

# Eden District Council

## Employment Land Allocations



### Sustainability Appraisal



14 June 2013

AMEC Environment & Infrastructure UK Limited

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UK Limited



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## Non-Technical Summary

### 1. Introduction

This document is the Non-Technical Summary of the Sustainability Appraisal (SA) for Eden District Council's employment allocations consultation document. The non-technical summary sets out the sustainability appraisal process and describes the key sustainability effects anticipated as a result of implementing the preferred policy options. It seeks to do this using plain English, avoiding the use of technical terms.

The production of this non-technical summary is a requirement of the EU Directive known as the „SEA Directive“.

#### 1.1 Why Has a SA Been Undertaken for Eden's Proposed Employment Allocations?

The Employment: Preferred Sites and Policies consultation document has been prepared by Deloitte LLP on behalf of Eden District Council. It sets out Eden District Council's preferred sites for new employment development, together with some supporting planning policies.

The primary objectives of the document are to:

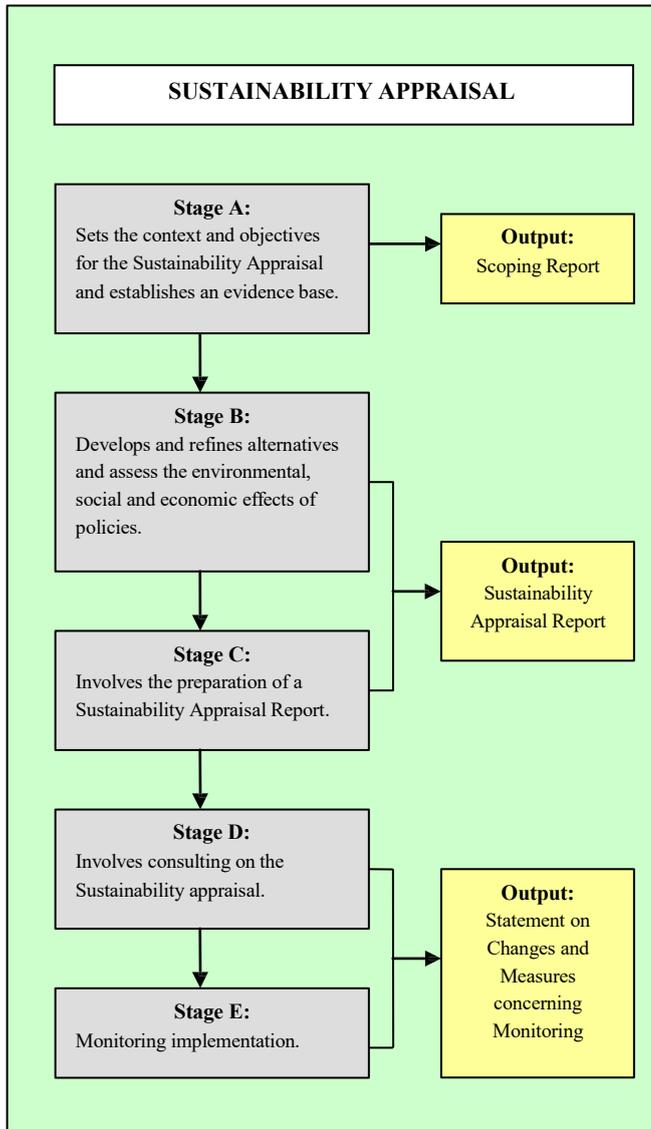
- Identify 50 ha land;
- Develop policies to support economic development;
- Consult the public on the distribution of employment land.

By undertaking a sustainability appraisal of the potential site allocations, together with the other, discounted options, this SA report seeks to ensure that principles of sustainability are embedded within the document such that opportunities to enhance positive performance and address negative performance are identified.

#### 1.2 Sustainable Development

It is very important to ensure that the policies and proposals contained in the Local Development Framework contribute to the aims of sustainable development. This is commonly defined as ensuring that there is a better quality of life for everyone both now and in the future. Sustainable development seeks to strike a balance between economic, environmental and social factors to enable people to meet their needs whilst minimising their impact, nor compromising the ability of future generations to meet their needs.

### 1.3 Why Sustainability Appraisal?



Sustainable development is one of the core principles of planning. The general thrust of the National Planning Policy Framework (NPPF) is aimed at contributing towards sustainable development through the planning system.

Sustainability Appraisal (SA) is one means to assess that all local plan documents demonstrate how they have considered the wider social, environmental and economic effects that its implementation may have on the existing environment.

In addition to the mandatory requirement to undertake SA, Eden District Council, like all planning bodies, is also required under a European Directive to carry out a Strategic Environmental Appraisal (SEA). Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach.

In 2007 a scoping report was produced jointly between the Cumbrian Authorities to set out the issues which councils should understand when considering the sustainability implications of identifying sites and drafting policies. A subsequent scoping report was issued in 2007 which addressed housing and development control policies. This outlined the baseline information used in the Issues and Options DPD and updated the evidence base, the SA framework and the Site Appraisal criteria. The framework

and the Site appraisal criteria, derived from the SA framework, has been subjected to consultation in 2007 and reviewed internally to encompass emerging themes and a more robust set of appraisal tools.

## 2. Characterisation of Eden District and Key Issues Which Must be Addressed

It is important that any plan takes into account the environmental, social and economic circumstances in which it is to be implemented. This is to ensure that unintended effects are avoided as well as to identify the potential for contributions towards other complementary public strategic objectives.

Based on an analysis of recent relevant information, the key environmental, social and economic issues (summarised as sustainability issues) in the Eden (excluding the National Park) have been identified and are summarised in **Table 1** below. Full contextual information (the review of plans and programmes, the baseline information and the evolution of the baseline) is presented in the main Environmental Report.

**Table 1 Summary of the Key Sustainability Issues Related to Employment Development Identified in the Strategic Environmental Assessment**

Topic Area	Key Economic, Social and Environmental Issues Drawn from Plans and Programmes and the Sustainability Drivers for the Plan
Biodiversity	<p>The need to consider anticipated effects of climate change and the impact on the resilience of species and their habitats.</p> <p>The need to protect or enhance biodiversity across the district.</p> <p>The need to protect or enhance the protected sites designated for nature conservation.</p> <p>The need to continue to improve the condition of priority habitats to support increases in wildlife, biodiversity and important protected species.</p> <p>The need to protect, maintain and enhance ecological function and connectivity.</p>
Geology and Soils	<p>The need to protect and enhance protected sites designated for their geological interest.</p> <p>The need to maintain or improve the quality of soils in the area.</p>
Water	<p>The need to consider anticipated effects of climate change and the impact on flooding.</p> <p>The need to ensure the risk of all forms of flooding is not increased, and options for mitigation and flood resilience are investigated.</p> <p>The need to maintain and improve water quality.</p>
Air Quality and Climate	<p>The need to reduce air pollutant and greenhouse gas emissions arising from the implementation of sites.</p> <p>The need to address the lack of reliable public transport increases reliance on private car use in smaller settlements around the district.</p> <p>The need to take into account, and where possible mitigate for, the potential effects of climate change.</p>
Human Environment	<p>Continued outward migration of working age population.</p> <p>Growing retired population.</p> <p>Demographic changes decreasing the level of skilled workforce.</p> <p>Lack of suitable employment opportunities to support a balanced economic growth.</p> <p>wide gap between male and female salaries.</p> <p>Unemployment is lower than the regional and national average, but more than doubled in the period 2006-2012.</p> <p>Dependency on low paid work and part time work with many people having more than one job.</p> <p>Poor access for many settlements to key services and facilities.</p> <p>Decline in rural services and distance to services from residents within a rural setting.</p> <p>Participation in the local demographic process is low.</p>

**Table 1 (continued) Summary of the Key Sustainability Issues Related to Employment Development Identified in the Strategic Environmental Assessment**

<b>Topic Area</b>	<b>Key Economic, Social and Environmental Issues Drawn from Plans and Programmes and the Sustainability Drivers for the Plan</b>
Material Assets and Resource Use	The need to reduce energy consumption. The need to ensure efficient use of resources such as construction materials.
Cultural Heritage	The need to protect or and enhance features, landscapes and sites of archaeological importance and cultural heritage interest as central to the culture of Wales. The need to recognise to conserve and local distinctiveness.
Landscape	The need to protect the natural beauty of the area, particularly in the AONB and the fringes of the Lake District National Park. The need to protect and maintain the landscape distinctiveness of the area.

### 3. SA Objectives and Appraisal Criteria

The SA objectives and appraisal criteria are components of a framework that will be used consistently to appraise the policies arising from the review. This framework sets out eleven assessment objectives relating to the key issues identified in **Table 2**. For each objective, guide questions are provided. The guide questions focus the assessment on specific aspects of the objective that reflect issues identified from a review of baseline and contextual information relating to Eden District.

**Table 2 Sustainability Appraisal Objectives**

<b>Ref</b>	<b>Sustainability Objectives</b>	<b>Sustainability Framework: Guidance on Making Progress Towards Each Objective</b>
SP1	To increase the level of participation in democratic processes	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?
SP2	To improve access to services, facilities, the countryside and open spaces	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?

Does the plan take account of climate change on transport infrastructure?

**Table 2 (continued) Sustainability Appraisal Objectives**

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective
SP3	To provide everyone with a decent home	<p>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?</p> <p>Do policies address fuel poverty and promote sustainable construction and low carbon design?</p>
SP4	To improve the level of skills, education and training	<p>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?</p> <p>Does the plan recognise the need for people to adapt to economic change and retrain where necessary?</p> <p>Does the plan enable people to live sustainable, low carbon lifestyles?</p>
SP5	To improve the health and sense of well-being of people	<p>Do plan policies ensure all members of society have access to the health care that they require?</p> <p>Do they reduce health inequalities within society associated with income, lifestyle and diet?</p> <p>Does the plan improve road safety and advocate sustainable modes of transport?</p> <p>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?</p> <p>Does the plan anticipate and plan for the potential impacts of climate change on health?</p>
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	<p>Does the plan promote a sense of community identity?</p> <p>Does it encourage social cohesion and help continue valued local traditions?</p> <p>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?</p> <p>Do policies stem outward migration from rural communities?</p> <p>Do policies allow for inward migration of persons outside the locality?</p>
EN1	To protect and enhance biodiversity	<p>Does the plan protect and conserve habitats and species especially where these may be rare, declining, threatened or indigenous?</p> <p>Will the plan ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource?</p> <p>Do policies minimise adverse impacts on species and habitats through human activities and development?</p> <p>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?</p> <p>Are the impacts of climate change on biodiversity taken into account?</p>
EN2	To preserve, enhance and manage landscape quality and character for future generations	<p>Are local landscape quality, distinctiveness and character protected from unsympathetic development and changes in land management?</p> <p>Is the remoteness and tranquillity of landscapes maintained?</p> <p>Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected?</p> <p>Are areas of high archaeological and historic landscape sensitivity protected?</p> <p>Do policies encourage low input organic farming with environmental stewardship styles of land management?</p>

Do they sustain and extend tree cover, hedgerows, woodlands and sustainable forestry?

**Table 2 (continued) Sustainability Appraisal Objectives**

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective
EN3	To improve the quality of the built environment	<p>Does the plan conserve features of historic and archaeological importance?</p> <p>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?</p> <p>Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation?</p> <p>Will policies guide inappropriate development away from flood risk areas?</p> <p>Do policies ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated?</p> <p>Will the plan reduce noise levels, light pollution, fly tipping, the spread of litter and graffiti?</p>
NR1	To improve local air quality and respond to the effects of climate	<p>Will the plan ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary?</p> <p>Will policies limit or reduce the emission of greenhouse gases and other air pollutants?</p> <p>Will the use of clean, low carbon energy efficient technologies be encouraged?</p> <p>Will policies maximise the use of energy from appropriate renewable resources including biofuels?</p> <p>Will they reduce the need to travel especially by car, and switch goods from roads onto the rail network?</p> <p>Will the plan introduce strategies to adapt to and mitigate other climate change impacts?</p>
NR2	To improve water quality and water resources	<p>Will the plan maintain and, where possible, improve the quality and quantity of all water resources, including marine and coastal waters?</p> <p>Will policies ensure sustainable drainage systems are widely used?</p> <p>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?</p>
NR3	To restore and protect land and soil	<p>Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site?</p> <p>Will it minimise the loss of greenfield sites or areas of open space?</p> <p>Will policies prevent soil degradation, pollution of soil and the use of peat?</p> <p>Does the plan consider the impacts of climate change on agriculture and forestry?</p>
NR4	To manage natural resources sustainably and minimise waste	<p>Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material?</p> <p>Will the plan seek to mitigate negative effects upon air quality and water use through extraction?</p> <p>Will the plan minimise the amounts of industrial, commercial and household waste generated and increase re-use, recovery and recycling?</p> <p>Will it promote the use of energy recovered from waste?</p>
EC1	To retain existing jobs and create new employment opportunities	<p>Will the plan increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise?</p> <p>Will the plan support local companies and help local businesses develop export markets?</p> <p>Will the plan help retain a skilled workforce, graduates and companies in Cumbria that are able to prosper in a low carbon economy?</p>

**Table 2 (continued) Sustainability Appraisal Objectives**

<b>Ref</b>	<b>Sustainability Objectives</b>	<b>Sustainability Framework: Guidance on Making Progress Towards Each Objective</b>
EC2	To improve access to jobs	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?
EC3	To diversify and strengthen the local economy	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 help increase the environmental performance of local companies and their products/services? Are 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 factor in likely impacts of climate change on the economy, particularly on tourism? Does the plan ensure that tourism consistently contributes to the economy?

Monitoring indicators are also provided in the SA report.

#### **4. The Potential Impacts of the Employment: Preferred Sites and Policies Consultation Document**

The Employment: Preferred Sites and Policies consultation document seeks to deliver economic development in Eden in accordance with the policies of the Core Strategy.

The Core Strategy sets out a requirement for 50 hectares of land available for employment use in the period 2006-2025 (Policy CS13). This is to be distributed in accordance with the locational policy identified in Policy CS2 Locational Strategy. Since this target was set, around 8 hectares of land has been developed for new employment, and this has taken place mainly in Penrith or on sites in rural locations and local service centres. As a result, there is now a need to identify around 42 hectares of land for new employment development.

The site allocations consultation document would deliver significant economic benefits as well as a wide range of other non-significant economic benefits. It would also deliver some significant social effects in terms of engaging the community and encouraging participation in local decision making processes.

It would have mixed effects on the environmental protection. Effects on the historic environment are likely to be significantly positive although biodiversity effects may be significantly adverse if certain sites continue to be taken forward and without appropriate mitigation being put in place. This is particularly the case for sites close to the River Eden SAC. Most of the identified sites are greenfield which means they are unlikely to be contaminated which is positive but they do use new resources and in a number of cases would result in a loss of best and most vulnerable agricultural land. Landscape effects are largely mixed or uncertain and can only be confirmed once the scale, height and siting of development within the sites is confirmed.

## 5. The Potential Impacts of the Considered Sites

A summary of the individual site assessments are included in Tables 3-5.

**Table 3 Assessment Summary for Sites in Penrith**

Ref	Sustainability Objectives	Indicator						
			Gilwilly 2A	Gilwilly 2B	Kemplay Bank	Masterplan B - Option 1	Masterplan B - Option 2	Masterplan C
SP2	To improve access to services, facilities, the countryside and open spaces	Access to public transport	+	+	+	++	++	+
		Distance to the main road network	-	+	+	++	++	++
		Public rights of way	-	-	N	N	N	N
SP4	To improve the level of skills, education and training	% population with NVQ4 and above	-	+	-	++	++	-
		% population with no qualifications	+	+	-	++	++	N
		Access to colleges and adult education centres	++	++	++	++	++	++
		Apprenticeships	+	+	++	+	+	+
SP5	To improve the health and sense of well-being of people	% population in good or very good health	N	N	+	++	++	+
		Number of residents with limited ability to do day-to-day activity	+	+	-	+	+	-
		Distance to children's play areas/accessible green spaces	++	++	N	++	++	+
		Neighbouring uses which may affect human health (light, noise, visual etc pollution)	--	?	N	N	N	+

Table 3 (continued) Assessment Summary for Sites in Penrith

Ref	Sustainability Objectives	Indicator	Gilwilly 2A	Gilwilly 2B	Kemplay Bank	Masterplan B – Option 1	Masterplan B – Option 2	Masterplan C
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Location in relation to existing settlement						
EN1	To protect and enhance biodiversity	Potential effects on local biodiversity	-	-	-	-	-	-
		Effect on trees and hedges	-	-	N	-	-	-
EN2	To preserve, enhance and manage landscape quality and character for future generations	Effect on landscape character (includes AONBs/National Parks)	+	-/N	-	-	-	-
		Effect on designated landscapes	++	++	++	++	++	++
EN3	To improve the quality of the built environment	Impact on historic features of interest (Conservation area, Listed building, SAM, AAI)	N	-/N	N	-	-	N
		Impact on local character, sense of place etc	N	-	0	-	-	N
		% of identified site which is at risk of flooding zone 3	+	-	++	+	++	++
NR1	To improve local air quality and respond to the effects of climate	Effects upon air quality (proximity to areas with known issues)	?	?	-/--	?	?	?
		Potential for the installation of decentralised renewable technologies (orientation, site size, topography/natural assets)	+	+	N	N	N	-
NR2	To improve water quality and water resources	Water Quality in Rivers	?	?	N	N	N	N
		Water resource availability(Correspondence from UU)	++	++	++	++	++	++
NR3	To restore and protect land and soil	Site based contaminants	++	++	++	++	++	-
		Agricultural Land Classification	-	-	-	-	-	-
NR4	To manage natural resources sustainably and minimise waste	Site condition (Brownfield or Greenfield)	+	-	-	-	-	-

Table 3 (continued) Assessment Summary for Sites in Penrith

Ref	Sustainability Objectives	Indicator						
			Gilwilly 2A	Gilwilly 2B	Kethrley Bank	Masterplan B - Option 1	Masterplan B - Option 2	Masterplan C
EC1	To retain existing jobs and create new employment opportunities	Annual tourist days expenditure Eden	N	N	N	?	?	N
		% tourism jobs				-	-	
		Average salary						
EC2	To improve access to jobs	Distance to employment centres						
		Regeneration benefits	+	+/N	++	N	N	++
EC3	To diversify and strengthen the local economy	Number of businesses in emerging technologies	N	+	+	+	+	?
		Increase in jobs in finance, IT, business	N	+	+	+	+	+
		Increase in jobs in public admin, education and health	N	N	N	+	+	N

Table 4 Assessment Summary for Sites in Alston and Appleby

Ref	Sustainability Objectives	Indicator	Alston			Appleby		
			Skelsgillside Workshops	Bonds Foundry	High Mill	Cross Croft	The Old Creamery	Shire Hall
SP2	To improve access to services, facilities, the countryside and open spaces	Access to public transport	N	N	N	+	+	++
			-	-	-	-	-	-
SP4	To improve the level of skills, education and training	Distance to the main road network						
		Public rights of way	N	N	N	N	N	N
		% population with NVQ4 and above	+	+	+	N	N	N
		% population with no qualifications	+	+	+	+	+	+
		Access to colleges and adult education centres	-	-	-	++	++	++
		Apprenticeships	+	+	+	+	+	+

Table 4 (continued) Assessment Summary in Alston and Appleby

Ref	Sustainability Objectives	Indicator	Alston			Appleby		
			Skeils gills Worksops	Bonds Foundry	High Mill	Cross Croft	The Old Creamery	Shire Hall
SP5	To improve the health and sense of well-being of people	% population in good or very good health	-	N	N	++	++	++
		Number of residents with limited ability to do day-to-day activity	-	-	-	+	+	+
		Distance to children's play areas/accessible green spaces	+	++	++	-	-	++
		Neighbouring uses which may affect human health (light, noise, visual etc pollution)	N	N	N	N	N	N
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Location in relation to existing settlement	+	+/N	++	+	++	++
EN1	To protect and enhance biodiversity	Potential effects on local biodiversity	-	-	+	+	+	+
EN2	To preserve, enhance and manage landscape quality and character for future generations	Effect on trees and hedges	N	N	N	-	N/-	N
		Effect on landscape character (includes AONBs/National Parks)	-	-	++	-	+	+
EN3	To improve the quality of the built environment	Effect on designated landscapes	-	-	++	++	++	++
		Impact on historic features of interest (Conservation area, Listed building, SAM, AAI)	N	N	++	N	++	N
		Impact on local character, sense of place etc	+	N	++	N	+	+
NR1	To improve local air quality and respond to the effects of climate	% of identified site which is at risk of flooding zone 3	++	++	++	++	++	++
		Effects upon air quality (proximity to areas with known issues)	+	+	+	+	+	+
		Potential for the installation of decentralised renewable technologies (orientation, site size, topography/natural assets)	-	-	-	-	-	-
NR2	To improve water quality and water resources	Water Quality in Rivers	N	N	0	0	0	0
		Water resource availability(Correspondence from UU)	++	++	++	++	++	N

Table 4 (continued) Assessment Summary in Alston and Appleby

Ref	Sustainability Objectives	Indicator	Alston				Appleby		
			Skelgillside Works hops	Bonds Foundry	High Mill	Cross Croft	The Old Creamery	Shire Hall	
NR3	To restore and protect land and soil	Site based contaminants	+	++	-	++	-	+	
		Agricultural Land Classification	+	+/N	++	-	++	++	
NR4	To manage natural resources sustainably and minimise waste	Site condition (Brownfield or Greenfield)	-	-/N	++	-	++	++	
EC1	To retain existing jobs and create new employment opportunities	Annual tourist days expenditure Eden	N	N	N	N	N	N	
		% tourism jobs	N	N	N	N	N	N	
EC2	To improve access to jobs	Average salary					N	N	N
		Distance to employment centres							
EC3	To diversify and strengthen the local economy	Regeneration benefits							
		Number of businesses in emerging technologies							
		Increase in jobs in finance, IT, business	N	-	-	N	+	++	
		Increase in jobs in public admin, education and health	N	-	-	N	+	+	

Table 5 Assessment Summary for the Other Sites

Ref	Sustainability Objectives	Indicator	Kirkby Stephen	Brough Main Street	Brough Main Street South	Tebay depot	
SP2	To improve access to services, facilities, the countryside and open spaces	Access to public transport	+	++	+	++	
		Distance to the main road network	N/A				+
		Public rights of way	N	N	N	-	
SP4	To improve the level of skills, education and training	% population with NVQ4 and above	N	N	N	+	
		% population with no qualifications	N	+	+	+	
		Access to colleges and adult education centres	-	+	+	-	
		Apprenticeships	+	N	N	+	

Table 5 (continued) Assessment Summary for the Other Sites

Ref	Sustainability Objectives	Indicator	Kirkby Stephen	Brough Main Street	Brough Main Street South	Tebay depot
SP5	To improve the health and sense of well-being of people	% population in good or very good health	N	+	+	-
		Number of residents with limited ability to do day-to-day activity	-	+	+	+
		Distance to children's play areas/accessible green spaces	-	++	++	-
		Neighbouring uses which may affect human health (light, noise, visual etc pollution)	N	-	--	N
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Location in relation to existing settlement	+	+	+	N
EN1	To protect and enhance biodiversity	Potential effects on local biodiversity	N	+	+	+
		Effect on trees and hedges	N	-	N	N
EN2	To preserve, enhance and manage landscape quality and character for future generations	Effect on landscape character (includes AONBs/National Parks)	+	++	-	-
		Effect on designated landscapes	++	-	-	++
EN3	To improve the quality of the built environment	Impact on historic features of interest (Conservation area, Listed building, SAM, AAI)	-	N	-	N
		Impact on local character, sense of place etc	N	N	-	N
		% of identified site which is at risk of flooding zone 3	++	++	++	+
NR1	To improve local air quality and respond to the effects of climate	Effects upon air quality (proximity to areas with known issues)	+	?	?	+
		Potential for the installation of decentralised renewable technologies (orientation, site size, topography/natural assets)	+	-	-	+
NR2	To improve water quality and water resources	Water Quality in Rivers	+	?	?	N
		Water resource availability(Correspondence from UU)	++	++	++	++

Table 5 (continued) Assessment Summary for the Other Sites

Ref	Sustainability Objectives	Indicator	Kirkby Stephen	Brough Main Street	Brough Main Street South	Tebay depot
NR3	To restore and protect land and soil	Site based contaminants	++	-	++	---
		Agricultural Land Classification	-	+++	-	++
NR4	To manage natural resources sustainably and minimise waste	Site condition (Brownfield or Greenfield)	-	+	-	+
EC1	To retain existing jobs and create new employment opportunities	Annual tourist days expenditure Eden	N	N	N	N
		% tourism jobs	N	N	N	N
		Average salary	+	+	+	+
EC2	To improve access to jobs	Distance to employment centres	++	+	+	-
		Regeneration benefits	+	++	++	++
EC3	To diversify and strengthen the local economy	Number of businesses in emerging technologies	+	?	?	?
		Increase in jobs in finance, IT, business	N	N	N	?
		Increase in jobs in public admin, education and health	N	N	N	?

## 6. Alternative Sites

The SA also considered the environmental effects of a number of sites which were rejected by the site assessment not included in the final consultation document. They were also subject to Sustainability Appraisal and the full results of this are included in Table 6 below. It should be noted that the reasons they were not taken forward were not necessarily as a direct response of the SA process.

It was noted that Masterplan A site north of the A66 offered a number of significant benefits however the viability assessment concluded that the odour arising from the rendering plant would make the area too unpleasant for anyone else to live or work in, thus making the site undevelopable at this stage.

This Penrith Mart site was put forward through the call for sites exercise by the current occupier who would prefer to relocate to the site at Stoneybeck. The site at Stoneybeck has been rejected as a potential allocation (see below for the justification of this) and as a result the market site would continue in its current location, rendering this site unavailable at this time.

**Table 6 Assessment Summary for the Alternative Sites**

Ref	Sustainability Objectives	Indicator	Master Plan Option A	Land at Penrith Mart	Stoneybeck
SP2	To improve access to services, facilities, the countryside and open spaces	Access to public transport	N	N	-
		Distance to the main road network	+	++	+
		Public rights of way	-	N	N
SP4	To improve the level of skills, education and training	% population with NVQ4 and above	-	-	+
		% population with no qualifications	++	++	+
		Access to colleges and adult education centres	++	++	+
		Apprenticeships	+	+	+
SP5	To improve the health and sense of well-being of people	% population in good or very good health	+	+	N
		Number of residents with limited ability to do day-to-day activity	+	+	+
		Distance to children's play areas/accessible green spaces	-	+	-
		Neighbouring uses which may affect human health (light, noise, visual etc pollution)	-	N	N
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Location in relation to existing settlement	N	-	-
EN1	To protect and enhance biodiversity	Potential effects on local biodiversity	+	N	-
		Effect on trees and hedges	-	N	N
EN2	To preserve, enhance and manage landscape quality and character for future generations	Effect on landscape character (includes AONBs/National Parks)	-	+	-
		Effect on designated landscapes	++	++	++
EN3	To improve the quality of the built environment	Impact on historic features of interest (Conservation area, Listed building, SAM, AAI)	N	-	-
		Impact on local character, sense of place etc	-	N	-
		% of identified site which is at risk of flooding zone 3	+	++	++
NR1	To improve local air quality and respond to the effects of climate	Effects upon air quality (proximity to areas with known issues)	-	?	-
		Potential for the installation of decentralised renewable technologies (orientation, site size, topography/natural assets)	-	N	-

Table 6 (continued) Assessment Summary for the Alternative Sites

Ref	Sustainability Objectives	Indicator	Master Plan Option A	Land at Penrith Mart	Stoneybeck
NR2	To improve water quality and water resources	Water Quality in Rivers	N	N	?
		Water resource availability(Correspondence from UU)	++	++	++
NR3	To restore and protect land and soil	Site based contaminants	++	-	++
		Agricultural Land Classification	-	++	-
NR4	To manage natural resources sustainably and minimise waste	Site condition (Brownfield or Greenfield)	-	+	-
EC1	To retain existing jobs and create new employment opportunities	Annual tourist days expenditure Eden	N	N	N
		% tourism jobs	N	N	N
		Average salary	+	+	+
EC2	To improve access to jobs	Distance to employment centres	++	++	+
		Regeneration benefits	++	+	N
EC3	To diversify and strengthen the local economy	Number of businesses in emerging technologies	+	+	N
		Increase in jobs in finance, IT, business	+	+	N
		Increase in jobs in public admin, education and health	N	N	N

## 7. Mitigation

A number of mitigation measures have been identified which would reduce or eliminate the potential environmental effects of some of the schemes. The consideration of mitigation measures would not necessarily change a site assessment from significantly adverse to adverse or from adverse to neutral because the extent of any change would depend on how the mitigation measures were implemented but they would lessen the adverse effects.

Mitigation measures include:

- Provision of new or extension of existing bus routes;
- Protection/ diversion of PRowS;

- Appropriate control of industrial processes to reduce nuisance to existing residential and commercial users;
- Mitigation arising from protected species surveys;
- Incorporate trees and hedges into site design;
- Appropriate design, materials and planting to retain local character and improve the local landscape;
- FRA and management of those parts of the site subject to flooding.

For Penrith Masterplan B, Masterplan Option C and Kemplay bank, extensive mitigation will be required to prevent run off from the site to the River Eamont which forms part of the River Eden SAC. This is likely to take the form of a SuDS scheme.

## 8. Conclusion

The principal test of Sustainability Appraisal is whether the proposed plan and/ or policies will make a positive contribution to the sustainability of the target area, as measured by a wide range of environmental, social and economic criteria. The Sustainability Appraisal has demonstrated that the policies and proposals of the employment land allocations consultation draft, with careful development management, should result in positive sustainability outcomes for the District.

## 9. Consultation

This Environmental Report is being issued as part of the consultation for the employment land sites allocation document.

It is now being made available for representations from 15<sup>th</sup> July 2013 to 9<sup>th</sup> September 2013. This document, along with other consultation documents for the Preferred Employment Sites and Policies.

### **Please make your comments using:**

The **Online Consultation Form**. This can be accessed via the Planning Policy pages at

<https://eforms.eden.gov.uk/formserver/ldfemploymentconsultation.form>

This form allows for comments on the SA of specific sites and policies to be made, and can also be used to identify additional sites for inclusion in the next stage of the document.

Alternatively a copy of the form in MS Word can be accessed on the consultation page of our website, to be sent to the following address:

Planning Policy

Eden District Council

Mansion House

Penrith CA11 7YG

By email: [preferredsites@eden.gov.uk](mailto:preferredsites@eden.gov.uk)

The closing date for comments is the 9<sup>th</sup> September 2013. Comments received after this date may not be taken into account when further versions are produced.

The Council will also be running a series of drop in events around the district so you can find out more, talk to Council Officers and submit your views. This is scheduled for:

- Wednesday 21<sup>st</sup> August from 4pm to 7pm. This session will be held in the Penrith Methodist Church.

## 1.0 Introduction

### 1.1 Background

AMEC was appointed in January 2013 to undertake the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of Eden District Council's Employment: Preferred Sites and Policies consultation document. This will form an important part of the Local Plan for Eden which provides the statutory planning framework to guide Edens development into the future.

### 1.2 Sustainable Development

Sustainable development is one of the core principles of planning. The general thrust of the National Planning Policy Framework (NPPF) is aimed at contributing towards sustainable development through the planning system. There is a presumption in favour of sustainable development "which should be seen as a golden thread running through both plan-making and decision-taking." There are three dimensions as to how the government aims to achieve sustainable development which gives rise to the need for the planning system to perform in a number of roles. The three roles, as set out in the NPPF, are as follows:

- **"Economic role** - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **Social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **Environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."<sup>1</sup>

The NPPF makes reference to the UK Sustainability Strategy *Securing the Future*<sup>2</sup> which sets out the five "guiding principles" of sustainable development. They are as follows:

- Living within the Environmental Limits;
- Ensuring a Strong Health and Just Society;

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<sup>1</sup> Communities and Local Government, (2012). *National Planning Policy Framework* p.2.

<sup>2</sup> Defra, (2005). *Securing the Future – UK Government Sustainable Development Strategy*.

- Achieving a Sustainable Economy;
- Promoting Good Governance;
- Using Sound Science Responsibly.

The Eden Local Plan should be based on these sustainable development principles.

### 1.3 Requirement for SA and SEA

SEA is required by the Environmental Assessment of Plans and Programmes Regulations 2004 (the „SEA Regulations“) which in turn is derived from the European Directive 2001/42/EC<sup>3</sup> (known as the SEA Directive). The SEA Regulations require the assessment of plans and programmes which are likely to have significant environmental effects. Development Plan Documents are considered to have significant environmental effects, and therefore require SEA.

The Planning and Compulsory Purchase Act 2004<sup>4</sup> requires the SA for Development Plan Documents and Supplementary Planning Documents. This requires the assessment of the sustainability of the proposals in the document in question. The Employment: Preferred Sites and Policies will form part of a Development Plan Document, and thus requires SA.

### 1.4 Approach to the SA incorporating SEA of the Eden Employment Land Allocations DPD

Government guidance set out in paragraph 165 of the NPPF states that:

*A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

This approach is proposed for the Employment: Preferred Sites and Policies consultation document. Throughout this document, where reference is made to SA, it denotes SA incorporating the requirements of the SEA Directive. The SA has been carried out taking account of *A Practical Guide to the Strategic Environmental Assessment Directive (2005)*<sup>5</sup> which provides guidance on SEA in the UK from the former ODPM and devolved administrations.

<sup>3</sup> European Parliament (2001) *Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.*

<sup>4</sup> British Government (2004) *The Planning and Compulsory Purchase Act 2004.*

<sup>5</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment: Practical guidance on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.*

SAs are an effective way to ensure that sustainable development principles are taken into account during the plan-making process. By assessing the plan policies against a broad range of SA objectives, the appraisal process exposes sustainability strengths and weaknesses of the plan, which can help to develop recommendations for its improvement. As well as helping to enhance the plan, the appraisal process also provides a basis for informed discussion between stakeholders around a shared set of objectives.

## **1.5 Eden District Council Employment: Preferred Sites and Policies Consultation Document**

The Employment: Preferred Sites and Policies consultation document has been prepared by Deloitte LLP on behalf of Eden District Council. It sets out Eden District Council's preferred sites for new employment development, together with some supporting planning policies. In the document, the term „employment development covers the following uses:

- Offices;
- Research and Development;
- Light industrial uses;
- General industrial uses; and
- Warehousing and distribution.

The allocation of sites and development of policies is designed to help to meet employment needs in the District for existing and future residents. This will help to promote economic growth, by providing certainty for new and existing businesses regarding space to grow and by providing certainty to developers and the public on where such development will be encouraged and likely receive eventual planning permission.

- The primary objectives of the document are to: Identify 50 ha land;
- Develop policies to support economic development;
- Consult the public on the distribution of employment land.

The compatibility of these objectives, against the SA objectives is set out in Appendix A.

## **1.6 Site Appraisal**

In formulating the consultation document a list of potential sites was drawn up, using a number of sources, including:

- Sites included within Cumbria County Council's employment land monitoring information, including existing undeveloped or part developed employment allocations included in the previous 1996 Eden District Local Plan;
- 2009 Eden Employment Land Study
- Other sites within/around Penrith considered through the Penrith Masterplan;
- Appropriate sites identified through a Call for Sites" exercise;
- Other sites already put to the Council, such as potentially surplus land owned by the County Council.

This complete long list is included in Appendix B. A number of these sites had already been developed and were discounted unless they were considered to represent a clear and realistic redevelopment opportunity which could make a meaningful contribution to the supply of employment land.

This generated a short list which was appraised by Deloitte LLP on the basis of a range of assessment criteria designed to consider the market attractiveness, environmental sustainability and the planning potential of each site. Finally a preferred option was selected.

In tandem with the assessment undertaken by Deloitte LLP all of the sites in the short list were also considered in the Sustainability Appraisal.

## **1.7 Relationship with the Eden Local Plan**

This Land Allocation document is being prepared within the context of the Council's existing Core Strategy (Local Plan). The Core Strategy sets out the vision, aims and strategy for spatial development in Eden District up to 2025 and beyond providing a framework for the formulation of more detailed generic and site specific policies. Such policies include those promoted within the Employment Land Site Allocations document. The Core Strategy was adopted by the Council on 31 March 2010. It is the document which sets out the requirement to identify land 50ha of employment land within the district.

The Core Strategy was prepared within the context of the Cumbria Structure Plan and North West Regional Spatial Strategy. The Order for the revocation of the Regional Strategy for the North West comes into force on 20 May 2013.

## **1.8 Purpose of this Report**

This Report sets out the environmental baseline of Eden District and contains an assessment of the sustainability effects which are likely to arise from the implementation of the Employment Land Site Allocations Options Consultation Document. It also sets out the proposed methodology and assessment framework by which the SEA/SA will be undertaken.

This document contains the following elements:

- Section 2: The Sustainability Appraisal Process – This section provides an overview of the SA process;
- Section 3: Links with other Relevant Plans and Programmes – This section outlines the review of relevant international, national, regional and local documents to assist in identifying the key sustainability issues and developing the sustainability objectives;
- Section 4: Key Sustainability Issues for Eden – This section sets out relevant baseline information for Eden as well as identifying and describing the key sustainability issues;
- Section 5: Development of the SA Objectives – This section sets out the proposed SA objectives, appraisal questions and the relevant indicators;
- Section 6: The SA Framework – This section sets out the proposed SA framework and describes how the framework will be used to assess policies;
- Section 7: Sustainability Appraisal of the Employment: Preferred Sites and Policies Consultation Document - This section sets out a summary of the detailed assessment of the plan as a whole and the site allocations;
- Section 8: Alternatives – This section sets out the other sites that have been considered and subsequently rejected. The reasons for their rejection is also noted;
- Section 9: Proposed Mitigation – This section describes the proposed mitigation measures which are designed to reduce or eliminate adverse effects of the scheme;
- Section 10: Conclusions and Recommendations – This section sets out the conclusions of the appraisal of the Employment: Preferred Sites and Policies Consultation Document.

## 2.0 The Sustainability Appraisal Process

### 2.1 The Staged Process

The publication of the NPPF means that PPS12 has been cancelled. DCLG are reviewing all their planning guidance, including the CLG Plan Making Manual, but until it is officially withdrawn or revised, it remains extant. The sustainability appraisal guidance contained within the CLG Plan Making Manual replaces the Development Plan Document component of the Sustainability Appraisal of Local Development Document. There are five main stages of SA, as identified in the Department for Communities and Local Government Plan Making Manual<sup>6</sup> guidance which is in turn based on the SEA guidance (2005). These are shown in **Table 2.1**.

**Table 2.1 Incorporating SA within the DPD Process (based on the stages within the CLG Plan Making Manual)**

<b>DPD Stage 1: Pre-Production – Evidence Gathering</b>	
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>	
Identifying other relevant policies, plans and programmes, and sustainability objectives	To help take account of policies, obligations and issues that affects your area and should be reflected in your plan. Consideration should be given to the relationships between the development plan document and other relevant plans and programmes as well as any relevant environmental protection objectives. Sustainability objectives of neighbouring authorities should also be taken into account.
Collecting baseline information	To provide evidence base for sustainability issues, prediction of effects, and monitoring; to help in the development of SA objectives. Collecting and presenting baseline information provides an opportunity to define key issues for the development plan document and to develop options.
Identifying sustainability issues and appraisal objectives	To help reach an informed view on the sustainability of the plan. Sustainability appraisal objectives, which can be derived from these issues, may be used to check and refine the plan. In particular, they can be used as a basis for testing and comparing the effects of alternative options considered in the plan.
Considering options and alternatives	It is a requirement of the SEA Directive to present the effects of “reasonable alternatives.” Developing options should begin from the outset of the development plan document preparation process. It will enable for identification of any adverse effects of the proposals as early as possible. Such effects can therefore be addressed, for example through mitigation measures. Options which are not taken forward can be dropped from consideration as the plan progresses.
Consulting on the scope of the SA	To ensure that the SA covers the likely significant sustainability effects of the plan and provides and fulfils the statutory requirement to consult the SEA consultation bodies and also to consult other stakeholders. It is good practice to work with other stakeholders when considering the scope of the sustainability appraisal. Sustainability appraisal steering groups and scoping workshops can help at this stage.
<b>Stage B: Developing and refining options and assessing effects</b>	
Testing the plan or programme objectives against the SA/SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan and the SA objectives and help in developing alternatives.
Develop and refine the options for the development plan document	To develop and refine strategic alternatives.

<sup>6</sup> CLG Plan Making Manual <http://www.pas.gov.uk/pas/core/page.do?pageId=109798>.

Table 2.1 (continued) Incorporating SA within the DPD Process (based on the stages within the CLG Plan Making Manual)

DPD Stage 1: Pre-Production – Evidence Gathering	
<b>Stage B: Developing and refining options and assessing effects (continued)</b>	
Predict and appraise the significant effects of the options	To predict and evaluate the significant sustainability effects of the plan and alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects and maximising beneficial impacts	To ensure that adverse effects are identified and potential mitigation measures are considered.
Proposing measures to monitor the significant effects of implementing the development plan document	To detail the means by which the environmental performance of the plan can be assessed
<b>Stage C: Preparing the Sustainability Appraisal Report</b>	
Preparing the SA Report	To present the predicted effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.
<b>Stage D: Consulting on the draft plan and SA Report</b>	
Sustainability appraisal report	At publication, the local authority is required to produce and publish the SA Report alongside the draft DPD.
Signposting and options not taken forward	The SA Report should „signpost“ where it provides information required by the SEA Directive.
Consulting the public and Consultation Bodies on the draft plan and the SA Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the SA Report and to use it as a reference point in commenting on the plan. They can make representations on the soundness of the development plan document and may take into account whether the development plan document is founded on a robust and credible evidence base, justified in that it is the most appropriate strategy when considered against the reasonable alternatives, effective and, consistent with national policy. To gather more information through the opinions and concerns of the public.
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and taken into account.  Regulation 28 requires a local authority to prepare a summary of the main issues raised at consultation.  Regulation 30 requires submission of the sustainability appraisal report and any revisions or supplements to it to the Secretary of State alongside the draft development plan document. A statement must also be provided setting out:  Who has been consulted throughout plan preparation; How they have been involved; A summary of the main issues raised; How the main issues have been taken into account as a result of consultation undertaken under Regulation 25.
Making decisions and providing information	To provide information on how the SA Report and consultees’ opinions were taken into account in deciding the final form of the plan to be adopted (in the form of an SA Statement with the Submission DPD).
<b>Examination of the DPD – SA</b>	
Examination of the DPD and SA submitted by local authority	The role of the Inspector at examination is to consider the soundness of the development plan document. He/she does this by using the sustainability appraisal as part of the evidence base. There may be circumstances where it appears to the Inspector that the evidence in the sustainability appraisal is insufficient to come to satisfactory conclusions about the soundness of the development plan document. Where the Inspector suggests significant changes in the binding report, he/she will need to be satisfied that sufficient sustainability appraisal material is available to inform the recommendation.

**Table 2.1 (continued) Incorporating SA within the DPD Process (based on the stages within the CLG Plan Making Manual)**

Adoption	
When the plan is adopted	<p>When the plan is adopted (incorporating any changes required by the Inspector), the local authority must issue a statement summarising:</p> <ul style="list-style-type: none"> <li>• Sustainability considerations - how these have been integrated into the development plan document;</li> <li>• Options and consultation responses - how any received on the development plan document and sustainability appraisal reports (at all stages) have been taken into account;</li> <li>• Alternatives - reasons for of the choice of alternatives in light of other reasonable alternatives considered;</li> <li>• Monitoring sustainability effects - measures to be taken to monitor the significant sustainability effects of implementing the development plan document (noting that the sustainability appraisal report and any revisions to it at earlier stages should already have documented proposed monitoring arrangements).</li> </ul>
Stages E: Monitoring the significant effects of implementing the plan	
Developing aims and methods for monitoring	Sustainability appraisal requires arrangements to be made for monitoring the significant effects of implementing the adopted development plan document. To track the environmental effects of the plan or programme to show monitoring whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.

## 2.1 Scoping Stage

The general approach to this document is based on the scoping report produced jointly between the Cumbrian Authorities in 2007. This set out the issues which councils may consider important to understand when considering the sustainability implications when identifying sites. It also included a proposed methodology for assessing the sites. This scoping report was subject to consultation with statutory consultees. A copy of the scoping report was sent to each of the statutory stakeholders to allow early input into the shape of the sustainability appraisal. A number of consultees recommended minor changes to baseline data but were supportive of the general approach.

A subsequent scoping report was issued in 2007 which addressed housing and development control policies. This outlined the baseline information used in the Issues and Options DPD and updated the evidence base, the SA framework and the Site Appraisal criteria. The framework and the Site appraisal criteria, derived from the SA framework, has been subjected to consultation in 2007 and reviewed internally to encompass emerging themes and a more robust set of appraisal tools.

## 2.3 Quality Assurance

The original guidance to the SEA Directive (ODPM, 2005) contains a checklist to demonstrate that all elements of the guidance have been complied with. It provides a useful reference point to demonstrate where those elements are contained within the Environmental Report and is therefore included here as Table 2.2.

Table 2.2 Quality Assurance Checklist

Topic	Present?
<b>Objectives and Context</b>	
<p>The plan's or programme's purpose and objectives are made clear.</p> <p>Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.</p> <p>SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.</p> <p>Links with other related plans, programmes and policies are identified and explained.</p> <p>Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.</p>	<p>Yes – Section 1.4.</p> <p>Key environmental issues for Eden are set out in Section 4. The sources for key objectives and international targets are identified in Appendix C.</p> <p>The SA Objectives and supporting indicators have been set out in Table 5.1 the report.</p> <p>Section 3 discusses the role that other plans and programmes had and the relevant ones are listed in Table 3.1. These are summarised in Appendix C.</p> <p>The compatibility between Plan Objectives and SA Objectives is set out in Appendix A.</p>
<b>Scoping</b>	
<p>Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</p> <p>The assessment focuses on significant issues.</p> <p>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</p> <p>Reasons are given for eliminating issues from further consideration.</p>	<p>Section 2.2 refers to the scoping exercises that were carried out in 2007; one for the approach chosen by all Cumbrian authorities and a subsequent one for housing and development control policies in Eden.</p> <p>This environmental report does not identify the changes that were made to the SA methodology and approach although this should be included in future iterations.</p> <p>The SA report identifies the key sustainability issues for Eden in 4.2.5 and the conclusion of the site assessments in section 7.3 focuses on the likely significant changes.</p> <p>Limitations of the SA framework are set out in Section 6.2.</p> <p>Objectives SP1 and SP3 have been scoped out from the site appraisals although not from the assessment of the plan. This is reported in Section 6.1.</p>
<b>Alternatives</b>	
<p>Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</p> <p>Alternatives include „do minimum“ and/or „business as usual“ scenarios wherever relevant.</p> <p>The environmental effects (both adverse and beneficial) of each alternative are identified and compared.</p> <p>Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.</p> <p>Reasons are given for selection or elimination of alternatives.</p>	<p>The initial list of sites identified are set out in Appendix B along with a justification as to which were considered within the SA. The preferred sites are set out in section (with full assessments included in Appendix F) and the rejected sites are identified in section 8, along with the reasons they were not selected.</p> <p>Alternative approaches to land allocations, including do nothing, over supply and different sites are considered in Section 8.</p> <p>Section 7 and 8 of the report identify the significant positive and negative effects of each site. These are assessed in more detail in Appendices F and G.</p> <p>Section 8 includes reference to the fact that failure to allocate sites would be in conflict with the Core Strategy.</p> <p>Section 8 demonstrates why each alternative has not been selected.</p>

Table 2.2 (continued) Quality Assurance Checklist

Topic	Present?
<b>Baseline Information</b>	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Section 4 provides a detailed description of the baseline environment.
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Table 7.1 summarises the likely changes to the environment as a result of the allocations.
Difficulties such as deficiencies in information or methods are explained.	There is no reference to deficiencies in information or methods.
<b>Prediction and Evaluation of Likely Significant Environmental Effects</b>	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate.	The assessment framework includes this range of environmental assets.
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	The positive and negative effects of each site and the plan as a whole are considered in Appendices E, F and G.
Likely secondary, cumulative and synergistic effects are identified where practicable.	Likely secondary, cumulative and synergistic effects are identified where practicable within the assessment matrices in Appendices E, F and G.
Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are considered where practicable within the assessment matrices in Appendices E, F and G.
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.	Where they exist, the prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.
Methods used to evaluate the effects are described.	The methodology is set out in Section 6.
<b>Mitigation Measures</b>	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Mitigation measures are included within the assessment matrices where appropriate.
Issues to be taken into account in project consents are identified.	Issues to be taken into account in project consents are included within the assessment matrices where appropriate.
<b>The Environmental Report</b>	
Is clear and concise in its layout and presentation.	The environmental report uses a clear structure and supporting appendices where necessary.
Uses simple, clear language and avoids or explains technical terms.	The Environmental Report has tried to avoid the use of technical jargon to make the report easier to read.
Uses maps and other illustrations where appropriate.	Maps showing key environmental constraints and site allocations are included in the report.
Explains the methodology used.	Section 6 sets out the methodology used.
Explains who was consulted and what methods of consultation were used.	Section 2.2 considers the consultation that was undertaken at the scoping stage. No subsequent consultation has been undertaken.
Identifies sources of information, including expert judgment and matters of opinion.	The document contains references to source data.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	Yes.

Table 2.2 (continued) Quality Assurance Checklist

Topic	Present?
<b>Consultation</b>	
<p>The SEA is consulted on as an integral part of the plan-making process.</p> <p>Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.</p>	<p>It will be consulted on alongside the employment allocations document.</p> <p>The consultation will be undertaken by the Council in accordance with regulations.</p>
<b>Decision-making and Information on the Decision</b>	
<p>The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.</p> <p>An explanation is given of how they have been taken into account.</p> <p>Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.</p>	<p>Not yet applicable.</p> <p>Not yet applicable.</p> <p>Not yet applicable.</p>
<b>Monitoring Measures</b>	
<p>Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.</p> <p>Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.</p> <p>Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)</p> <p>Proposals are made for action in response to significant adverse effects.</p>	<p>Monitoring framework is included in Appendix D.</p> <p>Not yet applicable.</p> <p>Not yet applicable.</p> <p>Not yet applicable.</p>

## 3.0 Links with other Relevant Plans and Programmes

### 3.1 Introduction

The purpose of reviewing plans and programmes as part of the SA is to ensure that the relationship with these other documents is fully explored and to ensure that the relevant environmental protection and sustainability objectives are taken on board throughout the SA and plan-making process. Reviewing plans and programmes can also provide appropriate information on the baseline for the plan area and the key sustainability issues. Summaries of the documents are set out in Appendix C with the plans and programmes selected as relevant listed in **Table 3.1** below. The environmental protection conclusions arising from the plan review are set out within Chapter 4.

**Table 3.1 Relevant Plans and Programmes**

Plans and Programmes
International
<p>A Resource-Efficient Europe – Flagship Initiative Under the Europe 2020 Strategy Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (COM 2011/21).</p> <p>Council of Europe (1981) Council Decision 82/72/EEC of 3 December 1981 concerning the conclusion of the Convention on the conservation of European wildlife and natural habitats.</p> <p>Council of Europe (19) Convention on the Protection of the Architectural Heritage of Europe.</p> <p>Council of Europe (2003) European Soils Charter.</p> <p>Council of Europe (2006) European Landscape Convention.</p> <p>EC (2002) The Sixth Community Environment Action Programme Decision No 1600/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Community Environment Action Programme.</p> <p>EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013.</p> <p>EEC (1980) The Groundwater Directive Council Directive 80/68/EEC of 17 December 1979 on the protection of groundwater against pollution caused by certain dangerous substances.</p> <p>EU (1991) Urban Waste Water Treatment Directive.</p> <p>EU (1992) Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC, Habitats Directive).</p> <p>EU (1992) European Convention on the Protection of the Archaeological Heritage.</p> <p>EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).</p> <p>EU (1998) Biodiversity Strategy.</p> <p>EU (1999) European Spatial Development Perspective.</p> <p>EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).</p> <p>EU (2001) Directive on the assessment of the effects of certain plans and programmes on the environment (2001/42/EC).</p> <p>EU (2002) The Environment Noise Directive (Directive 2002/49/EC).</p>

**Table 3.1 (continued) Relevant Plans and Programmes**

<b>Plans and Programmes</b>
<b>International (continued)</b>
<p>EU (2005) Thematic Strategy on Air Quality.</p> <p>EU (2006) Directive on Waste (2006/12/EC, Waste Framework Directive).</p> <p>EU (2006) European Thematic Strategy on Soil Protection.</p> <p>EU (2007) The Floods Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks.</p> <p>EU (2008) Ambient Air Quality and Cleaner Air for Europe Directive (2008/50/EC).</p> <p>EU (2009) Birds Directive (2009/147/EC).</p> <p>EU (2009) Renewable Energy Directive (2009/28/EC).</p> <p>EU (2012) European Biodiversity Strategy to 2020 (2011/2307 (INI)).</p> <p>European Commission (1999) Landfill of Waste Directive (99/31/EC) (The Landfill Directive).</p> <p>European Commission (2005) Second Climate Change Programme ECCPii.</p> <p>European Employment Strategy.</p> <p>European Union (2006) Sustainable Development Strategy.</p> <p>The Cancun Agreement (2011).</p> <p>The Integrated Pollution Prevention and Control Directive 2008/1/EC.</p> <p>The Pan-European Biological and Landscape Diversity Strategy (1995).</p> <p>The Wild Birds Directive. Council Directive of 2 April 1979 on the conservation of wild birds (79/409/EEC).</p> <p>UN Millennium Declaration (2000).</p> <p>UN Millennium Development Goals (2002).</p> <p>UNDGAACS (2002) Report of the World Summit on Sustainable Development.</p> <p>UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.</p> <p>UNFCCC (2009) Copenhagen Accord (Climate Change).</p> <p>United Nations Economic Commission for Europe (1998) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (The Aarhus Convention).</p> <p>WHO (2004) Children's Environment and Health Action Plan for Europe (CEHAPE).</p>
<b>National</b>
<p>CLG (2006) The Planning Response to Climate Change.</p> <p>CLG (2008) Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing.</p> <p>CLG (2011) The Community Infrastructure Levy (Amendment Regulations 2011).</p> <p>CLG (2011) The Localism Act.</p> <p>CLG (2012) National Planning Policy Framework.</p>

**Table 3.1 (continued)      Relevant Plans and Programmes**

<b>Plans and Programmes</b>
<b>National (continued)</b>
DECC (2009) UK Renewable Energy Strategy 2009.
Defra (2002) Working with the Grain of Nature: A Biodiversity Strategy for England.
Defra (2004) Rural Strategy.
Defra (2005) Making Space for Water: Taking forward a new Government strategy for flood and coastal erosion risk management in England (first Government response to 2004 consultation).
Defra (2005) UK Sustainable Development Strategy.
Defra (2007) Conserving Biodiversity: The UK Approach (The UK Biodiversity Action Plan).
Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty.
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2).
Defra (2007) Waste Strategy for England 2007.
Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem.
Defra (2008) Future Water, the Government's Water Strategy for England (Feb 08).
Defra (2009) Safeguarding our Soils: A Strategy for England.
Defra (2009) The Groundwater (England and Wales) Regulations 2009.
Defra (2010) Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network.
Defra (2011) Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services.
Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature.
Defra (2012) National Policy Statement for Waste Water
Environment Agency (2008) Water Resources in England & Wales - Current State & Future Pressures.
Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.
Environment Agency (2011) National Flood and Coastal Erosion Risk Management Strategy for England
HM Government (1949) National Parks and Access to the Countryside Act 1949.
HM Government (1979) Ancient Monuments and Archaeological Areas Act.
HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act.
HM Government (1991) Water Resources Act.
HM Government (1994) UK Biodiversity Action Plan (BAP).
HM Government (2000) Countryside and Rights of Way Act 2000.
HM Government (2006) Climate Change and Sustainable Energy Act 2006
HM Government (2006) Natural Environment and Rural Communities Act 2006.
HM Govt (2008) UK Climate Change Act 2008.
HM Government (2008) Climate Change Act 2009.
HM Government (2010) Conservation of Habitats & Species Regulations 2010 (as amended 2011).

**Table 3.1 (continued) Relevant Plans and Programmes**

<b>Plans and Programmes</b>
<b>National (continued)</b>
<p>HM Government (2010) Environmental Permitting (England and Wales) Regulations 2010 SI 675</p> <p>HM Government (2010) Flood and Water Management Act 2010.</p> <p>HM Government (2010) Local growth: realising every place's potential.</p> <p>HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England (2010)</p> <p>HM Government (2011) The natural choice: securing the value of nature (White Paper).</p> <p>HM Government Carbon Plan: Delivering our low carbon future (2011).</p>
<b>Regional</b>
<p>4NW (2003) Sustainable Communities in the North West; Building for the Future.</p> <p>4NW (2010) Future North west: Our Shared Priorities.</p> <p>4NW (2010) The Updated Regional Waste Strategy for North West England.</p> <p>Climate Change North West (undated) Rising to the Challenge A North West Climate Change Action Plan for England's North West 2010-2012.</p> <p>Cumbria County Council (2011) 3rd Cumbria Local Transport Plan (2011-2026).</p> <p>Cumbria County Council (2006) Cumbria Sustainability Strategy.</p> <p>Cumbria County Council (2011) Landscape Character Guidance and Toolkit.</p> <p>Cumbria Vision (2009) Cumbria Economic Strategy.</p> <p>Cumbria Wildlife Trust (2011) Cumbria Biodiversity Action Plan.</p> <p>Environment Agency (July 2009) Water for People and the Environment: Water Resources Strategy Regional Action Plan for the North West.</p> <p>Environment Agency (various) Catchment Abstraction Management Strategies.</p> <p>Environment Agency (various) Catchment Flood Management Plans.</p> <p>Environment Agency (various) River Basin Management Plans.</p> <p>Government Office for the North West (2004), Action for Sustainability – Regional Sustainable Development Framework.</p> <p>GONW (2006) The North West Sustainable Energy Strategy.</p> <p>North West Development Agency (2006), North West Sustainable Energy Strategy.</p> <p>NWRA (2004) Regional Waste Strategy for the North West.</p> <p>The Cumbria Biodiversity Evidence Base for Cumbria's Planning Authorities.</p>
<b>Local</b>
<p>Alston Moor Partnership.</p> <p>Eden and Esk Catchment Abstraction Management Strategy (2006).</p> <p>Eden Area Plan.</p> <p>Eden Catchment Flood Management Plan (Summary Report) (2009).</p> <p>Eden Cultural Strategy.</p>

**Table 3.1 (continued)      Relevant Plans and Programmes**

Plans and Programmes
Local (continued)
Eden District Retail Study.
Eden Economic Plan.
Eden Open Space and Recreation.
Eden Sustainable Community Strategy.
Employment Land Study.
Kirkby Stephen Landscape and Visual Impact Appraisal (LVIA).
Lake District LDF.
Lake District National Park Management Plan.
Landscape Character Guidance and Toolkit.
North Pennines AONB Management Plan (2004).
North Pennines AONB Planning and Design Guide (2011).
Penrith Landscape and Visual Impact Assessment (LVIA).
Penrith Strategic Master plan.
Strategic Flood Risk Assessment (SFRA).
The Cumbria Biodiversity Evidence Base for Cumbria's Planning Authorities.
Upper Eden Neighbourhood Plan.
Tyne Abstraction Strategy.

## 4.0 Key Sustainability Issues for Eden

### 4.1 Introduction

The following sections set out a summary of the baseline environmental, social and economic conditions in Eden informed by a review of environmental information and supported by the findings of the plan review which is presented within Chapter 3. The SEA Directive also requires that the evolution of the baseline conditions of the plan area (that would take place without the plan or programme) are identified. This is useful in informing assessments of significance, particularly with regard to the effect that conditions may already be improving or worsening and the rate of such change. The information has been arranged in topic headings that will also be used for the SA objectives, but starts by giving a general introduction to Eden as a whole. Some information crosses into more than one topic. Where this is the case, the information has been put in the section considered to be of most relevance.

### 4.2 Quality of Life in Eden District

Eden District is located within Cumbria and borders Northumberland, Yorkshire and North Yorkshire.

Between 2008 and 2010 life expectancy for females in Eden district at birth was 83.9 years, marginally higher than the value for the North West (81.1) and England as a whole (82.6). For the same period, the life expectancy for males at birth was 80.1 years which was also higher than the North West (77.0) and higher than England (78.6).<sup>7</sup>

Eden does not suffer from high levels of deprivation. From the Index of Multiple Deprivation its apparent Eden is the 211<sup>th</sup> most deprived district nationally (out of 326 where 1 is the most deprived). It is important to recognise that there are some pockets of rural deprivation within Eden which are often overlooked.

#### 4.2.1 Economy and Regeneration

61.7% of Eden's population are of working age. This is slightly lower than the North West or UK averages (64.5% and 64.7% respectively) as a result of the high level of retirees moving to Eden.

The median average annual household income in Eden is £26 265, £741 above the county average<sup>8</sup>. Eden is a relatively affluent district yet 15.3% of households still have an annual income of less than £10 000. In addition, average gross weekly pay in Eden for full time workers is £36 below the North West average<sup>9</sup> and £73.70 below the national average. There is a wide gap between male and female salaries with the average full time gross weekly salary for males in Eden at £492.4 but only £296.2 for females. This difference is far more marked in Eden than the North West region or nationally where the figures are higher for both men and women, but closer together.

<sup>7</sup> Department of Health & NHS (2012); Eden Health Profile 2012; [www.healthprofiles.info](http://www.healthprofiles.info).

<sup>8</sup> Cumbria Intelligence Observatory (2012) [Accessed March 2013];

<sup>9</sup> Nomis Official Labour Market Statistics (2012); Earnings by workplace 2012.

In terms of employment, Carlisle is a major competitor to Eden's main settlement of Penrith. Here, the working age population is slightly higher at 64.2% which is much closer to the regional and national averages. The average gross weekly pay is higher in Carlisle than in Eden (although only by £6). Average full time gross weekly salary for males is similar between the two authorities (£491.9 in Carlisle and £492.4 in Eden) but salaries for women are much higher in Carlisle: £390.3 but £296.2.

There are just over 27 600<sup>10</sup> people employed within the Eden. Tourism plays a key role in Eden's economy with tourism-related employee jobs and is the most significant area of growth for the District accounting for 19.7% of total Eden employee jobs. During 2011, Eden attracted 4.3 million visitors which accounted for £225.5 million being spent by these visitors which in turn accounted for 3 589 full time equivalent jobs.<sup>11</sup> Within the district the largest areas of employment are distribution, hotels and restaurants (33.2%), public admin, education and health (15.3%), manufacturing (9.4%) and construction (8.1%). Jobs in the financial sector are fewer in Eden, representing only 9.3% of employee jobs in contrast to about 22% nationally. Self-employment accounts for almost 21.5% of the working population, higher than both the North West figure of 8.4% and the national figure of 9.6% (Nomis 2012<sup>12</sup>). The ratio of total jobs to population 16-64 for Eden is 0.95 which is above both the regional and national average.

The profile for Carlisle is markedly different. Tourism makes up a much lower proportion of employment; only 7.7% compared to almost 20. The two largest employment sectors are the same although employment is distributed differently between them. In Carlisle Public admin, education & health accounts for 27.3% of employment and Distribution, hotels and restaurants 26.9%. Finance, IT, other business activities account for 13.1% of jobs and manufacturing for 12.4%.

The unemployment rate in Eden has risen from 1.6% in 2006 to 3.5% in 2012, but it still remain considerably lower than the average in Carlisle (5.7%), the North West (8.8%) and the national level of 7.9% (2012)<sup>13</sup>. Although the area has high levels of employment, this masks a dependency on low paid work and part time work with many people having more than one job.

The number of businesses in Eden has increased slightly between 1994 and 2007. In 1994 there were 3 160 businesses. In 2007 there were 3 370: an increase of almost 6.5%. This is much lower than the regional and average net business growth rates which were 21.14% and 25.89% respectively. Growth rates in Carlisle were much closer to the regional average at 17.6%. This is due in part to falling numbers of de-registrations in Carlisle as well as regionally and nationally whilst levels in Eden fluctuated but increased in 2007.

The District has a higher proportion of small businesses employing less than 10 people than nationally with a correspondingly lower proportion of larger businesses. Business survival rates are higher than nationally but

<sup>10</sup> Nomis Official Labour Market Statistics (Oct 2011-Sep 2012); Employment and Unemployment [Accessed March 2013].

<sup>11</sup> Eden District Council (Jan 2013); „Eden Tourism“ accessed at <http://www.eden.gov.uk/business-and-the-economy/tourism-in-eden/>.

<sup>12</sup> Nomis Official Labour Market Statistics (Oct 2011-Sep 2012); Economically active – In employment – Self-employed Eden.

<sup>13</sup> Nomis Official Labour Market Statistics (Oct 2011-Sep 2012); Economically active – Unemployed (Model Based) Eden.

formation rates are lower.<sup>14</sup> As of 2012 there was a total of 42.25 ha of employment land within Eden District. The Core Strategy requirement is for 50 ha available employment land identified up to 2025.

Qualification levels in Eden are relatively high; 88.7% residents aged 16-64 have some form of qualification NVQ1 and above which is higher than Carlisle (81.2%), the North West (83.1%) and GB (84%). The percentage of people in Eden with an NVQ4 qualification and above is 45.4% which again is substantially higher than Carlisle (26.3%), the North West (30.3%) or Great Britain (34.4%).<sup>15</sup>

## 4.2.2 Housing

Low levels of crime and a rich natural beauty make Eden a very desirable place to live. The average dwelling price in Eden is £198 340; this is much higher than the figure for Cumbria as a whole of £143 863 (Cumbria County Council, CACI data 2011).

A large number of residents in Eden are in housing need and therefore unable to rent or buy on the open market. Housing needs surveys indicate that there is a need for 118 affordable homes in Penrith alone, with 70% of these requiring social rented housing and 30% intermediate housing (shared ownership, shared equity).<sup>16</sup> The estimated need amounts to the equivalent of 227 new dwellings per year, and as of 2013 there were 1 012 people on the waiting list for affordable housing in Eden. This is becoming an increasingly problematic trend for the district with house prices 8.57 times the lower quartile income (2011). This is still the case even though 48.1% of new homes approved by the Council from 2003 to 2011 were affordable. The lack of affordable housing has been a key factor in young people migrating out of the district in search of more affordable housing together with education and employment opportunities. There are currently 1 350 houses in Eden being used as second homes which equates for 5.3% of the total stock; this not only impacts upon availability to obtain and afford housing but also has cascading effects upon the local economy through inconsistent spending patterns.

Eden has a high proportion of households owned outright with 46.3% in comparison to the average for North West (31.0%) and England (30.6%). However, the private and social rented sector accounts for 33.67% of the resident population.

There are high levels of substandard housing in the district with 27% of private sector housing stock in Eden classified as dangerous (having category one hazards) but one criteria for this is having no access to gas. Much of the district has no suitable supply infrastructure for mains gas distribution. This also contributes to the district having the highest level of fuel poverty in the county, at over double the national rate. 38.3% of households in Eden experience fuel poverty compared to the county average of 28.1% and the national average of 18.4%. The high level of fuel poverty results from the large number of old and poorly insulated properties in the district, many which are off mains gas and the high proportion of retired residents on comparably low incomes.<sup>17</sup>

<sup>14</sup> Eden LDF: Annual Monitoring Report 2010/11.

<sup>15</sup> Nomis Official Labour Market Statistics (Jan 2012-SeDec 2012); Qualifications Eden.

<sup>16</sup> Eden District Council (2012); Annual Monitoring Report 2010-11.

<sup>17</sup> Cumbria PCT (2012); Cumbria Joint Strategic Needs Assessment, Eden District Statistical Summary March 2012.

According to Eden District Council, there is currently 5.49 years of land supply<sup>18</sup> which are ready to develop housing sites. This is despite the council not meeting housing targets.

### 4.2.3 Population, Human Health and Other Social Issues

The population of 52 600 is scattered in small villages through a wide rural area. Penrith, Kirkby Stephen, Alston and Appleby are the four main towns with Penrith the largest having a population of 14 873 (mid 2011 estimate). There are now 24.6 people per square kilometre in Eden, 1.3 more people than in 2001. Eden is the least densely populated local authority in England and Wales. On average there are 15 times more people per square kilometre in England and Wales than in Eden.<sup>19</sup> Eden's population is increasing faster than any other district in Cumbria, having grown by 5.7% since 2001. The district's population is also ageing with 22% aged over 65 years.<sup>20</sup> Eden has a modest proportion of children (16.4%). 3% of Eden's population are from minority ethnic groups similar to the county average. The health of people in Eden is generally better than the England average.<sup>21</sup> Average life expectancy for both men and women is higher than the national average. People living in Eden have an average life expectancy 82.8 years<sup>22</sup>.

Eden has an older population profile than England and Wales and the population is „ageing“ at a faster rate than at both a county and national level<sup>23</sup> with the population of Eden's working age low at 62.7%. It is forecasted that there will be an additional 2 500 people in the district in 2025 and an increase of 4 200 people over the age of 65. Factors contributing to outward migration will contribute to a predicted loss of 1 700 people under the age of 65 by 2025.

The District's past and expected future growth has been greatly driven by in- migration due to the attractive lifestyle and environment of the District and also the influx of migrant workers. Factors such as the low levels of crime and the rich natural beauty make the district a very desirable place to live. The mean house price in the district is £220 400, significantly above the Cumbria average of £167 455.

Eden is characterised by small scattered settlements and effective transport links are vital to the local economy, residents and visitors. However, the small size of many of the settlements means they are unable to support a viable public transport system. Bus services are fairly infrequent apart from in the main centres of Penrith, Appleby, Kirkby Stephen and Alston. This creates a reliance on access to at least one private car, and increasingly often two, in order to access jobs, shops and services. Car ownership rates of 41.9% of households owning a car or van are consistent with the average for England of 42.2%.<sup>24</sup> This is also consistent with the proportion of people using a car or van as the method to travel to work (43% in 2011).<sup>25</sup> At the time of the last census in 2011, 13.9% of

<sup>18</sup> Eden Annual Monitoring Report: 5 Year Land Supply Data (2013).

<sup>19</sup> Cumbria Intelligence Observatory; Briefing – Population and Census Day 2011: Eden District.

<sup>20</sup> Office for National Statistics; Age Structure 2011.

<sup>21</sup> Health Profile 2012: Eden.

<sup>22</sup> Public Health Observatories; Eden District Life Expectancy 2012.

<sup>23</sup> Cumbria Intelligence Observatory; Briefing – Population at Census Day 2011: Eden District.

<sup>24</sup> Office for National Statistics; Neighbourhood Statistics: 2011 Car or Van Availability 2011.

<sup>25</sup> Office for National Statistics; Eden District Method of Travel to Work 2011.

households in the District did not have a car or van. This compares with the North West average of 27.9% and the national average of 25.8%. Those who do not own a car become increasingly isolated and disadvantaged and even people who own a car can find running costs difficult in a low wage economy and increasing fuel costs. This is a particular issue for 17.3% of Eden's rural population that are not located within 2 km of a primary school. Furthermore, 68.9% of Eden's rural residents live within 4 km of a GP which is lower than the regional proportion of 83%. However, access to key services is improving with the percentage of new houses accessible within 30 minutes by public transport for Hospitals is 62%, Primary school 86%, Secondary school 78%, retail centre 74% and employment 74%.

Eden is a safe place to live, with crime falling by 6.8% in the past year. The district has the lowest levels of crime in Cumbria and is the 3rd least deprived district in England in terms of crime. Despite low levels of crime Eden has the highest rate of drug crime in the county (a result of holding the Kendal Calling festival) and of burglaries at non dwellings. Levels of domestic violence are also rising. Crime is most likely to be committed by men aged 18-30 years.<sup>26</sup>

In terms of measuring participation in the local demographic process 43.26% took part in the 2011 Parish Election which is lower than the General Election from the previous year (2010) for Penrith and the border when 69.92% was calculated as the voting turnout.

#### 4.2.4 Environmental Issues

Eden District has the largest geographical area of all Cumbrian authorities. At 215 646 ha and with a population increase of 5.7% since 2001 of 52 600 (2011) it is the second largest and most sparsely populated District within England, with only 0.2 people per hectare compared with a national average of 4.1 persons per hectare<sup>27</sup> scattered in small villages through a wide rural area. Penrith, Kirkby Stephen, Alston and Appleby are the four main towns.

Approximately one-fifth of the District lies within the Lake District National Park and one quarter within the North Pennines Area of Outstanding Natural Beauty (AONB). It has an exceptionally high quality of environment, in terms of both its natural and built environments.

There are ninety one Sites of Special Scientific Interest (SSSIs) designated and accorded protection due to the national significance of their flora, fauna or particular geological value, and nine Special Areas of Conservation/ Special Protection Areas (which are designated under the 92/43/EEC, Habitats Directive). The percentage of SSSIs that meet Natural England's target condition of 95% rose from 96.57% for 2009/10 to 97.2% at the end of 2011. These conditions have further increased to 97.2% in 2013 which is higher than the average for Cumbria of 94.89%.<sup>28</sup> The district also has many sites of regional and local importance. The area encompasses a number of „priority“ habitats, comprising wetlands, woodland and field boundaries, that are currently seen as under threat. Some 24.5% of Eden is encompasses priority habitats.

<sup>26</sup> Cumbria PCT (2012); Cumbria Joint Strategic Needs Assessment, Eden District Statistical Summary March 2012.

<sup>27</sup> Office for National Statistics; Neighbourhood Statistics: 2011 Density (number of persons per hectare) 2011.

<sup>28</sup> Natural England (2013).

The SFRA (2007) tested all of the Key and Local Service Centres and determined that a considerable amount of them are liable to flooding. As of 2012 there were 1 593 properties at risk from flooding.

Eden has a fine historic environment with 1612 Listed Buildings (39 Grade I, 118 Grade II\*, 1455 Grade II) and 24 designated Conservation Areas. In addition, several historic parks and gardens have been identified as of particular value while there are also 218 Scheduled Ancient Monuments and sites of recognised archaeological value.<sup>29</sup>

Eden District Council set a target for the percentage of new housing built on previously developed land (PDL) in 2012 to be 50%. This was surpassed with 56% of new housing being constructed on PDL.

#### 4.2.5 Key Sustainability Issues

Part of understanding how policies can enhance towns and villages is reliant upon understanding what the key issues are in Eden. The below list of sustainability issues has been created based on what we consider are the pressing issues facing Eden and its residents, each of which has been related to the sustainability framework:

- Continued outward migration of working age population and a growing retired population is decreasing the level of skilled workforce (Objectives SP4, SP6, EC1, EC2, EC3);
- Lack of suitable employment opportunities to support a balanced economic growth (Objectives EC1, EC2, EC3);
- There is a wide gap between male and female salaries (Objective EC1, EC2, EC3);
- Although unemployment is lower than the regional and national average, it more than doubled in the period 2006-2012 and there is a dependency on low paid work and part time work with many people having more than one job (Objective EC1);
- Anticipated effects of climate change and the impact on flooding and resilience of species and their habitats (Objectives EN1, NR1, NR4);
- Poor access for many settlements to key services and facilities (Objectives SP2, SP6);
- Decline in rural services and distance to services from residents within a rural setting (Objectives SP2, SP5, SP6);
- Lack of reliable public transport increases reliance on private car use in smaller settlements around the district setting (Objectives SP2, SP6, NR1);
- A considerable number of Key and Local Service Centres are liable to flooding (Objective NR1);
- Participation in the local demographic process is low (Objective SP1).

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<sup>29</sup> Eden District Council (2012); Annual Monitoring Report 2010-11.

## **5.0 Development of the SA Objectives**

This section sets out the proposed SA objectives, appraisal questions and the relevant indicators.

### **5.1 SA Objectives and Appraisal Criteria**

The SA objectives and appraisal criteria are components of a framework that will be used consistently to appraise the policies arising from the review.

Eden District Council has already produced a Sustainability Appraisal for its Core Strategy and Housing Allocations Documents. Eventually it is intended that the Housing and Employment Land documents should be merged to produce a comprehensive Site Allocations Document which will form part of the Local Plan. The Employment Land SA is therefore designed to closely follow the approach of the Housing Allocations SA to minimise inconsistencies at a later date.

The list of SA objectives can be seen in Table 5.1. In most cases the objectives are supported by appraisal questions. These help to clarify the SA objectives, and ensure that everything from the regional objectives is captured where multiple objectives have been merged. The questions will be used during the assessment process, to help clarify to the assessors what they should be considering. This section is heavily based on the existing SA and all of the objectives and guide questions have been retained. However there are some indices which have been altered because the GIS data was not sufficiently robust to provide any meaningful distinction between sites due to the different needs for employment sites compared to those for housing. In addition, some new indicators have been added particularly related to employment land provision to provide a little more detail about the effects the delivery of these sites might have on economic aspects.

Table 5.1 Sustainability Appraisal Objectives

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective	Indicator
SP1	To increase the level of participation in democratic processes	<p>Does the plan encourage and empower local people to become involved?</p> <p>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?</p> <p>Does the plan identify and set out how hard to reach groups will be involved?</p> <p>Do plan policies respect the needs of all communities and future generations?</p>	No indicators are proposed for this document since the content of the document will not affect the level of participation in democratic processes. The process of document production, including consultation will engage people and encourage participation but the SA assesses the content of the document rather than the manner in which the plan is developed.
SP2	To improve access to services, facilities, the countryside and open spaces	<p>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)?</p> <p>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?</p> <p>Does the plan promote and facilitate access to, and opportunities to enjoy, the countryside and green space?</p> <p>Does the plan take account of climate change on transport infrastructure?</p>	<p>Access to public transport</p> <p>Distance to the main road network (M-ways and A roads)</p> <p>Public rights of way</p>
SP3	To provide everyone with a decent home	<p>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?</p> <p>Do policies address fuel poverty and promote sustainable construction and low carbon design?</p>	No indicators are proposed for this document since the document will not affect housing
SP4	To improve the level of skills, education and training	<p>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?</p> <p>Does the plan recognise the need for people to adapt to economic change and retrain where necessary?</p> <p>Does the plan enable people to live sustainable, low carbon lifestyles?</p>	<p>% population with NVQ4 and above</p> <p>% population with no qualifications</p> <p>% population with apprenticeships</p> <p>Access to colleges and adult education centres</p>
SP5	To improve the health and sense of well-being of people	<p>Do plan policies ensure all members of society have access to the health care that they require?</p> <p>Do they reduce health inequalities within society associated with income, lifestyle and diet?</p> <p>Does the plan improve road safety and advocate sustainable modes of transport?</p> <p>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?</p> <p>Does the plan anticipate and plan for the potential impacts of climate change on health?</p>	<p>% population in good or very good health</p> <p>Number of residents with limited ability to do day-to-day activity</p> <p>Distance to children's play areas/ accessible green spaces</p> <p>Neighbouring uses which may affect human health (Light, noise, visual etc pollution)</p>

Table 5.1 (continued) Sustainability Appraisal Objectives

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective	Indicator
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	<p>Does the plan promote a sense of community identity?</p> <p>Does it encourage social cohesion and help continue valued local traditions?</p> <p>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?</p> <p>Do policies stem outward migration from rural communities?</p> <p>Do policies allow for inward migration of persons outside the locality?</p>	Location in relation to existing settlement
<b>Effective Protection of the Environment</b>			
EN1	To protect and enhance biodiversity	<p>Does the plan protect and conserve habitats and species especially where these may be rare, declining, threatened or indigenous?</p> <p>Will the plan ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource?</p> <p>Do policies minimise adverse impacts on species and habitats through human activities and development?</p> <p>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?</p> <p>Are the impacts of climate change on biodiversity taken into account?</p>	Potential effects on local biodiversity Effect on trees and hedges
EN2	To preserve, enhance and manage landscape quality and character for future generations	<p>Are local landscape quality, distinctiveness and character protected from unsympathetic development and changes in land management?</p> <p>Is the remoteness and tranquillity of landscapes maintained?</p> <p>Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected?</p> <p>Are areas of high archaeological and historic landscape sensitivity protected?</p> <p>Do policies encourage low input organic farming with environmental stewardship styles of land management?</p> <p>Do they sustain and extend tree cover, hedgerows, woodlands and sustainable forestry?</p>	Effect on landscape character (includes AONBs/National Parks) Effect on designated landscapes

Table 5.1 (continued) Sustainability Appraisal Objectives

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective	Indicator
<b>Effective Protection of the Environment (continued)</b>			
EN3	To improve the quality of the built environment	<p>Does the plan conserve features of historic and archaeological importance?</p> <p>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?</p> <p>Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation?</p> <p>Will policies guide inappropriate development away from flood risk areas?</p> <p>Do policies ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated?</p> <p>Will the plan reduce noise levels, light pollution, fly tipping, the spread of litter and graffiti?</p>	<p>Impact on historic features of interest (Conservation area, Listed building, SAM, AAI)</p> <p>Impact on local character, sense of place etc</p> <p>% of identified site which is at risk of flooding zone 3</p>
<b>Sustainable Use and Management of Natural Resources</b>			
NR1	To improve local air quality and respond to the effects of climate	<p>Will the plan ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary?</p> <p>Will policies limit or reduce the emission of greenhouse gases and other air pollutants?</p> <p>Will the use of clean, low carbon energy efficient technologies be encouraged?</p> <p>Will policies maximise the use of energy from appropriate renewable resources including biofuels?</p> <p>Will they reduce the need to travel especially by car, and switch goods from roads onto the rail network?</p> <p>Will the plan introduce strategies to adapt to and mitigate other climate change impacts?</p>	<p>Effects upon air quality (proximity to areas with known issues)</p> <p>Potential for the installation of decentralised renewable technologies (orientation, site size, topography/natural assets)</p>
NR2	To improve water quality and water resources	<p>Will the plan maintain and, where possible, improve the quality and quantity of all water resources, including marine and coastal waters?</p> <p>Will policies ensure sustainable drainage systems are widely used?</p> <p>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?</p>	<p>Water Quality in Rivers</p> <p>Water resource availability</p>
NR3	To restore and protect land and soil	<p>Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site?</p> <p>Will it minimise the loss of greenfield sites or areas of open space?</p> <p>Will policies prevent soil degradation, pollution of soil and the use of peat?</p> <p>Does the plan consider the impacts of climate change on agriculture and forestry?</p>	<p>Site based contaminants</p> <p>Agricultural Land Classification</p>

Table 5.1 (continued) Sustainability Appraisal Objectives

Ref	Sustainability Objectives	Sustainability Framework: Guidance on Making Progress Towards Each Objective	Indicator
<b>Sustainable Use and Management of Natural Resources (continued)</b>			
NR4	To manage natural resources sustainably and minimise waste	<p>Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material?</p> <p>Will the plan seek to mitigate negative effects upon air quality and water use through extraction?</p> <p>Will the plan minimise the amounts of industrial, commercial and household waste generated and increase re-use, recovery and recycling?</p> <p>Will it promote the use of energy recovered from waste?</p>	Site condition (Brownfield or Greenfield)
<b>Building a Sustainable Economy in Which All Can Prosper</b>			
EC1	To retain existing jobs and create new employment opportunities	<p>Will the plan increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise?</p> <p>Will the plan support local companies and help local businesses develop export markets?</p> <p>Will the plan help retain a skilled workforce, graduates and companies in Cumbria that are able to prosper in a low carbon economy?</p>	<p>Annual tourist days spent in Eden</p> <p>% tourism jobs</p> <p>Measure average salary</p>
EC2	To improve access to jobs	<p>Will plan policies increase access for all to a range of jobs through improved training, sustainable transport and communication links?</p> <p>Will the plan lead to the location of new employment opportunities in areas of greatest need?</p>	<p>Distance to employment centres</p> <p>Regeneration benefits</p>
EC3	To diversify and strengthen the local economy	<p>Will the plan help create the right conditions and infrastructure provision to encourage private sector investment?</p> <p>Will it encourage indigenous growth?</p> <p>Will it stimulate the use of local companies, local products and services and provide other forms of community benefit?</p> <p>Will it help increase the environmental performance of local companies and their products/services?</p> <p>Are innovation, entrepreneurship and diversification encouraged, particularly in rural areas?</p> <p>Does the plan provide financial assistance?</p> <p>Will it help improve the competitiveness and productivity of the local economy?</p> <p>Do policies support research and development into environmental and other new key sector technologies including opportunities to recycle and re-use waste products?</p> <p>Does the plan factor in likely impacts of climate change on the economy, particularly on tourism?</p> <p>Does the plan ensure that tourism consistently contributes to the economy?</p>	<p>Number of businesses in emerging technologies</p> <p>Increase in jobs in finance, IT, business</p> <p>Increase in jobs in public admin, education and health</p>

## 5.2 Habitat Regulations Assessment

Under Article 6 of the Habitats Directive (92/43/EEC) in cases in which a plan or project is likely to have a significant impact on a protected site, the Directive states that there must be an “appropriate assessment” of the implications for the site in view of its conservation objectives. Under the terms of the Directive consent can only be granted for such a project if, as a result of the appropriate assessment either a) it is concluded that the integrity of the site will not be adversely affected, or b) where an adverse effect is anticipated there is shown to be an absence of alternative solutions and imperative reasons of overriding public interest man that the project should go ahead.

A Habitats Regulation Screening Assessment has been undertaken for the consultation document and is reported separately. The HRA concludes that significant effects could occur as a result of the development of two sites: MPC and MPB. There will therefore need to be a Habitats Regulation Assessment undertaken of the potential site allocations prior to any allocations being confirmed and the draft plan being taken forward.

The assessment concluded that the policies and the rest of the allocations will not, as far as can be reasonably determined, have any significant effects on any European site due to:

- The European site or interest features not being **sensitive** to the likely outcomes of the proposal; and/or
- The site or interest features not being **exposed** to the likely outcomes of the proposal due to the absence of reasonable impact pathways or the likely scale/location of the development.

## 5.3 Developing Indicators for Monitoring

It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the plan, programme or strategy will be monitored. However, as ODPM Guidance on Sustainability Appraisal of RSS and LDDs notes *„it is not necessary to monitor everything, or monitor an effect indefinitely. Instead monitoring needs to be focused on significant sustainability effects“*.

The Scoping Report identified a number of possible indicators that could be used for monitoring the sustainability impacts on Eden District Council’s LDF (i.e. not just this document). The list has been reviewed for its relevance to this document and a reduced set of indicators produced at Appendix D.

## 5.4 Rural Proofing

Rural proofing is a process which seeks to ensure that the needs and interests of rural people, communities and businesses are properly considered in the development and implementation of all policies and programmes. It requires policy makers to:

- Consider whether the policies they are developing will have any impacts on rural areas;
- Assess the significance of those impacts; and

- Where appropriate, adjust the policy to ensure that the needs of those who live in rural areas are addressed fairly.

The Sustainability Appraisal of the overall document considers the effects arising from the plan on both rural and urban areas, thus discharging the duty to rural proof.

## 6.0 The SA Framework

### 6.1 Assessing Sustainability Performance

**Table 6.1 and Table 6.2** illustrate a draft of the SA matrix developed to comprehensively meet the requirements of the SA Guidance (including the requirements of the SEA Directive). The first assesses site specific issues and the second considers the area wide policies. It contains the SA objectives and appraisal questions presented in Section 4. The matrix also includes the timescale of the effect and a commentary. These are briefly explained below:

- Timing of Effect – Will the effect manifest itself in the short, medium or the long term? In the context of the Eden Employment Land Allocations Document, the short term can be interpreted as being within the first five years of the Plan, the medium term within the lifetime of the Plan, and the longer term beyond this;
- Commentary – The commentary text within the matrix and summary text within the report will identify possible mitigation measures, in the form of amendments to policy or inclusion/removal of policy to increase the opportunity for sustainable development. Where a score is indicated as
- „uncertain“ the commentary should identify ways in which this uncertainty could be reduced, for example, through additional data collection or further consultation with experts;
- Secondary, cumulative and synergistic effects, as well as the temporary/permanence and likelihood of the effects are identified within the commentary:
  - Secondary or indirect effects are effects that are not a direct result of the DPD, but occur away from the original effect or as a result of a complex pathway. Examples of secondary effects are a development that changes a water table and thus affects the ecology of a nearby wetland; and construction of one project that facilitates or attracts other development;
  - Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the DPD (e.g. noise dust and visual) have a combined effect;
  - Synergistic effects interact to produce a total effect greater than the sum of individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all;
  - Temporary effects can occur for example during construction of a development. Whilst these are generally short lived, they may occur over several years with larger development schemes;
- Geographical effects will be noted where the effect is felt differentially, for example within Penrith, within the smaller towns, or within the rural area.

**Table 6.1 Draft SA Matrix for Sites**

Ref	Sustainability Objectives	Indicator	Score	Determination Threshold	Site Score	Comment
SP2	To improve access to services, facilities, the countryside and open spaces	Access to public transport	++	Bus stop or rail station <400 m from site		
			+	Bus stop or rail station 800 m from site		
			N	Within 2 km of a bus or rail service		
			--	Bus stop or rail station <2 km from site		
		Distance to the main road network	++	Motorway within 1 km		
			+	A road within 1 km and Motorway within 5km		
			-	A road >5 km and motorway within 10km		
			--	M-way >10 km		

**Table 6.2 Draft SA Matrix for the Plan**

	Questions	Timescale		Impact	Scale				Commentary (including cumulative and synergistic impacts)
		Short term	Long term		Local	Trans-boundar	Rural	Urban	
Sustainable Development Objectives									
1. 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?								

Each site or policy option that comes forward is considered against each of the SA objectives. This is undertaken by the appraisal team and consideration is informed by the baseline data and evidence gathered as part of the Scoping Report (and updated baseline featured within this report).

The level of effect arising from the assessment of the policy or site against the SA Objective is denoted via a number of symbols representing a range from Major Positive Impact (Significant Positive) to Major Negative Impact (Significant Negative).

The Plan is assessed against all of the SA objectives but the individual sites are not assessed against either SP1 To increase the level of participation in democratic processes or SP3 To provide everyone with a decent home since the employment allocations do not contribute to either of these objectives.

**Table 6.3 Assessment of Significance**

Score	Description	Symbol
Major Positive Impact	The proposed policy/site contributes significantly to the achievement of the objective.	++
Minor Positive Impact	The proposed policy/site contributes to the achievements of the objective but not significantly.	+
Neutral	The proposed policy/site does not have any effect on the achievements of the objective.	N
Minor Negative Impact	The proposed policy/site detracts from the achievement of the objective but not significantly.	-
Major Negative Impact	The proposed policy/site detracts significantly from the achievement of the objective.	--
Uncertain	The proposed policy/site has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?

## 6.2 Limitations of the framework

The reliance on GIS data means that thresholds can easily be set which makes assessments quantitative and more consistent however there is a risk that some useful qualitative data may be overlooked. For example the assessment looks at the distance of sites from the trunk road network but it doesn't assess how easy a site is to access, the width of roads, likelihood of congestion, appropriateness of route e.g. through a residential area and so on. This may need to be considered in the next stage of the SA.

## **7.0 Sustainability Appraisal of the Employment: Preferred Sites and Policies Consultation Document**

### **7.1 Introduction**

The Employment: Preferred Sites and Policies consultation document has been the subject of sustainability appraisal in order to identify the key economic, environmental and social impacts that may arise following its implementation. The document consists of all of the site allocations and policy guidance. The assessment has been split into a number of stages. These are:

- The SA of the overall Employment: Preferred Sites and Policies consultation document;
- SAs of the identified potential sites;
- Cumulative assessments of the preferred sites within a particular settlement.

The remainder of this section summarises the sustainability appraisal findings.

The detailed plan appraisal matrix is included in Appendix E. Detailed assessment proformas for the sites identified in the consultation document are contained in Appendix F and those which have been rejected are included in Appendix G.

## **7.2 Sustainability Appraisal of the Employment: Preferred Sites and Policies Consultation Document**

### **7.2.1 Assessment Summary**

The Employment: Preferred Sites and Policies consultation document seeks to deliver economic development in Eden in accordance with the policies of the Core Strategy.

The Core Strategy sets out a requirement for 50 hectares of land available for employment use in the period 2006-2025 (Policy CS13). This is to be distributed in accordance with the locational policy identified in Policy CS2 Locational Strategy.

Policy CS2 set out a hierarchy of settlements focussing most development on Penrith as the Key Service Centre. It considers that Penrith can accommodate sustained development appropriate to that of a large town, and notes a number of priorities for the town which include the provision of strategic employment land with Penrith being the location for any large scale individual developments.

The Core Strategy Policy CS2 also identifies three Key Service Centres at Alston, Appleby and Kirkby Stephen which should accommodate moderate development appropriate to the scale of the town but including provision of employment and improvements to accessibility as well as housing.

These settlements have been the focus for the employment land assessment.

Local Service Centres comprising smaller villages are considered appropriate for small scale development to sustain local services, support rural businesses and meet local needs, including housing, provision of employment and improvements to accessibility whilst in Smaller Villages, Hamlets and Open Countryside, development limited to meeting an identified need (Policy CS2).

The employment land allocations consultation document is entirely in accordance with this approach.

## **7.2.2 Social Progress Which Recognises the Needs of Everyone**

When appraised against objectives and criteria concerned with social progress, the Employment: Preferred Sites and Policies consultation document is considered to have largely positive effects.

Significant beneficial effects are experienced in terms of the increase in the level of participation in democratic processes since it is hoped that the publication of the document and the SA will encourage people to contribute to the debate about their communities and to help to make the decisions which shape the places in which they live. These effects are mainly short term, although once adopted the document will influence development until 2025. It will affect rural and urban areas equally although trans-boundary effects will be relatively limited.

Significant benefits are also experienced on accessibility within the urban area since all sites are close to the M6 and are either well served by public transport or routes which could be amended to serve the new sites.

The plan does not have any significant adverse effects on social mobility or communities.

The allocation of employment land as distributed in the document also improves access to services and facilities, by focussing on sites which are accessible by consumers, employees and suppliers, both in terms of public transport and on the main trunk road and rail network. This is particularly a result of focussing developments on key service centres and market towns across the district. Additionally, focussing development on the service centres will help to create vibrant, active, inclusive and open-minded communities with a strong sense local history.

Only a few sites are currently affected by PROW and those which are could be designed to protect or divert the paths.

There are many indirect benefits of job creation. These include improved mental and physical health in communities that work compared to those that do not, plus increased job availability generally leads to increased skill and education levels for people as they seek to find work. For all of these criteria, the document delivers long terms positive benefits and these may be experienced equally in urban and rural areas.

The plan has identified preferred options and restrictions on uses proposed at sites to minimise any adverse effects on neighbouring occupiers. Further environmental protection is provided by the Core Strategy and the NPPF but will need to be reinforced in site specific policies. This is an options consultation and such a detailed policy would not be appropriate at this stage. In later iterations of this document some form of development management controls will be required to offer appropriate protection.

There is nothing explicit in the plan which would protect and or increase accessibility to accessible open space but the identified sites are not within nor would they compromise access to accessible open space thus this is considered to be neutral.

### **7.2.3 Effective Protection of the Environment**

The plan would have largely significantly positive effects on the historic features of the built environment. Most allocations have no effect on any heritage assets but two sites, High Mill Alston and Shire Hall, Appleby are located within Conservation Areas and Shire Hall is a listed building. It is considered that using these buildings is the best way to ensure their protection and maintain the fabric of the conservation area, particularly in Alton where the Conservation Area is at risk, thus having a significantly positive effect. However, re-use should be undertaken in a manner that is sensitive to their character and appearance.

The effects on biodiversity have the potential to be significantly adverse. The River Eden SAC flows through the middle of the district and a number of sites are in close proximity or are linked to the Eden or its tributaries. The two sites of primary concern are Master Plan B and Masterplan C sites which are on the banks of the River Eamont. The identified developable area has been substantially reduced to provide land for suitable mitigation measures (SUDs) to protect the river from any adverse effects resulting from a potential deterioration in water quality but significant adverse effects upon this habitat cannot be ruled out at this stage.

Overall effects on trees and are uncertain because they are sites specific. There are few trees and hedges that may be lost as a result of development but this in part depends on site layout and design. For most of these sites compensatory tree planting may be appropriate.

Similarly effects on landscape character are uncertain for the same reason. The document does not explicitly refer to landscape character but the sites allocated here are either extension to existing employment sites where further development would be expected to be based on the same design criteria as existing buildings or are reuse of existing buildings within the town centre. Thus the effects on landscape character would be minimised. Final conclusions can only be reached once the form, scale and siting of the buildings is known and therefore a plan review can never conclude more than mixed or uncertain effects.

Alston lies within the North Pennines Area of Outstanding Natural Beauty. The sites allocated here are either extensions to existing employment sites, where further development would be expected to be based on the same design criteria as existing buildings, or are reuse of existing buildings within the town centre and accord with Core Strategy policy CS18. This would reduce the effects on the AONB. Elsewhere care must be taken in the siting and design of new developments although none is anticipated to have a significant adverse effect on local character or sense of place given the size of the sites proposed.

The plan does not explicitly refer to flooding. The only site which is at significant flood risk is the extension to Gilwilly but the developable land has been reduced to avoid the areas at risk of flooding.

#### **7.2.4 Sustainable Use and Management of Natural Resources**

The plan does not offer any significant benefits in terms of the management of natural resources.

Significant adverse effects could be experienced on water quality resulting from similar issues to those identified for biodiversity above. For those sites situated away from water courses this is not an issue but there are a number of sites situated adjacent to water courses where site run off could significantly affect water quality. The River Eden SAC runs through the district and a number of sites are in close proximity to it or its tributaries and in some locations development poses a significant threat to water quality resulting from run-off. The two sites of primary concern are Master Plan B and Masterplan C sites which are on the banks of the River Eamont. Whilst the identified developable area has been substantially reduced to provide land for suitable mitigation measures significant adverse effects to water quality, and hence biodiversity (see above) cannot be ruled out on these sites.

The document does not specifically set out to seek to reduce air pollution however during the site selection process their distribution across the district, accessibility to public transport and the access to the trunk road and rail network was considered to reduce the need to travel to and between sites. Whilst this is considered to be generally beneficial, increased concentration of traffic movements into key areas, such as Appleby, Alston and South West Penrith could increase congestion and vehicle emissions locally which might result in a deterioration of certain vehicle emissions.

Effects on water capacity, contamination, and the best and most valuable agricultural land and greenfield land are largely negative, although not significant.

The capacity and availability of water is an issue in Penrith (although currently being resolved). Waste water remains an issue for Kirkby Stephen and needs to be addressed. Appleby currently has ample capacity, whilst data for Alston is incomplete but there are no identified capacity issues.

Whilst the document does not refer to contaminated land, most of the identified sites are greenfield and no contamination is assumed. The Old Creamery at Appleby and High Mill, Alston may be contaminated by their former uses and may need to be addressed prior to work commencing.

The document does not address best Most Versatile Land (BMV). Eden has a mix of grade (gr) 2 around the R Eden, gr3, gr4 around the foot of the fells and gr5 on higher land. No gr2 land is affected although some sites are within gr3 land. Further research would demonstrate whether this is gr3a land (which is BMV) and gr3b land (which isn't). This information is not available at this stage and thus the worst case scenario is assumed i.e. that all gr3 and land is BMV. The next iteration of the SA will incorporate BMV as an indicator for assessing whether development on sites would involve the loss of productive agricultural land.

The site assessment considered brownfield sites but there are a very few available. Therefore most of the sites identified are greenfield extensions to existing settlements. The NLUD returns to DCLG for 2005 (published by DCHLG in 2006) suggest 21 (presumably ha, although it doesn't say) are available for redevelopment in Eden.

The document does not address capacity for renewable technologies. Wind power might be possible on some sites, although this is largely constrained by the built environment, AONB or landscape character assessment. It is more likely to be possible on the urban fringe around Penrith. Solar power is likely to be possible on many sites, with the possible exception of High Mill Alston and Shire hall, Appleby which are in conservation areas. Overall this is considered to be uncertain.

## **7.2.5 Building a Sustainable Economy in Which All Can Prosper**

The economic benefits of the plan would be largely positive.

The effect on regeneration is significantly positive. The creation of jobs will increase wealth locally and boost the economy. Where this happens and assists a ward that is economically disadvantaged then it would have significant regeneration benefits.

There would be positive benefits on resulting from the creation of new employment opportunities, improving access to jobs, and diversifying and strengthening the local economy.

The creation of new jobs increases the likelihood of a wider range of jobs and thus the opportunity for higher paid employment. This is therefore considered to be positive.

Proposed sites have been concentrated in a number of key settlements where there would be benefits from both other new allocations and existing employment uses. Some of the identified sites would be suitable to grow the sectors that the Council wishes to support.

The document does not specifically address tourism but it is not anticipated that the sites and the nature of the development proposed would affect tourism in the district in either a positive or negative way.

## **7.2.6 Conclusion**

The site allocations consultation document would deliver significant economic benefits as well as a wide range of other non-significant economic benefits. It would also deliver some significant social effects in terms of engaging the community and encouraging participation in local decision making processes.

It would have mixed effects on the environmental protection. Effects on the historic environment are likely to be significantly positive although biodiversity effects may be significantly adverse if certain sites continue to be taken forward and without appropriate mitigation being put in place. This is particularly the case for sites close to the River Eden SAC. Most of the identified sites are greenfield which means they're unlikely to be contaminated which is positive but they do use new resources and in a number of cases would result in a loss of best and most

vulnerable agricultural land. Landscape effects are largely mixed or uncertain and can only be confirmed once the scale, height and siting of development within the sites is confirmed.

## **7.3 Development Allocations**

### **7.3.1 Penrith**

Penrith is the largest town in the district of Eden, situated in East Cumbria. The town is situated at Junction 40 of the M6, with easy access to the A66. It is also served by the West Coast Mainline.

6 sites have been identified in and around Penrith for future employment development. They range in size from 1 ha (Kemplay Bank) to 12 ha (Gilwilly Industrial Estate extension). All are greenfield sites.

Penrith is well served for educational establishments with campuses for both the university of Cumbria and Askham Bryan Agricultural College at Newton Rigg and Ullswater Community College which offers a range of adult and lifelong learning courses.

To the South of Penrith is the River Eamont which is part of the River Eden SAC and the Lake District National Park lies approximately 3 miles to the west.

### **Gilwilly Industrial Estate Extension, Penrith**

#### **Site Context**

Gilwilly Industrial Estate is located on the western side of Penrith, between the town and the M6. The southern part of the site has been developed and the area that is identified for development here is an existing industrial allocation which has already been provided with an access road to facilitate further development. This allocation represents a 2.5 ha extension for B1, B2 or B8 uses.

#### **Site Assessment against the Sustainability Objectives**

The main positive and negative impacts of each site are summarised below.

#### **Positive Impacts**

- Gilwilly is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- There are accessible green spaces in close proximity to the site; the nearest is The Thaka Beck nature reserve is immediately to the east of the proposed site. Anecdotal evidence suggests that access to such space makes the development more desirable and developments more attractive;
- The development does not affect a designated landscape;

- Current waste water capacity issues in Penrith are being addressed by infrastructure improvements during 2013. There are no known capacity issues for potable or industrial water supplies;
- There is no known contamination on this site;
- The site is adjacent to the existing employment centre at Gilwilly; therefore development at this site would be an appropriate use of the site, but also by providing further employment land adjacent to existing employment uses may foster further economic activity;
- Other benefits include: good access to the trunk road network, good low-medium qualification base, low numbers of people who claim their day-to-day activities are limited, good location in relation to existing settlement, no adverse effect on landscape character, avoidance of land at risk of flooding, potential for the installation of decentralised renewable technologies; use of brownfield land and delivery of local regeneration benefits.

### **Negative Impacts**

- Significant effect on residents of Melbourne House which would be completely surrounded by industrial development;
- The average proportion of people in Penrith West ward with level 4 qualifications is lower than the national or regional average. Whilst development could encourage enhanced educational attainment of the population as more skilled employees are required, it is more likely, particularly in the short-term that local people are less likely to avail themselves of the higher paid jobs which require higher levels of qualifications;
- The highway infrastructure in this area is poor and is at capacity. This may result in congestion and deterioration of air quality if substantial further development takes place in this area without infrastructure improvements;
- Other site specific negative effects include: the public rights of way on the site which will need to be diverted; need for protected species surveys on the site, loss of trees and hedges, loss of BMV.

## **Eden Business Park Phase 2, Penrith**

### **Site Context**

This is a 4 ha site at the southern end of a much larger allocation immediately north of the currently allocated Gilwilly site. To the west it is bounded by the M6 and to the east, the West Coast Mainline. It is currently pasture. The site is adjacent to the railway line but no assessment has been made of its suitability for rail freight. There is potential for the site to be extended northwards should additional land be required.

### **Site Assessment against the Sustainability Objectives**

The main positive and negative impacts of each site are summarised below.

## Positive Impacts

- Gilwilly is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- There are accessible green spaces in close proximity to the site; the nearest is The Thaka Beck nature reserve is immediately to the east of the proposed site. Anecdotal evidence suggests that access to such space makes the development more desirable and developments more attractive;
- There is no known contamination on this site;
- The site is adjacent to the existing employment centre at Gilwilly, therefore development at this site would be an appropriate use of the site, but also by providing further employment land adjacent to existing employment uses may foster further economic activity;
- Other benefits include: good access to the trunk road network, community with good levels of qualifications and good health, potential of the site to accommodate renewable technology, potential to deliver significant regeneration benefits in Penrith West ward, and opportunities to create jobs in the emerging technologies and finance, IT and business sectors.

## Negative Impacts

- There are no significant adverse effects anticipated from the development of this site;
- There are a number of site specific negative effects which include: the public rights of way on the site which will need to be diverted, loss of priority habitat (grazing marsh) which may require compensation planting, loss of trees and hedges, adverse effects on rural landscape character, large proportion of the site is at risk of flooding and loss of gr3 agricultural land.

It would be possible to deliver just the southern part of the site (approximately 2 ha) which would eliminate the adverse effects on public rights of way and flood risk and substantially reduce the effects on landscape character and biodiversity.

## Kemplay Bank, Penrith

### Site Context

This site is situated immediately to the south of the A66-A6 junction, to the south of Penrith. It is located immediately to the west of the new fire station. South of the site is a small wood. The A6 and A66 provide the western and northern boundaries. The site is 5.5 ha of which 1 ha is considered to be developable.

### Site Assessment against the Sustainability Objectives

The main positive and negative impacts of each site are summarised below.

## Positive Impacts

- Gilwilly is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- The site is not susceptible to flooding
- The site is not within a landscaped designation;
- There is no known contamination on this site;
- The site is adjacent to an other proposed allocation and given that it is on the edge of Penrith and therefore the close proximity of other employment sites may foster further economic activity;
- Other benefits include: good access to public transport, good access to the public highway and potential to create jobs in the emerging technologies and finance, IT and business sectors.

## Negative Impacts

- There is a relatively low proportion of the population with L4 qualification, and a higher than average percentage of people with no qualifications;
- The site is very close to the River Eamont which is a part of the River Eden SAC. Any contamination arising from the site would run across the fields into the designated site which would cause a significant adverse effect;
- Other negative effects include: a community below average levels of qualifications and above average levels of limited day-to-day activity, adverse effects on open countryside, loss of BMV, loss of greenfield land on the urban fringe.

## Master plan Option B, Redhills – Land to the South of A66 (west), Penrith

### Site Context

This site is situated to the south of the A66 on the western side of Penrith. Two possible site areas are put forward for this site. The first comprises a large area bounded by the A66, the west coast mainline to the east, Rheged to the west and the River Eamont and open fields to the south. It wraps around the existing Redhills Business Park which comprises small office units. During the SA and HRA process, concern was raised about the potential effects of development on the River Eden AC. This resulted in the redrafting of the boundary to create option 2.

Option 2 forms a much smaller 3 ha area situated on the north western corner of the original site and is bounded by the A66 to the north, Rheged to the west, Stapestones Road to the south and the existing Redhills Business Park to the east.

### Site Assessment against the Sustainability Objectives for Option 1

The main positive and negative impacts of each option are summarised below.

## Positive Impacts

- The site fronts the A66 and the centre is less than 1km from J40 of the M6 thus it has significantly beneficial transport links although the A66 is not currently optimised for the industrialisation of this area. A full transport assessment will be required to highlight any changes required infrastructure to ensure no adverse effects would result;
- The western part of the site is already served by a bus stop on a regular route which offers significant benefits for employees and visitors accessing the site by public transport;
- Dacre ward where the site is located has an above average percentage of the population qualified to L4 and above which might assist recruitment;
- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- Dacre ward where the site is located has an above average percentage of the population qualified to L4 and above which might assist recruitment;
- The site is not within a designated landscape;
- Other benefits include: lower than average percentage of people without any qualifications; a healthy population, the close proximity to Rheged means that the site may attract tourism related businesses; the site is a large greenfield area and could be developed with the type of units which would attract new and emerging technologies, finance, IT, business, public admin, education and health.

## Negative Impacts

- The site is over 2 km from publically accessible open space although there is a golf course to the north of the A66 and there are open fields to the south;
- The southern boundary of the site is formed by the River Eamont which forms part of the River Eden SAC. Development on this site poses a significant risk to the SAC and some of the site will need to be given over to appropriate mitigation to ensure than no material or other contaminants from the site can be washed into the river and development here will need to demonstrate that there is no risk to the river or that the proposed development is in the Overriding Public Interest through a Habitat Regulations Assessment;
- Significant, adverse change to the open character of the „gateway to the lakes“ site;
- The site is green field which is not considered to be efficient use of land;
- There are other site specific negative effects which include: poor relation to the town, loss of trees and hedgerows, loss of BMV.

## Site Assessment against the Sustainability Objectives for Option 2

The main positive and negative impacts of the smaller option are summarised below.

## Positive Impacts

- The western part of the site is already served by a bus stop on a regular route which offers significant benefits for employees and visitors accessing the site by public transport;
- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- Dacre ward where the site is located has an above average percentage of the population qualified to L4 and above which might assist recruitment;
- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- The site is not within a designated landscape;
- Other benefits include: good access to the trunk road network; lower than average percentage of people without any qualifications; a healthy population, the close proximity to Rheged means that the site may attract tourism related businesses; the site is a large greenfield area and could be developed with the type of units which would attract new and emerging technologies, finance, IT, business, public admin, education and health.

## Negative Impacts

- The site is over 2 km from publically accessible open space although there is a golf course to the north of the A66 and there are open fields to the south;
- The River Eamont which forms part of the River Eden SAC is close to the site. The developable area within this site has been substantially reduced to accommodate mitigation to prevent run-off from reaching the river but the presence of the SAC still poses a significant risk to the development of this site and development here will need to demonstrate that there is no risk to the river or that the proposed development is in the Overriding Public Interest through a Habitat Regulations Assessment;
- Significant, adverse change to the open character of the „gateway to the lakes“ site;
- The site is green field which is not considered to be efficient use of land;
- There are other site specific negative effects which include: poor relation to the town, loss of BMV.

## Masterplan Option C, Skirsgill – Land to the South of A66 (east), Penrith

### Site Context

This is a 3.5 ha site south of the A66 bounded by the Cumbria Highways depot to the west and open fields to the east. The land is mainly pasture and hedges divide it into fields.

## Site Assessment Against the Sustainability Objectives

The main positive and negative impacts of each site are summarised below.

### Positive Impacts

- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- The site is not within the AONB or National Park;
- The site is previously undeveloped land and therefore unlikely to be contaminated;
- The site is near to other existing employment sites to the south of Penrith and other sites identified during this exercised. Close synergies between sites and businesses may foster further economic activity;
- The site is in one to the more deprived wards in the district. This means that the benefits of job creation are most likely to be felt. Providing employment in this location is therefore considered to be beneficial;
- Other benefits include: reasonable access by public transport, good access to the trunk road network, good access to publically accessible open space, a small part of the site is susceptible to flooding; the site is a large greenfield area and could be developed with the type of units which could attract, finance, IT and other business services.

### Negative Impacts

- Penrith South Ward has a below average percentage of residents with a L4 qualification. This may restrict people's ability to take up higher paid employment opportunities locally;
- To the south of the site is the River Eamont which forms part of the River Eden SAC. The developable area within this site has been substantially reduced to accommodate mitigation to prevent run-off from reaching the river but the presence of the SAC still poses a significant risk to the development of this site and development here will need to demonstrate that there is no risk to the river or that the proposed development is in the Overriding Public Interest through a Habitat Regulations Assessment.

There are other site specific negative effects which include: a relatively high proportion of the population with limited day-to-day activity, risk of problems associated with human health to nearby sensitive residential receptors, potential negative issues with landscape character, loss of tree cover, hedge etc, Potential hard to designated historic features, particularly the nearby SM; on adverse effect on landscape character, constraints to delivery of renewable energy and loss of BMV.

### Penrith Cumulative Assessment

The Penrith sites are all concentrated around the western and southern edge of the town. The high degree of concentration allows for links and synergies between businesses to be maximised but also allows for adverse

effects to be concentrated in a small area and their implications increased. Concentration around a major settlement is generally considered to be a more sustainable option since it reduces the need to travel however it also concentrates adverse effects into a small area, making them potentially more significant.

The most significant effect is the risk to the River Eden SAC, which is compounded by the proximity of MPB, MPC and Kemplay Bank. The cumulative effects of these three developments coming forward needs to be assessed in the in-combination effects section of an HRA although significant mitigation is likely to be required if all three sites were to be allocated.

It is also possible that there would be adverse effects on air quality along the A66, particularly as a result from standing traffic at junctions which would be exacerbated if traffic movements were to increase significantly. More data is required to assess the magnitude and severity of this change but it is possible that the cumulative effects of several developments would have a significantly adverse effects.

### **7.3.2 Alston**

Three sites have been identified in Alston, totalling 3.56 ha. Two of them are extensions to existing employment sites and the third is the redevelopment of an existing mill building within the town centre.

Alston is a small market town which provides a wide range of functions. The town is served by the trunk road network but is some distance from the motorway for wider access and distribution. There is public transport but this is restricted to very few buses a day. There is no 6th form or tertiary education within the town and adult education and training is offered at Melmerby Village Hall and Fellside Community Development Centre in Langwathby but these are approximately 18 and 25 km from Alston. Due to the distance and lack of efficient public transport, it is more difficult for people in Alston to easily access further education and higher level qualifications. This may reduce the pool of suitably skilled labour within the town, although census returns suggest that levels of qualifications in Alston are above average including those with L4 qualifications and those undertaking apprenticeships which are all benefits of the site.

People in Alston seem to have average levels of good or very good health although there is a higher percentage of people in Alston Moor ward claim their day-to-day activities are limited a lot or a little which may restrict the available labour force. The ward is currently among the most deprived in the district and therefore the regeneration benefits arising from an increase in employment opportunities could be significantly positive.

Alston is within the AONB and the landscape character in this area is described as the Dales, characterised by wide V shaped upland valleys, which are dominated by rough pasture, stone walls with main built features being farms, small traditional villages and rural roads.

Large scale employment development in this area would change the character of the area. Therefore any employment development would need to be appropriate to the setting in this rural upland landscape. Therefore mitigation measures would be required to ensure that development was environmentally sensitive, sympathetic building design and materials, and appropriate planting to retain its character of the area.

There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure.

## **Skelgillside Workshops, Alston**

### **Site Context**

This is a 1.9 ha site located to the on the south east side of Alston. It is surrounded by open countryside on three sides and by the Skelgillside Workshops site to the north east. The site is flat, scrubby grassland surrounding the existing development and bounded by a dry stone wall. There are open fields beyond on all sides. It is within the AONB. It is considered to be suitable for B1, B2 and B8 uses.

### **Site Assessment Against the Sustainability Objectives**

The main positive and negative impacts of each site are summarised below.

#### **Positive Impacts**

- The site is not at risk of flooding which is a significant benefit;
- It is close to other employment centres and would allow synergy between them which is a significant benefit;
- It would deliver regeneration benefits to Alston Moor which is the third most deprived ward in Eden which is a significant benefit;
- There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure which is significantly positive;
- Other site specific benefits include: good accessibility to public transport, close proximity to open space, it is on the edge of the settlement, development of a similar nature could reinforce the character of the site and its sense of place, the site is unlikely to be contaminated, it is not BMV and it may attract emerging technologies.

#### **Negative Impacts**

- Alston is a long way from an adult education centre. This is considered to be significantly adverse since it makes it more difficult for unemployed people in the team to receive the skills and training they require to commence work;
- Alston is a long way from the M6 or rail access which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- The site is within the AONB, therefore it could significantly affect the designated landscape if care is not taken with siting and design of the buildings;
- Other site specific negative effects include: risks to protected species (records suggest that there may be water vole on or near the site); constrains on the delivery of renewable energy due to landscape issues and loss of greenfield land.

## **Bonds Factory, Alston**

### **Site Context**

The 1.43 ha site is located to the on the south east side of Alston. It is surrounded by open countryside on three sides and by Bonds Foundry to the north. The site is flat, used as pasture and bounded by dry stone walls to the east and south. There is a small wood to the west. It is considered to be suitable for B1, B2 and B8 uses.

### **Site Assessment Against the Sustainability Objectives**

The main positive and negative impacts are summarised below.

#### **Positive Impacts**

- The site is not at risk of flooding which is a significant benefit;
- The site has easy access to public open space which is significantly positive in that it would enable workers to enjoy access to open areas for recreational purposes thereby promoting a healthy workforce;
- The site is greenfield and therefore unlikely to be contaminated which is significantly positive;
- The site is close to other employment locations and thus offers synergistic benefits which is significantly positive;
- The ward is currently among the most deprived in the district and therefore the regeneration benefits would be significantly positive;
- In terms of other benefits, it is accessible by public transport and close to the A road network; is on the edge of the settlement adjacent to an existing employment site but avoids the use of BMV;
- The site might offer potential for renewable energy;
- The site is gr4 ALC and therefore avoids the use of BMV;
- There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure which is significantly positive.

#### **Negative Impacts**

- Alston is a long way from an adult education centre. This is considered to be significantly adverse since it makes it more difficult for unemployed people in the team to receive the skills and training they require to commence work;
- The site is within the AONB, therefore it could significantly affect the designated landscape if care is not taken with siting and design of the buildings;
- Alston is a long way from the M6 or rail access which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- Other site specific adverse effects include potential adverse effects on protected species, landscape character, renewable energy potential, and likelihood of delivering jobs in finance, IT, business, public admin, education and health.

## High Mill, Alston

### Site Context

This site is a former mill situated in central Alston. It is currently vacant but has previously been used for light engineering. It is not listed but it is situated within the conservation area. It is considered to be suitable for B1 (part of mixed use development to include C3).

### Site Assessment Against the Sustainability Objectives

The main positive and negative impacts are summarised below.

#### Positive Impacts

- The site is close to publicly accessible open space which is considered a significant benefit in that it would enable workers to enjoy access to open areas for recreational purposes thereby promoting a healthy workforce;
- The site is situated in the centre of town which is considered a significant benefit in terms of its accessibility;
- The site is within the AONB and the Conservation Area the latter which is considered to be „at risk“. Restoring and continuing active use of the site would be of significant benefit to the townscape, the AONB, the character and the sense of place within Alston town centre;
- There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure which is significantly positive;
- The site is brownfield which is an efficient use of land resources;
- It is close to other employment centres and would allow synergy between them which is a significant benefit;
- It would deliver regeneration benefits to Alston Moor resulting from an increase in the number of jobs in the town which is the third most deprived ward in Eden and which is a significant benefit;
- The site is not at risk of flooding which is a significant benefit;
- Other site specific benefits include no known biodiversity issues.

#### Negative Impacts

- Alston is a long way from the M6 or rail access which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- Alston is a long way from an adult education centre. This is considered to be significantly adverse since it makes it more difficult for unemployed people in the team to receive the skills and training they require to commence work;
- The site would not have the capacity to deliver renewable energy given its town centre and conservation area location;
- Other site specific negative effects include: the risk of potential issues which could give rise to problems associated with human health because of the proximity of sensitive receptors (dwellings), the risk of contamination resulting from the site's previous use.

### Alston Cumulative Assessment

The cumulative effects of developing all three sites within Alston are largely restricted to increased traffic movements and potential landscape and visual effects.

Increased traffic movements from both service vehicles and employees commuting in would arise from the development of more buildings. This may adversely affect air quality as well as noise, disturbance and contribute to congestion on the road network leading to Alston and in the town centre itself.

There may also be adverse effects on landscape and the AONB as the development of two sites on the eastern edge of the town gives the rural-urban fringe a more urban character.

### 7.3.3 Appleby

Three sites have been identified in Appleby, totalling 8.46 ha. One is an extension to an existing employment site, one is the redevelopment of a former dairy sites and the third is the reuse of the old Shire Hall in the town centre.

Appleby is a small market town in the Eden valley which provides a wide range of functions. It is on the Settle-Carlisle railway and thus provides good access to Leeds and Carlisle.

The A66 passes through the centre of Appleby providing road access although the nearest motorway (M6) is about 23 km which may diminish the attractiveness of Appleby as a location for businesses focussed on wide scale distribution.

Amongst the population of Appleby, educational qualifications are average. The percentage of people with a L4 qualification is the same as the national average although there are slightly fewer people who have no qualifications and higher than average people who have completed apprenticeships. There is a 6th form in Appleby offering qualifications for those aged 16-19 and Appleby Heritage Centre offers adult and lifelong learning course including courses in numeracy, literacy and IT. This will help to encourage basic skill levels.

The population as a whole is healthy and fewer than the average number of people are limited a lot or a little in their day-to-day activities. This has a beneficial effect on the population which is available for work.

The River Eden SAC runs through the centre of the town. Natural England describes the water quality as unfavourable with no change. Therefore future development would have to give regard to any issues that could put the River Eden at risk from pollution.

There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure which is significantly positive.

Appleby Bongate is the second least deprived ward in the district. It is also within the least deprived quartile in the county. Whilst job creation here is considered positive, it is unlikely to deliver the range of regeneration benefits that would be experienced within a more deprived community (in terms of increasing employment, health, wealth, and so on).

## Cross Croft Industrial Estate, Appleby

### Site Context

This site is immediately to the east of an existing employment site. Cross Croft industrial estate comprises a number of small units which are occupied by a range of uses. The proposed extension is situated between the existing site and the railway line. It would provide room for expansion for the existing site and its occupants. It is considered suitable for B1, B2 and B8 uses.

### Site Assessment Against the Sustainability Objectives

The main positive and negative impacts are summarised below.

#### Positive Impacts

- The site is close to both 6th form and adult education facilities which will increased opportunities for learning and increasing skill levels within the community;
- A very high proportion of the community describes their health as good or very good;
- Development would not affect a designated landscape;
- The site is not at risk of flooding which is a significant benefit;
- The site is greenfield and unlikely to be contaminated;
- It is close to other employment centres and would allow synergy between them which is a significant benefit;

- Other site specific benefits include: good accessibility by public transport (once the new bus stop is installed), greenfield site which is well related to the existing settlement, there are no known sites or species of biodiversity importance within 250 m of site and due to the site being adjacent to existing industrial uses, there is potential for emerging technologies.

### **Negative Impacts**

- Appleby is a long way from the M6 which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- Other site specific negative effects include: the absence of accessible green spaces close to the site, loss of trees and hedgerows on site, change to the rural character of the site, constraints in delivering renewable energy given the size of the site, the proximity of the railway and landscape character, loss of BMV land and loss of greenfield land.

## **The Old Creamery, Appleby**

### **Site Context**

This 1.98 ha site is located within Appleby. Until recently it was used as a creamery although the site is now being cleared for redevelopment. It is a triangular site, heavily wooded at the northern end and bounded by the west coast main line to the west, Drawbriggs Lane with a mix of uses including grazing land, small industrial yard and residential properties to the east and a haulage yard to the south. The site is identified for B1 (part of mixed use development to include shops and dwellings).

### **Site Assessment Against the Sustainability Objectives**

The main positive and negative impacts are summarised below.

#### **Positive Impacts**

- The site is close to both 6th form and adult education facilities which will increased opportunities for learning and increasing skill levels within the community;
- A very high proportion of the community describes their health as good or very good;
- Development does not affect any designated landscapes;
- There is potential to enhance the Settle-Carlisle railway conservation area, through the replacement of a large industrial building with a more sympathetically designed building;
- The site is brownfield and within the settlement boundary;
- The site is not susceptible to flooding;
- No BMV would be lost;
- It is close to other employment centres and would allow synergy between them which is a significant benefit;
- Other site specific benefits include: good accessibility by public transport (once the new bus stop is installed), mixed use, including residential, would dictate a style and scale of new buildings which are more appropriate to the character of the town; the likely uses on the site are likely to contribute to jobs in the emerging technology, finance, IT, business, public admin, education and health sectors which the Council wishes to grow.

#### **Negative Impacts**

- Appleby is a long way from the M6 which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse.
- Other site specific negative effects include: the absence of accessible green spaces close to the site, potential loss of trees and hedgerows on site, constraints in delivering renewable energy given the location and proposed uses on the site and risk of contamination from the previous use.

## **Shire Hall, The Sands, Appleby**

### **Site Context**

Shire Hall, Appleby is the former Magistrates Court, offices and town gaol dating back to 1776-8. It is situated in

the centre of Appleby and is a Grade II listed building. It is currently partly occupied by various professional service and health organisations including solicitors, management consultants and dentist but is suitable for further B1 use.

## Site Assessment Against the Sustainability Objectives

The main positive and negative impacts are summarised below.

### Positive Impacts

- The site is close to both 6th form and adult education facilities which will increased opportunities for learning and increasing skill levels within the community;
- A very high proportion of the community describes their health as good or very good;
- Development would not affect a designated landscape;
- The site is not at risk of flooding which is a significant benefit;
- Continued use of an historic building represents the most appropriate way to secure its long-term survival;
- The site has excellent access to public transport;
- There is green space immediately adjacent to the site which provides recreational opportunities for workers;
- The site is previously developed and in the town centre;
- The site is not susceptible to flooding;
- It is close to other employment centres and would allow synergy between them which is a significant benefit;
- The building is already being used for professional services including management consultancy and solicitors and it is likely that further uses would comprise finance, IT, business uses;
- Other site specific benefits include: limited risk to biodiversity due to the presence of the building and existing uses despite the proximity of the River Eden SAC; retention and ongoing maintenance of a listed building within a conservation area which would contribute to the local character of Appleby, low risk of contamination, likely creation of jobs in public admin, education and health.

### Negative Impacts

- Appleby is a long way from the M6 which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- The listed building in a conservation area would severely constrain the opportunity to accommodate renewable energy technologies on the site, changes to the buildings as a result of its employment use will need to be carefully controlled to ensure that its character and appearance is preserved;
- There are no other negative effects anticipated from the reuse of this site.

## Appleby Cumulative Assessment

The cumulative effects of developing all three sites within Appleby are largely restricted to increased traffic movements. Increased traffic movements from both service vehicles and employees commuting in would arise from the development of more buildings although the A66 acts as a bypass for the town which would limit the flow of traffic through the town centre where effects are likely to be most substantial. There may still be air quality, noise, disturbance and contribute to congestion on the road network leading to Alston and in the town centre itself.

### 7.3.4 Kirby Stephen

Only one site is proposed within Kirby Stephen.

## Kirkby Stephen Business Park

### Site Context

This is a 4.5 ha greenfield site immediately to the west of the existing Kirkby Stephen business park on the north west edge of the town. The site is currently open fields. It is considered suitable for B1, B2 and B8 uses.

Kirkby Stephen is a market town in the southern part of Eden district. It is situated on the A685, about 30 miles from the nearest larger towns, Kendal and Penrith and on the Settle-Carlisle railway Line (although the station is

situated 1 mile south west of the town on higher ground. Kirkby Stephen has a wide range of functions and serves as a service centre for its rural hinterland.

### Site Assessment Against the Sustainability Objectives

The main positive and negative impacts are summarised below.

#### Positive Impacts

- The site is not susceptible to flooding;
- The site is greenfield and previously undeveloped, therefore contamination issues are unlikely;
- The site is adjacent to the employment centre of Kirkby Stephen. Therefore it would be in a sustainable location adjacent to other employment uses;
- The site is not within a designated landscape;
- Other benefits include: good public transport with a bus stop in close proximity, the local population is generally in good health, 3.6% of people have completed an apprenticeship which is considered to be positive, the site would contribute to regeneration benefits in a relatively deprived area and provide space to create jobs in the emerging technologies the site is an extension of an existing employment site which links well to the town and provides a logical development area and would the site has the potential for the application of renewable technology, the River Eden locally is described by Natural England as unfavourable but recovering, and the site has the capacity to accommodate emerging technologies.

#### Negative Impacts

- Kirkby Stephen is about 20 km from the M6 which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse;
- Kirkby Stephen is a long way from an adult education centre – the nearest site is Great Asby Village Hall, 12 km away. This is considered to be significantly adverse since it makes it more difficult for unemployed people in the town to receive the skills and training they require to commence work;
- Other site specific negative effects include: an above average proportion of people in Kirkby Stephen who describe their day-to-day activities as limited a lot or a little. This may reduce the working population within the town and result in a greater requirement for in-commuting. The site is some distance away from accessible green space reducing opportunities for worker recreation and the site is opposite the North Lodge to Stobars Hall, a Grade II listed building so care will need to be taken that the setting of this building is not affected and the land is BMV which would be lost as a result of development.

### 7.3.5 Brough

Two adjoining sites are proposed within Brough; Brough Main Street and Brough Main Street (South). The first site is largely brownfield land and is currently used as a bus depot and associated hard standing whilst Brough Main Street South is greenfield land.

Brough is a small village in the east of Cumbria served by the A66. It has no railway line but regular bus services to Kirkby Stephen, Appleby and Penrith. Whilst it is possible to access the village by public transport it is likely that most people will choose to access the village by private car. Brough is about 26 km from the M6 which makes accessibility to wider markets more difficult.

In Brough the level of qualifications held by residents are fairly average. Slightly fewer people have a L4 qualification than the national or regional average but the percentage of people with no qualifications is the same as the district average and slightly lower than that for the region. There is a 6th form in Appleby (about 12km away) offering qualifications for those aged 16-19 and Appleby Heritage Centre offers adult and lifelong learning course including courses in numeracy, literacy and IT. This will help to encourage basic skill levels.

The population as a whole is healthy and fewer than the average number of people are limited a lot or a little in their day-to-day activities. This has a beneficial effect on the population which is available for work.

There are no known water capacity issues for potable or industrial water supplies or waste water infrastructure which is significantly positive.

Brough ward is the 4th most deprived ward in the district and is in the most deprived quartile. It is in the more deprived wards that the benefits of job creation are most likely to be felt. Providing employment in this location is therefore considered to be of significant benefit.

## **Brough Main Street**

### **Site Context**

This site straddles the main road in Brough. To the north of the road it comprises a large area of hardstanding and a 2-storey vehicle repaired centre, large enough to accommodate buses. There is also a green tin shed on the site with roller doors. Across the Maun Street, the site comprises a single paddock.

### **Site Assessment Against the Sustainability Objectives**

The main positive and negative impacts are summarised below.

#### **Positive Impacts**

- The site has reasonable access to public transport which links Brough to a range of places within Cumbria and the North East;
- The site is close to publically accessible green space;
- The redevelopment of this area is unlikely to have an adverse effect on the landscape in the north but there would be negligible effect on the landscape from development in the southern part of the site. Attractive building design and materials, and appropriate planting to retain the rural character of the M6 corridor would improve the local landscape;
- The site is not susceptible to flooding;
- There are no known water capacity issues in Brough;
- Other beneficial effects include: good access to the trunk road network; a skilled and healthy population; the site is well related to the settlement; no known ecologically sensitive sites, habitats or species; reuse of brownfield land; employment centre accessed by appropriate public transport within 30 mins.

#### **Negative Impacts**

- There are no significant adverse effects but redevelopment of the site could cause adverse effects on neighbouring residential uses without appropriate care; potential loss of trees; potential harm to adjoining AONB without appropriate mitigation; potential constraints for the development of renewable technology; risk of contamination;

## **Brough Main Street South**

### **Site Context**

This site is situated on the south side of Main Street on the western edge of Brough. To the north is a paddock which is considered for employment use as part of Brough Main Street site. The western boundary is the drive to a residential property. Musgrave lane forms the eastern boundary and is a residential street. There is a further residential detached property on the southern boundary. The land is currently in equestrian use.

### **Site Assessment Against the Sustainability Objectives**

The main positive and negative impacts of the sites are summarised below.

#### **Positive Impacts**

- The site is close to accessible green spaces which help to provide an attractive development and help to meet health and well-being objectives;
- The site is not susceptible to flooding;
- The site is Greenfield and previously undeveloped, therefore contamination issues are unlikely;
- Other positive effects include: the site is well related to the existing settlement; no known ecologically sensitive sites, habitats or species.

## Negative Impacts

- Development would have a significantly negative impact upon the quality of life of residents in the homes surrounding the site;
- Other negative effects include the risk of affecting the setting of the AONB; risk of affecting Brough Castle (SAM); adverse effect on local character, sense of place etc; potential constraints for the development of renewable technology; greenfield site comprising grade 3 agricultural land.

### 7.3.6 Tebay

One site is proposed within Tebay.

#### Tebay Depot

##### Site Context

This site is situated along the former railway depot at Tebay. It is a narrow, brownfield site situated immediately to the east of the River Lune. Its eastern boundary is formed by the A 685 and there are open fields to the north and south. There is access to the north and south of the site; the southern access is narrow and steep whilst the new northern access is flatter. Both lead directly on to the A685.

Tebay is a small village with a limited range of services and functions situated in the Lune Valley. The M6 and the West Coast Main Line both pass through the valley close to Tebay.

#### Site Assessment Against the Sustainability Objectives

The main positive and negative impacts are summarised below.

##### Positive Impacts

- The site is close to a bus stop which makes it accessible to staff and customers without access to a private car;
- The development does not affect a designated landscape;
- The site is brownfield;
- Orton with Tebay is the second most deprived ward in the district and falls within the most deprived quartile. Any jobs created here are likely to have a significant benefit to the community in terms of increasing job opportunities;
- Other benefits include: A road within 1km and Motorway within 5 km; a well qualified community; No known ecological issues; the unlikely to have significant effects on air quality. The site has potential for the application of renewable technology; the site is brownfield.

##### Negative Impacts

- The site is 12 km from the nearest education centre making it difficult for local residents to access additional education and training;
- There is a significant risk of contamination on the site, given the former use of the site;
- The site is a long way from other substantial employment sites so there is unlikely to be much synergy with other businesses;
- Other site specific negative effects include: A road within 1km and Motorway within 5 km; poor levels of good or very good health; nearest Green space or play facility is within 2 km of site; Potential negative issues with landscape character; site margins are subject to flooding.

## 7.4 Areas Likely to be Significantly Affected

The SEA Directive requires that the Environmental report identify the locations within the district that are likely to be significantly affected by the employment land policies and site allocations. Because this Sustainability report is required to comply with the requirements of the Directive those areas likely to be affected are highlighted in Table 7.1 below.

**Table 7.1 Environmental Characteristics of Areas Likely to be Significantly Affected**

Area Likely to be Significantly Affected	Environmental Characteristics
Penrith	<p>The River Eamont which forms part of the River Eden SAC is at significant risk from run off assuming from construction and operation of adjacent sites unless substantial mitigation measures are implemented.</p> <p>None of the sites are within designated landscapes but there would be changes to the rural landscape character as a result of development.</p> <p>There are risks to air quality along the A66 corridor as a result of cumulative developments south of Penrith.</p> <p>The sites are greenfield and likely to be uncontaminated.</p> <p>This quantum of development would give Penrith and the district a significant economic boost.</p>
Alston	<p>There would be an increase in vehicle numbers on the roads, transporting staff, customers and materials. This is likely to have an adverse effect on congestion and air quality.</p> <p>Increased vehicle numbers would also adversely affect cobbled road through the centre of Alston</p> <p>The village is within the AONB therefore there4 may be adverse landscape effects.</p> <p>The sites are not at risk of flooding.</p> <p>There are no significant biodiversity issues associated with these sites but phase 1 habitat/protected species surveys may be requires.</p>
Appleby	<p>Increasing development would increase traffic movements but most of this could be directed straight out onto the A66 to reduce the effects in the town centre.</p> <p>There may be air quality, noise, disturbance and congestion issues which arise from the schemes.</p> <p>The sites are within the town or on the edge of it and landscape effects would therefore be reduced.</p> <p>There are no known biodiversity issues.</p> <p>The sites are not at risk of flooding.</p> <p>The sites are unlikely to be contaminated.</p>
Kirkby Stephen	<p>The site is not susceptible to flooding.</p> <p>Kirkby Stephen is about 20 km from the M6 which might make transportation of goods or access to wider markets difficult. This is therefore considered to be significantly adverse.</p> <p>Kirkby Stephen is a long way form an adult education centre – the nearest site is Great Asby Village Hall, 12 km away. This is considered to be significantly adverse since it makes it more difficult for unemployed people in the team to receive the skills and training they require to commence work.</p>

**Table 7.1 (continued) Environmental Characteristics of Areas Likely to be Significantly Affected**

Area Likely to be Significantly Affected	Environmental Characteristics
Brough	<p>Many people have some qualification but not at the highest levels and higher education is hard to access because of distance which may reduce skilled workforce in the local area.</p> <p>Higher than average levels of deprivation.</p> <p>Reasonable access to public transport which links Brough to a range of places within Cumbria and the North East.</p> <p>Neither site is susceptible to flooding.</p>
Tebay	<p>Reasonable public transport which allows access but many people still reliant on private car use for convenience;</p> <p>Higher than average levels of deprivation</p> <p>Risk of flooding in site margins</p> <p>Higher education hard to access because of distance which may reduce skilled workforce in the local area.</p>

## 8.0 Alternatives

### 8.1 Alternative approaches

One alternative to the quantum of land put forward at this time would be to put forward a greater or lesser area.

Allocating no land for development would change very little in the natural environment. There would be no change to agricultural land, landscape and visual effects, biodiversity, public rights of way or flood risk. The only sites where there would be a change through the non-allocation and no development options would be the existing built sites High Mill Alston, Shire Hall, Appleby and the Old Creamery, Appleby where leaving buildings and cleared sites vacant would have an adverse effect on the townscape and contribute to an air of neglect. There would also be a deterioration in the quality of a listed building were Shire Hall, Appleby not to be used and maintained.

Failure to deliver appropriate land for jobs would have significant adverse effects on the local economy, restricting growth and reducing job creation. This in itself would be a significant adverse effect but the secondary effects would be more significant in terms of increased out commuting to find work, cautions more vehicle movements, congestion and emissions, reduction in apprenticeships offered locally since there would be fewer businesses to offer them, there may be adverse effects on human health since employment tends to contribute to improved physical and mental well being, reduced incomes locally may result in lower expenditure and reduced economic capacity.

Overall failure to allocate land for employment use would be contrary to the policies of the Core Strategy but would have significant social and economic effects on Eden and its residents. The lower the proportion of land identified, the greater the significance of the effect.

In the current economic climate, over allocation of sites is unlikely to have significant effects because only viable sites would come forward and there is not currently the demand in the market to support over development. Under more buoyant market conditions over allocation of land would serve to drive down land prices until the market stabilised again. At present Eden faces a small shortfall of employment land and it is expected that additional sites will be identified as a result of the forthcoming consultation to allow the 50 ha commitment to be met.

### 8.2 Alternative Sites

The SA also considered the environmental effects of a number of sites which were rejected by the site assessment not included in the final consultation document. These are summarised below and the reasons for their non-selection provided. Detailed assessment proformas for these sites are included in Appendix F.

#### Penrith Master Plan Option A

##### Site Context

This is a significant greenfield site on the western side of the M6. It is currently in agricultural use, with fields bounded by post and wide fences, dry stone walls and hedges. The site almost completely surrounds an existing industrial use; Alba protein pet food manufacturer.

##### Site Assessment against the Sustainability Objectives

The main positive and negative impacts of each site are summarised below.

##### Positive Impacts

- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;

- The site is also located within a ward where there is a very low proportion of the population with no qualifications. This will contribute to recruiting and developing a work force;
- No designated landscapes would be affected;
- There are no waster capacity issues;
- The site is greenfield and therefore unlikely to be contaminated;
- The site is in a ward in bottom quartile for deprivation so the regeneration benefits of job creation here would be significant;
- Other positive effects include proximity to the trunk road network, high numbers of people who have undertaken apprenticeships, high % population in good or very good health; low number of residents with limited ability to do day-to-day activity; no known effects on local biodiversity and only the site margins are subject to flooding.

### **Negative Impacts**

- The site is located within a ward where there is a very low proportion of the population with level 4 qualifications. Combined with the low proportion of people with no qualifications this indicates that most people in Penrith West have low to moderate qualifications. This will make recruiting to high level (and often high earning) jobs more challenging in this location;
- The site surrounds a pet food manufacturing plant which produces malodorous emissions;
- Development would change the rural character of the area which is considered to have a significantly adverse effect on landscape character;
- The site is greenfield land in a rural are and therefore does not make the best use of previously developed land;

- Other negative effects include the need to protect or divert public rights of way; distance to accessible green spaces; loss of tree cover and hedges; potential for site to have negative effects on interest feature(s); potential to negatively contribute towards air quality in combination with other sites; constraints for the development of renewable technology and loss of gr3 agricultural land.

## **Conclusion**

The site offers a number of significant benefits however the viability assessment concluded that the odour arising from the pet food plant would make the area too unpleasant for anyone else to live or work in, thus rendering the site undevelopable at this stage.

## **Penrith and District Farmers Auction Mart**

### **Site Context**

This site is situated on the north western side of M6 Junction 40. It is a triangular site bounded by the railway line, the A66 and the M6. It is currently used as a livestock market although a portion of the land is used as a highways depot.

### **Site Assessment against the Sustainability Objectives**

The main positive and negative impacts of each site are summarised below.

#### **Positive Impacts**

- The site has excellent access to the motorway, being accessed directly from J40 roundabout;
- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- The site is also located within a ward where there is a very low proportion of the population with no qualifications. This will contribute to recruiting and developing a work force;
- The site is not at risk of flooding;
- The site is not within a designated landscape;
- The site is brownfield land;
- The site is near to the existing employment centre at Gilwilly, and other sites identified during this exercised. Close synergies between sites and businesses may foster further economic activity;
- Other benefits include: a healthy population, reuse of a brownfield site and opportunities to create jobs in the emerging technologies and finance, IT and business sectors.

#### **Negative Impacts**

- There are no significant adverse effects affecting this site;

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- There are a number of site specific negative effects which include low levels of people with L4 qualifications (although this is offset by higher than average L1-3 qualifications), the site is not well related to Penrith although it is well related to the motorway and it is currently in use, there is a risk the site may be contaminated by its previous uses.

## Conclusion

This site was put forward through the call for sites exercise by the current occupier who would prefer to relocate to the site at Stoneybeck. The site at Stoneybeck has been rejected as a potential allocation (see below for the justification of this) and as a result the market site would continue in its current location, rendering this site unavailable at this time.

## Stoneybeck Site

### Site Context

This is a 9 ha triangular site, delineated by the A6 and the B5035 to the north of Penrith. It is close to Junction 41 of the M6. It is currently in agricultural use and is largely flat and open although it rises to the south.

### Site Assessment Against the Sustainability Objectives

The main positive and negative impacts of each site are summarised below.

#### Positive Impacts

- The site is in close proximity to further and higher education establishments and live long learning centres which would support additional learning and may provide opportunities to learn skills appropriate to the workplace;
- The site is not within the AONB or National Park;
- The site is not susceptible to flooding;
- The site is previously undeveloped land and therefore unlikely to be contaminated;
- Other benefits include: reasonable access to public transport, and the trunk road network, a skilled and healthy workforce, no effects on known biodiversity assets and reasonable proximity to other employment sites.

#### Negative Impacts

- The site is very much outside the existing settlement of Penrith; it is a greenfield site and although it is close to farm buildings and the Inn, it is isolated;
- Being a rural site, development here would have a significant adverse effect on the character of the open landscape;
- This is a greenfield site, about 2.6 km from the existing Penrith settlement and it is not surrounded by any other built environment and is particularly isolated even though it has decent links to the M6;
- There are a number of site specific negative effects which include: distance from accessible open space and loss of BMV.

## Conclusion

This site is a remote rural site which could generate substantial volumes of traffic and have a significant adverse landscape and visual effect. Allocating this site would be contrary to Core Strategy policies CS1, CS2, CS3, CS14, and CS16. It is for these reasons that the site has not been allocated.

## 9.0 Mitigation

A number of mitigation measures have been identified which would reduce or eliminate the potential environmental effects of some of the schemes. In some cases, such as remediation or protection of a public right of way, they may eliminate long term adverse effects whilst in others, such as appropriate design, they may reduce the severity of an effect but not eliminate it. The consideration of mitigation measures would not necessarily change a site assessment from significantly adverse to adverse or from adverse to neutral because the extent of any change would depend on how the mitigation measures were implemented but they would lessen the adverse effects.

**Table 9.1 Proposed Mitigation Measures**

Site	Mitigation
Gilwilly Industrial Estate Extension	<p>New bus route.</p> <p>Protection/diversion of PRoW.</p> <p>Appropriate control of industrial processes to reduce nuisance to existing residential and commercial users.</p> <p>Mitigation arising from protected species surveys.</p> <p>Incorporate trees and hedges into site design.</p> <p>Appropriate design, materials and planting to retain the rural character of the M6 corridor and improve the local landscape.</p> <p>Avoid development in site margins which flood.</p>
Eden Business Park Phase 2	<p>Extend bus route.</p> <p>Explore opportunities for rail freight.</p> <p>Protection/diversion of PRoW.</p> <p>Appropriate control of industrial processes to reduce nuisance to existing residential users.</p> <p>Mitigation or compensatory land provision to offset any loss of priority habitat.</p> <p>Mitigation arising from protected species surveys.</p> <p>Incorporate trees and hedges into site design.</p> <p>Appropriate design, materials and planting to retain the rural character of the M6 corridor and improve the local landscape.</p> <p>FRA and management of those parts of the site subject to flooding.</p>
Kemplay Bank	<p>Further assessment is required of the site's relationship with the River Eamont, part of the River Eden SAC.</p> <p>Incorporate trees into site design.</p>
Penrith Masterplan B – Option 1	<p>Appropriate control of industrial processes to reduce nuisance to existing residential and commercial users.</p> <p>Incorporate trees and hedges into site design.</p> <p>Extensive mitigation required to prevent run off to the River Eamont which forms part of the River Eden SAC.</p> <p>Incorporate trees into site design.</p> <p>Appropriate design, materials and planting to reduce the adverse effects on the rural character of the site.</p> <p>FRA and management of those parts of the site subject to flooding.</p>

Table 9.1 (continued) Proposed Mitigation Measures

Site	Mitigation
Penrith Masterplan B – Option 2	<p>Appropriate design and layout and control of potential uses and associated vehicle movements required to ensure that they do not adversely affect the attractiveness and viability of Rheged.</p> <p>Incorporate trees and hedges into site design.</p> <p>Extensive mitigation required to prevent run off to the River Eamont which forms part of the River Eden SAC.</p> <p>Appropriate design, materials and planting to reduce the adverse effects on the rural character of the site.</p>
Masterplan Option C	<p>Appropriate planting to reduce the risk of adverse effects on human health and quality of life.</p> <p>Extensive mitigation required to prevent run off to the River Eamont which forms part of the River Eden SAC.</p> <p>Mitigation arising from protected species surveys particularly within Whinfell Forest.</p> <p>Measures may be required to protect water quality in the River Eamont.</p>
Skelgillside Workshops	<p>Retain similar uses of a similar scale on site extension to prevent adverse effects on neighbours.</p> <p>Ecological mitigation/translocation may be required depending on outcome of protected species surveys.</p> <p>Site design, layout and materials must be suitable for rural upland landscape to reduce adverse effects on AONB.</p>
Bonds Factory	<p>Ecological mitigation/translocation may be required depending on outcome of protected species surveys.</p> <p>Protect copses of trees on southern boundary from development.</p> <p>Site design, layout and materials must be suitable for rural upland landscape to reduce adverse effects on AONB.</p>
High Mill	<p>Care will be required with regard to noise, emissions and transport including parking needs if the site were to be developed for future employment use.</p> <p>Restrict parking at the mill to reduce the number of vehicles accessing the site using the cobbled road which is a key feature of the Conservation Area.</p> <p>Sympathetic restoration of the building is required to reduce the effects on the Conservation Area.</p> <p>Uses may need to be restricted to ensure that they do not have any further adverse effects on the Conservation Area.</p>
Cross Croft Industrial Estate	<p>The trees around the site boundary should be protected.</p> <p>Development should be sensitive to its environment with sympathetic building design and materials, and appropriate planting to retain the rural character of the area.</p>
The Old Creamery	<p>Ornamental trees along Drawbriggs Lane should be protected and further trees and hedgerow planting could be incorporated into future development.</p> <p>Sympathetic building design and materials, and appropriate planting to enhance the character of the area.</p> <p>Mitigation measures to restrict operating hours, noise, vehicle movements and emissions to protect residential amenity.</p>
Shire Hall	<p>The use of „bad neighbour“ uses should be restricted.</p> <p>Any external alterations to the building will require Listed Building consent.</p>
Kirkby Stephen Business Park	<p>The trees on the southern Boundary should be incorporated into the scheme as a landscaping buffer.</p> <p>Careful design and scale of structures and appropriate planting. Would reduce landscape and visual effects of a development here.</p> <p>Regard should be had to and risk of pollution from the site affecting the River Eden.</p>

**Table 9.1 (continued) Proposed Mitigation Measures**

<b>Site</b>	<b>Mitigation</b>
Brough Main Street	<p>If the site use were to intensify, mitigation measures may be required to protect residential amenity.</p> <p>Trees along the road and rear boundary of the site should be protected.</p> <p>Attractive building design and materials, and appropriate planting to retain the rural character of the M6 corridor.</p> <p>Previous use may require remediation prior to redevelopment.</p>
Brough Main Street South	<p>Control is required to reduce or eliminate noise, air quality, light and nuisance issues for neighbouring residents.</p> <p>Careful design, siting and choice of materials is required to reduce the landscape and visual effects of the scheme on the AONB and Brough castle SAM.</p>
Tebay Depot	<p>The PRoW will need to be retained or diverted.</p> <p>Land may require remediation prior to development.</p> <p>FRA and management of those parts of the site subject to flooding.</p>

## 10.0 Conclusions and Recommendations

The principal test of Sustainability Appraisal is whether the proposed plan and/or policies will make a positive contribution to the sustainability of the target area, as measured by a wide range of environmental, social and economic criteria. The Sustainability Appraisal has demonstrated that the policies and proposals of the employment land allocations consultation draft, with careful development management, should result in positive sustainability outcomes for the District.

This is demonstrated in the overwhelming compatibility between the SA Objectives and the Strategic Policies and in the outcomes of more specific appraisal of individual sites. The principal recommendation of the Sustainability Appraisal, apart from the standard caveat of the need for careful implementation and monitoring, is the challenge of tracking the effects of the implementation of the number of policies which are proposed.

### 10.1 Next Steps

The remaining stages of the SA process are detailed in Table 10.1. The next stage of the SA process (Stage D) involves consulting on the Core Strategy – Further Engagement Draft and the Interim SA Report and then appraising any significant changes to the DPD. The final stage involves monitoring the implementation of the plan following adoption, including finalising aims and methods for monitoring and responding to any adverse effects.

**Table 10.1 Incorporating SA Within the DPD Process (based on the stages within the CLG Plan Making Manual)**

<b>Stage B: Developing and refining options and assessing effects</b>	
Testing the plan or programme objectives against the SA/SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan and the SA objectives and help in developing alternatives.
Develop and refine the options for the development plan document	To develop and refine strategic alternatives.
<b>DPD Stage 1: Pre-Production – Evidence Gathering</b>	
<b>Stage B: Developing and refining options and assessing effects (continued)</b>	
Predict and appraise the significant effects of the options	To predict and evaluate the significant sustainability effects of the plan and alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects and maximising beneficial impacts	To ensure that adverse effects are identified and potential mitigation measures are considered.
Proposing measures to monitor the significant effects of implementing the development plan document	To detail the means by which the environmental performance of the plan can be assessed.
<b>Stage C: Preparing the Sustainability Appraisal Report</b>	
Preparing the SA Report	To present the predicted effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.

**Table 10.1 (continued) Incorporating SA Within the DPD Process (based on the stages within the CLG Plan Making Manual)**

<b>Stage D: Consulting on the draft plan and SA Report</b>	
Sustainability appraisal report	At publication, the local authority is required to produce and publish the SA Report alongside the draft DPD.
Signposting and options not taken forward	The SA Report should „signpost“ where it provides information required by the SEA Directive.
Consulting the public and Consultation Bodies on the draft plan and the SA Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the SA Report and to use it as a reference point in commenting on the plan. They can make representations on the soundness of the development plan document and may take into account whether the development plan document is founded on a robust and credible evidence base, justified in that it is the most appropriate strategy when considered against the reasonable alternatives, effective and, consistent with national policy. To gather more information through the opinions and concerns of the public.
Assessing significant changes	<p>To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and taken into account.</p> <p>Regulation 28 requires a local authority to prepare a summary of the main issues raised at consultation.</p> <p>Regulation 30 requires submission of the sustainability appraisal report and any revisions or supplements to it to the Secretary of State alongside the draft development plan document. A statement must also be provided setting out:</p> <ul style="list-style-type: none"> <li>• Who has been consulted throughout plan preparation; How they have been involved;</li> <li>• A summary of the main issues raised;</li> <li>• How the main issues have been taken into account as a result of consultation undertaken under Regulation 25.</li> </ul>
Making decisions and providing information	To provide information on how the SA Report and consultees' opinions were taken into account in deciding the final form of the plan to be adopted (in the form of an SA Statement with the Submission DPD).
<b>Examination of the DPD – SA</b>	
Examination of the DPD and SA submitted by local authority	The role of the Inspector at examination is to consider the soundness of the development plan document. He/she does this by using the sustainability appraisal as part of the evidence base. There may be circumstances where it appears to the Inspector that the evidence in the sustainability appraisal is insufficient to come to satisfactory conclusions about the soundness of the development plan document. Where the Inspector suggests significant changes in the binding report, he/she will need to be satisfied that sufficient sustainability appraisal material is available to inform the recommendation.
<b>Adoption</b>	
When the plan is adopted	<p>When the plan is adopted (incorporating any changes required by the Inspector), the local authority must issue a statement summarising:</p> <ul style="list-style-type: none"> <li>• Sustainability considerations - how these have been integrated into the development plan document;</li> <li>• Options and consultation responses - how any received on the development plan document and sustainability appraisal reports (at all stages) have been taken into account;</li> <li>• Alternatives - reasons for of the choice of alternatives in light of other reasonable alternatives considered;</li> <li>• Monitoring sustainability effects - measures to be taken to monitor the significant sustainability effects of implementing the development plan document (noting that the sustainability appraisal report and any revisions to it at earlier stages should already have documented proposed monitoring arrangements).</li> </ul>

**Table 10.1 (continued) Incorporating SA Within the DPD Process (based on the stages within the CLG Plan Making Manual)**

<b>Stages E: Monitoring the significant effects of implementing the plan</b>	
Developing aims and methods for monitoring	Sustainability appraisal requires arrangements to be made for monitoring the significant effects of implementing the adopted development plan document. To track the environmental effects of the plan or programme to show monitoring whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.

## 10.2 Consultation

This Environmental Report is being issued as part of the consultation for the employment land sites allocation document.

It is now being made available for representations from 15<sup>th</sup> July 2013 to 9<sup>th</sup> September 2013. This document, along with other consultation documents for the Preferred Employment Sites and Policies

### **Please make your comments using:**

The **Online Consultation Form**. This can be accessed via the Planning Policy pages at <https://eforms.eden.gov.uk/formserver/ldfemploymentconsultation.form>

This form allows for comments on the SA of specific sites and policies to be made, and can also be used to identify additional sites for inclusion in the next stage of the document.

Alternatively a copy of the form in MS Word can be accessed on the consultation page of our website, to be sent to the following address:

Planning Policy  
Eden District Council  
Mansion House  
Penrith CA11 7YG  
By email: [preferredsites@eden.gov.uk](mailto:preferredsites@eden.gov.uk)

The closing date for comments is the 9<sup>th</sup> September 2013. Comments received after this date may not be taken into account when further versions are produced.

The Council will also be running a series of drop in events around the district so you can find out more, talk to Council Officers and submit your views. This is scheduled for:

- Wednesday 21<sup>st</sup> August from 4pm to 7pm. This session will be held in the Penrith Methodist Church.

### **10.3 What Happens Next?**

Much will depend on the results of this consultation exercise and the comments submitted. The Council will consider all comments, and if no or only minor changes are necessary they may be incorporated into a “Submission Version” of this part of the Local Plan, prior to being submitted formally to the Secretary of State for independent examination in public. Further work may need to be carried out on viability, infrastructure and deliverability before this occurs.