to maximise previously developed sites for housing, this objective will help to protect biodiversity, the area's landscapes and natural resources, as well as directly prioritising re-use of previously developed land and ensuring that local housing needs are met.
- 5.11 **Objective 6:** By addressing the redevelopment of B&Bs for other uses, this objective will help to protect the distinctiveness of Skegness's townscape as well as promoting viable economic growth that supports communities within the district.
- 5.12 **Objective 7:** By restricting the development of HMOs throughout the town, this objective will help to protect the local townscape as well as supporting vibrant, mixed communities and ensuring that local housing needs are met by preserving family-sized housing.
- 5.13 **Objective 8:** By seeking to provide more affordable housing within the town, this objective will help to ensure that local housing needs are met.
- 5.14 **Objective 9:** By relocating parking within the town centre to improve pedestrian circulation, this objective will help to enhance the townscape and improve accessibility to key services and facilities within the town, including by promoting a more sustainable means of access.
- 5.15 **Objective 10:** By making improvements along the foreshore, this objective will enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment.
- 5.16 **Objective 11:** By identifying and improving the town's 'Gateways', this objective will enhance the quality and distinctiveness of the town's surrounding landscapes and townscapes.
- 5.17 **Objective 12:** By encouraging the re-let of small units within the town centre for retail purposes, this objective will enhance the quality of the townscape, promote viable economic

growth and improve accessibility to key facilities, including shops, within the town centre.

- 5.18 **Objective 13:** By seeking to expand the leisure and tourism offer within Skegness to create an attractive, year-round resort, this objective will help to promote diverse economic growth within the town as well as enhancing accessibility to amenities for visitors and residents.
- 5.19 **Objective 14:** By ensuring that the development of caravan parks are met in a sustainable way throughout the Neighbourhood Plan period, this objective will help to protect and enhance the landscape surrounding Skegness, help to improve accessibility to services and facilities by those living in caravan parks by ensuring they are developed in sustainable locations, support vibrant communities and ensure that local housing needs are met in a sustainable way.
- 5.20 **Objective 15:** By seeking to pedestrianise Lumley Road, this objective will help to enhance the townscape of Skegness and improve accessibility to services and facilities using a sustainable travel mode, which will in turn contribute towards encouraging healthy lifestyles.

**c) Required Alternatives**

- 5.21 No element of the Neighbourhood Vision or Objectives scores negatively against the Sustainability Objectives, and taken as a whole they are deemed to have a positive impact against each of the Sustainability Objectives. No alterations to the Vision and Objectives are therefore considered necessary as a result of this appraisal.

## **6.0 NEIGHBOURHOOD PLAN POLICIES APPRAISAL**

### **a) Sustainability Appraisal**

- 6.1 The Policies contained in the Neighbourhood Plan have been developed by the Skegness Neighbourhood Plan Steering Group to work alongside policies contained in the Core Strategy. These will deliver the aspirations of the local community, as outlined in the Draft Vision & Objectives.
- 6.2 The SA of the Plan Policies can be found on the following page. A wide range of policy areas have been included within the Pre-Submission Neighbourhood Plan.
- 6.3 It will be these areas that will be appraised in the SA to evaluate whether they have a positive or negative impact on the future of the area, using the Sustainability Appraisal Framework to undertake the evaluation.
- 6.4 The table on the following pages set out the appraisal of the policies within the Skegness Neighbourhood Plan against the SA framework.

**Table 6. SA of the Skegness Neighbourhood Plan Policies**

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
<b>Policy E1</b>					++	++							
	In supporting the development of starter/incubator business floorspace on brownfield sites, this policy will have a positive impact on the objectives to promote viable and diverse economic growth that supports communities within the district and to prioritise re-use of previously developed land.												
<b>Policy E2</b>					++	+							
	This policy supports the development of employment and businesses uses on existing employment sites or sustainable locations, provided they do not impact on the amenity of neighbouring uses, the character or appearance of the area, or have negative highways implications. Employment uses will only be supported where it can be demonstrated that these will not have a negative impact on existing environmental designations or flood defences. This policy will therefore not have a negative impact on the area's biodiversity, landscapes or natural resources. The policy will have a strong positive impact on the promotion of economic growth and a positive impact on the objective to prioritise re-use of previously developed land, through the support of employment uses on existing employment sites.												
<b>Policy E3</b>					++	++	+						
	This policy supports the re-use of existing sites to deliver employment-generating uses, including those within the tourism industry and visitor economy, subject to certain criteria being met. This policy will therefore support the objective to prioritise appropriate re-use of previously developed land, as well as supporting the promotion of diverse economic growth and improving accessibility to amenities.												
<b>Policy E4</b>						++	++						
	This policy supports the development of new or enhanced educational establishments, skills development or training facilities on brownfield sites. As such, this policy will have a positive impact on prioritising the re-use of previously developed land, as well as improving accessibility to key education facilities.												
<b>Policy V1</b>					++		+						
	This policy supports the development of tourism-related development, subject to certain criteria being met, including ensuring the development does not negatively impact upon existing environmental designations, flood defences or the local townscape. This policy will therefore have a negative impact on most of the SA objectives. It will however have a positive impact on the promotion of viable and diverse economic growth and improving accessibility to amenities (including tourism-related facilities).												
<b>Policy V2</b>											+		

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
	This policy seeks to prevent unnecessary loss of tourist accommodation (hotels, guest houses and B&Bs), particularly within the designated Serviced Holiday Accommodation Areas. Applications for changes of use from tourist accommodation uses outside these designated areas will be supported subject to certain criteria being met including if the application involves the conversion of the premises to affordable housing, a community use, a single family dwelling, older persons accommodation, or would result in an increased number of jobs being provided. It is not therefore considered that this policy would negatively impact upon local economic growth and it has the potential to positively contribute towards ensuring that local housing needs are met.												
<b>Policy V3</b>		+											
	This policy supports the development of new serviced tourist accommodation both within and outside the designated Serviced Holiday Accommodation Areas, subject to certain design and amenity-related criteria being met. This policy therefore has the potential to positively enhance the quality and distinctiveness of Skegness's townscape.												
<b>Policy TC1</b>					+		+		+				
	This policy supports the retention of active shopping frontages within the Town Centre and seeks to prevent the loss of floorspace to non-town centre uses, unless the development can be demonstrated to have a positive impact on the vitality of the town centre and is compatible with any nearby residential uses. This policy should therefore have a positive impact on promoting economic growth within the town and ensuring that access to key services and facilities is retained, as well as also supporting vibrant communities.												
<b>Policy TC2</b>											+		
	This policy supports applications for residential (C3) uses on upper floor levels above existing shops in the town centre provided that the use does not adversely affect the viability of any commercial ground floor use. This policy will therefore have a positive impact on ensuring that local housing needs are met.												
<b>Policy TC3</b>		++											
	This policy seeks to ensure that planning applications in the Town Centre and Foreshore area lead to the creation of active and quality frontages that improve the visual character of the area. In doing so, this policy will therefore have a positive impact on protecting and enhancing the quality and distinctiveness of the local townscape.												
<b>Policy INF1</b>							++					+	
	This policy provides support for planning applications that provide for and encourage the use of sustainable transport modes and minimise the need to travel. This policy will therefore have a positive impact on improving accessibility to key services and facilities through the promotion of sustainable modes of access, it will also encourage and provide the infrastructure and facilities												

Element of Draft Plan	Sustainability Appraisal Objectives													
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13	
	for healthy lifestyles.													
<b>Policy INF2</b>		++											-	-
	<p>This policy sets out minimum required car parking standards that will be applied to applications for new residential development. By outlining minimum standards to be provided within new developments, this policy seeks to reduce on-street parking and thereby protecting and enhancing the local townscape. Providing car parking within new developments may have a minor negative impact on climate change, due to the emissions from vehicles, and may discourage forms of active travel. However, this policy will be enacted alongside other policies, such as INF1 (sustainable travel), INF10 (cycle parking standards) and INF11 (Ultra Low Emission Vehicle parking standards), whose cumulative impacts will likely balance each other out (the cumulative impacts are assessed in Section 8 of this report).</p>													
<b>Policy INF3</b>		++											-	-
	<p>This policy sets out minimum required car parking standards that will be applied to applications for new HMO developments. By outlining minimum standards to be provided within new developments, this policy seeks to reduce on-street parking and thereby protecting and enhancing the local townscape. Providing car parking within new developments may have a minor negative impact on climate change, due to the emissions from vehicles, and may discourage forms of active travel. However, this policy will be enacted alongside other policies, such as INF1 (sustainable travel), INF10 (cycle parking standards) and INF11 (Ultra Low Emission Vehicle parking standards), whose cumulative impacts will likely balance each other out (the cumulative impacts are assessed in Section 8 of this report).</p>													
<b>Policy INF4</b>		++											-	-
	<p>This policy sets out minimum required car parking standards that will be applied to applications for new hotels, guest houses and B&amp;Bs. By outlining minimum standards to be provided within new developments, this policy seeks to reduce on-street parking and thereby protecting and enhancing the local townscape. Providing car parking within new developments may have a minor negative impact on climate change, due to the emissions from vehicles, and may discourage forms of active travel. However, this policy will be enacted alongside other policies, such as INF1 (sustainable travel), INF10 (cycle parking standards) and INF11 (Ultra Low Emission Vehicle parking standards), whose cumulative impacts will likely balance each other out (the cumulative impacts are assessed in Section 8 of this report).</p>													
<b>Policy INF5</b>		++											-	-
	<p>This policy sets out minimum required car parking standards that will be applied to applications for non-residential developments. By outlining minimum standards to be provided within new developments, this policy seeks to reduce on-street parking and thereby protecting and enhancing the local townscape. Providing car parking within new developments may have a minor negative impact on climate change, due to the emissions from vehicles, and may discourage forms of active travel. However, this</p>													



Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
	policy will be enacted alongside other policies, such as INF1 (sustainable travel), INF10 (cycle parking standards) and INF11 (Ultra Low Emission Vehicle parking standards), whose cumulative impacts will likely balance each other out (the cumulative impacts are assessed in Section 8 of this report). This policy also has lower parking requirements for proposed developments that have an effective Travel Plan in place, as this may provide enhanced opportunities for access by sustainable modes of travel.												
<b>Policy INF6</b>		++											
	This policy requires applications that do not meet the minimum parking standards set out in policies INF4 and INF5 to prepare a Parking Survey in order to demonstrate the impact of any projected overspill from these developments, including resultant demand for on-street parking. If on-street parking is found to be available, this may count towards meeting the required parking standard providing road safety is not compromised as a result. This policy will therefore help to protect and enhance the local townscape by ensuring that on-street parking does not exceed available capacity as a result of new development.												
<b>Policy INF7</b>		+											
	This policy requires planning applications to provide spaces for delivery and service vehicles where practical and feasible to do so. This policy will therefore enhance highway safety and protect the quality of the area's townscape.												
<b>Policy INF8</b>							+						
	This policy sets out minimum required disabled parking standards for new development. This policy will have a positive impact on improving accessibility to key services, facilities and amenities by disabled persons.												
<b>Policy INF9</b>		+										-	-
	This policy sets out required motorcycle parking standards for new developments. There is evidence to suggest that motorcycles are more fuel efficient than cars, however the impact of this policy on climate change is still considered to be slightly negative. However, this policy may still have a minor negative impact on the objective to encourage healthy lifestyles as it may discourage active forms of travel. These negative impacts are considered to be outweighed by the likely positive impact on enhancing the townscape, by reducing instances of on-street parking.												
<b>Policy INF10</b>		+					++					++	+
	By setting out minimum required cycle parking standards for new developments, this policy will help to minimise the effects of climate change, promote sustainable modes of travel and encourage healthy lifestyles. It will also have a minor positive impact on enhancing the quality of the area's townscapes by reducing the need for car parking.												

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
<b>Policy INF11</b>							++						+
<p>By setting out minimum required Ultra-Low Emission Vehicle (ULEV) charging point provision in new residential and non-residential developments, this policy will have a positive impact on promoting sustainable modes of travel and will also contribute towards minimising the effects of climate change.</p>													
<b>Policy INF12</b>													
<p>This policy seeks to retain existing public car parking provision within Skegness unless suitable alternative provision is made elsewhere or the current provision is demonstrated not to be required. Where additional demand for public car parking is identified, applications for new public car parks within and around the Town Centre will only be supported where it can be demonstrated that these needs cannot be adequately addressed by public transport or other sustainable travel modes (including access to out-of-centre park and ride facilities). This policy is therefore considered to have a neutral impact on climate change, as it does not actively encourage new public car parking provision unless a need for this is identified. By seeking to retain existing public car parking provision within this town, this policy will have a neutral impact on the quality of the townscape as it will ensure that instances of additional on-street parking are minimised.</p>													
<b>Policy H1</b>										++			
<p>This policy provides support for redevelopment of existing buildings to provide affordable residential accommodation, provided that certain conditions relating to the design of the proposed development and provision of adequate car parking etc. are met. It is therefore considered that this policy will have a neutral impact on the quality of the surrounding townscape and will have a positive impact on ensuring that local housing needs are met.</p>													
<b>Policy H2</b>		+				++				++			
<p>This policy supports small-scale residential developments (up to 9 dwellings) on brownfield infill and redevelopment sites provided these meet certain criteria related to design, amenity and highways impacts, and impacts on open space / recreation provision. This policy will therefore have a positive impact on the objective to prioritise appropriate re-use of previously developed land, as well as helping to ensure that local housing needs are met. The design considerations included in this policy will also ensure that the quality and distinctiveness of Skegness's townscape is protected and enhanced.</p>													
<b>Policy H3</b>							+			++			
<p>This policy provides support for the development of older persons housing and other specialist forms of older persons residential accommodation, provided certain criteria related to accessibility, open space provision and (in the case of larger scale developments) demonstration of local need are met. This policy will therefore have a significant positive impact on ensuring local housing needs are met. It will also help to improve accessibility to key services, facilities and open spaces amongst residents of</p>													

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
	the proposed developments.												
<b>Policy C1</b>							+						
	This policy seeks to ensure that existing community facilities and public open spaces within Skegness are where possible retained, by supporting the identification and nomination of land and facilities as Assets of Community Value. It also seeks to restrict the change of use or loss of existing community facilities unless certain criteria are met. This policy will therefore have a positive impact by improving accessibility to key services, facilities and amenities through ensuring that essential facilities are not lost.												
<b>Policy C2</b>							++						
	This policy supports applications for essential community infrastructure and facilities, including schools, youth facilities, facilities for older people or public open spaces, subject to certain locational and accessibility criteria being met. This policy is therefore considered to have a significant positive impact on improving accessibility to key services, facilities and amenities within Skegness.												
<b>Policy C3</b>							++						
	This policy seeks to retain and enhance existing community health facilities, as well as providing support for new community health facilities or improvements to existing facilities subject to certain criteria being met, such as those related to the location of the development, parking provision and potential impacts on highway safety and the local environment. By supporting the development of new community health facilities, this policy will have a positive impact on the objective to improve accessibility to key services and facilities.												
<b>Policy D1</b>		++											
	This policy sets out standards for design in new developments, and in doing so will have a significant positive impact on the objective to enhance the quality and distinctiveness of Skegness's townscapes, surrounding landscapes and historic environment.												
<b>Policy D2</b>		++											
	This policy outlines standards for the design of new car parking in both residential and other developments. In doing so, this policy will have a significant positive impact on the objective to enhance the quality and distinctiveness of Skegness's townscapes, surrounding landscapes and historic environment.												
<b>Policy D3</b>		+								+			
	This policy seeks to ensure that developments at key gateway locations will deliver enhancements and improvements to the												

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
	visual approaches and main arrival points of the town and that the visual impact of development in these locations on the surrounding landscape and countryside will be minimised as far as possible. This will have a positive impact on the objective to protect and enhance the quality and distinctiveness of the area's landscapes and townscapes. This policy also provides support for affordable housing in edge-of-settlement locations, and as such will help to ensure that local housing needs are met.												
<b>Policy D4</b>	+	++	++				+						
	This policy designates 7 sites within Skegness as Local Green Spaces, which this policy seeks to protect from development (except in very special circumstances). This policy will therefore have a significant positive on the objective to protect and enhance the quality and distinctiveness of the town's landscapes (including open spaces) and will protect these natural resources from avoidable losses. This policy will also have a minor positive impact by ensuring that access to green infrastructure continues to be retained and by protective the biodiversity that exists within these green spaces.												
<b>Policy NDP1</b>						++	++			++			
	This policy allocates the former Skegness Council Offices for leisure, tourism and/or commercial use; or affordable residential use, subject to certain criteria being met. These criteria include adequate on-site parking provision, demonstrating compliance with the Sequential and Exception Test set out in Annex 2 of the Core Strategy Local Plan, a Travel Plan and Transport Assessment being provided, compliance with layout and design guidance set out in Lincolnshire County Council's Development Design and Sustainable Drainage Guide and provision of a detailed drainage strategy. The requirements set out in this policy will ensure that the proposed development does not have any negative impacts on the risk of flooding or the surrounding townscape through increases in on-street parking. This site allocation will have potential positive impacts by improving accessibility to services, facilities and amenities (if developed for tourism and/or commercial use) or ensuring that local housing needs are met (if developed for affordable residential use). The allocation of this site also promotes the re-use of previously developed land.												
<b>Policy NDP2</b>					++	++				++			
	This policy allocates the Skegness Fire Station and Firemen Houses (Churchill Avenue) site for employment or affordable residential use, subject to certain criteria being met. These criteria include adequate on-site parking provision, demonstrating compliance with the Sequential and Exception Test set out in Annex 2 of the Core Strategy Local Plan, a Travel Plan and Transport Assessment being provided, compliance with layout and design guidance set out in Lincolnshire County Council's Development Design and Sustainable Drainage Guide and provision of a detailed drainage strategy. The requirements set out in this policy will ensure that the proposed development does not have any negative impacts on the risk of flooding or the surrounding townscape through increases in on-street parking. This site allocation will have potential positive impacts by ensuring that local housing needs are met (if developed for affordable residential use) or by supporting diverse economic growth (if developed for employment use). The allocation of this site also promotes the re-use of previously developed land.												

Element of Draft Plan	Sustainability Appraisal Objectives												
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13
<b>Policy NDP3</b>		-			++	--							
	<p>This policy allocates land north of Wainfleet Road for employment use or the development of a Park and Ride facility, subject to certain criteria being met. These criteria include adequate on-site parking provision, demonstrating compliance with the Sequential and Exception Test set out in Annex 2 of the Core Strategy Local Plan, a Transport Assessment being provided, ensuring adequate visibility at site access points from the A52 and provision of a detailed drainage strategy. The requirements set out in this policy will ensure that the proposed development does not have any negative impacts on the risk of flooding. The policy is likely to have a positive impact on promoting viable and diverse economic growth (if developed for employment use) and has the potential to have a positive impact on enhancing the quality and distinctiveness of the area's townscapes by reducing on-street parking within the Town Centre (if developed for a Park and Ride facility). The development of a Park and Ride facility may also have a potential negative impact on objective SAO2 through the impact of developing this site on the quality of the landscape surrounding Skegness town. However, these impacts can be mitigated through the cumulative impact of other policies within the plan, including policies D1 and D2 which would also need to be complied with (these cumulative effects are discussed in Section 8 of this report). The proposed development will also have a negative impact on SAO6 through the proposed development of a greenfield site. However, these impacts are likely to be outweighed by the positive impacts in terms of enhanced economic growth (if developed for employment use) and improvements to the character and townscape of the town (if developed for a Park and Ride facility). It is also unlikely that a Park and Ride facility would utilise the whole of the site; it is more likely that a combination of uses would be delivered or a smaller portion of the site would be developed..</p>												
<b>Policy NDP4</b>					++	++				++			
	<p>This policy allocates the Skegness Household Waste Recycling Centre site on Warth Lane for employment or affordable residential use, subject to certain criteria being met. These criteria include adequate on-site parking provision, demonstrating compliance with the Sequential and Exception Test set out in Annex 2 of the Core Strategy Local Plan, a Travel Plan and Transport Assessment being provided, compliance with layout and design guidance set out in Lincolnshire County Council's Development Design and Sustainable Drainage Guide, provision of adequate access and visibility from Warth Lane, and provision of a detailed drainage strategy. The requirements set out in this policy will ensure that the proposed development does not have any negative impacts on the risk of flooding or the surrounding townscape through increases in on-street parking. This site allocation will have potential positive impacts by ensuring that local housing needs are met (if developed for affordable residential use) or by supporting diverse economic growth (if developed for employment use). The allocation of this site also promotes the re-use of previously developed land. As this site is currently in use as a recycling centre, there is potential that allocating this site for other uses may have a negative impact upon reuse and recycling rates (SAO8). However, it is our understanding that this site is being made available by the County Council as it is either surplus to requirements or will be replaced with alternative recycling provision elsewhere, therefore the impact of this policy on SAO8 is considered to be neutral.</p>												

**b) Summary**

- 6.5 Most policies contained within the Neighbourhood Plan only score positively against the Sustainability Objectives. A number of policies are identified as having minor negative impacts against a number of the objectives (INF3, INF4, INF5, INF9), however these negative impacts are considered to be outweighed by the identified positive impacts of the policy as a whole when measured against the other Sustainability Objectives.
- 6.6 Policy NDP3 is the only policy identified as having a potential significant negative impact against SAO6 and a minor negative impact when assessed against SAO2 due to the fact that this site allocation involves the development of a large, greenfield site. This policy is, however, when assessed against SAO5, this allocation policy is also likely to have a significant positive impact on economic growth in the town. The identified negative impacts may be mitigated through the cumulative impact of other policies within the plan (such as those relating to design and the development of gateway sites) with which an application for development of this site would also need to comply. These cumulative impacts are assessed in Section 8 of this report.

## 7.0 SUSTAINABILITY APPRAISAL OF THE ALTERNATIVES

- 7.1 As part of this Sustainability Appraisal, two alternatives to the implementation of the current Neighbourhood Plan have been identified.
- 7.2 The first alternative is the implementation of the current Neighbourhood Plan, with the exception of allocations policies NDP1 to NDP4. The main rationale for the undertaking of a full SEA of the current Skegness Neighbourhood Plan was due to recognising the potential impact of the allocation of these sites. For this reason, an appraisal of an alternative not allocating sites is considered relevant.
- 7.3 The second alternative is to revert to the existing policy position for the area, managing development through the existing local and national legislation and plans.
- 7.4 The overall contribution of the Neighbourhood Plan and of the alternatives towards sustainable development can be determined by assessing the Neighbourhood Plan and each alternative against the impacts on each individual SA Objective. In general, the absence of site allocation policies or the absence of the Neighbourhood Plan altogether will have an impact on East Lindsey as a whole.
- 7.5 The absence of a Neighbourhood Plan will have additional consequences. Whilst the Core Strategy's policies would broadly contribute towards achieving the Objectives of the Plan, they would not present sufficient location-specific provisions to tackle issues that are particular to Skegness, such as the regeneration of Skegness Town Centre and the desire to encourage year-round tourism opportunities and enhanced educational facilities in the town.
- 7.6 The table below summarises the impacts of these alternatives on the sustainability of the Neighbourhood Plan area.

**Table 7. Sustainability Appraisal of the Alternatives to the Draft Neighbourhood Plan**

Sustainability Appraisal Objective		Appraisal of Alternatives
1	<b>Protect and enhance the quality and distinctiveness of the area's biodiversity (native plants and animals) and geodiversity</b>	<b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on the quality and distinctiveness of the area's biodiversity and geodiversity. Therefore the removal of site allocations from the Neighbourhood Plan would have minimal effect on this Sustainability Objective.
		<b>No Neighbourhood Plan</b> Policy D4 allocates a number of Local Green Spaces which are assessed as playing a role in protecting the biodiversity within the Neighbourhood Plan area, and as such would have a positive impact on this objective. The alternative of having no Neighbourhood Plan in place would therefore be a comparatively worse position when assessed against this objective as these open spaces (and their associated biodiversity) are not afforded as much protection under national and local policy as they would be under this policy within the Neighbourhood Plan.
2	<b>Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment</b>	<b>No Site Allocations</b> Site allocations policy NDP3 is assessed as having a potentially negative impact upon the quality of the area's landscapes as this allocation involves the development of a greenfield site. However, this potential impact may be

Sustainability Appraisal Objective		Appraisal of Alternatives
		<p>mitigated through the cumulative impact of other policies within the Neighbourhood Plan, such as design policies D1 and D2. The impact of the other site allocations when assessed against this objective is neutral. Having no site allocations within the Neighbourhood Plan may have a marginally more positive impact upon this objective than if the site allocations were included in the Plan.</p> <p><b>No Neighbourhood Plan</b> A large number of the policies within the Plan were assessed as having a positive impact upon the landscapes, townscapes and historic environment within Skegness. Therefore, if the Plan was not in place there would be fewer positive impacts upon the landscapes, townscapes and historic environment, particularly as there are no parking standards set out within the East Lindsey Core Strategy.</p>
3	<b>Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses</b>	<p><b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on the loss of natural resources and pollution. Therefore the removal of site allocations from the Neighbourhood Plan would have minimal effect on this Sustainability Objective.</p> <p><b>No Neighbourhood Plan</b> Policy D4 allocates a number of Local Green Spaces which are assessed as playing a role in protecting natural resources (including open spaces) from avoidable losses within the Neighbourhood Plan area, and as such would have a positive impact on this objective. The alternative of having no Neighbourhood Plan in place would therefore be a comparatively worse position when assessed against this objective as these open spaces are not afforded as much protection under national and local policy as they would be under this policy within the Neighbourhood Plan.</p>
4	<b>Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided</b>	<p><b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on the risk of flooding, due to requirements set out within the policies to ensure that flood risk is taken account of and properly assessed, where necessary. Therefore the removal of site allocations from the Neighbourhood Plan would have a minimal effect on this Sustainability Objective.</p> <p><b>No Neighbourhood Plan</b> All policies within the Neighbourhood Plan are assessed as having a neutral effect on the risk of flooding, due to requirements set out within the policies to ensure that flood risk is taken account of and properly assessed, where necessary. The alternative of having no Neighbourhood Plan in place would therefore have a minimal effect on this Sustainability Objective.</p>
5	<b>Promote viable and diverse economic growth that supports communities within the district</b>	<p><b>No Site Allocations</b> Site allocation policies NDP2, NDP3 and NDP4 allocate land for employment use, and as such have been assessed</p>



Sustainability Appraisal Objective		Appraisal of Alternatives
		<p>as having a positive impact on promoting economic growth in Skegness. The removal of these site allocations from the Neighbourhood Plan would therefore have a negative effect on this Sustainability Objective.</p> <p><b>No Neighbourhood Plan</b> A large number of policies within the Neighbourhood Plan are assessed as having a positive impact on promoting economic growth in Skegness. No policy is assessed as having a negative impact on this objective. The alternative of having no Neighbourhood Plan in place would likely have a negative effect on this objective as existing local and national policies do not provide locally-specific policies that support employment and economic growth as are provided in the Neighbourhood Plan.</p>
6	<b>Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites</b>	<p><b>No Site Allocations</b> Site allocations NDP1 to NDP3 were assessed as having a positive impact upon this objective as they involve the allocation of brownfield sites. Site allocation NDP4 is a greenfield site and therefore was assessed as having a negative impact upon this objective. Whilst the alternative of having no site allocations might have a slightly more positive impact upon this objective compared with if these site allocations were retained within the plan, it is considered that the other benefits associated with delivering these allocations, including the significant impact on economic growth and employment opportunities outweigh the potential negative impact upon this Sustainability Objective.</p> <p><b>No Neighbourhood Plan</b> A number of policies contained within the Neighbourhood Plan directly support the re-use of previously developed land and as such the Plan as a whole has a positive impact upon this objective. Three of the site allocations also allocate under-utilised brownfield sites for redevelopment and therefore directly contribute towards achieving this objective. The alternative of having no Neighbourhood Plan in place would therefore likely have a negative effect on this objective compared with if the Plan were in place.</p>
7	<b>Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access</b>	<p><b>No Site Allocations</b> Policy NDP1 allocates the former Skegness Council Offices for leisure, tourism or commercial use, and as such is assessed as having a positive impact upon this objective. The other three allocations were assessed as having a neutral impact upon this objective. The alternative of not allocating any sites within the Plan would therefore likely have a negative effect on this objective compared with if these sites were allocated.</p> <p><b>No Neighbourhood Plan</b> In addition to Policy NDP1, a number of other policies within the Neighbourhood Plan were assessed as having a positive impact upon this objective by supporting the provision of new or protection of existing community</p>

Sustainability Appraisal Objective		Appraisal of Alternatives
		infrastructure or by promoting sustainable transport access. The alternative of having no Neighbourhood Plan in place would therefore likely have a negative effect on this objective compared with if the Plan were in place.
8	<b>Increase reuse and recycling rates and minimise the production of waste</b>	<b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on recycling rates. Therefore the removal of site allocations from the Neighbourhood Plan would have a minimal effect on this Sustainability Objective.
		<b>No Neighbourhood Plan</b> All policies within the Neighbourhood Plan are assessed as having a neutral effect on rates of recycling. The alternative of having no Neighbourhood Plan in place would therefore have a minimal effect on this Sustainability Objective.
9	<b>Support inclusive, safe and vibrant communities</b>	<b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on supporting inclusive, safe and vibrant communities. Therefore the removal of site allocations from the Neighbourhood Plan would have a minimal effect on this Sustainability Objective.
		<b>No Neighbourhood Plan</b> Policy TC1 within the Neighbourhood Plan was assessed as having a positive impact on this objective by encouraging the retention of active shop frontages and supporting a vibrant Town Centre. The alternative of having no Neighbourhood Plan in place would therefore have a negative impact on this Sustainability Objective.
10	<b>Ensure that local housing needs are met</b>	<b>No Site Allocations</b> Three of the site allocations policies allocate land for affordable housing use and therefore were assessed as having a significant positive impact on this objective. Therefore the removal of site allocations from the Neighbourhood Plan would have a negative impact on the achievement of this Sustainability Objective.
		<b>No Neighbourhood Plan</b> A number of policies within the Neighbourhood Plan contribute directly towards the achievement of this objective, by either allocating land for affordable housing or supporting applications for affordable housing and older persons housing in order to ensure that local housing needs are met. The alternative of not having a Neighbourhood Plan in place would therefore have a negative impact on the achievement of this objective.
11	<b>Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments</b>	<b>No Site Allocations</b> The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on energy efficiency, sustainable design and construction. Therefore, the removal of site allocations from the Neighbourhood Plan would have minimal effect on this Sustainability Objective.

Sustainability Appraisal Objective		Appraisal of Alternatives
		<p><b>No Neighbourhood Plan</b></p> <p>All policies within the Neighbourhood Plan are assessed as having a neutral effect on energy efficiency and sustainable design and construction. The alternative of having no Neighbourhood Plan in place would therefore have a minimal effect on this Sustainability Objective.</p>
12	Encourage and provide the facilities and infrastructure for healthy lifestyles	<p><b>No Site Allocations</b></p> <p>The site allocations within the Neighbourhood Plan are assessed as having a neutral effect on encouraging and providing facilities and infrastructure for healthy lifestyles. Therefore, the removal of site allocations from the Neighbourhood Plan would have minimal effect on this Sustainability Objective.</p>
		<p><b>No Neighbourhood Plan</b></p> <p>A number of the car/motorcycle parking standards policies within the Neighbourhood Plan were assessed as having a potentially negative impact on this objective, as the provision of car parking may discourage active modes of travel. Policy INF10 was assessed as having a significant positive impact on this objective by setting out minimum cycle parking standards. The alternative of having no Neighbourhood Plan in place may however result in fewer incentives to provide adequate cycle parking in new and insufficient levels of car parking being provided in new developments. This would in turn result in a greater negative impact on other Sustainability Objectives, such as SAO2, due to increases in on-street parking.</p>
13	Positively plan for, and minimise the effects of, climate change	<p><b>No Site Allocations</b></p> <p>The site allocations within the Neighbourhood Plan are assessed as having a neutral impact on planning for and minimising the effects of climate change. Therefore, the removal of site allocations from the Neighbourhood Plan would have minimal effect on this Sustainability Objective.</p>
		<p><b>No Neighbourhood Plan</b></p> <p>A number of the car/motorcycle parking standards policies within the Neighbourhood Plan were assessed as having a potentially negative impact on this objective, as the provision of car parking may encourage car use and contribute towards increased vehicle emissions. Policies INF10 and INF11 however were assessed as contributing positively towards minimising the effects of climate change by encouraging cycling and use of ultra-low emission vehicles. The alternative of having no Neighbourhood Plan in place result in fewer incentives for new developments to introduce cycle parking and ULEVs, thereby having a negative effect on the achievement of this Sustainability Objective.</p>

## **8.0 APPRAISAL OF SECONDARY, CUMULATIVE AND SYNERGISTIC EFFECTS**

8.1 Secondary (or indirect) effects are effects that are not a direct result of a policy but occur away from the original effect or as a result of a complex pathway. Cumulative effects occur where two or more insignificant impacts combine to form a significant impact. Synergistic effects occur as the result of interactions between individual effects producing a total effect greater than the sum of each of the individual effects. Secondary, cumulative or synergistic effects may be either positive or negative. The secondary, cumulative and synergistic effects of the policies in the Skegness Neighbourhood Plan have been assessed and are summarised in the table below.

**Table 8. Appraisal of Secondary, Cumulative and Synergistic Effects**

Sustainability Appraisal Objective		Policies	Effects Identified	Significance
1	<b>Protect and enhance the quality and distinctiveness of the area's biodiversity (native plants and animals) and geodiversity</b>	D4	Only one policy is assessed as having an impact on this objective, therefore no synergistic or cumulative impacts are identified.	No secondary, cumulative or synergistic effects identified.
2	<b>Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment</b>	V3, TC3, INF2, INF3, INF4, INF5, INF6, INF7, INF9, INF10, H2, D1, D2, D3, D4, NDP3	The majority of these policies are assessed as having a positive or significant positive impact on this objective. Together, the cumulative impact of these policies will have a positive impact on this objective. Policy NDP3 identified a potential minor negative impact on this objective, however taken as a whole, the cumulative impact of the plan's policies will be positive when assessed against this objective. Some of the plan's other policies which encourage redevelopment / re-use of brownfield land may have secondary (indirect) positive impacts on this objective.	The impact of the plan's policies on the achievement of this objective will be positive.
3	<b>Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses</b>	D4	Only one policy is assessed as having an impact on this objective, therefore no synergistic or cumulative effects are identified.	No secondary, cumulative or synergistic effects identified.
4	<b>Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided</b>		No policies were identified as having a direct impact on this objective. The site allocations policies (NDP1 to NDP4) may have a secondary (indirect) positive impact on this objective, as the policies require the development of these sites to demonstrate that flood risk will be avoided and will not increase as a result of the development.	Some indirect positive impacts are identified in the site allocations policies (NDP1 to NDP4).

Sustainability Appraisal Objective		Policies	Effects Identified	Significance
5	<b>Promote viable and diverse economic growth that supports communities within the district</b>	E1, E2, E3, V1, TC1, NDP2, NDP3, NDP4	The majority of these policies are assessed as having a positive or significant positive impact on this objective. Together, the cumulative impact of these policies will have a positive impact on this objective by supporting the diversification of economic growth within the town. These policies may also have synergistic impacts through potential agglomeration effects of businesses being attracted to an area by the success of other businesses already established in that location.	Strong positive cumulative effects of the plan have been identified when assessed against this objective. There is also potential identified for further synergistic effects.
6	<b>Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites</b>	E1, E2, E3, E4, H2, NDP1, NDP2, NDP3, NDP4,	The majority of these policies are assessed as having a positive or significant positive impact on this objective. Together, the cumulative impact of these policies will have a positive impact on this objective. Policy NDP3 is identified as having a negative impact on this objective as it involves the allocation of a greenfield site, however taken as a whole, the cumulative impact of the plan's policies will be positive when assessed against this objective.	The impact of the plan's policies on the achievement of this objective will be positive overall.
7	<b>Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access</b>	E3, E4, V1, TC1, INF1, INF8, INF10, INF11, H3, C1, C2, C3, D4, NDP1	These policies as having positive or significant positive impacts on this objective. Taken as a whole, the cumulative impact of the plan's policies will therefore be positive when assessed against this objective.	The impact of the plan's policies on the achievement of this objective will be positive.
8	<b>Increase reuse and recycling rates and minimise the production of waste</b>		No policies were identified as having a direct impact on this objective. No secondary impacts of the plan's policies on this objective have been identified.	No secondary, cumulative or synergistic effects identified.
9	<b>Support inclusive, safe and</b>	TC1	Only one policy is assessed as having a	The impact of the plan's policies on the

Sustainability Appraisal Objective		Policies	Effects Identified	Significance
	<b>vibrant communities</b>		direct positive impact on this objective, therefore no cumulative effects are identified. There may be some secondary (indirect) impacts of other policies within the plan, such as those which support new development in sustainable locations or through re-use of previously developed or under-utilised sites (e.g. E1, E2, E3, E4, V1, V3, TC2, H1, H2, C2, C3, NDP1, NDP2, NDP4), as these policies will help to support the development of vibrant communities.	achievement of this objective will be positive. The plan's policies will also likely have secondary positive impacts on the achievement of this objective.
<b>10</b>	<b>Ensure that local housing needs are met</b>	V2, TC2, H1, H2, H3, D3, NDP1, NDP2, NDP4	These policies are assessed as having a direct positive or significant positive impact on this objective by providing support for the development of housing to meet local needs (such as affordable housing, family housing or older persons accommodation). Together, the cumulative impact of these policies will have a positive impact on this objective.	The cumulative impact of the plan's policies on the achievement of this objective will be positive.
<b>11</b>	<b>Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments</b>		No policies were identified as having a direct impact on this objective. No secondary impacts of the plan's policies on this objective have been identified.	No secondary, cumulative or synergistic effects identified.
<b>12</b>	<b>Encourage and provide the facilities and infrastructure for healthy lifestyles</b>	INF1, INF2, INF3, INF4, INF5, INF9, INF10	These policies were identified as having a mixture of both minor negative and positive/strong positive impacts upon the achievement of this objective. The overall cumulative effect of these policies is considered to be neutral, as the policies which seek to ensure sufficient car parking is provided will be enacted alongside policies which also ensure that sufficient cycle parking / ULEV charging points are provided within new	The cumulative impact of the plan's policies on the achievement of this objective will be neutral.

Sustainability Appraisal Objective		Policies	Effects Identified	Significance
			developments.	
13	<b>Positively plan for, and minimise the effects of, climate change</b>	INF2, INF3, INF4, INF5, INF9, INF10, INF11	These policies were identified as having a mixture of both minor negative and positive impacts upon the achievement of this objective. The overall cumulative effect of these policies is considered to be neutral, as the policies which seek to ensure sufficient car parking is provided will be enacted alongside policies which also ensure that sufficient cycle parking / ULEV charging points are provided within new developments.	The cumulative impact of the plan's policies on the achievement of this objective will be neutral.



## **9.0 MONITORING**

- 9.1 Monitoring of this Sustainability Appraisal will be carried out by Skegness Town Council alongside its monitoring of the Neighbourhood Plan. The monitoring cycle should be aligned to the Neighbourhood Plan review period.

**APPENDIX 1 SEA SCREENING OPINION, EAST LINDSEY DISTRICT COUNCIL (OCTOBER 2020)**



# **SCREENING OPINION FOR SKEGNESS NEIGHBOURHOOD DEVELOPMENT PLAN**

# **Screening Opinion**

## **Skegness Neighbourhood Development Plan**

### **1. Introduction**

1.1 This screening opinion is intended to determine whether or not the content of the Skegness Neighbourhood Development Plan (NDP) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

1.2 The purpose of the Skegness NDP is to establish planning policies for the development and use of land within Skegness. Some NDPs will allocate land for development, others will be primarily policy based. In the case of Skegness, the NDP will be allocating sites for affordable housing and employment development.

1.3 Below is an outline of the legislation behind the need for this screening opinion. This is then followed by the assessment of the likely significant environmental effects of the NDP and the determination of whether there is the need for a full SEA.

### **2. Legislation**

2.1 The legislation pertaining to Strategic Environmental Assessments and Sustainability Appraisal is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations. The Government published 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005), which provides more detailed guidance on how an SEA should be carried out.

2.2 The Planning and Compulsory Purchase Act 2004 also requires that a Sustainability Appraisal (SA) is prepared for all spatial plans. It is considered best practice to incorporate requirements of the SEA Directive into an SA.

2.3 The Government has stated that a Sustainability Appraisal is not needed for NDPs, but has said that it must be demonstrated how the NDP contributes to the achievement of sustainable development in the area.

2.4 Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 refers to the Habitats Directive. The Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an appropriate assessment. Paragraphs 2 – 5 of Schedule 2 amend the Conservation of Habitats and Species Regulations 2010 so that its provisions apply to NDOs and NDPs. The

regulations do state that the making of an NDP is not likely to have a significant effect on a site designated at European level for its biodiversity, however, this needs to be ascertained and this can be done at the time the screening opinion is being sought.

2.5 This report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.

### **3. Criteria for Assessing the Effects of a Neighbourhood Development Plan (NDP)**

3.1 Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004 sets out the criteria to be used for determining the likely significance of effects on the environment. These are:

1. The characteristics of plans and programmes, having regard, in particular, to—
  - (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
  - (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
  - (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
  - (d) environmental problems relevant to the plan or programme; and
  - (e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
  - (a) the probability, duration, frequency and reversibility of the effects;
  - (b) the cumulative nature of the effects;
  - (c) the transboundary nature of the effects;
  - (d) the risks to human health or the environment (for example, due to accidents);

(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

(f) the value and vulnerability of the area likely to be affected due to—

(i) special natural characteristics or cultural heritage;

(ii) exceeded environmental quality standards or limit values; or

(iii) intensive land-use; and

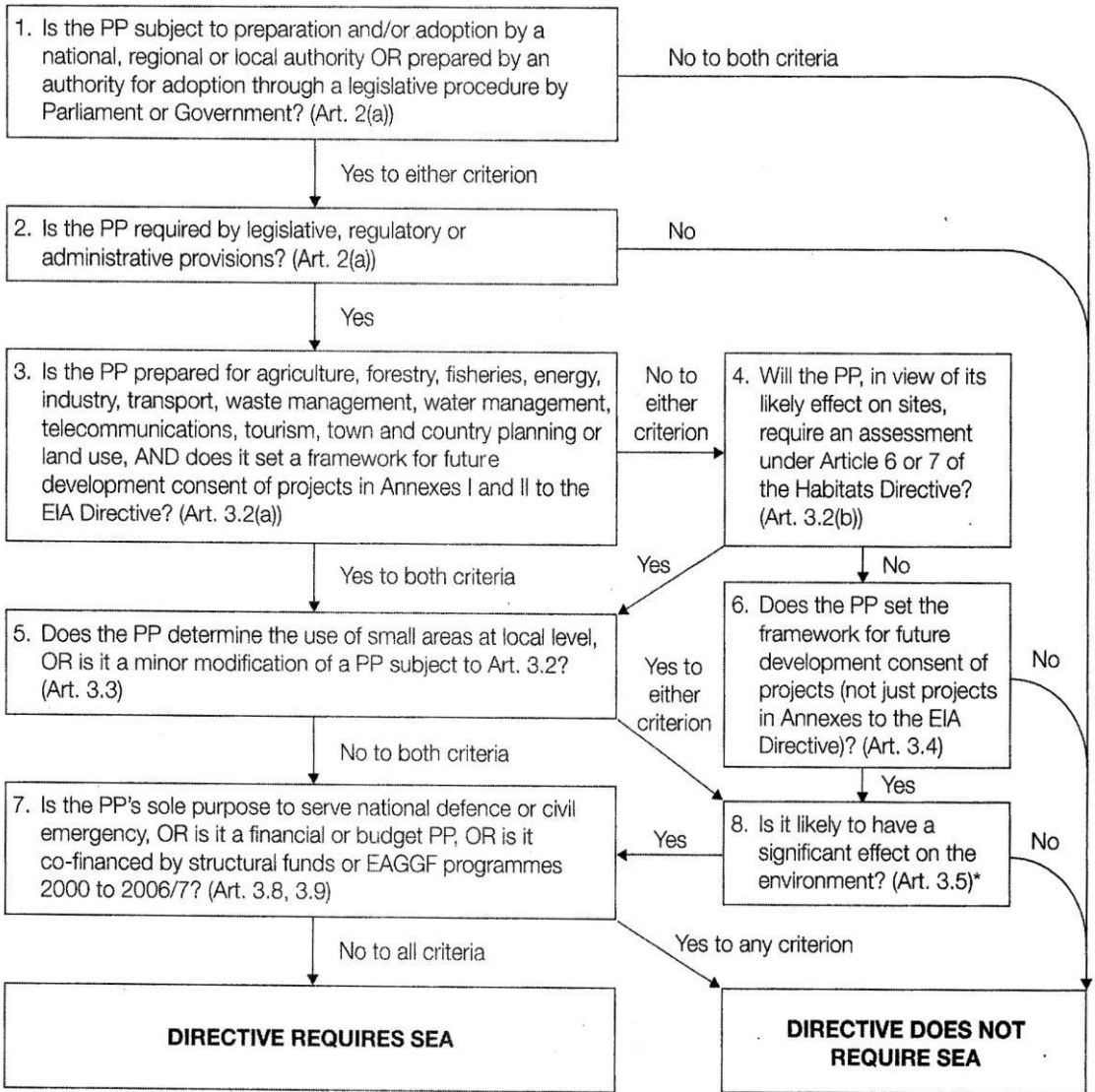
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

#### **4. Assessment**

4.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.

**Figure 2 – Application of the SEA Directive to plans and programmes**

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



\*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

source: A Practical Guide to the Strategic Environmental Assessment Directive Scottish Executive Welsh Assembly Government and DOE September 2005

4.2 The table below contains the assessment of whether the Skegness NPD will require a full SEA. The questions below are drawn from the diagram above which sets out how the SEA Directive should be applied.

Stage	Y/ N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	<p>The preparation of the Skegness NDP is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Skegness NDP will be "made" (adopted) by East Lindsey District Council once it had passed through the formal stages of its preparation under the Neighbourhood Planning (General) Regulations 2012.</p> <p>Go to Stage 2</p>
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	<p>The preparation of an NDP is not a requirement of legislation, but is an option for communities under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. If the NDP passes all the stages required under the Neighbourhood Planning (General) Regulations 2012, it will be "made" by the District Council and will become part of the development plan for the District. It therefore has to conform to the appropriate legislative, regulatory and administrative procedures.</p> <p>Go to Stage 3</p>
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	<p>The Skegness NDP is being prepared for town and country planning purposes. It allocates land for development, including affordable housing and employment uses. As such, the NDP contains a framework for further development consent for urban development projects (listed as 10(b) in Annex II of the EIA Directive).</p> <p>Go to Stage 5</p>
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	Y	<p>A HRA Screening has been carried out and found the potential for significant effects.</p>



5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The NDP determines the use of small sites at a local level.  Go to Stage 8
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	N/A	N/A
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	The NDP's purpose is not covered by the terms of this criterion.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	See Assessment below: Likely significant effects on the environment. Go to Stage 7

Stage 8 Assessment (N.B. Community in this context refers to the European Community)

SEA Directive criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Likely significant effect	East Lindsey District Council assessment
The characteristics of the Skegness Neighbourhood Development Plan, having regard, in particular to:		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Y	The Skegness NDP will, if "made" by East Lindsey District Council, form part of the statutory Development Plan. As such, it will contribute to the framework for the development consent for projects. The NDP will determine the location, nature and size of development sites (affordable housing, employment and Park and Ride facility) in the community.

<p>(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>N</p>	<p>The Skegness NDP will sit within the Development Plan. It is required to be in conformity with national legislation, some European legislation and with the planning policy documents prepared by East Lindsey District Council. The NDP should not in itself influence other plans and programmes, although it will influence development proposals.</p>
<p>(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</p>	<p>Y</p>	<p>As the Skegness NDP is must comply with relevant legislation, it should be seeking to integrate environmental considerations. To this end, an appraisal has been prepared, although not formally required by legislation, to demonstrate how the plan has integrated these issues. It is therefore considered that environmental considerations will be integrated in the Skegness NDP.</p>
<p>(d) environmental problems relevant to the plan or programme</p>	<p>Y</p>	<p>The preparation of Skegness NDP will need to consider the impact of proposals on sites designated for biodiversity, heritage assets and flood risk. Skegness lies adjacent to Saltfleetby-Theddlethorpe Dunes &amp; Gibraltar Point Special Area of Conservation (SAC); Greater Wash Special Protection Area (SPA), Gibraltar Point (SPA, Ramsar Site and Site of Special Scientific Interest. Also close by are The Wash and North Norfolk Coast SAC; and The Wash SPA and Ramsar sites. A Habitat Regulation Screening Opinion will also be required.</p>
<p>(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and</p>	<p>Y</p>	<p>The Skegness NDP does not directly relate to the implementation of European legislation in respect of waste management or water protection. However, it will need to take into account the impact of the</p>

programmes linked to waste management or water protection).		Water Framework Directive. Indirectly, there are a number of ways the plan helps to implement European environmental legislation through policies, including those on climate change, sustainable development, biodiversity etc and many of these indirect links will be brought out through the SA of the NDP.
SEA Directive criteria and Schedule 2 of Environmental Assessment of Plans and Programmes Regulations 2004	Likely significant effect	East Lindsey District Council assessment
Characteristics of the effects and of the Neighbourhood Development Plan Area likely to be affected, having regard, in particular, to		
(a) the probability, duration, frequency and reversibility of the effects	Y	There will be short term effects during the construction of development on allocated and other sites. There are likely to be minor and localised longer term effects resulting from the development of areas in and around the town and although the environment may adapt to these change in circumstances, the effect is likely to be permanent.
(b) the cumulative nature of the effects	Y	Skegness NDP will be allocating a number of sites for development (affordable housing, employment and a Park and Ride Facility). The sites are mostly small and the opportunity for cumulative effects is limited. Development coming forward as a result of the policies cannot be predicted.
(c) the transboundary nature of the effects	Y	There are unlikely to be transboundary effects of the NDP.
(d) the risks to human health or the	N	There are unlikely to be any significant risks to human health or

environment (for example, due to accidents)		the environment due to accidents as a result of the NDP. Skegness is located within Flood Zone three and is also in the highest Hazard level in the Environment Agency's Hazard mapping, but this is addressed through the policies of the Plan.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	N	The NDP covers the parish of Skegness, which has a population of 19,579 (2011).
(f) the value and vulnerability of the area likely to be affected due to : (i) special natural characteristics or cultural heritage	Y	Until the location and scale of development coming forward as a result of the policies is determined, it is not possible to properly assess the effects on natural character or cultural heritage. However, the Plan includes policies, or reference within policies, referring to design, local character, and green space.
(f) the value and vulnerability of the area likely to be affected due to : (ii) exceeded environmental quality standards or limit values	N	The Skegness NDP is not expected to exceed environmental limits.
(f) the value and vulnerability of the area likely to be affected due to : (iii) intensive land-use	N	The Skegness NDP contains policies that require development to reflect local density and pattern of development.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	N	Skegness lies 8.5km from the eastern edge of the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) so is unlikely to impact on this protected landscape. Sites protected at an international level for biodiversity are outlined above.

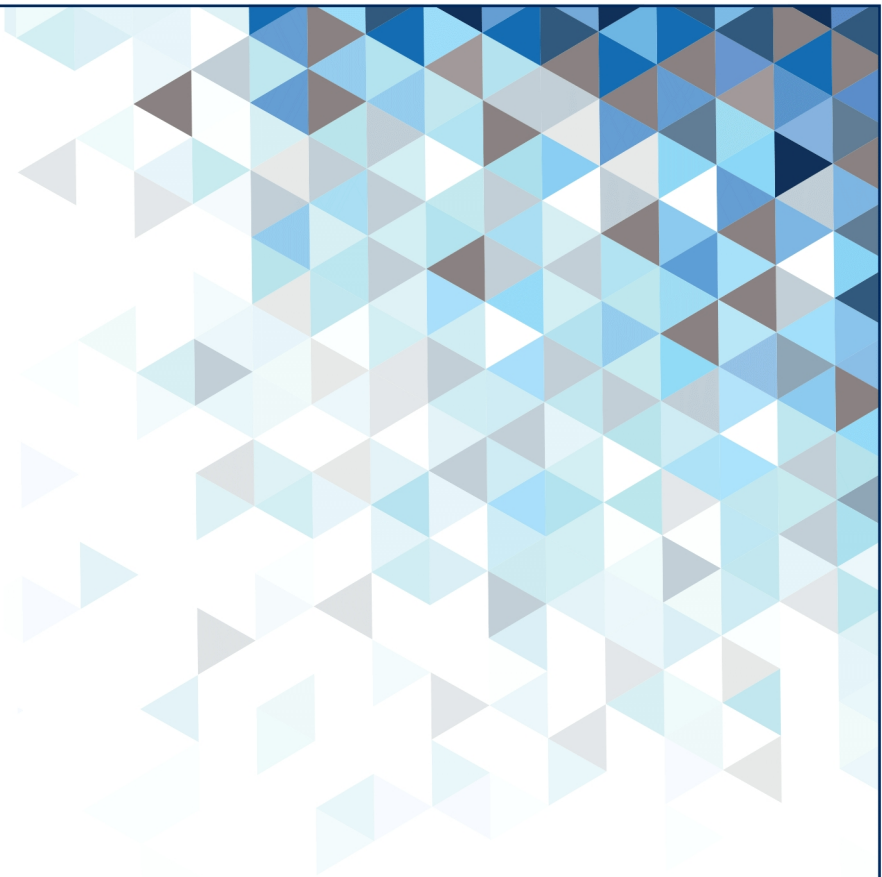
Assessment under Stage 8	<p>The Skegness NDP is likely to have a significant effect on the environment.</p> <p>Go to 7</p>
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## 5. Screening Outcome

5.1 As a result of the assessment above, there is potential that there will be significant environmental effects arising from the Skegness Neighbourhood Development Plan. As such, the Skegness Neighbourhood Development Plan requires a full SEA to be undertaken. This screening opinion is based on the information that is available at the time of assessment.

5.2 The East Lindsey Core Strategy has been subject to a Sustainability Appraisal (incorporating SEA), but the Skegness NDP goes further in that it looks to allocate additional sites for development and contains policies bringing forward development not included in the East Lindsey Local Plan. It is therefore important that the Skegness NDP be subject to SEA.

5.3 East Lindsey District Council had advised all its communities preparing Neighbourhood Development plans, whether allocating sites or not, that they should prepare a sustainability assessment in order to comply with the Government's requirement that the NDP demonstrate how it contributes to the achievement of sustainable development in their area. The Council has suggested a lighter touch approach than that used by the District Council's Sustainability Appraisal, which it feels is proportionate to the approach taken by Neighbourhood Planning. The Council consulted English Heritage, Natural England and the Environment Agency on the approach to be used, and all agreed that it was an appropriate approach for Neighbourhood Plan Groups to take. The approach is framed to enable SEA to be incorporated, as good practice now recommends. It is therefore recommended that a 'light touch' SA (incorporating SEA) be prepared for the Skegness Neighbourhood Development Plan, as advocated by the Council, giving special consideration to the aspects outlined in the assessment table above: namely the impacts on sites protected internationally for their biodiversity and flood risk.



**BEDFORD**

**Planning / SDD / SPRU**

bedford@dlpconsultants.co.uk

**BRISTOL**

**Planning / SDD / SPRU**

bristol@dlpconsultants.co.uk

**EAST MIDLANDS**

**Planning/ SDD**

nottingham@dlpconsultants.co.uk

**LEEDS**

**Planning**

leeds@dlpconsultants.co.uk

**LONDON**

**Planning**

london@dlpconsultants.co.uk

**MILTON KEYNES**

**Planning**

miltonkeynes@dlpconsultants.co.uk

**RUGBY**

**Planning**

rugby.enquiries@dlpconsultants.co.uk

**SHEFFIELD**

**Planning/ SDD / SPRU**

sheffield@dlpconsultants.co.uk



**IEMA** Transforming the world  
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**RTPI**  
Chartered Town Planner