

**Appendices to
Sustainability Appraisal of
Housing Policies and Site Allocations DPD
Issues and Options Paper**

Appendix A - Sustainability Appraisal Framework

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
1 (SP1)	To increase the level of participation in democratic processes	Will it encourage participation in democratic processes? Will it increase the ability of people to influence decisions?	Does the plan encourage and empower local people to become involved? Are all members of society able to participate fully in decision making processes based on an understanding of these processes and how decisions impact on them? Does the plan identify and set out how hard to reach groups will be involved? Do plan policies respect the needs of all communities and future generations?
2 (SP2)	To improve access to services, facilities, the countryside and open spaces	Will it improve accessibility to key services? Will it improve access to facilities?	Does the plan improve access and affordability for all to services, essential goods, facilities, and education and employment opportunities (where possible within local communities using sustainable transport choices)? Does it help retain essential local facilities and ensure that physical access to transport, facilities, buildings and public spaces are suitable for those with a disability? Does the plan promote and facilitate access to, and opportunities to enjoy, the countryside and green space?
3 (SP3)	To provide everyone with a decent home	Will it improve the quality and location of housing? Will it increase the range and affordability of housing for all social groups?	Will the plan help meet local housing need by ensuring that good quality, resource efficient, affordable housing with reduced environmental impact is available to all?

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
4 (SP4)	To improve the level of skills, education and training	Will it improve qualifications of children? Will it improve qualifications and skills of adults?	Will the plan deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? Does the plan recognise the need for people to adapt to economic change and retrain where necessary? Does the plan enable people to live sustainable lifestyles?
5 (SP5)	To improve the health and sense of well-being of people	Will it increase the access to, and availability of health services? Will it positively affect the wellbeing of people? Will it reduce the need for health benefits?	Do plan policies ensure all members of society have access to the health care that they require? Do they reduce health inequalities within society associated with income, lifestyle and diet? Does the plan help create a healthy and safe working and living environment with low rates of crime and disorder? Does the plan help improve quality of life for all? Does the plan anticipate and plan for the potential impacts of climate change on health?
6 (SP6)	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Will it enhance the inclusiveness of communities? Will it contribute to cultural identity and crime reduction?	Does the plan promote a sense of community identity? Does it encourage social cohesion and help continue valued local traditions? Is recreational and cultural activity embracing the arts, heritage, the environment, dialect and sport promoted along with multicultural understanding, respect for all and equality of opportunity? Do policies stem outward migration from rural communities?

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
7 (EN1)	To protect and enhance biodiversity	<p>Will it protect and enhance biodiversity?</p> <p>Will it maintain and enhance sites designated for their nature conservation interests?</p>	<p>Does the plan protect and conserve habitats and species especially where these may be rare, declining, threatened or indigenous. Will the plan ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource? Do policies minimise adverse impacts on species and habitats through human activities and development? Do policies ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species? Are the impacts of climate change on biodiversity taken into account?</p>
8 (EN2)	To preserve, enhance and manage landscape quality and character for future generations	<p>Will it improve the landscape and ecological quality and character of the environment?</p> <p>Will it reduce the amount of derelict, underused or degraded land in the district?</p>	<p>Is local landscape quality, distinctiveness and character protected from unsympathetic development and changes in land management? Is the remoteness and tranquillity of landscapes maintained? Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected? Are areas of high archaeological and historic landscape sensitivity protected? Do policies encourage low input organic farming with environmental stewardship styles of land management? Do they sustain and extend tree cover, hedgerows, woodlands and sustainable forestry?</p>

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
9 (EN3)	To improve the quality of the built environment	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value?</p> <p>Will it promote/ensure high design standards in new development?</p> <p>Will it incorporate protection against flooding?</p>	<p>Does the plan conserve features of historic and archaeological importance? Will policies ensure that new development is of high quality, sympathetic to the character of the built environment, strengthen local distinctiveness, enhance the public realm and help create a sense of place? Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation? Will policies guide inappropriate development away from areas at risk of flooding, taking account of climate change impacts? Do policies ensure that where new development is, exceptionally, necessary in flood risk areas, policy aims to make development safe without increasing flood risk elsewhere and where possible, reducing flood risk overall? Will the plan reduce noise levels, light pollution, fly tipping, the spread of litter and graffiti?</p>
10 (NR1)	To improve local air quality and reduce greenhouse gas emissions	<p>Will it reduce emissions of greenhouse gases? Will it reduce energy consumption and encourage energy efficiency and renewable energies?</p> <p>Will it lead to an improvement in air quality?</p>	<p>Will the plan ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary? Will policies limit or reduce the emission of greenhouse gases and other air pollutants? Will the use of clean, low carbon energy efficient technologies be encouraged? Will policies maximise the use of energy from renewable resources? Will they reduce the need to travel especially by car, and switch goods from roads onto the rail network? Will the plan introduce strategies to adapt to and mitigate other climate change impacts? Does the plan seek to promote the design of development that contributes to improved energy conservation through maximised energy efficiency?</p>

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
11 (NR2)	To improve water quality and water resources	Will it improve water quality? Will it reduce water consumption?	Will the plan maintain and, where possible, improve the quality and quantity of all water resources? Will it minimise the risk of water pollution from all sources, including through ensuring adequate provision for foul and surface water and wastewater treatment? Will policies ensure sustainable drainage systems are widely used? Will policies lead to the effective management of demand for water, prevent stress on the natural environment and help water users adapt to the impacts of climate change?
12 (NR3)	To restore and protect land and soil	Will it minimise the loss of soils to development? Will it maintain the present condition and use of land?	Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site? Will it minimise the loss of greenfield sites or areas of open space? Will policies prevent soil degradation, pollution of soil and the use of peat? Does the plan consider the impacts of climate change on agriculture and forestry?
13 (NR4)	To manage mineral resources sustainably and minimise waste	Will it reduce household waste? Will it increase waste recovery and recycling?	Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material? Will the plan minimise the amounts of industrial, commercial and household waste generated and increase re-use, recovery and recycling? Will it promote the use of energy recovered from waste?
14 (EC1)	To retain existing jobs and create new employment opportunities	Will it retain existing jobs? Will new employment opportunities be created?	Will the plan increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise? Will the plan support local companies and help local businesses develop export markets? Will the plan help retain a skilled workforce, graduates and companies in Cumbria that are able to prosper in a low carbon economy?

SA Objective		Key Considerations	Guidance on Progressing Towards Objectives
15 (EC2)	To improve access to jobs	<p>Will it reduce need to travel?</p> <p>Will it improve accessibility to work?</p> <p>Will it reduce the effect of congestion?</p> <p>Will it reduce journey times between key destinations?</p>	<p>Will plan policies increase access for all to a range of jobs through improved training, sustainable transport and communication links? Will the plan lead to the location of new employment opportunities in areas of greatest need?</p>
16 (EC3)	To diversify and strengthen the local economy	<p>Will it encourage inward investment?</p> <p>Will it make efficient use of economic land and property?</p> <p>Will it encourage innovation, entrepreneurship and diversification in rural areas?</p>	<p>Will the plan help create the right conditions and infrastructure provision to encourage private sector investment? Will it encourage indigenous growth? Will it stimulate the use of local companies, local products and services and provide other forms of community benefit? Will it lead to ' increase the environmental performance of local companies and their products/services? Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas? Does the plan provide financial assistance? Will it help improve the competitiveness and productivity of the local economy? Do policies support research and development into environmental and other new key sector technologies including opportunities to recycle and re-use waste products? Does the plan take account of likely impacts of climate change on the economy, particularly on tourism?</p>

Appendix B - Objectives Appraisal

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

Question 1: Draft Objectives for DPD:

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





SA Objective	Objective				Comments/Mitigation
	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	
1. To increase the level of participation in democratic processes	+	+	++	++	Participation in democratic processes is much easier if immediate needs (such as a home) are sorted. There was also a feeling that Eden residents may be more likely to participate in democratic processes if they can do so from the communities where they grew up.
2. To improve access to services, facilities, the countryside and open spaces	+	+	+	++	Again, immediate needs must be met before services can be readily accessed.
3. To provide everyone with a decent home	++	++	++	+	Objectives 1, 2 and 3 were either about inclusion or about providing homes. Objective 4 scored positively, because it was felt that housing being close to services and jobs was potentially part of a home being 'decent'.

SA Objective	Objective				Comments/Mitigation
	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	
4. To improve the level of skills, education and training	++	++	+	++	A reasonable living environment is often a necessary prerequisite to successful study, and immediate needs being satisfied provides more opportunities for training. Balanced communities tend to lead to balanced schools
5. To improve the health and sense of well-being of people	++	++	++	++	A comfortable, decent home is essential to health and well being.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	++	++	++	++	Community participation is much easier once immediate needs are satisfied. Inclusion is a strong feature of both the housing objectives and this sustainability objective.
7. To protect and enhance biodiversity	-	-	X	+	Objectives 1 and 2 will lead to additional development, which is likely to have a negative impact on biodiversity overall, although careful design and location can help to mitigate impacts. Objective 4 was felt to have a marginally positive impact through minimising journeys.

SA Objective	Objective				Comments/Mitigation
	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	
8. To preserve, enhance and manage landscape quality and character for future generations	+	+	+	0	The landscape character is a product of living, working rural communities, and there is a need to maintain these to preserve the landscape character. However, inappropriate development would have a negative impact. Objective 3 - balanced communities - was felt to provide opportunities for people to move within the same community without unnecessary new build. Objective 4 was felt to have a negative impact on the landscape of Alston Moor and Mallerstang, which have traditionally had a very dispersed settlement pattern. On the other hand, concentrating additional development in a few places will help preserve the landscape of the rest of the district.
9. To improve the quality of the built environment	+	++	+	X	Quality was felt to be implicit in objective 1, although this could be made explicit by using the phrase “good quality affordable housing”. 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. There would then be the potential for objective 1 to score more highly. Suggestion: Use the phrase “good quality affordable housing” in objective 1.

SA Objective	Objective				Comments/Mitigation
	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	
10. To improve local air quality and reduce greenhouse gas emissions	+	+	?	++	This is dependent on the location and quality of housing. Objective 1 scored positively based on assumptions about the standards new housing would be built to, although this is not explicit in the objective. Although the government intends to cover many aspects of environmental standards through building regulations, consideration should be given to including a phrase about the environmental sustainability of housing within the objectives.
11. To improve water quality and water resources	?	?	X	X	If built to the highest standards, new homes can help with water efficiency. Impacts are uncertain as they depend on the design and location of housing. Some watercourses in the district are particularly sensitive to sewage discharges.
12. To restore and protect land and soil	?	?	X	+	This is dependent on the land take of new development, and how 'decency' is achieved. Concentrating development close to services and jobs makes brownfield development more likely as it concentrates development in the larger settlements where there is the greatest availability of brownfield land.

SA Objective	Objective				Comments/Mitigation
	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	
13. To manage mineral resources sustainably and minimise waste	+	+	X	X	Objectives 1 and 2 scored positively in anticipation of how houses would be built, and that they would be efficient to run. This is really only implicit.
14. To retain existing jobs and create new employment opportunities	++	+	+	+	Housing in Eden is currently very expensive in comparison to local wages, and therefore providing more affordable housing will assist the local economy. In addition, building and renovating property creates jobs. A balanced community implies a balanced workforce.
15. To improve access to jobs	++	+	+	++	Local business are currently closing down and employing migrant labour due to labour shortages locally which are exacerbated by housing shortages.
16. To diversify and strengthen the local economy	++	+	++	++	As above. In addition, providing housing accessible to jobs and services brings residents and jobs together, and encourages greater use of services, thus diversifying and strengthening the local economy.

SA Objective	Objective				Comments/Mitigation
	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	
Summary					
<p>All the objectives scored positively overall, particularly against social and economic objectives. The lowest scores were against the environmental and resources sustainability objectives. 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 RSLs, and enhance some of the positive scores recorded within this matrix. Suggestion: Amend objectives to reflect the importance of housing to achieving environmental sustainability aspirations.</p>					

Appendix C

Question 2: Are the figures in [the table below] appropriate to create and maintain sustainable communities in Eden?

A. Yes

B. No (please provide alternative proportions)

Settlement	Fixed Percentage (taken from Core Strategy Preferred Options Paper)	Possible Alternative Percentage Range
Penrith	60%	55% - 65%
Alston	4%	3% - 5%
Appleby	9%	7% - 11%
Kirkby Stephen	7%	6% - 8%
Local Service Centres	20%	18% - 22%

During appraisal of the Core Strategy Issues and Options Paper, Entec appraised the allocations in the 2004 Housing Policies document against a lower and higher percentage allocation for Local Service Centres. The Preferred Option from the Core Strategy Preferred Options Paper represents a higher percentage allocation for Local Service Centres. The sustainability implications of raising and lowering the relative proportions allocated to different settlements have therefore already been appraised, and it is felt that further appraisal of this option cannot add anything at this point.

In summary, the Entec appraisal of the Core Strategy Issues and Options concluded that increasing the proportion allocated to Local Service Centres relative to Key Service Centres has a negative impact on access to services and greenhouse gas emissions.

However, during appraisal of the Preferred Option (which was a less detailed version of the table above, in that it did not mention specific figures), there were no negative scores awarded, and the policy 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

NB - The appraisal makes no assumptions about what the figures or bandwidths are, and only appraises a flexible approach against a more rigid approach.

Q3	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	X	X	
2. To improve access to services, facilities, the countryside and open spaces	?	?	Provided that provision was not permitted to be at either extreme of the range for a sustained period of time there should be no significant impact. Suggestion: clarify whether there would be a mechanism to ensure that over the course of a few years provision would be in line with targets
3. To provide everyone with a decent home	+	-	Greater flexibility is likely to help ensure housing provision
4. To improve the level of skills, education and training	X	X	
5. To improve the health and sense of well-being of people	?	?	No impact if overall provision remains unaltered.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	-	Flexibility allows decision making to take account of local circumstances, which will assist with creating/maintaining vibrant, active communities
7. To protect and enhance biodiversity	?	?	No impact if overall provision remains unaltered.
8. To preserve, enhance and manage landscape quality and character for future generations	?	?	Negligible impact if overall housing provision in different locations is unaltered



Q3	Options		Comments/Mitigation
SA Objective	A	B	
9. To improve the quality of the built environment	+	0	Greater flexibility may help ensure development is appropriate in scale and character to local built environment
10. To improve local air quality and reduce greenhouse gas emissions	X	X	Negligible impact if overall housing provision in different locations is unaltered
11. To improve water quality and water resources	X	X	Negligible impact if overall housing provision in different locations is unaltered
12. To restore and protect land and soil	X	X	Negligible impact if overall housing provision in different locations is unaltered
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	+	0	Greater flexibility and reducing the need for phasing may help make developments more financially viable, assisting construction firms
15. To improve access to jobs	?	?	Negligible impact if overall housing provision in different locations is unaltered
16. To diversify and strengthen the local economy	+	0	Greater flexibility and reducing the need for phasing may help make developments more financially viable, assisting construction firms
Summary			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

Q4	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	X	X	
2. To improve access to services, facilities, the countryside and open spaces	0	0	Negligible effect as this question only impacts the distribution of development between various Local Service Centres, which are assumed to provide a similar level of access to services. There may be problems if an extreme situation developed where some Local Service Centres continuously received a disproportionately large or small share of development.
3. To provide everyone with a decent home	-	+	Greater flexibility may help with delivering housing.
4. To improve the level of skills, education and training	X	X	All LSCs have a primary school under current criteria.
5. To improve the health and sense of well-being of people	X	X	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	?	There is potential for a negative impact if a more flexible policy resulted in development of an inappropriate scale to the character of some villages, or led to no new development in other villages.
7. To protect and enhance biodiversity	X	X	



Q4	Options		Comments/Mitigation
SA Objective	A	B	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	
9. To improve the quality of the built environment	+	-	This policy protects Local Service Centres from overdevelopment, and removing it may lead to an erosion of village character
10. To improve local air quality and reduce greenhouse gas emissions	X	X	
11. To improve water quality and water resources	X	X	
12. To restore and protect land and soil	-	+	Greater flexibility may assist with maximising use of brownfield sites.
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	X	X	
15. To improve access to jobs	0	0	There may be an over-provision of housing in relation to jobs in some settlements. On the other hand, a more flexible approach would allow housing provision to match any employment development.
16. To diversify and strengthen the local economy	X	X	
Summary			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

Q5	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	
3. To provide everyone with a decent home	++	-	Option A is more flexible and is therefore thought likely to assist with providing a greater amount of affordable and open market housing in the district.
4. To improve the level of skills, education and training	X	X	
5. To improve the health and sense of well-being of people	+	-	Through enabling a greater supply of housing and more balanced communities
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	++	-	Option A enables a mix of housing appropriate to the community's identified need to be provided. Option B is a rigid approach which may force inappropriate housing types onto communities, particularly in areas where the identified need for affordable housing is for little or none (eg currently at Kirkby Thore)
7. To protect and enhance biodiversity	X	X	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	There may be a slight positive effect through adopting a flexible approach which allows development to proceed in a manner appropriate to different settlements, rather than a blanket approach for the district. However, such a relationship was felt to be tenuous.

Q5	Options		Comments/Mitigation
SA Objective	A	B	
9. To improve the quality of the built environment	X	X	Will affect mix of development, but not quality as such
10. To improve local air quality and reduce greenhouse gas emissions	X	X	
11. To improve water quality and water resources	X	X	
12. To restore and protect land and soil	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	X	X	No direct impact, other than generally helping to support the economy through flexible and responsive housing delivery (see 15 and 16 below).
15. To improve access to jobs	+	-	Positive impact through allowing flexible delivery of housing to meet identified need.
16. To diversify and strengthen the local economy	+	-	Positive impact through allowing flexible delivery of housing to meet identified need.
Summary			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?

Q6	Options			Comments/Mitigation
	A	B	C	
SA Objective				
1. To increase the level of participation in democratic processes	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	
3. To provide everyone with a decent home	+	+	-	It was felt that this more flexible approach may assist with providing both open market and affordable housing
4. To improve the level of skills, education and training	X	X	X	
5. To improve the health and sense of well-being of people	+	+	0	Some indirect impacts through affect on housing availability and affect on communities, the fact that provision of some affordable housing is better than none.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-	+	0	Option A may lead to communities being less inclusive, with affordable housing becoming concentrated in a few areas. Option B may assist with creating vibrant communities, as some areas of the district require lower proportions of affordable housing.
7. To protect and enhance biodiversity	X	X	X	

Q6	Options			Comments/Mitigation
SA Objective	A	B	C	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	X	
9. To improve the quality of the built environment	X	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	X	X	X	
11. To improve water quality and water resources	X	X	X	
12. To restore and protect land and soil	X	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	-	+	-	Option B allows housing to fit local need - providing appropriate housing to workforce needs. Options A and C may result in under provision of affordable housing in some areas and overprovision in others.
15. To improve access to jobs	-	+	-	Option B allows housing to fit local need - providing appropriate housing to workforce needs. Options A and C may result in under provision of affordable housing in some areas and overprovision in others.
16. To diversify and strengthen the local economy	-	+	-	Option B allows housing to fit local need - providing appropriate housing to workforce needs. Options A and C may result in under provision of affordable housing in some areas and overprovision in others.
Summary				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

Q7	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	+	-	Allocating sites in DPDs provides additional opportunity for community consultation
2. To improve access to services, facilities, the countryside and open spaces	X	X	
3. To provide everyone with a decent home	?	?	Opinions differ as to whether this approach will deliver additional affordable housing or whether allocating sites (even solely for affordable housing) will give them a “hope” value and landowners/developers will not develop in anticipation of being allowed to built market housing on the sites in future.
4. To improve the level of skills, education and training	X	X	
5. To improve the health and sense of well-being of people	X	X	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	?	?	If allocating sites assists with providing affordable housing in rural areas, this will have a significantly positive effect in allowing local people to remain in their communities and allowing rural communities to retain their young people.
7. To protect and enhance biodiversity	+	-	There may be some benefits to be gained from allocating sites through a DPD process rather than responding reactively to applications as they come forward.
8. To preserve, enhance and manage landscape quality and character for future generations	+	-	See comments to 7 above

Q7	Options		Comments/Mitigation
SA Objective	A	B	
9. To improve the quality of the built environment	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	X	X	
11. To improve water quality and water resources	+	-	There may be some benefits to be gained from allocating sites through a DPD process rather than responding reactively to applications as they come forward
12. To restore and protect land and soil	0	0	There may be some benefits to be gained from allocating sites through a DPD process rather than responding reactively to applications as they come forward. On the other hand, allocating sites may reduce the amount of housing built on brownfield windfall sites and therefore overall impacts on land and soil are likely to be neutral.
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	?	?	There is uncertainty as to whether the policy would deliver additional affordable housing development.
15. To improve access to jobs	?	?	There is uncertainty as to whether the policy would deliver additional affordable housing development. An increased amount of housing in the most rural communities may lead to greater commuting
16. To diversify and strengthen the local economy	?	?	There is uncertainty as to whether the policy would deliver additional affordable housing development.



Q7	Options		Comments/Mitigation
SA Objective	A	B	
Summary	?	?	<p>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.</p>

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

Q8	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	
3. To provide everyone with a decent home	++	--	The fixed multiples approach is felt to be too rigid and is leading to (i) low provision of affordable housing (ii) a lack of variety in the type of affordable housing provided
4. To improve the level of skills, education and training	X	X	
5. To improve the health and sense of well-being of people	+	-	Indirect effects through provision of housing and more balanced communities
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	++	--	Should assist with providing a variety of different types of housing, aiding the creation/maintenance of balanced, inclusive communities
7. To protect and enhance biodiversity	X	X	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	

Q8	Options		Comments/Mitigation
SA Objective	A	B	
9. To improve the quality of the built environment	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	X	X	
11. To improve water quality and water resources	X	X	
12. To restore and protect land and soil	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	X	X	
15. To improve access to jobs	X	X	
16. To diversify and strengthen the local economy	X	X	
Summary			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.]

Q9	Options				Comments/Mitigation
SA Objective	A	B	C	D	
1. To increase the level of participation in democratic processes	+	+	+	0	Arguably, setting criteria out in a DPD allows greater consultation and public involvement than in reacting to planning applications.
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	X	
3. To provide everyone with a decent home	+	+	+	0	Using the housing needs information to indicate the appropriate size type and tenure of housing on sites facilitates meeting the needs of everyone in the district, provided the information remains sufficiently up to date.
4. To improve the level of skills, education and training	X	X	X	X	
5. To improve the health and sense of well-being of people	+	+	+	0	Only an indirect impact through availability of appropriate housing and balanced communities
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	++	++	++	-	Using housing needs information to indicate the size, type and tenure of housing to be developed should help create and maintain vibrant inclusive communities, and avoid development focussing excessively on the types of houses (and occupiers) which yield the greatest profit.
7. To protect and enhance biodiversity	X	X	X	X	

Q9	Options				Comments/Mitigation
SA Objective	A	B	C	D	
8. To preserve, enhance and manage landscape quality and character for future generations	+	+	X	0	The size and type of housing is an important feature of our landscape
9. To improve the quality of the built environment	+	+	X	-	Will help ensure development appropriate to the location and avoid monotonous development
10. To improve local air quality and reduce greenhouse gas emissions	X	X	X	X	
11. To improve water quality and water resources	X	X	X	X	
12. To restore and protect land and soil	X	X	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	X	X	
14. To retain existing jobs and create new employment opportunities	+	X	+	0	If the correct balance is specified, this may assist with meeting the needs of employers for a particular kind of workforce. The development industry may find it restrictive but will have the benefit of knowing in advance what the council expects.
15. To improve access to jobs	+	X	+	0	If the correct balance is specified, this may assist with meeting the needs of employers for a particular kind of workforce. The development industry may find it restrictive but will have the benefit of knowing in advance what the council expects.
16. To diversify and strengthen the local economy	+	+	+	-	If the correct balance is specified, this may assist with meeting the needs of employers for a particular kind of workforce. The development industry may find it restrictive but will have the benefit of knowing in advance what the council expects.



Q9	Options				Comments/Mitigation
SA Objective	A	B	C	D	
Summary					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.

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

Q10	Options		Comments/Mitigation
SA Objective	A	B	
1. To increase the level of participation in democratic processes	?	0	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. Suggestion: any detailed policy on this issue should take care that it is as independent, objective and transparent as possible
2. To improve access to services, facilities, the countryside and open spaces	X	X	
3. To provide everyone with a decent home	++	-	It is felt that currently some sites are not being developed at all because requirements for affordable housing may be overly stringent, and that development with a lower proportion of affordable housing goes further to meeting this objective than an empty site.
4. To improve the level of skills, education and training	X	X	
5. To improve the health and sense of well-being of people	X	X	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	?	Option A is likely to lead to a greater proportion of open market housing being built than is identified as optimal by the housing policies, which may lead to communities being less inclusive. However, if the alternative is no housing then the overall impact on communities of option A is likely to be positive.
7. To protect and enhance biodiversity	X	X	

Q10	Options		Comments/Mitigation
SA Objective	A	B	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	
9. To improve the quality of the built environment	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	X	X	
11. To improve water quality and water resources	X	X	
12. To restore and protect land and soil	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	
14. To retain existing jobs and create new employment opportunities	+	?	There may be an indirect effect through helping to house a workforce, particularly if it removes a block which is preventing sites from being developed.
15. To improve access to jobs	X	X	
16. To diversify and strengthen the local economy	+	?	Option A is likely to lead to a less than ideal balance of housing which may appeal to wealthy retirees rather than housing a local workforce. However, if the alternative is an overall shortage of housing, then the impacts will be positive.
Summary			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

C. [Open option - can't be appraised]

D. Neither - Affordable housing should be provided solely by conventional routes

Q11	Options			Comments/Mitigation
SA Objective	A	B	D	
1. To increase the level of participation in democratic processes	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	
3. To provide everyone with a decent home	++	++	--	
4. To improve the level of skills, education and training	X	X	X	
5. To improve the health and sense of well-being of people	+	+	-	Through provision of housing
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	+	-	There may well be issues of inclusion with community land trusts, if small communities nominate who is allowed to live in their midst. However, negative impacts are likely to be outweighed by the positive impacts of enabling more affordable housing to be built in rural areas. Suggestion: consider mechanisms to ensure such policies result in inclusive communities
7. To protect and enhance biodiversity	X	X	X	





Q11	Options			Comments/Mitigation
SA Objective	A	B	D	
8. To preserve, enhance and manage landscape quality and character for future generations	+	+	0	The landscape character is a product of living, working rural communities, and there is a need to maintain these to preserve the landscape character. Providing affordable housing for local people should assist with this. However, any inappropriate development would have a negative impact.
9. To improve the quality of the built environment	X	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	-	-	0	Through increased travel
11. To improve water quality and water resources	X	X	X	Mechanism for providing housing won't have impact - location will
12. To restore and protect land and soil	X	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	+	+	-	Assisting with housing provision in rural areas helps with economic diversification by providing a workforce for rural enterprises. It will also benefit the local construction industry.
15. To improve access to jobs	+	+	0	This policy provides for those who work in rural areas but cannot afford a home there, including farming families. However, there is no requirement to work in the locality and therefore the benefits are only marginally positive, as many rural dwellers commute to work in the district's towns.
16. To diversify and strengthen the local economy	+	+	-	Assisting with housing provision in rural areas helps with economic diversification by providing a workforce for rural enterprises.
Summary				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.**

Q12	Options				Comments/Mitigation
SA Objective	A	B	C	D	
1. To increase the level of participation in democratic processes	+	+	+	-	Affordable housing keeps local people in the area, who may participate in democratic processes, whereas there are limits to the extent to which holidaymakers and second home owners can do this.
2. To improve access to services, facilities, the countryside and open spaces	+	+	+	-	Permanent residents will help to sustain services more than holidaymakers.
3. To provide everyone with a decent home	+	+	+	-	Options A to C only received marginally positive scores, because there is no mention in this policy of the 'decency' of holiday accommodation. This is however mentioned in the supporting text of the current draft paper, and there would be the potential for a suitably robust policy to receive a significantly positive score against this objective.
4. To improve the level of skills, education and training	0	0	0	-	This policy may help prevent the closure of small local schools
5. To improve the health and sense of well-being of people	+	+	+	-	There will be a slight positive impact through increasing people's access to housing.

Q12	Options				Comments/Mitigation
SA Objective	A	B	C	D	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	0	+	+	-	This policy was acknowledged to not be very inclusive. However, it was felt that by increasing the number of permanent residents in small communities their vibrancy and sense of local history might be improved.
7. To protect and enhance biodiversity	X	X	X	X	No relationship
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	X	X	No relationship
9. To improve the quality of the built environment	X	X	X	X	No relationship
10. To improve local air quality and reduce greenhouse gas emissions	-	-	--	+	Local emissions might be increased by having people resident all year rather than just in the holiday season. However, it was also acknowledged that much of the tourism in Eden involves extensive use of the private car.
11. To improve water quality and water resources	X	X	X	X	Water and sewerage infrastructure for the homes in question would have to have sufficient capacity for a permanent dwelling.
12. To restore and protect land and soil	+	+	+	-	Through minimising the land needed to build affordable houses for Eden's population
13. To manage mineral resources sustainably and minimise waste	-	-	-	+	For the local community, more waste will be created through having a greater population resident all year round
14. To retain existing jobs and create new employment opportunities	+	+	+	-	Holidaymakers are vital to the local economy. However, on balance it was felt that increasing the pool of permanent residents would be of greater economic benefit.
15. To improve access to jobs	++	+	+	0	By increasing the supply of housing available to the local workforce

Q12	Options				Comments/Mitigation
SA Objective	A	B	C	D	
16. To diversify and strengthen the local economy	+	+	+	-	Holidaymakers boost the tourism sector, but permanent residents access a range of services and therefore are felt to be more beneficial to a strong and diverse economy.
Summary					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 14: Do you agree with the definition of a local connection to the area [as defined in 2004 Housing Policies]

- Yes
- No

Question 15: Should local connection be allowed to extend beyond the district boundary for development in parishes on the edge of the district?

- Yes, any parish adjoining the parish where the development is proposed should be considered regardless of which district (or county) it is in
- Yes, but only for adjoining parishes of other districts in Cumbria (ie Allerdale, Carlisle and South Lakeland)
- No, the local occupancy should only be for Eden residents




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

Q. Should the definition of a local connection to the area

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

Q14 and 15	Options			Comments/Mitigation
SA Objective	A	B	C	
1. To increase the level of participation in democratic processes	0	+	-	
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	

Q14 and 15	Options			Comments/Mitigation
SA Objective	A	B	C	
3. To provide everyone with a decent home	+	0	0	The number of people benefiting wouldn't change if the definition was altered, merely who benefits. It is never going to be the case that "everyone" benefits from a mechanism designed to positively discriminate.
4. To improve the level of skills, education and training	X	X	X	No direct relationship and no impacts anticipated
5. To improve the health and sense of well-being of people	+	0	-	Impact on the well being of the people in Eden.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	+	0	This policy is trying to counterbalance an unbalanced market. If this policy is made less stringent, it will be less effective at doing so.
7. To protect and enhance biodiversity	X	X	X	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	X	
9. To improve the quality of the built environment	X	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	0	+	-	Less stringent definition of 'local' may result in greater level of commuting?
11. To improve water quality and water resources	X	X	X	
12. To restore and protect land and soil	X	X	X	




Q14 and 15	Options			Comments/Mitigation
SA Objective	A	B	C	
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	++	+	0	Option A was felt to represent a balanced approach which helps provide housing for a local workforce and allow some migration into the area for work. Options B and C would not change the amount of housing with a local occupancy clause, only who qualified. However, they were felt to be less beneficial for the local economy.
15. To improve access to jobs	++	+	0	Option A was felt to represent a balanced approach which helps provide housing for a local workforce and allow some migration into the area for work. Options B and C would not change the amount of housing with a local occupancy clause, only who qualified. However, they were felt to be less beneficial for the local economy.
16. To diversify and strengthen the local economy	++	+	0	Option A was felt to represent a balanced approach which helps provide housing for a local workforce and allow some migration into the area for work. Options B and C would not change the amount of housing with a local occupancy clause, only who qualified. However, they were felt to be less beneficial for the local economy.
Summary				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 (eg 80%)**
- C. Only the affordable element of housing development in Penrith**

Q16	Options			Comments/Mitigation
SA Objective	A	B	C	
1. To increase the level of participation in democratic processes	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	-	0	+	Reducing the proportion of local occupancy clauses increases the viability of the development, meaning there is a larger profit margin from which contributions can be sought for other benefits.
3. To provide everyone with a decent home	-	+	+	Option A is less inclusive, and does not make provision for “everyone”
4. To improve the level of skills, education and training	X	X	X	
5. To improve the health and sense of well-being of people	X	X	X	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	+	++	+	Option B is likely to create the most inclusive community in Penrith, as it provides for both in-migration and for local people unable to afford the highest prices. Options A and C, however, both have positive aspects.
7. To protect and enhance biodiversity	X	X	X	

Q16	Options			Comments/Mitigation
SA Objective	A	B	C	
8. To preserve, enhance and manage landscape quality and character for future generations	X	X	X	
9. To improve the quality of the built environment	X	X	X	
10. To improve local air quality and reduce greenhouse gas emissions	X	X	X	
11. To improve water quality and water resources	X	X	X	
12. To restore and protect land and soil	X	X	X	
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	X	X	X	Impacts are dependent on wording of local occupancy clause. As currently worded, someone moving here to work and buying a house qualifies, whereas someone moving for work but needing affordable housing doesn't. The only people this policy would affect therefore 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 would remain available for purchase by this group, it was agreed that this policy would have little economic impact assuming no change to the wording of the local occupancy clause.
15. To improve access to jobs	X	X	X	See comments to objective 14
16. To diversify and strengthen the local economy	X	X	X	See comments to objective 14





Q16	Options			Comments/Mitigation
SA Objective	A	B	C	
Summary				<p>Under the current wording of the local occupancy clause, the only people this policy would affect are people wanting to retire to Penrith or wanting to continue working 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.</p>

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**

Q17	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
1. To increase the level of participation in democratic processes	X	X	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	-	++	-	++	?	As contributions all have to come out of the same profit margin, there is an extent to which these different benefits may come at the expense of each other. The impacts of Option E are dependent on what community benefits could be extracted in the absence of standard contributions, and have therefore been assessed as uncertain throughout.
3. To provide everyone with a decent home	++	-	+	-	?	Safety from flooding can be regarded as an element of 'decency' with regard to housing; not setting standard contributions may encourage a greater number of houses to be built.
4. To improve the level of skills, education and training	X	X	X	X	?	There is no reference to a contribution to providing any community facilities other than open space. Suggestion: consider whether this might be appropriate
5. To improve the health and sense of well-being of people	+	++	++	0	?	Many of the services mentioned are crucial to people's health and well being. Additional housing without additional services would have a negative impact.




Q17	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	++	++	+	+	?	Many of the services mentioned are crucial to communities. Additional housing without additional services would have a negative impact.
7. To protect and enhance biodiversity	X	++	+	-	?	The services in question overall provide more opportunities than problems for protecting/ enhancing biodiversity. Thus, not asking for contributions would be a missed opportunity
8. To preserve, enhance and manage landscape quality and character for future generations	X	+	+	-	?	
9. To improve the quality of the built environment	X	+	+	+		
10. To improve local air quality and reduce greenhouse gas emissions	X	+	X	?	?	Greenspace in towns can help to improve local air quality. Impacts of option D depend on the transport infrastructure in question; reducing congestion reduces emissions but allowing cars to travel at fast rather than moderate speeds increases emissions. Public transport infrastructure would reduce emissions
11. To improve water quality and water resources	X	?	++	?	?	For options B and D, impacts are possible but dependent on the nature of provision.
12. To restore and protect land and soil	X	+	+	-	?	
13. To manage mineral resources sustainably and minimise waste	X	X	X	X	X	

Q17	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
14. To retain existing jobs and create new employment opportunities	+	+	+	++	?	In the short term, providing these services will create jobs. In the longer term, they are all part of a pleasant/inclusive/safe/healthy living environment which helps support a higher wage economy. Transport infrastructure is particularly important.
15. To improve access to jobs	+	X	X	++	?	People usually need somewhere to live before they can access work.
16. To diversify and strengthen the local economy	+	+	+	++	?	In the short term, providing these services will create jobs. In the longer term, they are all part of a pleasant/inclusive/safe/healthy living environment which helps support a higher wage economy. Transport infrastructure is particularly important.
Summary					?	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**




Q18	Options			Comments/Mitigation
SA Objective	A	B	C	
1. To increase the level of participation in democratic processes	+	-	-	Windfall sites have been through a reduced amount of scrutiny by democratic processes
2. To improve access to services, facilities, the countryside and open spaces	+	+	0	Options A and B score positively because sites allocated within the LDF will have been assessed against the access to services they allow and by definition Key and Local Service Centres provide this access. Windfall sites in other villages will provide reduced access to services but greater access to the countryside.
3. To provide everyone with a decent home	-	+	+	Options B and C are likely to increase the number of houses built
4. To improve the level of skills, education and training	X	X	X	
5. To improve the health and sense of well-being of people	X	X	X	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	0	+	+	Windfall sites increase the amount of development which can be accommodated within (as opposed to on the edge of) development.
7. To protect and enhance biodiversity	-	+	+	Building on windfall sites is likely to mean less building on greenfield sites. However, it must be remembered that brownfield sites are also potential havens for biodiversity.

Q18	Options			Comments/Mitigation
SA Objective	A	B	C	
8. To preserve, enhance and manage landscape quality and character for future generations	-	+	+	Building on windfall sites is likely to mean less building on greenfield sites
9. To improve the quality of the built environment	-	+	+	Allowing windfall sites facilitates re-use of buildings
10. To improve local air quality and reduce greenhouse gas emissions	-	+	-	Option B may increase the amount of housing which can be provided within (as opposed to on the edge of) key and local service centres, thus reducing the need to travel.
11. To improve water quality and water resources	-	+	+	Building on windfall sites is likely to mean less building on greenfield sites
12. To restore and protect land and soil	-	+	+	Building on windfall sites is likely to mean less building on greenfield sites
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	-	+	+	Benefits due to ease of providing houses and benefits to local construction industry
15. To improve access to jobs	-	+	+	Benefits due to ease of providing houses and benefits to local construction industry
16. To diversify and strengthen the local economy	-	+	+	Benefits due to ease of providing houses and benefits to local construction industry
Summary				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?**

Q19	Options			Comments/Mitigation
	A	B	C	
SA Objective				
1. To increase the level of participation in democratic processes	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	
3. To provide everyone with a decent home	+	+	++	More flexible policies will make it easier to ensure sufficient numbers of houses are built.
4. To improve the level of skills, education and training	X	+	+	Options B and C are likely to encourage a local construction industry and maintain levels of traditional construction skills.
5. To improve the health and sense of well-being of people	0	0	+	The need for affordable housing in rural areas is a particularly pressing issue, and helping to provide this is likely to increase health and well being for a significant sector of the district's population.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	0	0	+	Providing housing which local young people in rural areas can afford is vital to maintaining the vibrancy of Eden's communities, and option C will facilitate this.
7. To protect and enhance biodiversity	+	+	+	Building on windfall sites is likely to mean less building on greenfield sites and help to protect biodiversity overall. However, it must be remembered that many brownfield sites are also havens for biodiversity.

Q19	Options			Comments/Mitigation
	A	B	C	
8. To preserve, enhance and manage landscape quality and character for future generations	+	+	-	Proactively allocating sites in the site allocations DPD is more likely to lead to sites which respect the landscape than merely reacting to applications which come forward. However, allowing use of brownfield sites as they come forward will reduce the amount of greenfield building necessary, thus helping preserve the landscape.
9. To improve the quality of the built environment	+	+	0	Building on previously developed windfall sites as soon as they are available will help keep the number of derelict sites low.
10. To improve local air quality and reduce greenhouse gas emissions	+	+	0	Options A and B may increase the amount of housing which can be provided within (as opposed to on the edge of) key and local service centres, thus reducing the need to travel.
11. To improve water quality and water resources	+	++	+	Building on windfall sites is likely to mean less building on greenfield sites
12. To restore and protect land and soil	+	++	+	Building on windfall sites is likely to mean less building on greenfield sites
13. To manage mineral resources sustainably and minimise waste	X	X	X	
14. To retain existing jobs and create new employment opportunities	+	+	++	Benefits due to ease of providing houses and benefits to local construction industry
15. To improve access to jobs	+	+	++	Benefits due to ease of providing houses and benefits to local construction industry
16. To diversify and strengthen the local economy	+	+	++	Benefits due to ease of providing houses and benefits to local construction industry
Summary				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**

Qs 20 and 21	Options						
SA Objective	A	B	C	D	E	F	Comments/Mitigation
1. To increase the level of participation in democratic processes	X	X	X	X	X	X	There was a feeling that the process of adopting this policy would increase participation in democratic processes, because it would be an example of the council responding positively to previous consultations. However, it was decided to award a no relationship score on the basis that the effects of the policy (the actual redevelopment of farm buildings) would not mean a change in the level of participation in democratic processes.
2. To improve access to services, facilities, the countryside and open spaces	0	0	0	++	+	0	Neutral impacts were recorded for A, B and C because it was felt that a possible reduction in access to services was balanced by access to the countryside and open spaces. Local Service Centres provide access to both essential services and the countryside. Access to services deteriorates down the settlement hierarchy.

Qs 20 and 21	Options						
SA Objective	A	B	C	D	E	F	Comments/Mitigation
3. To provide everyone with a decent home	X	X	X	X	X	X	This shouldn't affect the total number or quality of housing units.
4. To improve the level of skills, education and training	X	+	X	X	X	X	Converting traditional buildings requires some specific traditional skills. No direct relationship was identified with other options.
5. To improve the health and sense of well-being of people	0	0	0	+	0	0	This policy is likely to lead to a slightly more dispersed pattern of development and hence reduced access to health services. On the other hand, there may be a greater availability of housing, which would have a positive impact on health and well being.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	?	+	?	?	?	?	In Eden, a community is not necessarily a nucleated settlement, and converting or redeveloping the sites of agricultural buildings may help sustain some or Eden's more rural communities. However, this is dependent on the occupiers of the buildings - it is less likely to be the case, for example, if they become second homes. Converting traditional buildings and therefore preventing them from falling (further) into disrepair, will help maintain a sense of local history.
7. To protect and enhance biodiversity	?	?	?	?	?	?	It was recognised that agricultural buildings are an important habitat for species such as bats and barn owls. There was some disagreement over whether or not converting agricultural buildings would benefit these species (because they would be provided with bat boxes instead of a dilapidated barn that would eventually fall down).
8. To preserve, enhance and manage landscape quality and character for future generations	-	+	-	+	+	+	This depends on whether dilapidated barns are considered worse than redevelopment from a landscape perspective. There is also a danger that this policy might encourage farmers to sell up, thus having a negative impact on landscape quality and character. Option B would help preserve traditional buildings, hence having a positive impact on character.

Qs 20 and 21	Options						
SA Objective	A	B	C	D	E	F	Comments/Mitigation
9. To improve the quality of the built environment	0	+	-	0	0	0	Options A and B both provide the opportunity to take buildings of merit and reuse them, although there is no guarantee that this would be the outcome with option A. Option C is a continuation of the current situation which results in abandoned, dilapidated buildings in rural areas.
10. To improve local air quality and reduce greenhouse gas emissions	0	0	0	0	-	--	This was felt to depend on the current use of the building (ie what the change would be). In Local Service centres development would be likely to take place anyway, it is just a matter of where. Allowing conversion/redevelopment in other areas may increase the dispersed nature of settlement thus increasing greenhouse gas emissions from travel.
11. To improve water quality and water resources	X	X	X	X	X	X	No relationship
12. To restore and protect land and soil	++	++	-	0	+	++	This policy allows land which is built on (brownfield) to be classed as such, therefore reducing the amount of truly Greenfield land in the district which is needed for development. In Eden, which has always had an agricultural rather than industrial economy, brownfield land as defined in PPS3 is in short supply, but there are a large number of unused and/or underused farm buildings. Option F scores more positively than D and E because it represents the greatest use of this brownfield land.
13. To manage mineral resources sustainably and minimise waste	+	+	-	0	+	+	Options A and B both potentially provide for efficient re-use of local building materials, reducing the need for further extraction. Option F scores more positively than D and E because it represents the greatest use of this brownfield land.






Qs 20 and 21	Options						
SA Objective	A	B	C	D	E	F	Comments/Mitigation
14. To retain existing jobs and create new employment opportunities	+	+	0	0	+	+	Redeveloping on farm sites and converting traditional buildings was thought to be more appropriate to small local building firms than large national companies and thus would help retain skilled local jobs. Option C was felt to be a lost opportunity in this respect.
15. To improve access to jobs	+	+	-	+	0	-	Positive impacts were scored on the basis of improving access to local construction jobs. However, this has to be balanced with the likely poor access to jobs that future residents of the dwellings would experience, unless they were employed locally in land-based industries.
16. To diversify and strengthen the local economy	+	+	-	0	+	+	Providing opportunities for small local firms to prosper helps promote a strong and diverse economy.
Summary							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]**

Q22	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
1. To increase the level of participation in democratic processes	+	0	0	0	-	Option A may facilitate participation in democratic processes through site residents being in contact with community leaders on the existing site. Option E puts site residents away from district and parish councils and other democratic channels.
2. To improve access to services, facilities, the countryside and open spaces	+	+	+	+	-	Options A-D all place site residents in proximity to existing services.
3. To provide everyone with a decent home	++	++	++	++	++	All options will help to provide a home for members of the gypsy and traveller community.
4. To improve the level of skills, education and training	++	+	+	+	-	Option E puts site residents at some distance from schools. Options A to D will provide access to at least a primary school. Option A is felt to be significantly positive because, as well as access to primary, secondary and university education, Sure Start provide specialist services on site, and it is easier to provide services on a smaller number of sites.

Q22	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
5. To improve the health and sense of well-being of people	?	0	0	0	?	Option A was scored as uncertain because, although the existing site is accessible for health services, there is potential for a detrimental impact on health and well being if sites become too large and/or badly managed. Option E was scored as uncertain because there was no way of knowing where the sites would be located, and there would be potential detrimental impacts of health from some sites.
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-	+	+	+	--	Options B to D promote inclusion by locating sites in existing centres of population. Option A was felt to have marginal negative impacts through concentrating gypsies and travellers on one site, contrary to historical patterns. Option E specifically separates gypsies and travellers from the settled population, which was felt to strongly operate against inclusion.
7. To protect and enhance biodiversity	X	X	X	X	X	No relationship
8. To preserve, enhance and manage landscape quality and character for future generations	+	-	-	-	--	Option A might have positive impacts through the potential to improve landscaping on the existing site as part of any enlargement
9. To improve the quality of the built environment	+	0	0	0	0	Similarly, there might be improvements to the existing site as part of any enlargement.
10. To improve local air quality and reduce greenhouse gas emissions	++	++	++	+	-	Whilst travel is likely to remain an important part of travellers' lifestyles, proximity to key service centres and to a lesser extent local service centres will shorten some journeys, such as trips to school.
11. To improve water quality and water resources	X	X	X	X	X	No relationship
12. To restore and protect land and soil	-	?	?	?	-	Options A and E will necessitate greenfield land take, whereas options B to D might involve brownfield sites.





Q22	Options					Comments/Mitigation
SA Objective	A	B	C	D	E	
13. To manage mineral resources sustainably and minimise waste	X	X	X	X	X	No relationship
14. To retain existing jobs and create new employment opportunities	X	X	X	X	X	No relationship
15. To improve access to jobs	+	+	+	+	-	Although there is a high rate of self-employment among the gypsy and traveller community, proximity to service centres will provide access to a range of employment opportunities.
16. To diversify and strengthen the local economy	X	X	X	X	X	No relationship
Summary						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 a 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 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**

Q25	Options				Comments/Mitigation
SA Objective	A	B	C	D	
1. To increase the level of participation in democratic processes	X	X	X	X	
2. To improve access to services, facilities, the countryside and open spaces	X	X	X	X	Any impact on the distribution of houses across the settlement hierarchy will be negligible.
3. To provide everyone with a decent home	--	-	0	0	The lowest target may prove too restrictive and prevent sufficient housing units being built in some villages, as it will require several sites to be found in many villages; higher targets are unlikely to cause any problems.
4. To improve the level of skills, education and training	X	X	X	X	
5. To improve the health and sense of well-being of people	X	X	X	X	

Q25	Options				Comments/Mitigation
SA Objective	A	B	C	D	
6. To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	0	0	0	0	More restrictive options could have a positive impact through preventing development of an inappropriate scale in one area of a village, and helping to ensure growth happens in a more 'organic' fashion, on the other hand, larger sites may make more money available for community benefits such as community open space.
7. To protect and enhance biodiversity	X	X	X	X	There will be no impact on the overall level of development and policies protecting biodiversity in site selection will apply.
8. To preserve, enhance and manage landscape quality and character for future generations	++	+	+	-	Thresholds on site size will have a positive impact by helping to ensure that village growth happens in a more 'organic' fashion. From a landscape perspective, the tightest limits are likely to have the most positive impact.
9. To improve the quality of the built environment	0	0	0	0	Smaller thresholds on site size will have a positive impact by helping to ensure that village growth happens in a more 'organic' fashion. However, larger developments will provide economies of scale which may make money available for other improvements to the quality of the built environment.
10. To improve local air quality and reduce greenhouse gas emissions	X	X	X	X	
11. To improve water quality and water resources	X	X	X	X	
12. To restore and protect land and soil	--	-	0	+	Tight thresholds will restrict the use of any large brownfield sites which become available in villages. However, the largest threshold mentioned here would accommodate all but the largest sites currently identified.
13. To manage mineral resources sustainably and minimise waste	X	X	X	X	

Q25	Options				Comments/Mitigation
SA Objective	A	B	C	D	
14. To retain existing jobs and create new employment opportunities	X	X	X	X	
15. To improve access to jobs	X	X	X	X	
16. To diversify and strengthen the local economy	X	X	X	X	
Summary					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.