

Sustainability Appraisal to accompany the Housing Development Plan Document Issues and Options Paper

August 2007

Introduction

This sustainability appraisal has been prepared in order to provide information on the anticipated social, environmental and economic effects of the options presented in the Housing DPD Issues and Options Paper.

A formal report is not a requirement at this stage because sustainability appraisal should be seen as an ongoing process alongside DPD preparation. However, government guidance states that appraisal information should be available to the public and relevant bodies whilst they are participating in the process of identification and selection of options.

This short report has therefore been prepared in order to give a snapshot of the available sustainability appraisal information at the time of consultation on the Housing DPD Issues and Options paper. It follows on from the March 2007 Scoping report and will be followed by a more detailed report at the time of consulting on the Preferred Options. In order to keep this report short, detailed background information has not been included.

Further detailed information can be found in the appendices to this report. These have not been printed in order to save paper, but can be downloaded from the Council's website or requested from the Council. Further information on the requirements for sustainability appraisal, baseline information for the district and how the sustainability appraisal framework was created can be found in the Scoping Report, and will be republished in the full Sustainability Report which will accompany the Housing Preferred Options Paper in due course. Copies of the Scoping Report can be downloaded from the Council's website or are available on request from the council using the contact details below.

Please send any comments you have on this report to the Environmental Sustainability Officer at the address below by **Friday 21 September 2007** (electronic responses are welcome).

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Comments on the Scoping Report

The March 2007 report was an updated version of the Core Strategy Scoping Report published in September 2005. In order to minimise repetitive consultation, this latest report was sent only to statutory consultees and the sustainability team at Cumbria County Council. It has since been published on Eden District Council's website.

The comments received and the response made to them are set out in the table below. Some comments received referred to the anticipated content of DPDs. These have been noted and passed to the officers concerned.

Cumbria County Council

| Consultation Responses | Sustainability Appraisal Response |
|---|---|
| Suggest changing the term 'sub-objectives' to something more appropriate | Wording changed to "key considerations" |
| Support the approach to developing sustainability criteria for appraising housing sites | |
| Suggest cross-checking the list of plans, policies and programmes reviewed with that of the SEA for the Wind Energy SPD | Some additional plans and policies to include in review identified. |

English Heritage

| Consultation Responses | Sustainability Appraisal Response |
|---|--|
| <p>The following documents should be added to the Review of Relevant Plans and Programmes:</p> <p>European Landscape Convention;</p> <p>Planning (Listed Buildings and Conservation Areas) Act 1990;</p> <p>Ancient Monuments and Archaeological Areas Act 1979;</p> <p>The Historic Environment: a Force for Our Future (DCMS 2001);</p> <p>White Paper Heritage Protection for the 21st Century 2007;</p> <p>Regional Cultural Strategy;</p> | <p>While it is not possible for the review of plans and programmes to be exhaustive, the majority of the available suggested documents have now been reviewed, as will be detailed in the updated PPSI list.</p> |

| Consultation Responses | Sustainability Appraisal Response |
|---|---|
| <p>Regional Tourism Strategy;</p> <p>Streets for All;</p> <p>LDNP Management Plan;</p> <p>AONB Management Plan;</p> <p>Community Strategy;</p> <p>Cultural Strategy;</p> <p>Local Heritage Strategy;</p> <p>Conservation Area Character Appraisals and Management Plans</p> | |
| <p>Indicators should be extended beyond merely recording the number of historic assets, to include information on the condition of the historic environment.</p> | <p>Historic Landscape Characterisation information for Eden will be available from Cumbria County Council late 2007. <i>Countryside Quality Counts</i> also due to be released later in 2007.</p> |
| <p>Incorporate list of problems, issues and opportunities developed by English Heritage into the SA process</p> | <p>Issues identified will be incorporated into more detailed baseline information presented in final SA report</p> |
| <p>Insert an additional historic environment objective into the SA framework.</p> | <p>Consider that historic environment adequately covered by existing sustainability objective EN3 (built environment)</p> |
| <p>Involve conservation and archaeological staff of Eden and Cumbria in the preparation of DPDs and their assessment</p> | <p>Relevant staff will be invited to SA workshops, as appropriate</p> |
| <p><i>Additional comments on the lists of key sustainability issues</i></p> | <p>Some minor wording changes</p> |
| <p><i>Comments on what the content of DC Policies DPD should be</i></p> | |

Environment Agency

| Consultation Responses | Sustainability Appraisal Response |
|--|--|
| <p>The following documents should be added to the Review of Relevant Plans and Programmes:</p> <p>River Basin Planning Framework for the Solway Tweed River Basin District (2006);</p> | <p>All included, although awaiting 2007 update on the Eden Catchment Flood Management Plan</p> |

| | |
|---|---|
| <p>The Eden and Esk Catchment Abstraction Management Strategy (2006);</p> <p>Eden Catchment Flood Management Plan;</p> <p>Eden Salmon Action Plan</p> | |
| <p>Climate change and flood risk should be added to the list of Key Issues</p> | <p>Climate change and flood risk will be included in more detailed baseline in final SA report, and will also be included in Key Issues table for future scoping reports</p> |
| <p>Use the modified framework recently circulated by Cumbria County Council.</p> | <p>Revised framework used</p> |
| <p>Suggest additional modified wording for EN3, NR2 and NR4</p> | <p>Changed to better reflect PPS25</p> <p>An abridged version of the suggested wording added to NR2.</p> <p>Agree with principles, have amended NR1 regarding energy and consider NR2 already covers water conservation</p> |
| <p>Site locations will potentially impact on water quality, particularly if a watercourse is present on site, or if there are impacts during the construction phase</p> | <p>Include presence of watercourses on site in list of criteria to consider when appraising sites</p> |

Natural England

| Consultation Responses | Sustainability Appraisal Response |
|--|--|
| <p>Attention drawn to amended Habitats Regulations</p> | <p>Include reference to work on Habitats Regulations Assessment in final SA report</p> |
| <p>There is a new duty for Local Authorities to have regard to the purpose of conserving biodiversity – EDC may wish to make this obligation clearer within SA</p> | <p>Include duty to have regard to biodiversity in list of key messages.</p> |
| <p>The following documents could add key messages and be added to the Review of Relevant Plans and Programmes: PPS7 Sustainable Development in Rural Areas; PPS9 Biodiversity and Geological</p> | <p>While it is not possible for the review of plans and programmes to be exhaustive, the majority of the available suggested documents have now been reviewed, as detailed in the updated PPSI list.</p> |

| | |
|--|--|
| <p>Conservation;</p> <p>PPG17 Planning for Open Space;</p> <p>Environmental Quality in Spatial Planning – Incorporating the natural built and historic environment and rural issues in plans and strategies;</p> <p>Accessible Natural Green Space Standards in Towns and Cities;</p> <p>Rising to the Challenge: A Climate Change Action Plan for England’s Northwest</p> | |
| Sources of baseline info | Gratefully noted |
| Additional sustainability issues suggested | Issues considered during sustainability appraisal where appropriate |
| Explore the potential for including an indicator for protected species | Awaiting work on biodiversity evidence base for Cumbria. |
| Include an indicator for monitoring whether development is locally distinctive | Not considered feasible at present. Will be reconsidered during preparation of Development Control Policies DPD. |

Appraisal of DPD Objectives

Method

A set of draft DPD objectives were tested against the sustainability appraisal framework (see Appendix A) at a small workshop comprising planning and housing officers on 18th June 2007.

The officers present were:

Chris Hoban, Local Plans Officer
Roger Hopcraft, Planning Policy Manager
Fiona Moss, Environmental Sustainability Officer
Anne Rogers, Acting Principal E.H.O. Housing

The draft objectives appraised were:

1. To provide affordable housing and meet local housing need
2. To provide everyone with a decent home
3. To create and maintain balanced communities
4. To provide housing that is accessible to local services and jobs

Results

The results of the objectives appraisal can be found in figure 1 (overleaf). In summary, all the objectives scored positively overall, particularly against social and economic objectives. The lowest scores were against the environmental and resources sustainability objectives. A full results table including commentary is located in **Appendix B**. The results use the symbols below:

Scoring System

- + + Move significantly towards sustainability objective
- + Move marginally towards sustainability objective
- 0 Neutral effects (may include both positive and negative effects balancing out)
- Move marginally away from sustainability objective
- - Move significantly away from sustainability objective
- ? Uncertain effects
- X No relationship

Summary Symbols




-  mostly + or ++
-  a mixture of + and - , or mostly 0 or X
-  mostly - or - -
- ? overall effects uncertain

Figure 1: Results of objectives appraisal

| Sustainability Objective | | Housing DPD Objective | | | |
|--------------------------|--|---|---|---|---|
| | | 1. To provide affordable housing and meet local housing need | 2. To provide everyone with a decent home | 3. To create and maintain balanced communities | 4. To provide housing that is accessible to local services and jobs |
| Social Objectives | 1. To increase the level of participation in democratic processes | + | + | ++ | ++ |
| | 2. To improve access to services, facilities, the countryside and open spaces | + | + | + | ++ |
| | 3. To provide everyone with a decent home | ++ | ++ | ++ | + |
| | 4. To improve the level of skills, education and training | ++ | ++ | + | ++ |
| | 5. To improve the health and sense of well-being of people | ++ | ++ | ++ | ++ |
| | 6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history | ++ | ++ | ++ | ++ |
| Environmental Objectives | 7. To protect and enhance biodiversity | - | - | X | + |
| | 8. To preserve, enhance and manage landscape quality and character for future generations | + | + | + | 0 |
| | 9. To improve the quality of the built environment | + | ++ | + | X |
| Resources Objectives | 10. To improve local air quality and reduce greenhouse gas emissions | + | + | ? | ++ |
| | 11. To improve water quality and water resources | ? | ? | X | X |
| | 12. To restore and protect land and soil | ? | ? | X | + |
| | 13. To manage mineral resources sustainably and minimise waste | + | + | X | X |
| Economic Objectives | 14. To retain existing jobs and create new employment opportunities | ++ | + | + | + |
| | 15. To improve access to jobs | ++ | + | + | ++ |
| | 16. To diversify and strengthen the local economy | ++ | + | ++ | ++ |
| Summary | |  |  |  |  |

Recommendations

There were two potential improvements suggested by the sustainability appraisal:

| Recommendation | Reason |
|--|---|
| Use the phrase “good quality affordable housing” in objective 1. | Whilst affordable housing built with public money is required to meet high standards, making this explicit within policy would be helpful as an increasing amount of affordable housing is expected to be provided by the private sector. |
| Amend objectives to reflect the importance of housing to achieving environmental sustainability aspirations. | Whilst the principal focus of this DPD is providing housing, it would nonetheless be appropriate to do this in a sustainable manner and consideration should be given to including this within the objectives. Although new affordable housing is generally of good environmental quality, making this explicit within objectives may assist with ensuring affordable housing provided by the private sector meets similar standards to that provided by Registered Social Landlords. |

Appraisal of Policy Options

Method

The policy options were mostly appraised in a workshop setting by the same officers who appraised the objectives. Whilst there was not time for detailed completion of all matrices in the initial workshop, the impacts of all the alternatives were thoroughly discussed, allowing the remaining matrices to be completed by the sustainability officer and then further discussed at a second workshop. The results are summarised below; full results can be found in **Appendix C**. The questions are not in every case exactly the same as those in the published Issues and Options paper. This is because sustainability appraisal is an iterative process, which takes place as the policy options evolve.

Results

Question 1:

This question was the proposed objectives, discussed above.



Question 2:

This question was not appraised because very similar questions have been appraised as part of the Core Strategy sustainability appraisal. Sustainability of the Core Strategy Preferred Option MSC2b, which was a less detailed version of this question, found that it scored well against social, economic and environmental objectives.

Question 3:

Should the percentages for housing provision in the different settlements be shown as band widths rather than specific figures?



- A. Yes
- B. No, there should be single targets

| A | B | Comments |
|---|---|---|
|  |  | Greater flexibility is thought to provide various benefits, and, assuming overall provision is not skewed significantly towards or away from the larger settlements for more than a few years at a time, no negative impacts. |

Question 4:

Should the size of individual developments in Local Service Centres continue to be limited in order to allow development to be spread across the district each year? (If proposals are for developments greater than the threshold this limit could be achieved through phasing)



- A. Yes
- B. No

| A | B | Comments |
|---|---|---|
|  |  | The main issues identified during discussion were the benefits of flexibility versus a need to protect the character of smaller settlements. Both options score a few slight positive and negative scores, but option B (a more flexible approach) scores slightly more positively. |

Question 5:

Should a more flexible and tiered approach to the affordable housing requirement be adopted that would allow different percentages of social rented housing and intermediate housing to be specified in order to meet affordable housing requirements in different parts of the district?




- A. Yes
- B. No

| A | B | Comments |
|--|--|--|
|  |  | A more flexible approach is felt to deliver numerous positive sustainability benefits, some of them significant. No positive scores were awarded to the more rigid approach, because, although there were acknowledged to be potential benefits to having a consistent level of affordable housing expected, the balance of opinion in the workshop was that current policies have not delivered affordable housing in the way that was envisaged. |

Question 6:

Should we allow off-site provision of affordable housing? (tick all that apply):

- A. For developers of small sites?
- B. To enable cross subsidy from parts of Eden that currently have lower proportions identified affordable housing need (and may in fact require market housing)?
- C. Not at all?

| A | B | C | Comments |
|---|---|---|---|
|  |  |  | It was felt that on-site provision of affordable housing remains the best option in most circumstances. However, if there are circumstances which make this inappropriate, some flexibility may be helpful. It is on this basis that positive scores have been awarded and option B has scored most positively. |

Question 7:

Should the Council allocate sites as being suitable solely for providing affordable housing

development?



- A. Yes
- B. No

| A | B | Comments |
|---|---|---|
| ? | ? | Allocating “rural exception sites” would be intended to facilitate affordable housing in the most rural communities. Such affordable housing is already permitted under other policies although very little has been built. Opinions differ as to whether the policy would be successful in this regard and therefore it is difficult to predict its impacts on housing provision and related objectives. Other impacts of the policy come from the pros and cons of allocating sites compared with relying on applications coming forward. The latter may mean a greater number of brownfield windfall sites, but in rural areas there are very few of these and allocating sites may lead to benefits through the ability to select sites with the lowest environmental impact. |

Question 8:

Should the Council provide price ranges for different types of housing for sale that would be deemed to be affordable rather than the fixed multiples of individual and household earnings as is currently the case?

- A. Yes
- B. No





| A | B | Comments |
|---|---|--|
|  |  | This is a fairly technical question, which does not relate directly to many of the criteria. However, option A scored a couple of significantly positive scores while option B scored some significantly negative scores. This is because the current rigid approach encourages developers to provide only flats for affordable housing; setting prices for different types of houses may encourage more varied provision. |

Question 9:

Should an indication of the household size, type and tenure be given for all sites that are allocated? (Tick all that apply)

- A. Size
- B. Type
- C. Tenure
- D. None at all [Option D added to ensure all reasonable alternatives appraised.]



| A | B | C | D | Comments |
|---|---|---|---|----------|
| | | | | |

| | | | | |
|---|---|---|---|--|
|  |  |  |  | <p>Options A-C scored very positively, whereas option D received neutral and negative scores. However, this is based on the assumption that needs are correctly identified and projected and that policies are sufficiently flexible to accommodate changing information on needs.</p> |
|---|---|---|---|--|

Question 10:

Would you support a viability test, in principle, for assessing the proportion of affordable housing that should be provided on individual sites? (when proposing a lower figure than stated in the housing policies)




- A. Yes
- B. No

| A | B | Comments |
|---|---|--|
|  |  | There are some concerns raised by the prospect of a viability test which have to be addressed. However, on the whole a viability test is felt to have positive impacts through enabling more housing to be provided. Whilst this may not result in the ideal housing balance, experience suggests that the current approach of strict quotas is not serving the district well. |

Question 11:

Should the Council support the use of the following in order to provide affordable housing in Eden? (tick all that apply)





- A. Community Land Trusts
- B. Coat Tailing (see Housing Issues and Options Paper for explanation)
- C. Other [Open option – can't be appraised]
- D. Neither (i.e. Affordable housing should be provided solely by conventional routes)

| A | B | D | Comments |
|---|---|---|---|
|  |  |  | Options A and B are likely to increase the amount of affordable housing available to local people in the most rural communities, and therefore scored positively against social and economic objectives through helping to sustain these communities. |

Question 12:

Do you think that the Council should consider the conversion of holiday accommodation to provide affordable housing:

- A. In Key Service Centres only?
- B. In Key Service Centres and Local Service Centres only?
- C. In any village with an identified need for affordable housing?
- D. Holiday accommodation should not be converted into affordable housing.

| A | B | C | D | Comments |
|---|---|---|---|---|
|  |  |  |  | Options A to C all scored positively, mainly due to positive scores against social and economic objectives. Option D received a large number of negative scores against these objectives. |

Question 13




This is an open question which cannot be appraised.

Questions 14 and 15:

Question 14 is very general and question 15 very specific. It is considered that for sustainability appraisal purposes at this initial stage there are three basic alternatives to evaluate:

Should the definition of a local connection to the area




- A. Remain as it is
- B. Be more stringent
- C. Be less stringent

| A | B | C | Comments |
|---|---|---|---|
|  |  |  | Option A (leave the local occupancy clause as it is) scored a number of significantly positive scores and is felt to represent a good approach to attempting to provide some balance to an unbalanced market. Making the definition of local more stringent scored positively overall, but less positively than the current approach. Relaxing the definition received a few negative scores, because it was felt the policy would be less able to provide for local needs. |

Question 16:

Should the Council attach a local occupancy clause to:





- A. All new housing development in Penrith
- B. A proportion of housing development in Penrith (e.g. 80%)
- C. Only the affordable element of housing development in Penrith

| A | B | C | Comments |
|---|---|---|--|
|  |  |  | Under the current wording of the local occupancy clause, the only people this policy would affect are people wanting to buy a house and retire to Penrith or wanting to move to Penrith but continue to work outside Eden. As the existing stock without a local occupancy clause will remain available to this group, the impacts of the different options are unlikely to be significant. Option A received a few negative scores because it was felt to operate against inclusion and reduce the viability of developments, therefore reducing the contributions which could be sought for other community and infrastructure benefits. |

Question 17:

Do you support, in principle, a standard contribution on housing developments to provide (tick all that apply):




- A. Affordable housing
- B. Community open space provision
- C. Flood alleviation and water extraction (to apply in Penrith and Appleby)
- D. Transport infrastructure (to apply in Penrith)
- E. No standard contributions should be set

| A | B | C | D | E | Comments |
|---|---|---|---|---|---|
|  |  |  |  | ? | Options A-D all scored some significantly positive scores and some negative scores. Option D (contributions to transport infrastructure) scored more negative scores than the others, primarily due to scoring negatively against several environmental objectives. However, it still scored positively overall. Option E was difficult to score because impacts depend upon what contributions are sought in the absence of a "standard contribution". |

Question 18:

Should the Housing Policies DPD make an allowance for a very small number of windfall developments to take place to provide affordable housing in Eden?




- A. No, there should be no allowance for windfall sites and all sites should be allocated through the Local Development Framework
- B. Yes, windfall sites can be allowed to provide affordable housing in the Key Service Centres and Local Service Centres only
- C. Yes, windfall sites can be allowed to provide affordable housing in any village

| A | B | C | Comments |
|---|---|---|---|
|  |  |  | Option A (not allowing any development on windfall sites) received several negative scores due to (i) making it more difficult to meet housing need and (ii) requiring more building on greenfield land. Options B and C score positively overall, with B scoring more positively through keeping development within Key and Local Service Centres. |

Question 19:

If windfall sites are allowed within the first 5 years of the Housing DPD should they be allowed on:

- A. Previously developed sites (excluding agricultural buildings) only?
- B. Previously developed sites (including agricultural buildings) only?
- C. Previously developed sites and small Greenfield Rural Exception sites in rural areas to provide affordable housing in perpetuity?







| A | B | C | Comments |
|---|---|---|---|
|  |  |  | All the options scored very positively overall, with options B and C scoring most positively. The only negative score was option C, which is likely to have a negative impact on landscape character. |

Questions 20 and 21:

Should Eden consider agricultural buildings as being previously developed land when searching for sites and applying the sequential approach as outlined on page 40 of the Core Strategy Preferred Options paper (November 2006)?

[These have been appraised together as many comments apply to both questions]






- A. Yes, consider the redevelopment and/or re-use of land containing agricultural buildings
- B. Yes, consider the conversion of appropriate traditional agricultural buildings only
- C. No, consider agricultural buildings as Greenfield development
- D. In Local Service Centres only
- E. In villages with services
- F. In all rural settlements

| A | B | C | D | E | F | Comments |
|---|---|---|---|---|---|---|
|  |  |  |  |  |  | The general principle of considering agricultural buildings as previously developed land received a large number of positive scores, with a policy specifying conversion of traditional agricultural buildings scoring particularly highly. However, extending this approach down the settlement hierarchy to all rural settlements is of more questionable benefit, due to poorer access to jobs and services. |

Question 22:

If a need for additional gypsy and traveller sites is identified for Eden district, should these sites be located:

- A. As extensions to existing sites?
- B. Within Penrith?
- C. Within all of the Key Service Centres as appropriate?
- D. Within Key Service Centres and Local Service Centres?
- E. Away from existing settlements [Option E added to ensure all principle alternatives appraised.]

| A | B | C | D | E | Comments |
|---|---|---|---|---|--|
|  |  |  |  |  | Overall, options A to D all scored very positively and option E scored very negatively. Option A (extending the existing site) scored most positively, although there were queries as to whether there would come a point when an extended site was deemed to be too big and the site size would start having a detrimental impact on well being and other objectives. |

Question 23:

This question has not yet been appraised as it was inserted too close to publication to allow time for sustainability appraisal.





Question 24:

This question was not appraised because it is very similar to Question 6 in the Core Strategy Issues and Options Paper, which was appraised by Entec as part of the Core Strategy sustainability appraisal. The results were that greater use of village envelopes scored more positively against sustainability objectives.

Question 25:

Should the maximum size of individual sites that are allocated in villages be limited?

- A. Yes, to a maximum of approx 0.33 hectares or 10 dwellings
- B. Yes, to a maximum of approx 0.67 hectares or 20 dwellings
- C. Yes, to a maximum of approx 1 hectare or 30 dwellings
- D. No, there should be no maximum size for sites in villages

| A | B | C | D | Comments |
|---|---|---|---|--|
|  |  |  |  | Options A, B and D all scored a few positive and a few negative scores. Option C received several neutral scores and one positive score (on landscape), and therefore scored the most positively overall. However, the results were closely balanced and are probably best regarded as inconclusive. |

Question 26:

This is an open question which cannot be appraised.

Question 27:

This is an open question which cannot be appraised.

Recommendations

There were a number of recommendations made by the sustainability appraisal:

| Question | Recommendation | Reason |
|----------|---|---|
| 3 | Clarify whether there would be a mechanism to ensure that over the course of a few years provision would be in line with targets. | If the distribution of housing between settlements was allowed to significantly vary from targets, several aspects of sustainability could be compromised. |
| 10 | Any detailed policy on this issue should take care that it is as independent, objective and transparent as possible sustainability aspirations. | This provides the possibility for development economics to override the detail of policies arrived at through transparent democratic processes and steps would need to be taken to ensure that any viability test was as transparent as possible. |

| Question | Recommendation | Reason |
|----------|--|--|
| 11 | Consider mechanisms to ensure such policies result in inclusive communities. | There may well be issues of inclusion with community land trusts, if small communities nominate who is allowed to live in their midst. |
| 15 | Consider whether a standard contribution to community facilities other than open space might be appropriate. | To assist with the provision of community facilities if appropriate. |

Some of these suggestions have since led to revisions to the Issues and Options Paper.

Appraisal of Site Allocations

Method

As explained in the Scoping Report, appraisal of the sites at this stage has used an adapted set of criteria of particular relevance to site allocations. The criteria used and the scoring system are set out below, followed by the results. This information will help to inform the selection of sites to take forward to the Preferred Options stage. It is anticipated that appraisal of the Preferred Options stage will follow a similar but more detailed approach. Some of the largest or most sensitive sites may be appraised in a workshop format using the standard appraisal framework.

It is acknowledged that there are limitations to this approach, and practical suggestions as to how it might be improved will be gratefully received. The principle limitations stem from a lack of detailed data on a number of issues, some of which it will be necessary to gather before the sustainability appraisal of the Preferred Options. The appraisal results represent the information readily available at the time of publication of Issues and Options. Not all of the sites have been visited for appraisal purposes, but this will occur before appraisal of the Preferred Options sites.

The scoring criteria have been designed to distinguish between available sites. If almost all sites were receiving very low or very high marks in any particular category, the criteria were revised. It is more important to show sustainability differences between sites within Eden than to judge sites against any particular national benchmark.

Nonetheless, the distance thresholds used can in some cases be regarded as arbitrary, particularly with regard to distance from protected sites. Thresholds remain the best method in the absence of more specific knowledge about sites. Where particular knowledge about a specific site suggests a different score should be awarded, this should be allowed to overrule the generic scoring system. Such information is anticipated in response to this consultation.

| Feature | Scoring Criteria and Notes (if any) | |
|--|-------------------------------------|---|
| Access to village halls or civic buildings | + | Village Hall or other civic buildings within settlement |
| | - | No village hall in settlement |
| | N B | Village halls/ civic buildings not plotted on GIS, so distance from village hall not feasible measure |
| Location in relation to open space | ++ | An amenity site at least 200m ² within 240m AND a 100ha natural/semi-natural site within 5km |
| | + | An amenity site at least 200m ² within 450m OR a 100ha natural/semi-natural site within 5km |
| | 0 | An amenity site at least 200m ² within 600m OR a 500ha natural/semi-natural site within 10km |

| Feature | Scoring Criteria and Notes (if any) | |
|--|-------------------------------------|---|
| | - | An amenity site at least 100m ² within 600m, Greater than 10km from nearest 500ha site OR allocation involves building on accessible open space 100-200m ² |
| | -- | Greater than 10km from nearest 500ha site. Greater than 600m from nearest amenity site at least 100m ² OR allocation involves building on accessible open space >200m ² |
| Access to shop selling food to meet day-to-day needs | + | Shop within settlement |
| | - | No shop within settlement |
| | N B | Shops not plotted on GIS, so not feasible to use precise distance as measure at this stage |
| Location in relation to leisure/ cultural facilities | ++ | Major leisure/cultural facility within 8km AND any equipped play provision within 450m |
| | + | Major leisure/cultural facility within 8km OR any equipped play provision within 450m |
| | 0 | Major leisure/cultural facility within 12km OR any equipped play provision within 600m |
| | - | Major leisure/cultural facility within 16km OR any equipped play provision within 1km |
| | -- | No major leisure/cultural facility within 16km AND no equipped play provision within 1km |
| | N B | Major facilities currently identified are Castle Park, Penrith; Coronation Park, Appleby; Penrith Leisure Centre and Appleby Swimming Pool. Information from a recent survey on attitudes to Green Spaces has been used to help identify leisure facilities most appropriate to include here. |
| Location in relation to educational facilities | ++ | Secondary school within 1.5km AND primary school within 400m |
| | + | Secondary school within 1.5km OR primary school within 1km |
| | 0 | 1-2km to nearest primary school |
| | - | 2-5km to nearest primary school |
| | -- | >5km to nearest primary school |
| Location in relation to health | ++ | GP Surgery within 1km |
| | + | GP surgery within 2km |

| Feature | Scoring Criteria and Notes (if any) | |
|---|-------------------------------------|--|
| services | 0 | 2-4km to GP surgery |
| | - | 4-5km |
| | -- | >5km to nearest GP surgery |
| Location in relation to existing communities | + | Within existing settlement |
| | 0 | On the edge of existing settlement |
| | - | Neither within nor adjacent to existing settlements |
| Location in relation to protected biological or geological sites | 0 | No known constraints |
| | - | Some constraints: Within 1km of SAC/SPA OR adjacent to SSSI, County Wildlife Site (CWS) or Regionally Important Geological Site (RIGS) |
| | -- | Significant constraints: Within 250m of SAC/SPA, OR on a SSSI, CWS or RIGS OR drains into a stretch of River Eden and tributaries SAC which is known to have current water quality problems |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | + | Opportunity to significantly improve setting of listed building or other asset. |
| | 0 | No known constraints |
| | - | Some constraints: Adjacent to or opposite listed building or Conservation Area or 250m from Scheduled Ancient Monument |
| | -- | Significant constraints: Within Conservation Area or Listed Building on site or 100m from SAM |
| Location in Relation to Transport Links | ++ | Settlement is on at least two bus/rail routes, at least one of which runs Monday to Saturday and could be used for commuting |
| | + | Settlement has a bus or train service at least Monday to Friday. |
| | 0 | Settlement has a bus service at least once a week. |
| | - | No regular public transport service to settlement |
| | N B | For the highest score to be awarded, services early enough for commuters must run all year, not only on schooldays |

| Feature | Scoring Criteria and Notes (if any) | |
|------------------------------|-------------------------------------|---|
| Flood risk zone | 0 | Zone 1 |
| | - | Zone 2 |
| | - - | Zone 3 |
| Greenfield or brownfield | + | Brownfield |
| | - | Greenfield |
| Location in relation to jobs | ++ | Large employment sites (>2ha) within 1.5km or smaller employment site within 400m |
| | + | Large employment site within 3km or smaller employment site 400m-1km |
| | 0 | Large employment site 3-5km or smaller employment site 1-2km |
| | - | Small employment site 2-4km |
| | - - | No employment site within 4km |
| | N B | In the absence of new employment land designations, allocations from the 1996 Local Plan were used. There is also potential to include known industrial estates/ business parks/major employers, and by the time of Preferred Options Appraisal, some potential new employment land may have been identified. |

Results

The results are shown in figure 2.

It is important to note that although a negative sustainability score may have been awarded due to site constraints or distance from services, this does not mean that development on the site will automatically have a negative impact on that aspect of sustainability. There may be scope for the development to have a positive impact. This might be, for example, by providing facilities on site, or by good quality design which enhances the setting of a listed building.

No weighting has been attached to the different criteria, and it would therefore be misleading to attempt to rank the sites. The primary use of the information presented below will be to highlight the sustainability advantages and disadvantages of each site, in particular any constraints which will have to be borne in mind when developing the sites. However, where the negative impacts seem to equal or outweigh the positive impacts, serious consideration will have to be given as to whether that site should be removed from the list of sites to be allocated.

Figure 2: Results of sites appraisal

| | Penrith | | | | | | | | | | | | | | | | | | |
|---|---------|----|----|----|----|----|----|----|----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P10 | P11 | P12 | P13 | P14 | P15 | P16 | P17 | P18 | P19 |
| Distance from village halls or civic buildings | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to open space | ++ | + | ++ | ++ | + | + | ++ | + | ++ | + | + | + | + | + | ++ | ++ | -- | ++ | ++ |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to leisure facilities | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | + | + | + | + | ++ | ++ | ++ | ++ | ++ |
| Location in relation to educational facilities | + | ++ | ++ | ++ | + | + | ++ | ++ | + | + | + | 0 | 0 | 0 | 0 | + | + | + | + |
| Location in relation to health services | 0 | + | + | + | ++ | ++ | + | + | + | + | + | + | + | + | + | + | 0 | 0 | 0 |
| Location in relation to existing communities | 0 | + | + | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Location in relation to protected biological or geological sites or habitats | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | - | 0 | - | - | 0 | 0 | -- | - | 0 | - | 0 | 0 | 0 | 0 | - | - | 0 | 0 | 0 |
| Number of Public Transport Routes through settlement | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| Flood risk zone | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Any watercourses on site? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Greenfield or brownfield | ? | + | - | - | - | - | - | + | + | - | - | - | - | - | - | - | - | - | - |
| Location in relation to jobs | ++ | ++ | ++ | ++ | + | + | + | ++ | ++ | + | + | + | + | + | + | + | ++ | ++ | ++ |

| | Penrith (continued) | | | | | | | | | | | | | | | | | | |
|---|---------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | P20 | P21 | P22 | P23 | P24 | P25 | P26 | P27 | P28 | P29 | P30 | P31 | P32 | P33 | P34 | P35 | P36 | P37 | P38 |
| Distance from village halls or civic buildings | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to open space | ++ | ++ | ++ | ++ | + | + | ++ | ++ | + | ++ | + | + | -- | -- | + | ++ | + | + | ++ |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to leisure facilities | ++ | ++ | ++ | ++ | + | + | ++ | ++ | ++ | ++ | + | + | ++ | ++ | ++ | ++ | ++ | ++ | + |
| Location in relation to educational facilities | + | + | + | + | + | 0 | 0 | + | 0 | 0 | 0 | 0 | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| Location in relation to health services | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | ++ | + | ++ | + | + |
| Location in relation to existing communities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | + |
| Location in relation to protected biological or geological sites or habitats | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | - | - | 0 | - | 0 | - | -- |
| Number of Public Transport Routes through settlement | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| Flood risk zone | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -* |
| Any watercourses on site? | 0 | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Greenfield or brownfield | - | - | - | - | - | - | - | - | - | - | - | - | - | - | + | + | + | + | + |
| Location in relation to jobs | ++ | ++ | ++ | ++ | ++ | ++ | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ |

| | Penrith (continued) | | | | | | | | | | | | |
|---|---------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | P39 | P40 | P41 | P42 | P43 | P44 | P45 | P46 | P47 | P48 | P49 | P50 | P51 |
| Distance from village halls or civic buildings | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to open space | + | + | ++ | + | + | + | + | + | + | + | + | + | + |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to leisure facilities | + | + | ++ | + | + | + | + | + | + | + | + | + | + |
| Location in relation to educational facilities | + | + | + | 0 | - | 0 | - | - | - | - | - | - | -- |
| Location in relation to health services | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Location in relation to existing communities | + | + | - | - | - | - | - | - | - | - | - | - | - |
| Location in relation to protected biological or geological sites or habitats | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Number of Public Transport Routes through settlement | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| Flood risk zone | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Any watercourses on site? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Greenfield or brownfield | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Location in relation to jobs | + | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | + | + | + | + |

| | Alston | | | | | | Appleby in Westmorland | | | | | | | | Kirkby Stephen | | | |
|---|--------|-----|-----|-----|-----|-----|------------------------|-----|-----|-----|-----|-----|-----|-----|----------------|-----|-----|-----|
| | AL1 | AL2 | AL3 | AL4 | AL5 | AL6 | AP1 | AP2 | AP3 | AP4 | AP5 | AP6 | AP7 | AP8 | KS1 | KS2 | KS3 | KS4 |
| Distance from village halls or civic buildings | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to open space | + | + | ++ | ++ | ++ | ++ | + | + | + | + | ++ | + | + | + | + | ++ | ++ | ++ |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to leisure facilities | + | 0 | 0 | + | + | - | ++ | + | + | + | + | + | ++ | + | - | - | + | + |
| Location in relation to educational facilities | ++ | + | + | ++ | + | + | + | + | + | + | + | 0 | + | + | + | + | + | + |
| Location in relation to health services | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | + | + | ++ | + | ++ | + | + | ++ | ++ | ++ |
| Location in relation to existing communities | 0 | + | + | + | 0 | 0 | + | + | 0 | + | + | 0 | + | 0 | + | 0 | + | 0 |
| Location in relation to protected biological or geological sites or habitats | 0 | 0 | 0 | - | - | - | --- | - | - | - | -* | - | --- | - | --- | --- | --- | --- |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | 0 | - | - | 0 | - | 0 | - | - | 0 | - | - | - | - | - | 0* | 0 | - | - |
| Number of Public Transport Routes through settlement | + | + | + | + | + | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| Flood risk zone | 0 | -* | 0* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Any watercourses on site? | 0 | 0 | 0 | 0 | - | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Greenfield or brownfield | - | + | + | - | - | - | + | + | - | - | - | - | + | + | + | ? | - | - |
| Location in relation to jobs | ++ | ++ | ++ | ++ | + | + | 0 | + | ++ | + | + | ++ | + | ++ | ++ | ++ | ++ | ++ |

| | Local Service Centres | | | | | | | | | | | | | | |
|---|-----------------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| | LAR1 | LBO1 | LBR1 | LBR2 | LHA1 | LKT1 | LKT2 | LKT3 | LLG1 | LLG2 | LLZ1 | LLZ2 | LLZ3 | LLZ4 | LMO1 |
| Distance from village halls or civic buildings | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to open space | + | + | ++ | ++ | + | + | + | + | + | ++ | + | + | + | ++ | + |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to leisure facilities | - | ++ | 0 | 0 | + | + | + | + | + | + | + | 0 | 0 | + | + |
| Location in relation to educational facilities | + | + | + | + | + | + | + | + | + | + | + | + | + | + | + |
| Location in relation to health services | -- | - | ++ | ++ | -- | 0 | 0 | 0 | -- | -- | + | + | 0 | 0 | - |
| Location in relation to existing communities | 0 | + | 0 | 0 | + | 0 | + | 0 | 0 | + | + | 0 | + | 0 | + |
| Location in relation to protected biological or geological sites or habitats | - | - | 0 | - | -- | - | - | - | - | -- | - | - | 0 | - | 0 |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | - | 0 | 0 | - | 0 | - | -* | - | 0 | - | - | - | 0 | 0 | - |
| Number of Public Transport Routes through settlement | ++ | 0 | ++ | ++ | + | + | + | + | ++ | ++ | ++ | ++ | ++ | ++ | 0 |
| Flood risk zone | 0 | 0 | 0 | 0* | 0 | 0 | 0 | 0 | 0 | 0 | -- | 0 | 0 | 0 | 0* |
| Any watercourses on site? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ? | 0 | 0 |
| Greenfield or brownfield | - | - | - | - | - | - | - | - | - | - | + | + | -* | - | + |
| Location in relation to jobs | ++ | -- | ++ | ++ | - | + | ++ | ++ | ++ | + | ++ | ++ | + | + | -- |

| | Local Service Centres (continued) | | | | | | | | | | | | Other Villages | | |
|---|-----------------------------------|------|------|------|------|------|------|------|------|------|------|------|----------------|------|------|
| | LMO2 | LMO3 | LRA1 | LSH1 | LTE1 | LTE2 | LTE3 | LTE4 | LTE5 | LTE6 | LTS1 | LWA1 | LCR1 | LPL1 | LSW1 |
| Distance from village halls or civic buildings | + | + | - | + | + | + | + | + | + | + | + | + | + | - | - |
| Location in relation to open space | + | + | ++ | + | ++ | ++ | ++ | ++ | + | + | + | ++ | ++ | + | -- |
| Shop within settlement? | + | + | + | + | + | + | + | + | + | + | - | + | - | + | - |
| Location in relation to leisure facilities | + | + | -- | - | + | + | + | + | + | + | 0 | ++ | + | + | - |
| Location in relation to educational facilities | + | + | + | + | + | + | + | + | + | + | + | + | + | - | - |
| Location in relation to health services | - | - | -- | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | - | -- | -- | -- |
| Location in relation to existing communities | + | 0 | 0 | + | 0 | + | + | + | 0 | + | + | 0 | 0 | + | + |
| Location in relation to protected biological or geological sites or habitats | 0 | 0 | -- | -- | 0 | 0 | 0 | 0 | 0 | 0 | - | - | -- | 0 | 0 |
| Location in relation to Scheduled Ancient Monuments and other cultural assets | 0 | 0 | -- | 0 | 0 | 0 | 0 | 0 | 0* | 0 | -- | 0 | - | 0 | - |
| Number of Public Transport Routes through settlement | 0 | 0 | + | + | ++ | ++ | ++ | ++ | ++ | ++ | ++ | ++ | 0 | ++ | - |
| Flood risk zone | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ? | 0 | -- | ? | 0* |
| Any watercourses on site? | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | - |
| Greenfield or brownfield | - | - | - | - | - | - | - | - | - | - | -* | - | + | -* | ? |
| Location in relation to jobs | -- | -- | -- | -- | ++ | ++ | ++ | ++ | ++ | ++ | - | + | -- | 0 | - |

Next Steps

After this consultation period, the proposed housing policies and site allocations will be refined and published in a Preferred Options Paper, and these Preferred Options will be subject to sustainability appraisal. A full Sustainability Appraisal Report will then be published alongside the Preferred Options Paper.

In addition, the Council will need to ensure that the Housing Policies and Site Allocations DPD is compliant with the Habitats Regulations. Initial discussions with Natural England have already taken place and the Council will work closely with relevant partners to ensure the necessary measures are taken alongside production of the DPD.

Note on Appendices

In order to save paper, the appendices have not been attached to this document. They are as follows:

Appendix A – Sustainability Appraisal Framework

Appendix B – Objectives Appraisal

Appendix C – Appraisal of Questions 2-25

They can be downloaded from the council's website or a hardcopy can be requested from the planning policy team by emailing loc.plan@eden.gov.uk or telephoning one of the numbers below.

01768 212160 (Environmental Sustainability Officer)

01768 212162 (Planning Policy Manager)

01768 817817 (Contact Centre)