

Preferred Housing Sites and Policies Sustainability Appraisal

February 2013

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1. Non Technical Summary

In line with the Governments National Planning Policy framework (NPPF), Eden District Council are preparing new planning policy documents to help facilitate development within the district.

The Core Strategy remains the primary policy document in Eden, after it was adopted by the Council in March 2010. The Housing Sites and Policies builds upon the principles in the Core Strategy and will establish a set of policies and housing sites that will deliver new housing growth in the district.

In time, the Core Strategy will be combined with the allocations documents and other key policies to form the Eden Local Plan. This streamlined document will provide a comprehensive 'one stop' policy document for setting out Eden's vision for the next 12 years.

The Council first published its Housing Issues and Options Document in 2007, with potential options for housing. It presented an opportunity for members of the public to comment and suggest new sites for inclusion. As a follow up to this, the Housing Alternative Sites document was published in 2008, which collected the responses from the first consultation, and showed the locations of the sites submitted from the public.

The Preferred Options document represents the latest stage in finding developable housing land in the district. Drawing upon sites and information submitted in the past, the Preferred Options document uses a number of different criteria to choose the most suitable sites for development. This consultation will allow another opportunity for local views and knowledge to influence the plan.

Planning in Eden and the Sustainability Appraisal

New planning documents that the Council develop are required to be underpinned by a sustainability appraisal. This is a document which assesses the impacts of the plan against social, economic and environmental indicators to understand how effectively the plan contributes towards sustainable development.

The Council have developed this document to appraise the various options and determine whether the route chosen may lead to the most sustainable outcomes. Importantly, this also provides an opportunity to recommend how the plan could be improved and offer alternative options if appropriate.

The non-technical summary provides a breakdown of the key issues and recommendations in the sustainability appraisal. The sustainability appraisal is being published for consultation alongside the Preferred Options Housing Document. The sustainability appraisal should be read alongside the plan, to understand how sustainability considerations have influenced the plan. The consultation also gives the opportunity for members of the public and statutory agencies to comment on the plan and the proposed methodology.

Sustainability Appraisal Methodology

In 2006 Eden District Council took part in stakeholder workshops to define a sustainability framework for the county. These workshops included representatives from districts in Cumbria and stakeholders from English Nature, the Environment Agency and English Heritage. An appraisal framework was agreed upon, which has since been adopted by the Council. This framework was used in the Sustainability Appraisal for the Core Strategy and has formed the template for appraisal tools in the Housing Sites and Policies document. This ensures a consistent approach, both within the Council and offers a comparative tool against other Authorities in Cumbria.

Table 1: Eden Sustainability Framework

Eden District Council Sustainability Framework
SP1: To increase the level of participation in democratic processes
SP2: To improve access to services, facilities, the countryside and open
SP3: To provide everyone with a decent home
SP4: To improve the level of skills, education and training
SP5: To improve the health and sense of well-being of people
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense local history
EN1: To protect and enhance biodiversity
EN2: To preserve, enhance and manage landscape quality and character for future generations
EN3: To improve the quality of the built environment
NR1: To improve local air quality and respond to the effects of climate
NR2: To improve water quality and water resources
NR3: To restore and protect land and soil
NR4: To manage natural resources sustainably and minimise waste
EC1: To retain existing jobs and create new employment opportunities
EC2: To improve access to jobs
EC3: To diversify and strengthen the local economy

The sustainability framework was developed to reflect the requirements of the European Strategic Environmental Assessment and national regulations on Strategic Environmental Assessment, which is required for all significant planning documents produced by the Council. These are principally concerned with the impact of emerging plans on the environment.

Through undertaking a sustainability appraisal, Eden District Council can ensure that the legal requirements of Directive are met, but also that wider sustainability considerations are taken into account. To be compliant with the legislation, the Council must takes steps to ensure that various stages are complied with. These are outlined as follows:

Table 2: Stages of SA process and integration into Local Plan production (adapted from SA Guidance, ODPM 2005)

Local Plan Stage	SA Stages	SA Process
<i>LP Stage 1: Pre-production – Evidence Gathering</i>	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
	<ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. 	Brings together a range of information to address potential constraints and influence options.
	<ul style="list-style-type: none"> • A2: Collecting baseline information. 	Helps identify sustainability problems by creating indicators based on gathered evidence.
	<ul style="list-style-type: none"> • A3: Identifying sustainability issues and problems. 	Opportunity to define key issues for the LP and bring forward any potential tensions or inconsistencies that may arise.
	<ul style="list-style-type: none"> • A4: Developing the SA framework. 	The framework provides a way in which the sustainability effects can be appraised.
	<ul style="list-style-type: none"> • A5: Consulting on the scope of the SA. 	Views sought from statutory bodies in 5 week consultation.
<p><i>The first step of the sustainability appraisal process is to understand the baseline conditions for the district and deciding upon the scope of the document. In 2007 Eden District Council produced a joint scoping report for Housing and Development Management Policies. Key stakeholders were invited to comment on the proposed methodology, which received comments from the County Council, Natural England, the Environment Agency and English Heritage. The document has since been revised to reflect the input made from these organisations.</i></p>		
<i>LP Stage 2: Production</i>	Stage B: Developing and refining options and assessing effects	
	<ul style="list-style-type: none"> • B1: Testing the LP objectives against the SA framework. 	Sustainability principles tested to ensure that document is in line with objectives
	<ul style="list-style-type: none"> • B2: Developing the LP options. 	Reasonable options and alternatives formulated, which are crucial to the appraisal process.
<p><i>Once the scope of the sustainability appraisal was accepted, the framework was applied to the Housing Issues and Options DPD and Housing Alternative Sites DPD. These documents were consulted upon in 2007 and 2008 respectively, and represented the Council's initial call for sites. Two different appraisal tools were used in these documents, which reflect the approaches needed for both sites and policies. The tools to assess housing sites relied heavily upon Geographical Information Systems (GIS), to spatially analyse the sites to determine how suitable they are.</i></p>		

Local Plan Stage	SA Stages	SA Process
	<ul style="list-style-type: none"> B3: Predicting the effects the LP. 	Transparent professional judgement based upon evidence used to quantify effects.
	<ul style="list-style-type: none"> B4: Evaluating the effects of the LP. 	Using predictions, evaluations made based upon significance of effects.
	<ul style="list-style-type: none"> B5: Considering ways of mitigating adverse effects and maximising beneficial effects. 	SA document should prevent, reduce or offset adverse effects of DPD. Mitigation measures should emerge through the process that seek to modify policies and options in light of appraisal.
	<ul style="list-style-type: none"> B6: Proposing measures to monitor the significant effects of implementing the LP 	Identify and document proposals for monitoring significant effects.
Stage C: Preparing the Sustainability Appraisal Report		
	<ul style="list-style-type: none"> C1: Preparing the SA Report. 	Report produced addressing requirements of SEA Directive.
<p><i>This stage represents the current progress made by the Council. The method of site analysis used in Stage B has been used in this document, however, indicators have been amended to reflect changes to best practice and updated datasets. The framework has been used to determine which sites and policies perform well or poorly against sustainability objectives. This document provides both an assessment of suitability but also offers alternative options which may lead to more sustainable outcomes if adopted.</i></p>		
Stage D: Consulting on the preferred options of the plan and SA Report		
	<ul style="list-style-type: none"> D1: Public participation on the preferred options of the LP and the SA Report. 	Second stage of consultation for SA process, comments invited from public and statutory consultation bodies.
<p><i>This document will be made available for consultation, alongside the Preferred Housing Sites and Policies document. Any recommendations to the context, method or scoring will be considered and help evolve the content of the plan. In an event in which there are significant changes to the plan or sustainability appraisal, we will move back to Stage C, which involves reassessing our options against revised information and make the revised documents available for consultation.</i></p>		
LP Stage 3: Examination	<ul style="list-style-type: none"> D2: Appraising significant changes. 	Significant amendments documented from consultation responses or SA process.
LP Stage 4: Adoption and monitoring	<ul style="list-style-type: none"> D3: Making decisions and providing information. 	Sustainability statement produced that outlines how considerations have been integrated in the document.
Stage E: Monitoring the significant effects of implementing the plan		
	<ul style="list-style-type: none"> E1: Finalising aims and methods for monitoring. 	Indicators that measure performance of LP policies through Annual Monitoring Report.

Local Plan Stage	SA Stages	SA Process
<i>It is important to establish a monitoring framework to understand the impacts of the plan, and respond to change if there are adverse affects. As the sustainability appraisal develops, we will create a number of indicators which will effectively track the progress of the plan.</i>		
	<ul style="list-style-type: none"> E2: Responding to adverse effects. 	Adverse effects monitored to assess whether they fall within acceptable limits or whether remedial action is required.

Limitations

Many of the indicators used to assess the suitability of housing sites are based upon distance thresholds to sites or designations, using GIS computer systems. There are a number of sustainability indicators which cannot be measured in this way, however careful judgement will ensure the indicator set is consistent.

A number of policy scenarios and site options have been tested. Sites within Key Service Centres have been tested both independently and within options to understand cumulative impact. Sites in Local Service Centres have not been tested independently. After sieving sites for size, location and major constraints, there are 134 sites in Local Service Centres, in comparison to the housing target of 168 units for the Centres. Given the number of sites, it would have been impractical to undertake an assessment for each site. Alternatively, an assessment of the sustainability of each LSC has been undertaken, which has informed the selection of sites. In addition, the options for LSCs have also been appraised against the sustainability framework.

Baseline Conditions in Eden

Environmental

Eden District has the largest geographical area of all Cumbrian authorities. At 215,646 ha and with a population of 52,500 (mid 2010 estimate) it is the second largest and most sparsely populated District within England, with only 0.24 people per hectare compared with a national average of 3.9 persons per hectare.

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, both in terms of the natural environment and the built.

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. The district also has many sites of regional and local importance.

Eden has a fine historic environment with over 1,600 Listed Buildings and twenty four designated Conservation Areas. In addition, several historic parks and gardens have been identified as of particular value while there are also many Scheduled Ancient Monuments and sites of recognised archaeological value.

Economic

62.7% of Eden's population are of working age. The median average annual household income in Eden is £27,344, £1,340 above the county average. Eden is a relatively affluent district yet 12.3% of households still have an annual income of less than £10,000.

There are just over 23,900 people employed within the District. Tourism plays a key role in Eden's economy. Within the district the largest areas of employment are hotels and restaurants (17.9%), wholesale and retail (15.3%), manufacturing (9.4%) and business services (8.4%). Jobs in the financial sector are fewer in Eden, representing only 10% of employee jobs in contrast to about 21% nationally. Self-employment accounts for almost 10% of the working population, higher than both the North West figure of 8% and the national figure of 9%.

The unemployment rate in Eden has risen from 0.7% in 2006 to 1.4% in 2012, but it still remain considerably lower than the national level of 7.7% (2012). 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.

There are 3,460 businesses registered for VAT in Eden. 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 formation rates are lower.

Social

The population of 52,500 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 14,882 (mid 2006 estimate).

Eden's population is increasing faster than any other district in Cumbria, having grown by 3.8% since 2001. The districts population is also ageing, during the same time period there was a 21.5% increase in residents aged over 65 years. This is the largest increase in this age group for any district in Cumbria. 4.8% of Eden's population are from black and minority ethnic groups similar to the county average. Eden has the highest life expectancy in Cumbria at 81.3 years and a healthy life expectancy of 73 years.

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 are high with 84% of households owning a car compared with the national average of 73%. 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.

Key Sustainability Issues

Part of understanding how our 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.

- Shortage of affordable housing in suitable locations (Objectives SA2, SA3, SA5)
- Continued outward migration of working age population and a growing retired population (Objectives SA5, SA5, SA6, SA14)
- Lack of suitable employment opportunities to support a balanced economic growth (Objectives SA4, SA6, SA14, SA16)
- High levels of fuel poverty in the district (Objectives SA2, SA3, SA5, SA9)
- Anticipated effects of climate change and the impact on flooding and resilience of species and their habitats (Objectives SA7, SA8, SA10, SA13)
- Poor access for many settlements to key services and facilities (Objectives SA2, SA10, SA15)
- Decline in rural services (Objectives SA2, SA6, SA14)
- History of poor quality design of housing and impact upon settlement character (Objectives SA6, SA8, SA9, SA17)

Summary of Sustainability Appraisal Findings

This section summarises the findings of the sustainability appraisal relating to the Council's preferred options for both housing sites and policies. Further testing has been undertaken to determine the suitability of the Council's other options for sites and policies, which have been summarised in the below sections. More information on the options testing process can be found in the main body of the sustainability appraisal.

Penrith Housing Options

Table 3: Summary of Penrith Housing Options

Best Performing Options	Option 1, Option 3, Option 5
Poorest Performing Option	Option 2, Option 4
Council's Preferred Option	Option 1
	Option 1, Option 3, Option 5
	Option 2, Option 4

The sustainability appraisal is supportive of the option chosen for Penrith. Developed from the Penrith masterplan, this option is grounded in solid evidence. Options 3 and 5 also score well against the sustainability appraisal, however less work has been undertaken on the sites to establish their overall suitability and achievability.

Alston Housing Options

Table 4: Summary of Alston Housing Options

Best Performing Sites	AL1, AL3, AL4, AL8, AL10, AL11
Poorest Performing Sites	AL6, AL7, AL9
Council's Preferred Option	AL1, AL3, AL4, AL7, AL8, AL9, AL10, AL11
	AL3, AL8
	AL1, AL4, AL10, AL11
	AL6, AL7, AL9

Though there is not a great degree of flexibility, given the small number of sites, this option could be improved through not supporting sites AL7 and AL9. Though there is some development already in this area of Alston, it is unlikely to support any service provision and feels spatially inconsistent with the town.

Appleby Housing Options

Table 5: Summary of Appleby Housing Options

Best Performing Sites	AP2, AP4, AP5, AP14, AP10, AP11, AP7, AP8, AP9, AP13, AP18
Poorest Performing Sites	AP17, AP12, AP16, AP6
Council's Preferred Option	AP11 (Part) AP5 (Consented permission)
	AP2, AP4, AP5
	AP14, AP10, AP11, AP7, AP8, AP9, AP13, AP18
	AP17, AP12, AP16, AP6

The housing option chosen by the Council reflects one of the more sustainable sites appraised AP5, which has an approved planning consent. The sustainability appraisal identifies two further sites which may be more suitable than those proposed by the Council. It is understood that these sites have logistical difficulties, not recognised by the sustainability appraisal, which discounts them as suitable.

Kirkby Stephen Housing Options

Table 6: Summary of Kirkby Stephen Housing Options

Sites preferred	KS4, KS13, KS5, KS6 , KS9, KS10, KS11, KS15, KS17, KS19
Sites not preferred	KS2, KS3, KS7, KS20, KS22, KS18, KS21
Council's Preferred Option	KS2, KS4, KS5, KS7, KS9, KS15, KS17, KS22
	KS4, KS13, KS5, KS6, KS9, KS10
	KS11, KS15, KS17, KS19
	KS2, KS3, KS7, KS20, KS22, KS18, KS21

The Council's preferred option and the sites identified as most sustainable are broadly similar. Though site KS2 was not considered appropriate in the appraisal, it has since been combined with KS5, which is likely to lead to more sustainable outcomes. There are a number of large sites in the town that are likely to need new green and grey infrastructure to support the development of the site, that will increase the sustainability of the sites. This will be investigated as the plan is developed further.

Local Service Centre Options

Table 7: Summary of Local Service Centre Housing Options

Locations Preferred	Armathwaite, Brough, Clifton, Greystoke, Kirkby Thore, Kirkoswald, Langwathby, Lazonby, Nenthead, Orton, Plumpton, Shap, Sockbridge & Tirril, Stainton, Tebay, Temple Sowerby, Yanwath
Locations not preferred	Bolton, Calthwaite, Croglin, Crosby Ravensworth, Culgaith, Gamblesby, Great Asby, Hackthorpe, High Hesket, Ivegill, Kings Meaburn, Long Marton, Maulds Meaburn, Melmerby, Milburn, Morland, Ousby, Ravenstonedale, Renwick, Skelton, Warcop
Council's Preferred Locations	Armathwaite, Bolton, Hackthorpe, Kings Meaburn, Kirkby Thore, Kirkoswald, Langwathby (2 Sites), Lazonby, Morland, Tebay, Temple Sowerby, Warcop
	Brough, Langwathby, Lazonby, Plumpton, Shap, Stainton, Tebay
	Armathwaite, Clifton, Greystoke, Kirkby Thore, Kirkoswald, Nenthead, Orton, Sockbridge & Tirril, Temple Sowerby, Yanwath
	Bolton, Calthwaite, Croglin, Crosby Ravensworth, Culgaith, Gamblesby, Great Asby, Hackthorpe, High Hesket, Ivegill, Kings Meaburn, Long Marton, Maulds Meaburn, Melmerby, Milburn, Morland, Ousby, Ravenstonedale, Renwick, Skelton, Warcop

A number of locations have been considered in the Council's preferred option which would be considered unsuitable in the sustainability appraisal. Part of the rationale behind this is that sites within the 5 year land supply have been included. The sites have not been chosen on sustainability credentials but reflect progress has already been made to develop these sites.

This hierarchy for development could be improved upon by focussing development to the most sustainable centres on this list. Though this would limit the amount of development that is directed to smaller centres, it would reduce the need to travel for smaller journeys and help sustain the services in these centres.

Policy Appraisals

Table 8: Summary of Policy Appraisals

Policy	Scoring	Mitigation/Enhancements	More Sustainable Options?
SD1: Presumption in Favour of Sustainable Development	The proposal scored positively overall, with a strong positive correlation with the environmental, social and economic indicators.	None required.	No. The policy is recognised as a positive approach nationally.
HS1: Local Service Centres	The proposal scored well against the criteria, presenting a more sustainable pattern of development than in the 2010 Core Strategy.	n/a	The effects of revising the policy were uncertain. If the criterion for option 2 was access to daily public transport, the sustainability of this policy could be increased.
HS2: Housing Allocations	Assessed above in site based assessments	n/a	n/a
HS3: Master plans	The proposal scored positively overall, with several significantly positive scores against social objectives, slight positive scores against economic objectives and mixed scores against environmental objectives. If detailed proposals for this policy included environmental protection and enhancement measures, there would be potential for many of these scores to improve.	Biodiversity and enhancements to the natural environment should be included along with all other considerations. Separating the northern sites into 2 master plans would also increase democratic accountability and public involvement.	No. Alternative policy would lead to fragmented approach towards larger urban extension sites.

Policy	Scoring	Mitigation/Enhancements	More Sustainable Options?
HS4: Additional Housing to Meet Local HS4:Need in Rural Areas	This scenario scored positively overall, with several significantly positive scores against social objectives, positive scores against economic objectives and mixed scores against environmental objectives. Under this policy, local communities would benefit from additional housing that would help sustain village growth and keep services viable. It would also bring short term benefits to the construction industry, as these properties are built. It does however promote a pattern of development in locations which are not well connected to larger centres and key services.	The scoring could be improved by ensuring that more development is focussed to areas which have better access to public transport and other services.	No. This policy is most suitable from the options presented, however could be improved with suggested mitigation measures.
HS5: Housing Mix	The proposal scored positively overall, with several significantly positive scores against social and economic objectives and little correlation with environmental objectives. It would provide much needed housing to meet the needs of the local population, and without prescribing specific percentages it gives developers the flexibility to take account of the most up to date demographic evidence.	It would not be appropriate to include mitigation measures to improve the environmental score. Other policies will mitigate against any environmental implications.	No. this policy is most suitable from the options presented, as it puts in place a requirement for a housing mix, but allows some flexibility.
HS6: Design	This proposal scored positively overall, borrowing design criteria from a nationally established dataset. Whilst this policy may include additional guidelines to foster sustainable development, it is a relatively unknown tool.	Following the previously used national approach, BfL should be advocated for developments >10 units, but given a degree of flexibility for smaller developments.	No.

Policy	Scoring	Mitigation/Enhancements	More Sustainable Options?
<p>HS7: Housing for Older People & Those in Need of Support</p>	<p>The policy has a direct significant positive correlation with the social objectives as it provides housing for those in need in the most sustainable locations, whilst providing care and support, and so reducing the burden on health care. The policy has very limited correlation with the environmental objectives. As well as the initial benefits for the construction industry, the policy has the potential to have positive implications on the economic objectives as providing housing for older people will free up existing (and new build) housing for the working age population.</p>	<p>Ensure the cumulative effects of older peoples housing development meet the local need, but do not reduce the development of housing for others in need- in particular housing for people of working age.</p>	<p>No, this policy is most suitable from the options presented as there is evidence to show it is a viable mechanism for delivering housing for older people/ those in need of support.</p>
<p>HS8: Essential Dwellings for Workers in the Countryside</p>	<p>The policy scores positively against the economic objectives, in particular at the rural scale and in the long term. It is likely the policy will sustain and strengthen rural businesses. The policy scores negatively against the social objectives as the developments it is permitting are likely to be located in rural and sometimes remote areas where the access to services and facilities is poor, and there is less of a sense of community. The policy scores relatively neutrally against the environmental objectives, with the potential for some negative effects, particularly in the long term, if the policy isn't enforced successfully to mitigate against them.</p>	<p>Parts 4 and 5 of the policy have been included to mitigate against negative environmental effects. Individual applications should be assessed in order to ensure their adherence to these. Furthermore, the cumulative impacts of such developments should be monitored and any negative effects mitigated against as a result.</p>	<p>No. This policy is the most suitable of those presented.</p>

Policy	Scoring	Mitigation/Enhancements	More Sustainable Options?
HS9: Self Build Housing & Community Land Trusts	Measuring the sustainability of the policy is difficult until specific schemes are brought forward, as it relies heavily on the locations of development. The policy scores generally positively against the social objectives as self build schemes and CLTs will provide houses required by local people and potentially strengthen communities. However, the developments may not be in the most sustainable locations which may have social and environmental implications. The policy scores positively against the economic objectives as it will potentially create jobs in the construction industry and sustain/ enhance local (in particular rural) business.	Assess sustainability of location when determining planning applications to ensure no negative social or environmental implications. The policy could be enhanced by including urban areas as well as rural, in order to widen the influence of the positive benefits of the policy.	No. The option to not include a policy has been appraised
HS10: Conversion of Employment Sites to Housing	This policy received a mix of scores, though performed well against this objective. The policy scored well against meeting rural affordable housing and improving the built environment. As locations are not listed, it is difficult to ascertain what impact upon ecology this will have, and what locations will be affected.	Policy could be enhanced by including the wording "Development will be permitted unless there are not strong economic or environmental reasons why it would be inappropriate".	No

Policy	Scoring	Mitigation/Enhancements	More Sustainable Options?
HS11: Holiday Accommodation	The policy scores positively against indicators relating to economic development as it will potentially sustain and enhance local businesses, diversify the local economy, provide jobs in the service sector and increase inward investment to the area from tourism. The policy received mixed scores in relation to the social objectives as it has the potential to sustain/ enhance local services and facilities but there are negative implications associated with off-peak seasons. In terms of environmental effects, there is the risk the policy will encourage development in unsustainable locations and increase the levels of traffic, use of resources etc.	The policy includes mitigation measures including development being subject to a legal agreement limiting use to holiday accommodation. This will ensure housing is not developed in unsustainable locations. Furthermore, development will only be supported where the location is appropriate.	No. Not including a policy was considered, however, the council is supportive of such development to strengthen the local economy subject to the mitigation measures in place.
HS12: Live/work units	The policy scored well against indicators relating to economic development. The policy received mixed to poor scores in relation to social and environmental objectives, due to the support given for development in potentially isolated locations	Encouraging the reuse of buildings will improve the policy slightly, though tightening the policy to individual scale development outside of KSCs/LSCs would improve the score.	No.

Monitoring

To understand whether these policies are being successfully applied, there is a duty to monitor policies and review them if necessary. The Council currently use the Annual Monitoring Report as a way of reflecting upon how well the planning policies are working. In addition to the current indicator set, there will be a need to monitor the policies detailed in this document. The arrangements for doing this can be found within the main body of the document.

Commenting on the Document

The housing plan, along with sustainability appraisal is available to be downloaded from the Council's website. The document and supporting material are available to download at: www.eden.gov.uk/preferredhousingallocations/

Hard copies of the documents are available to view at the following locations:

- Alston Local Links Centre
- Appleby Library
- Kirkby Stephen Local Links Centre
- Lazonby Local Links Centre
- Mansion House, Penrith
- Penrith Library
- Penrith Town Hall
- Shap Library

Consultation on the document will take place from **22 February 2013 to 22 April 2013**.

2. Introduction

Plan Description

The emerging Eden Housing Sites and Policies document has been produced by the Council to identify suitable land for housing development. This document follows on from the Eden Core Strategy DPD, which sets out a development hierarchy for the district, identifying locations which promote patterns of sustainable growth.

Under the NPPF, the Government has moved towards the revocation of the Local Development Framework system, which over time will be replaced by a singular Local Plan. The Core Strategy DPD was adopted prior to the publication of the NPPF. It is the intention that Eden will adapt the Core Strategy, and other Local Development Documents into a singular Local Plan, however progressing the housing allocations is of principal importance, so that greater certainty can be given to the development sector to help Eden recover from the effects of the economic downturn.

Documents produced by the Council need to be in conformity with the NPPF. The guidance places a responsibility for Local Authorities to significantly increase both market and affordable housing within their administrative boundaries through the identification of key sites which are fundamental to the delivery of the strategy.

In line with the Core Strategy, the preferred housing sites and policies document sets out a plan to deliver new growth in identified locations for growth. The housing sites and policies document will be the principal document for allocating new growth to meet identified housing need, and push forward the strategic objectives for growth, as set in the Core Strategy.

Objectives of the Sustainability Appraisal

The sustainability appraisal has been produced alongside the development of the housing sites and policies document, to allow sustainability considerations to be integrated into the development of the document.

The Government have placed a strong emphasis on sustainable development through the publication of the National Planning Policy Framework (NPPF). Whilst no formal definition is given within this document, there is a strong presumption for new growth as long as this does not worsen the living conditions for future generations as a result. The principles behind the Government's strategy towards sustainable development have been transposed from the UK Government Sustainability Strategy, published in 2005.

Table 9: Sustainable Development Principles

Living within Environmental Limits

Respecting the limits of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.

Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.

Achieving a Sustainable Economy

Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.

Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy, and diversity.

Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

Definitions from both the NPPF and the sustainable development strategy will be used to define the concept of sustainable development for the purposes of this document.

The 2004 Planning and Compulsory Purchase Act places requires that Local Authorities undertake assessments of their plans, which appraise the social, economic and environmental sustainability of their proposed plan. The sustainability appraisal is written in a way that explores these sustainability considerations, but also meets the requirements of the SEA Directive. The European Strategic Environmental Assessment Directive (2001/42/EC) requires that plans and proposals developed by Local Authorities consider any environmental effects that may arise as a consequence of the plan. The requirements of the directed were transposed into UK law through the 2004 Environmental Assessment of Plans and Programmes Regulations.

The purpose of this report is to reflect social, environmental and economic concerns in a way that can compliment and shape the document, promoting sustainable development. In particular, the report will identify any potential effects resulting from the plan and determine the significance, synergistic and cumulative impacts of development.

The below Table describes the stages of the SA report, which will be followed for the Preferred Options stage of the DPD, and repeated for the Submission stage that accounts for stakeholder/public representation. The sustainability appraisal has been developed with these requirements in mind, to ensure that the requirements of the directive are met and that key sustainability considerations can be fed into the main document.

Table 10: SEA Directive Requirements

Requirements	Where covered in SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Article 5 and Annex I);	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 1, Section 2, Appendix 1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 4
c) The environmental characteristics of areas likely to be significantly affected;	Section 1, Section 7, Section 8, Appendix 2, Appendix 3
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Section 3, Appendix 1
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, consideration have been taken into account during its preparation;	Section 3, Appendix 1, SA Scoping Report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	NTS, Section 7, Appendix 1, Appendix 2
g) The measures envisaged to prevent, reduce as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 7, Section 8
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 7, Section 8
i) A description of measures envisaged concerning monitoring in accordance with Article 10;	Section 9
j) A non-technical summary of the information provided under the above headings.	Section 1

Requirements	Where covered in SA Report
The report must include the information that may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).	Throughout document
Consultation: <ul style="list-style-type: none"> • Authorities with environmental responsibility, when deciding on the scope and level of detail of the information that must be included in the environmental report (Article 5.4). 	NTS, Section 6
<ul style="list-style-type: none"> • Authorities with environmental responsibility and the public shall be given an early and effective opportunity within the appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Article 6.1, 6.2). 	NTS, Section 6
<ul style="list-style-type: none"> • Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Article 7). 	N/A
Taking the environmental report and the result of the consultations into account in decision-making (Art. 8).	
Provision of information on the decision:	To be provided on adoption of the DPD
<ul style="list-style-type: none"> • when the plan or programme is adopted, the public and any countries consulted under Article 7, must be informed and the following made available to those so informed: 	To be provided on adoption of the DPD
<ul style="list-style-type: none"> • the plan or programme as adopted. 	To be provided on adoption of the DPD
<ul style="list-style-type: none"> • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and 	To be provided on adoption of the DPD
<ul style="list-style-type: none"> • the measures decided concerning monitoring (Article 9). 	To be provided on adoption of the DPD
Monitoring of the significant environmental effects of the plan or programme's implementation (Article 10).	To be provided on adoption of the DPD
Quality Assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive.	Throughout

Neighbouring Plans/Strategies

Table 11: Neighbouring Plans or Programmes

Planning Policy Document	Stage	Notes
Cumbria County Council		
Draft Minerals and Waste Local Plan	Consultation (Ends April 2013)	In Eden, recycling facilities are proposed for extension in Flusco and new mineral extraction at Stamphill gypsum site.
Minerals and Waste Development Framework	Adopted 2009	Includes Core Strategy and Development Management Policies relevant to across Cumbria (exc National Parks).
Cumbria and lake District Joint Structure plan 2001-2016	Adopted 2001	Only saved Policies still relevant.
North West Regional Spatial Strategy	Adopted	Set to be abolished.
South Lakeland District Council		
South Lakeland District Council Local Plan	Adopted 1997	Superseded by Local plan Adopted Alterations.
South Lakeland District Council Local Plan- Adopted Alterations	Adopted 2006	Only saved policies still relevant.
Core Strategy 2010-25	Adopted 2010	
Land Allocations Development Plan Document	Submitted to SoS for examination in 2012	Includes land allocations for Housing, Employment and Recreation, Green Space and Green Gaps.
Lake District National Park Authority		
Local Plan part 1- Core Strategy 2010-25	Adopted 2010	
Local Plan part 2- Allocations of Land	Currently under consultation (ending February 2013)	Includes land allocations for Housing, Employment, Waste Management, Local Green Space, and site specific plans for Bowness Bay and The Glebe.
Local Plan part 3- Minerals Safeguarding Areas	Currently under consultation (ending February 2013)	

Planning Policy Document	Stage	Notes
Yorkshire Dales National Park Authority		
Yorkshire Dales Local Plan	Adopted 2006	81 policies saved and still relevant.
Housing Development Plan	Adopted 2012	11 policies and housing site land allocations.
Minerals and Waste Local Plan	Adopted 1998	
Local Plan 2015-2030	Currently under development	
Carlisle City Council		
Carlisle City Council Local Plan 2001-2016	Amended and adopted- 2008	
Carlisle City Council local Plan	Currently under development	
Allerdale Borough Council		
Allerdale Borough Council Local Plan 1996-2006	Adopted 1998	Only saved policies still relevant.
Allerdale Borough Council Local Plan 2013-2028	At Preferred Option stage	To include Core Strategy and Development Management Policies.
Northumberland County Council		
Northumberland Consolidated planning Policy Framework	Adopted	Planning policies from the 7 previous Local planning Authorities.
Core Strategy	Currently under consultation (6 February 2013- 20 March 2013)	To form the first part of the new Local Development Framework.

Appropriate Assessment

In conformity with the 91/42/EEC Habitats Directive, an assessment of these internationally recognised sites needs to be undertaken to ensure that the plan or development does not have any effect on the conservation objectives of each site. Due to the range of sites in, and surrounding Eden, a separate Habitats Regulations Assessment will be produced alongside the appraisal.

It is anticipated that the AA screening report will be published for consultation alongside the preferred options stage of the DPD. This will allow for the implications of the report to inform the Preferred Options stage, and consequently the findings of the full report will inform the Submission stage of the document. These effects will then be tested against the site's conservation objectives which are compiled and updated by Natural England. Based upon this evaluation there are three actions that may be required to ensure that the integrity of the Natura sites are not undermined;

- Finding alternative solutions
- Mitigating the effects of development
- Undertaking development due to reasons of overriding public interest. Note that this will only be considered in exceptional circumstances, to which compensatory measures will be implemented.

Integrated Assessments

As policies and sites in the document become firmer, it is the intention that both a Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) are undertaken to appraise the impacts of the plan. This will be undertaken after the consultation of the preferred sites and policies to give an opportunity for the assessments to influence the scope of the SA.

Changes since Issues and Options SA

The combined Housing and Primary DC policies DPD scoping report produced in March 2007 outlined the baseline information used in the Issues and Options DPD. This report has since 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. Changes to both sets of information can be found in appendix 1.

3. Review of relevant Plans, Policies, Programmes, Strategies and Initiatives

A full list of PPPSIs is detailed in Appendix 1 but the key messages taken from the collection is listed below in Table 12. PPPSI analysis is important within Stage A of the process as it identifies any relevant information that may influence the content of the Local Plan.

The SEA Directive requires that environmental protection objectives founded at an International and European levels are included in the study. There are also a range of documents relating to National, regional and local sustainability that have been reviewed. The relevance of these documents can be seen as contextual, directly influential, or strategically useful to the point where they should inform the development of the document also.

This list has been constantly reviewed to reflect the most recent documents and emerging practice in policy and development. The documents have been appraised against relevance to the Local Plan and the Preferred Housing Sites and Policies in particular; any key considerations that have arisen have been noted.

Table 12: Considerations from PPPSIs

Messages	Source
Document replaces PPS/PPG system of guidance and acts as the new development plan to which all planning documents should adhere. The requirement for SA is reiterated in the NPPF. The document Sets out comprehensively the principles that should guide emerging plans and proposals. Defines which aspects of sustainable development are important to emerging plans.	National Planning Policy Framework (NPPF)
Commitment to building a humane, equitable and caring global society. Commitments towards sustainable production and consumption, including renewable energies, efficient water infrastructure and increase water recycling.	Johannesburg Declaration on Sustainable Development
Establishes a number of public rights; access to environmental information held by public authorities, the right to public participation in decision making & access to justice in environmental matters regarding community institutions and bodies.	Aarhus Convention
The document recognises the need for the protection of European Sites, however, the Habitats Regulations Assessment Screening will cover these issues in more detail.	Amended Habitats Regulations
Greater support should be given to local authorities in achieving appropriate levels of affordable housing, particularly through increased interaction with housing corporations and registered social landlords.	Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing
Initiatives include educating consumers on reducing energy need and encouraging large corporations to follow a similar approach towards energy efficiency that includes insulation, lighting and ventilation. Support will also be offered to communities and individuals who want to generate their own energy locally.	Energy White paper
Ensures that biodiversity is embedded into as a consideration into future developments. The preservation of which is crucial to creating a sustainable future.	Working with the grain of nature: a biodiversity strategy for England
This document aims to support vital village services, particularly through market town regeneration. Affordable homes, increased rural services and a better connected transport infrastructure need to be considered when creating a vibrant working countryside.	A Fair Deal For Rural England (Rural White Paper)
Regulations account for the 1995 Disability Discrimination Act (DDA), that calls for reasonable provision within dwellings construction so that anyone can use and gain access to them.	Building Regulations (part M)
The vision of the document is use sustainable development as the foundation to deliver an improved quality of life within the region. This approach is guided by the visions underlying principles; Integrate economic, environmental & social activities; encourage partnerships in decision making; capitalise on scientific innovation; develop a productive and prosperous economy; create and restore natural, cultural and physical assets; value diversity, and promote equality and equal opportunities for all.	Action for Sustainability Programme

Messages	Source
By developing and improving the transport network in Cumbria there will in turn be an increased accessibility to jobs, and services. Position of development in key centres will be guided to minimise the need to travel. By implementing traffic calming measures and training young drivers the plan hopes to create safer roads with fewer accidents.	LPT 2 2005/06 - 2011/12
The strategy aims to support decent affordable housing, underpinned by an effective transport system and a strong economy. Aims from the LSP are to enable people to take care of their own environment, ensure equal access to services and in particular improve the amount and availability of activities for young people.	Eden Sustainable Community Strategy

4. Key Issues in the District

Assessing the current state of the area is best achieved through consultation with local and statutory bodies but also through identifying trends and emerging issues. This is usually undertaken over time by monitoring indicators, which can unearth trends and patterns of inequalities. We can use these trends to assess the current and future state of policies, to which the sustainability appraisal can offer solutions or alternatives.

The characteristics of these key issues should be reflected with an indicator that accounts for the level of detail of the plan. Where an issue is not reinforced by an indicator, these gaps in knowledge will be noted and taken into account in the monitoring and implementation stages of the SA process.

Akin to the indicators and figures, the key issues have been developed and updated from the 2005 core strategy scoping report. Through partnerships and statutory representations the baseline information for the district can evolve and will be updated when relevant information is obtained.

The below text examines the list of key economic, social, environmental and resource based issues within the district. Each section has been coupled with relevant messages derived from the PPPSI's and the objectives that will be used to address whether the policies and allocations in the Housing sites and policies document.

Table 13: Key issues for the district

Issue	Likely future evolution without the plan
Housing Provision	
<p>A large number of residents are in housing need i.e. unable to rent or buy on the open market. The estimated need amounts to the equivalent of 227 new dwellings per year, and there are currently 1000 people on the waiting list for affordable housing in Eden.</p>	<p>Outflow of those in housing need, in particular young people and families with negative consequences for settlement vibrancy, the skills base and the wider economy.</p>
<p>Housing in the district is unaffordable to many. House prices in 2011 for the lower quartile were 8.57 times the lower quartile income.</p>	<p>Out-migration of residents in search of more affordable housing with negative consequences for settlement vibrancy, the skills base and the wider economy.</p>
<p>The population of the district is growing and ageing, there is forecast to be an additional 2,500 people in the district by 2025; an increase of 4,200 people over the age of 65 and a loss of 1,700 people under the age of 65.</p>	<p>The growing population will exacerbate the housing need issues already evident. The older sector is typically wealthier than younger generations and the risk is that they price out the housing market for the younger generations, resulting in an outflow of the working age population in search of more affordable housing. This will have negative effects on the wider economy of the district.</p>
<p>The district council is not meeting its housing targets.</p>	<p>Low levels of housing building will have a direct effect on the construction industry and wider economy of the district; it will result in less revenue for infrastructure and support services and have negative implications on the desirability to invest in the district. Furthermore it will exacerbate the housing need issues discussed above.</p>
Skills, education and training	
<p>Young people are migrating out of the district in search of housing, educational and employment opportunities.</p>	<p>The lack of affordable housing is a key driver of out migration. Low levels of inward investment and economic growth.</p>

Issue	Likely future evolution without the plan
Health and wellbeing	
A growing and ageing population is placing an increasing burden on health and social care services.	The demographic change is forecast to continue. Without policies regarding master planning and housing for older people and those in need of support, health and social care services may be less integrated within the planning system in the district.
Significant health inequalities exist amongst the districts residents.	Access to adequate housing has a direct effect on the health and wellbeing of the districts residents. Levels of poor housing and homelessness will increase if the supply and affordability do not improve.
Vibrant communities	
Fear of crime in rural areas.	A lack of housing accessible to the young/ more mobile sector of the population may create areas easily targeted by crime and/ or a fear of this.
The provision of services/ facilities in the rural areas across the district is dwindling.	The outflow of residents in search of affordable and accessible housing will directly affect the viability of rural services. The loss of services will have negative implications to the sustainability and vibrancy of communities, to the wider economy, the resident's quality of life and the environment; as a result of the increased need to travel.
Biodiversity	
Ongoing degradation of biodiversity assets.	Continued threat to biodiversity assets with no cumulative impacts of large scale housing development across the districts/settlements known prior to development.
Landscape	
Potential for negative landscape change as a result of climate change.	It is considered impacts will be more severe without evidence-based policy guidance.
Excessive lighting and increased noise from development.	Cumulative impacts of housing development and their impact on the landscape not assessed prior to development.

Issue	Likely future evolution without the plan
Quality of the built environment	
Existing pressures on housing affordability may discourage use of high quality design and materials.	Design quality is likely to be below acceptable standards without clear guidance and promotion for high quality design.
Erosion of historic character of settlements. There are currently 49 entries on the Heritage at Risk Register.	Although national policy guidance is in place to ensure heritage assets are protected, there is the potential for further degradation of the historic character if no evidence based assessment of how to provide an adequate amount of housing without having detrimental effects is done.
Air quality and greenhouse gas emissions	
Potential traffic growth and associated emissions generated from growing population, increased industry and a loss of public transport.	Traffic and emissions are likely to grow without local policies to address settlement pattern.
Greenhouse gas emissions generated from development.	
Reliance on cars and other private vehicles in the district is high standing at 84% in 2001. It is through the lack of alternative modes of transport which contributes to the generation of around 1/3 of all CO2 emissions for the district.	Traffic and emissions are likely to grow without local policies to address settlement pattern.
Water resources and quality	
Discharge of sewage into water bodies impacting on water quality.	Sewage discharges are likely to cause a problem without considering the cumulative effects of large scale housing developments on infrastructure capacity and liaison with the relevant utility companies.
Surface run off	
Land and soil	
A lack of previously developed land on which to direct development.	Development likely to take place on Greenfield land, given constraints on land within settlements.

5. Sustainability Framework

The framework consists of balanced sustainability indicators that are usually set in the form of objectives or targets. The questions posed within the proposal aim to cover a cross section of topics within the district. Where there is not a completely defined set of baseline information, the SA framework will act as a proxy to assess the objectives of the DPD, including the sites and policies that are put forward.

The framework has been adapted from the 2006 sustainability appraisal framework, derived through County wide stakeholder workshops. The workshops collaboratively identified a set of objectives, which represent the sustainability issues in the County. These workshops also invited comments from key stakeholders, including the Environment Agency, Natural England and English Heritage. Since 2006, the framework has been slightly adjusted, to reflect factors including climate change and future resilience, though the common strands for each objective remain the same.

Table 14: Eden Sustainability Objectives

Reference	Sustainability Objectives	Sustainability Framework: guidance on making progress towards each objective
Social progress which recognises the needs of everyone		
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?
SP3	To provide everyone with a decent home	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? Do policies address fuel poverty and promote sustainable construction and low carbon design?
SP4	To improve the level of skills, education and training	Will the plan deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? Does the plan recognise the need for people to adapt to economic change and retrain where necessary? Does the plan enable people to live sustainable, low carbon lifestyles?
SP5	To improve the health and sense of well-being of people	Do plan policies ensure all members of society have access to the health care that they require? Do they reduce health inequalities within society associated with income, lifestyle and diet? Does the plan improve road safety and advocate sustainable modes of transport? Does the plan help create a healthy and safe working and living environment with low rates of crime and disorder? Does the plan help improve quality of life for all? Does the plan anticipate and plan for the potential impacts of climate change on health?

Reference	Sustainability Objectives	Sustainability Framework: guidance on making progress towards each objective
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Does the plan promote a sense of community identity? Does it encourage social cohesion and help continue valued local traditions? Is recreational and cultural activity embracing the arts, heritage, the environment, dialect and sport promoted along with multicultural understanding, respect for all and equality of opportunity? Do policies stem outward migration from rural communities? Do policies allow for inward migration of persons outside the locality?
Effective protection of the environment		
EN1	To protect and enhance biodiversity	Does the plan protect and conserve habitats and species especially where these may be rare, declining, threatened or indigenous. Will the plan ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource? Do policies minimise adverse impacts on species and habitats through human activities and development? Do policies ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species? Are the impacts of climate change on biodiversity taken into account?
EN2	To preserve, enhance and manage landscape quality and character for future generations	Is local landscape quality, distinctiveness and character protected from unsympathetic development and changes in land management? Is the remoteness and tranquillity of landscapes maintained? Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected? Are areas of high archaeological and historic landscape sensitivity protected? Do policies encourage low input organic farming with environmental stewardship styles of land management? Do they sustain and extend tree cover, hedgerows, woodlands and sustainable forestry?
EN3	To improve the quality of the built environment	Does the plan conserve features of historic and archaeological importance? Will policies ensure that new development is of high quality, sympathetic to the character of the built environment, strengthen local distinctiveness, enhance the public realm and help create a sense of place? Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation? Will policies guide inappropriate development away from flood risk areas? Do policies ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated? Will the plan reduce noise levels, light pollution, fly tipping, the spread of litter and graffiti?

Reference	Sustainability Objectives	Sustainability Framework: guidance on making progress towards each objective
Sustainable use and management of natural resources		
NR1	To improve local air quality and respond to the effects of climate	Will the plan ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary? Will policies limit or reduce the emission of greenhouse gases and other air pollutants? Will the use of clean, low carbon energy efficient technologies be encouraged? Will policies maximise the use of energy from appropriate renewable resources including biofuels? Will they reduce the need to travel especially by car, and switch goods from roads onto the rail network? Will the plan introduce strategies to adapt to and mitigate other climate change impacts?
NR2	To improve water quality and water resources	Will the plan maintain and, where possible, improve the quality and quantity of all water resources, including marine and coastal waters? Will policies ensure sustainable drainage systems are widely used? Will policies lead to the effective management of demand for water, prevent stress on the natural environment and help water users adapt to the impacts of climate change?
NR3	To restore and protect land and soil	Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site? Will it minimise the loss of greenfield sites or areas of open space? Will policies prevent soil degradation, pollution of soil and the use of peat? Does the plan consider the impacts of climate change on agriculture and forestry?
NR4	To manage natural resources sustainably and minimise waste	Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material? Will the plan seek to mitigate negative effects upon air quality and water use through extraction? Will the plan minimise the amounts of industrial, commercial and household waste generated and increase re-use, recovery and recycling? Will it promote the use of energy recovered from waste?
Building a sustainable economy in which all can prosper		
EC1	To retain existing jobs and create new employment opportunities	Will the plan increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise? Will the plan support local companies and help local businesses develop export markets? Will the plan help retain a skilled workforce, graduates and companies in Cumbria that are able to prosper in a low carbon economy?
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?

Reference	Sustainability Objectives	Sustainability Framework: guidance on making progress towards each objective
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?

6. Sustainability Appraisal Methodology

SA Process: Stage A (Scoping)

In 2007 Eden produced a joint scoping report, which set the context, baseline information and remit of the sustainability appraisal. It proposed the issues which would be important to understand the sustainability issues on identified sites, and proposed a methodology for assessing the sites. 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 comments were received as follows:

Cumbria County Council were broadly supportive of the report, in particular they welcomed the approach to develop a criteria for appraising sites. Emphasis was made to the SEA of the wind energy SPD, as an influencing document.

A list of updated plans and programmes were supplied by **English Heritage**, who also commented on a number of indicators to include and recommended that conservation officers are utilised early in the SA process, to ensure that concerns related to the historic environment are addressed early in the process.

The **Environment Agency** also added a number of key documents for consideration in the baseline. In particular, they wanted to highlight the importance of watercourses on development sites, and the impacts that this may lead to, particularly in the construction phase. These comments have been reflected in the appraisal methodology for the preferred sites and policies document.

In addition to key documents added into the early review, **Natural England** requested various sustainability issues be included in the scope, along with early reference to the need for a habitats regulations assessment. A HRA screening will be undertaken alongside this sustainability assessment, and other sustainability issues such as reuse of materials and access to open spaces will be considered as part of the plan.

SA Process: Stage B (Developing and refining options and assessing effects)

The Council published the Housing Issues and Options/Alternative sites in 2007/2008 respectively. These investigated various policy issues and proposed an initial call for sites. All of the policy issues have since been incorporated into the Core Strategy which was adopted in 2010. The sites proposed in both of these documents have been subject to consultation and SA, forming the basis of this document.

Consultation comments from this stage can be found in the summary of responses, published in 2008.

SA Process: Stage C (Preparing the Sustainability Appraisal Report)

This report has been prepared to meet the requirements of this stage. It has mirrored the development of the preferred sites and policies document, and aims to appraise the sustainability of the options, considering reasonable options for development where suitable. Though key considerations for the SA will have been integrated into the development of the plan, the consultation summary will address the sustainability implications proposed from the SA.

SA Process: Stage D (Consulting on the preferred options of the document and SA report)

The consultation stage will last 8 weeks, aligning itself with the preferred sites and policies document. Responses will be sought from statutory consultees in particular, though the consultation is open to other interest groups and members of the public.

SA Process: Stage E: (Monitoring the significant effects of implementing the plan)

The SA report identifies tools that could be used to monitor future rates of development that are proposed through this document. Many of these will be adaptations of the monitoring system outlined in the Core Strategy, which are monitored through the Annual Monitoring Report. As the document progresses, specific indicators and targets will be established that can monitor the effectiveness of the document.

Preferred Housing Sites and Policies Methodology

The Housing allocations document will build upon in more detail the evidence and policies that emerge from the Core Strategy. Various forms of evidence such as Eden's SHLAA and draft SHMAA are vital to creating a robust evidence base that will aid the creation of sound policies.

The Housing allocations and sites will also allocate sites in the district favourable for residential development to cover the LDF plan period until 2025.

Prior to the assessment of sites using the sustainability appraisal, a number of filters have been applied to the sites to remove sites which would be unacceptable from the outset, in terms of suitability and conformity with the Core Strategy. Sites have been excluded from the appraisal process if they:

- Are below a size threshold of 0.14ha; as these sites are less capable of providing an element of affordable housing when developed at 30DPH. It is worth noting that in the SHLAA, a size threshold of >0.5ha in KSCs and >0.1ha in LSCs was used; however, this has since been revised to ensure a consistent approach, and reflect the potential of higher density schemes in the main towns.
- Are submitted outside of the development hierarchy, as set in the Core Strategy. This includes sites outside of Key or Local Service Centres. Whilst some of these sites may be suitable for 100% affordable housing schemes, they would be classified as an exception to policy.
- Are prone to flooding. Whilst sites will be screened for their flood risk, any sites that include a sizable area of flood zones 3a/3b have been removed from the plan from the outset.
- Have a current planning permission. Since the previous rounds of consultation, some sites have either been granted permission for development, or begun construction. We have not excluded sites if it has a planning permission, as it does not always preclude development, however if development has commenced on site, these have been removed from our assessment.

- Lie within a heritage asset. If sites fall within a Scheduled Ancient Monument (SAM) or historic park/garden, these have been automatically discounted.
- Lie within a nature site of International significance. If the site falls within a Special Area of Conservation (SAC), Special Protection Area (SPA) or RAMSAR, it has been discounted from the outset.

Table 15: Sites included within Sustainability Appraisal

Locations	All Sites Submitted	Too Small	Unsuitable Location	Flood Risk	Sites with planning permission	Within Heritage Asset	No Longer Available	Within Natural Asset	Other	Sites Assessed in Document/SA
Penrith	104	5	0	0	13	0	3	0	2	81
Alston	11	0	0	0	2	0	0	0	0	9
Appleby	18	2	0	0	1	0	0	0	0	15
Kirkby Stephen	22	1	0	1	2	0	0	0	0	18
LSCs/Other	271	28	83	5	12	2	0	0	0	141
Total	426	38	0	6	18	0	3	0	2	264

SA Sites and Policies

The site assessment matrix has been adapted since the previous iterations of the Sustainability Appraisal. Though there have been tweaks to the sites methodology, the principles of what the indicators were trying to achieve have not changed. The new alterations reflect updated datasets and approaches to understanding the sustainability of proposed housing sites. In particular, indicators have been created to assess the impacts of new development against soil, water and resources, all of which are included within the SEA Directive.

The list of objectives has been translated into quantifiable indicators, which can be used to assess either housing sites or policies. This approach was first used in 2007 when the Council published its Housing: Issues and Options paper, and was again used for the Alternative Sites consultation paper. Moving into the Preferred Options document, the method used for testing housing policies remains the same, however, the indicator list to appraise the sustainability of housing sites has been adjusted. The new list of indicators accounts for updated datasets and assessment tools, which were not fully developed in previous stages of assessment.

The housing matrix, derived from the SA framework, will consider the constraints and positive attributes of each site that can be presented in an objective way. The site allocations have been tested against potential constraints to delivery, but also the potential to enhance and sustain services. Nationally derived distance thresholds were used to understand the impact of new housing sites and the potential secondary effects such as the likelihood that sites promote sustainable forms of transport.

The matrix will be compiled as a desktop exercise with the indicators requiring site assessments to be grouped together with the site assessments for the Housing DPD. Assessment of sites and policies using a different methodology is required as sustainability issues on site vary from issues met in the SA framework, which is better suited to assess sustainability at a policy level. Asking the questions listed in table XX, the policy assessments will follow the sustainability framework. The site appraisals on the other hand, will be judged in relation to the following criteria:

- Access to voting stations
- Access to shop
- Access to post office
- Access to public transport
- Potential flood risk (fluvial and surface water)
- Access to primary schools
- Access to secondary schools
- Access to GP surgery
- Access to cultural and/or leisure facilities
- Access to play areas and accessible green spaces
- Neighbouring conditions
- Location in relation to settlement
- Potential impacts upon the biodiversity
- Potential impact on landscape quality
- Potential impact upon the built/historic environment
- Impact on air quality
- Potential inclusion of renewable technologies
- Water availability/disposal
- Impact on water quality
- Greenfield or brownfield land
- Potential contamination
- Agricultural land classification
- Access to recycling facilities
- Access to higher education and adult education facilities
- Access to key employment areas

Although the sites and policies will be appraised using a slightly different set of criteria the scoring system will be identical. This scoring system has been used in the previous iterations of the sustainability appraisal and will be followed through the process to ensure a consistency of approach. The full matrices for both policy and site assessment can be found in Appendices, 1 and 2. In line with the SEA directive, it is required that assessments consider the potential effects of development in both the short and long term, but also the relationship of sites on a cumulative and synergistic basis. This has been addressed individually for each policy element, or in the comments section for the site assessments.

Table 16: SA scoring system

Score	Definition
++	Highly Compatible with sustainability objectives
+	Compatible with sustainability objectives
0	Neutral Impacts
?	Impacts uncertain
-	Incompatible with sustainability objectives
--	Highly incompatible with sustainability objectives

Limitations of Approach

GIS led approach

Many of the indicators are reliant on spatial thresholds from key services. The foundations for this assessment rely on maintaining a list of key services, which may over time change or be lost. As the Preferred Options document was being written, another process was also taking place to undertake a review of the Local Service Centres.

The Core Strategy takes a flexible view of Local Service Centres, which seeks to review them every two years. As the LSC criterion is based around service provision, settlements may either gain or lose status, depending on the biennial assessments. In 2012 the first review of LSC services was undertaken. This involved a joint exercise between planning officers and members of Eden's Scrutiny Review Committee.

Whilst it may be a consideration for future sustainability appraisals, the list of services in Eden can be considered accurate for the purposes of this report.

Datasets

Many of the indicators relied on distance thresholds to determine how suitable the sites were against the sustainability objectives. There are a number of other indicators which involve an element of judgement from the planning officer. Two officers were involved in the assessment stage, and regular communication ensured that the data was interpreted in a consistent way.

There were difficulties however in the application of some of the indicators. For example, data on water availability and disposal is not complete. The Local Planning Authority have met with United Utilities over the past two years to understand the areas which have freshwater/wastewater capacity issues, however there are still areas in Eden where the situation is unknown. We would anticipate that both United Utilities and Northumbrian Water will comment on the plan and we will feed information into our assessments accordingly.

With regards to biodiversity, sites have been screened against known local, national and international designations, along with evidence of key species data. We have tried to list all the potential species which may be present on site though it is recognised that further work will need to take place to understand in more detail the likely impacts on the sites and neighbouring biodiversity corridors. As the pattern of sites becomes clearer, additional evidence will be commissioned to investigate the impacts of development on the sites, which may lead to identifying alternative sites if suitable mitigation measures cannot be made on site.

Impacts on air and water quality have been formulated through a composite of both distance thresholds, and consultation with the Council's environmental health team. Due to the rural nature of the district, the Authority only monitors air quality in Penrith. Impacts of modest levels of new development in the Local Service Centres were not considered to lead to significant impacts. In addition to this, access to key services was also measured, which would serve as an indicator of potential car usage.

Assessments

A number of assessments have been undertaken to account for all of the sites, policies and their alternative options.

The one omission in the process is that individual local service centre sites have not been assessed. This decision was taken based on practicalities associated with assessing each individual site. Against a need of 168 units, 271 sites were submitted in the Local Service Centres.

Instead, the distribution and features of each local service centre has been appraised, which identifies the settlements performing well or poorly against the criteria. The approach used to appraise the different settlements was developed in an early stage of the options generation. As such, the appraisal of the LSCs was able to be fed into the site selection process to inform the most sustainable sites.

In addition to the settlement surveys, the LSC options appraisals have also been tested against the sustainability framework, to determine which options lead to the most sustainable pattern of development. This adds another dimension to the testing of the LSCs, to ensure that the most suitable options are presented.

7. Appraisal of Allocations

This section aims to present data collected using the methodologies listed above. Summaries of the predicted impacts of sites, or groups of sites are detailed in relation to each settlement. It is not intended that this section will detail the sustainability implications for each site, but will provide an overview for each of the settlements, based on the comparison of Eden's preferred sites against the alternative options. Whilst the policies will also be tested against the alternative options, they will be represented thematically against the different sustainability objectives. In accordance with the SEA Directive, the results will identify sites and policies which may lead to significant impacts upon the environment and human health. Where significant impacts are recorded, alternative options presented may be considered more suitable, or mitigation measures may be recommended in the later chapters. The detailed policy and site appraisals can be found in appendices 1 and 2.

SP1: To increase the level of participation in democratic processes

One of the appraisal criteria related to this objective, which ranked settlements against whether they had suitable access to polling stations. Most settlements scored well against this criteria, as many villages have access to a village hall, or alternative building that is used for elections.

As part of the SEA Directive, it is a requirement for statutory consultees and the public to be invited to comment on the document. Representations have already been accounted for during the Scoping and Issues and Options/Alternative sites stages.

SP2: To improve access to services, facilities, the countryside and open spaces

The sustainability appraisal used a number of distance based criteria to understand the impact of new development on existing facilities and services.

Generally, the Key Service Centres were awarded the highest scores against these criteria. The subtleties between sites in these centres helped highlight the more suitable sites, but also indicated which of the services within the criteria were inaccessible by sustainable means.

Given the low service provision in much of rural Eden, the Local Services Centres were more divisively split, as certain settlements demonstrated stronger performance against this criteria. This has been a defining criteria in separating which LSCs are considered more suitable for strategic development.

SP3: To provide everyone with a decent home

The delivery of the housing allocations document will be one of the key strategies to unlocking new growth in the district. Whilst all sites may be able to bring forward additional housing, the type and size of the site may dictate housing mix and levels of affordable housing that can be secured on site. Following the approach advocated by the SA, there will be greater potential of delivering greater numbers of affordable housing in locations that are accessible by sustainable forms of transport. This reflects a recent shift of housing need to the more populous areas, as fuel poverty is out pricing many residents from rural areas.

The housing mix policy will also give greater weight to ensuring that the evidence base drives the type of housing needed in different areas in Eden.

SP4: To improve the level of skills, education and training

The site assessments relate to access to primary/secondary education, and locations for adult education and training.

The majority of settlements considered to be the most sustainable have strong access to primary schools. Many of the sites score poorly against secondary schools, as only the Key Service Centres have access to secondary education.

The Council is already in discussions with Cumbria County Council to plan for growth in Penrith. Given the levels of growth, a number of new school facilities will be required. As the preferred sites and policies document progresses the Council will identify which schools outside of Penrith require further investment that can be secured as a contribution from new development.

SP5: To improve the health and sense of well-being of people

Sites have been assessed against access to medical centres but also to access to green spaces and play areas. The district does not support a great number of health services, though supporting locations which can access them in a reasonable time has been an influential criteria.

As the document develops, it will need to consider in more detail the linkages between health and green spaces. This has been a particular issue with the strategic urban extensions, where wording has been recommended to enhance this policy.

SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense local history

The character of settlements has been considered through this indicator, to ensure that new development helps to support key facilities but at the same time is not overbearing on settlement character.

The SA has ensured that infill sites have been prioritised, with reference to sites that can support a range of house types.

EN1: To protect and enhance biodiversity

Sites have taken account of prominent biodiversity that are near, or linked to particular development sites. Particular reference has been given to the European sites, which have been covered through the Habitats Regulations Screening Report.

Sites that have been highlighted to have the potential to impact biodiversity on site, alone or in combination with other sites, will be subject to further assessment after the consultation of the preferred sites and policies document.

EN2: To preserve, enhance and manage landscape quality and character for future generations

Landscape impact has been an important feature, in line with the 2006 European landscape convention. Scoring for the sites have been adapted from evidence developed for the Council, and recommend screening measures to mitigate against the impacts of development. The influence of the AONB has also been important, as new developments in Alston moor are considered to need particular design standards, in line with the AONB design guide.

EN3: To improve the quality of the built environment

Sites that were within 250m of a Scheduled Ancient Monument have been filtered from the assessment process. Sites have been appraised for their ability not only to be sympathetic with heritage interests, but for the possibility to enhance the historic environment. There are limited cases where this has occurred, though they have been noted in the scoring.

Design specific policies like the one in the document add further weight to CS18, which will ensure that standards of design are increased for the new allocations.

NR1: To improve local air quality and respond to the effects of climate

The environmental health team have been influential in providing information within the Key Service Centres to understand areas which suffer from air quality issues. Whilst these considerations have been fed into the plan, the main way the SA has judged sites and policies against this indicator is through the likelihood the sites using sustainable modes of transport. Focussed development in larger areas scored better against the SA in this objective.

NR2: To improve water quality and water resources

Sites and policies have been tested against water quality and resource. In particular, much of the focus has been the water capacity and availability. Eden DC have used information guided by United Utilities and the Environment Agency to ensure that new development does not occur in inappropriate locations.

NR3: To restore and protect land and soil

The SA investigated whether the land proposed represented a significant value in soil quality. This was tested through assessing whether sites were greenfield or brownfield, and a wider assessment of agricultural land value. Of the housing options, the brownfield sites have more often been recommended as the most sustainable sites, though there have not been significant differences in land quality across the sites.

NR4: To manage natural resources sustainably and minimise waste

All new development is likely to lead to increased waste. The policy has considered the impacts of domestic waste, but also the effects of CS18, which requires that locally sourced materials are used where feasible.

Eden DC operates a comprehensive door recycle service, which will mitigate many of the effects of domestic waste, however the locational strategy has still be a guiding factor to ensure that waste journeys are not exacerbated through rural sprawl.

EC1: To retain existing jobs and create new employment opportunities

It has been considered that new development in both the towns and villages will help to deliver construction jobs to the district. The information guiding this indicator will be enhanced once the Employment sites document is developed to a more advanced stage.

EC2/EC3: To improve access to jobs & diversify and strengthen the local economy

Access to employment centres was the guiding principal behind this indicator. The next stage of the assessment will be integrated with information from the employment sites document. There was a weak correlation with many of the objectives as the 1996 Local Plan sites give little bearing to where new growth may be allocated. Benefits have been derived in this indicator through a steady stream of employment in the construction industry, though the benefits will be limited without a diverse employment base.

8. Conclusion and Recommendations

General

A number of details regarding the sites can be found in this section, along with recommended alternative sites and mitigation measures. Full site and policy appraisals can be found in Appendices 2 and 3.

Housing Allocations

Penrith

A total of 80 sites have been assessed against the sustainability framework in Penrith. Though all sites have been assessed individually, the larger urban extensions have been grouped together in parcels, to more accurately account for the potential cumulative impacts of development.

The largest distinction within the group of sites is the scores relating to access to key services. It becomes clear when looking at a number of urban extensions on the fringes of the town, they score poorly in comparison to more central sites. Though these sites are attributed better scores than some of the sites tested in more rural areas, the scale of development highlights a need for new services to be delivered if they are to be taken forward by the Council.

Though some sites perform better than others in terms of social objectives, there are no sites in Penrith that perform poorly against social objectives. This being said, the extent of development through any of the housing options will create peripheral extensions which will require additional services to reduce the need to travel.

Housing options 2 and 4 scored less well against these indicators, as the focus of development spreads north of the town. All of these extensions would perform better against social objectives if provision was given for new primary schools and open space. This requires substantial new development in the growth areas to generate contributions for these forms of infrastructure.

One of the key forms of evidence for the environmental impact on Penrith is the landscape impact assessment. The majority of housing sites have been tested through this assessment, which considers that sites to the north and east of Penrith will have a high landscape impact. This, to a certain extent is unavoidable given the proposed levels of development. Elsewhere, given the land take of greenfield sites, there will be an ecological deficit as a result of the plan, compensation of which needs to be a key consideration as the plan develops. The development of these greenfield sites will also need to compensate for the amount of potential additional surface water created as a result of development. Of particular interest is the impact upon the River Eden. Extensions in Penrith may drain into this river, which is an internationally designated site.

Broad positive scores were awarded against economic indicators in Penrith. As the employment centre for the district, new development is expected to support the construction industry through the plan period and may be a catalyst for further inward investment.

Table 17: Summary of Penrith Housing Options

Best Performing Options	Option 1, Option 3, Option 5
Poorest Performing Option	Option 2, Option 4
Council's Preferred Option	Option 1
	Option 1, Option 3, Option 5
	Option 2, Option 4

The sustainability appraisal is supportive of the option chosen for Penrith. Developed from the Penrith masterplan, this option is grounded in solid evidence. Options 3 and 5 also score well against the sustainability appraisal, however less work has been undertaken on the sites to establish their overall suitability and achievability.

Alston

Eleven sites were brought forward in the town from previous documents. All but two of these sites have been tested, removing those sites currently under construction. Given the compact nature of the town, many of the sites scored well against the sustainability criteria.

All sites scored well against social criteria, with most sites falling within walking distance of key services. The following sites scored less well against this objective, due to proximity to a primary school and open space AL2, AL5, AL6, AL7, AL9, AL10.

There was a mix of scores upon environmental objectives. There are a number of brownfield sites in the town, which could be improved upon through reuse as residential housing. This would improve local soil quality and enhance the built environment, including the Alston conservation area, which is currently on the heritage at risk register. It is likely that there will be risks to local biodiversity, though the extents are unknown. Landscape quality on the other hand may be enhanced on certain brownfield sites.

As a Key Service Centre Alston is considered to have access to employment facilities. In reality, we understand that Alston's economy has suffered as a result of the economic downturn. In the absence of adult training facilities, all sites in the town have a mixed score relating to employment objectives.

Table 18: Summary of Alston Housing Options

Best Performing Sites	AL1, AL3, AL4, AL8, AL10, AL11
Poorest Performing Sites	AL6, AL7, AL9
Council's Preferred Option	AL1, AL3, AL4, AL7, AL8, AL9, AL10, AL11
	AL3, AL8
	AL1, AL4, AL10, AL11
	AL6, AL7, AL9

Though there is not a great degree of flexibility, given the small number of sites, this option could be improved through not selecting sites AL7 and AL9. Though there is some development already in this area of Alston, it is unlikely to support any service provision and feels spatially inconsistent with the town.

Appleby




Fourteen sites in Appleby have been assessed for housing development. A mix of positive and neutral affects on the sustainability appraisal indicators have been identified for all of the sites, with very few negative affects.

A number of sites are likely to have significant positive effects on the social indicators, including AP2, 10, 11, 9, 13 and 18 as they are relatively more easily accessible in relation to key services and facilities than the other sites. None of the sites are likely to have negative social effects, as they are all located within the settlement and Appleby is a Key service Centre with a range of services and facilities. Sites AP6 and 8 are the least accessible sites and are expected to be in neutral in terms of social effects.

None of the sites are expected to a negative effect on the environmental sustainability appraisal indicators. Only two of the sites; AP2 and AP8 are likely to have a significant positive effect as they are brownfield sites and their development would improve the landscape in particular. The remaining sites are likely to have little effect on the environmental indicators, as they are all greenfield sites and are not located within close proximity to any landscape or biodiversity designations.

All of the sites are likely to have significant positive effects on the economic objectives (EC1, 2 and 3), as Appleby is an employment centre and all the sites are within the settlement.

Table 19: Summary of Appleby Housing Options

Best Performing Sites	AP2, AP4, AP5, AP14, AP10, AP11, AP7, AP8, AP9, AP13, AP18
Poorest Performing Sites	AP17, AP12, AP16, AP6
Council's Preferred Option	AP11 (Part) AP5 (Consented permission)
	AP2, AP4, AP5
	AP14, AP10, AP11, AP7, AP8, AP9, AP13, AP18
	AP17, AP12, AP16, AP6

The housing option chosen by the Council reflects one of the more sustainable sites appraised AP5, which has an approved planning consent. The sustainability appraisal identifies two further sites which may be more suitable than those proposed by the Council. It is understood that these sites have logistical difficulties, not recognised by the sustainability appraisal, which discounts them as suitable.

Kirkby Stephen

Seventeen sites in Kirkby Stephen have been assessed for housing development. Mainly positive and neutral effects have been identified, and a very small number of negative effects. KS8, KS16 and KS14 have been sieved out from the outset either on grounds of size or major constraints.




The only site not expected to have a positive effect on the social sustainability indicators is site KS14, as it is located significantly further away from key services and facilities than the other sites. A number of sites are expected to have a significant positive effect socially, with sites KS8, KS9 and KS22 receiving the highest scores as they are relatively more easily accessible in relation to key services and facilities than the other sites.

In general the sites in Kirkby Stephen do not score as well against the environmental indicators as they do against the social and economic indicators. All of the sites will have a significant negative effect on water resources, as United Utilities have identified capacity issues in Kirkby Stephen given the expected rates of development. Furthermore, a number of the sites are within close proximity to the River Eden and may effect the water quality.

Sites KS10, KS14, KS21 and KS22 are expected to have a negative effect on the environment. Sites KS14, 21 and 22 border the River Eden, whilst KS10 would have implications for landscape character. Sites KS4, KS5, KS6, KS11, KS15, KS13 and KS15 are expected to have a positive effect on the environmental indicators, whilst the remaining sites are likely to have no effect.

All of the sites are likely to have significant positive effects on the economic objectives (EC1, 2 and 3), as Kirkby Stephen is an employment centre and all the sites are within the settlement.

Table 20: Summary of Kirkby Stephen Housing Options

Sites preferred	KS4, KS13, KS5, KS6, , KS9, KS10, KS11, KS15, KS17, KS19
Sites not preferred	KS2, KS3, KS7, KS20, KS22, KS18, KS21
Council's Preferred Option	KS2, KS4, KS5, KS7, KS9, KS15, KS17, KS22
	KS4, KS13, KS5, KS6, KS9, KS10
	KS11, KS15, KS17, KS19
	KS2, KS3, KS7, KS20, KS22, KS18, KS21

The Council's preferred option and the sites identified as most sustainable are broadly similar. Though site KS2 was not considered appropriate in the appraisal, it has since been combined with KS5, which is likely to lead to more sustainable outcomes. There are a number of large sites in the town that are likely to need new green and grey infrastructure to support the development of the site, that will increase the sustainability of the sites. This will be investigated as the plan is developed further.

Local Service Centres



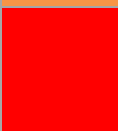
After relevant filters have been applied to sieve unsuitable housing locations, we have 134 housing sites in the Local Service Centres to choose from. Rather than appraise each housing site, the Local Service Centres themselves have been appraised for suitability of location.

The appraisal found there was a mix of scores in the Local Service Centres, reflecting a mix of villages with varying levels of service provision. There are a number of settlements which are rich in services, meeting many social objectives, however a number of other settlements will be heavily reliant on travel to neighbouring villages for shops, schools etc. Many of the centres scored poorly in terms of access to secondary schools and health services, reflecting the limited provision in the district.

There were varying impacts on the natural environment. Many settlements have historically grown around the River Eden for protection or resources. Depending on the pattern of development proposed this could lead to cumulative impacts on the river, which is designated as a site of European significance. Recent correspondence with United Utilities has also highlighted capacity issues with a number of Eden's service centres, which has been reflected in the assessments.

Whereas many villages in the list may have some service provision, the economic indicators have been divisive in separating which settlements are more sustainably located to employment areas. In the main, settlements with good access to the Key Service Centres have scored well against this indicator set.

Table 21: Summary of Local Service Centre Housing Options

Locations Preferred	Armathwaite, Brough, Clifton, Greystoke, Kirkby Thore, Kirkoswald, Langwathby, Lazonby, Nenthead, Orton, Plumpton, Shap, Sockbridge & Tirril, Stainton, Tebay, Temple Sowerby, Yanwath
Locations not preferred	Bolton, Calthwaite, Croglin, Crosby Ravensworth Culgaith, Gamblesby, Great Asby, Hackthorpe, High Hesket, Ivegill, Kings Meaburn Long Marton, Maulds Meaburn, Melmerby, Milburn, Morland, Ousby, Ravenstonedale, Renwick, Skelton, Warcop
Council's Preferred Locations	Armathwaite, Bolton, Hackthorpe, Kings Meaburn, Kirkby Thore, Kirkoswald, Langwathby (2 Sites), Lazonby, Morland, Tebay, Temple Sowerby, Warcop
	Brough, Langwathby, Lazonby, Plumpton, Shap, Stainton, Tebay
	Armathwaite, Clifton, Greystoke, Kirkby Thore, Kirkoswald, Nenthead, Orton, Sockbridge & Tirril, Temple Sowerby, Yanwath
	Bolton, Calthwaite, Croglin, Crosby Ravensworth Culgaith, Gamblesby, Great Asby, Hackthorpe, High Hesket, Ivegill, Kings Meaburn Long Marton, Maulds Meaburn, Melmerby, Milburn, Morland, Ousby, Ravenstonedale, Renwick, Skelton, Warcop

A number of locations have been considered in the Council's preferred option which would be considered unsuitable in the sustainability appraisal. Part of the rationale behind this is that sites within the 5 year land supply have been included. The sites have not been chosen on sustainability credentials but reflect progress has already been made to develop these sites.

This hierarchy for development could be improved upon by focussing development to the most sustainable centres on this list. Though this would limit the amount of development that is directed to smaller centres, it would reduce the need to travel for smaller journeys and help sustain the services in these centres.

Housing Policies

HS1: Local Service Centres

The list of settlements in this policy has been awarded a similar score to that of in the Core Strategy in 2010. The proposed list would, however, lead to enhancements over the 2010 list, as a number of less sustainable centres have been removed. This is likely to lead to a pattern of development that results in more sustainable outcomes overall. Other policy options tested resulted in greater uncertainty for future development and included a possibility of negative scores if a laissez faire approach was adopted.

The policy could be enhanced by providing a more explicit option 2 to test. This policy recommended changing the service criteria, but did not indicate what would be the guiding features. Scores could be increased if the criteria for development were changed to include only settlements with regular public transport. Though a mechanism would also be needed to facilitate growth in smaller settlements, it would mean that new strategic growth would be directed to the most sustainable locations.

HS2: Housing Allocations

Covered in site assessments, above.

HS3: Masterplans

The proposal scored positively overall, with several significantly positive scores against social objectives, positive scores against economic objectives and mixed scores against environmental objectives. It would provide much-needed housing in a relatively sustainable location. If detailed proposals for this site included environmental protection and enhancement measures, there would be potential for many of these scores to improve.

There are ways in which this policy could be enhanced:

- a) The grouping of sites in the North may be more manageable if subdivided into two distinct areas, comprising of N1 as a separate masterplan and N2-4 as a second area.
- b) The third paragraph of the text should also include an agreed approach to pedestrian movement strategies and biodiversity enhancements.

HS4: Additional Housing to Meet Local Need in Rural Areas

The proposal includes permitting new housing in addition to the numbers proposed in the main plan scored positively overall, with several significantly positive scores against social objectives, positive scores against economic objectives and mixed scores against environmental objectives. Under this policy, local communities would benefit from additional housing that would help sustain village growth and keep services viable. It would also bring short term benefits to the construction industry, as these properties are built. It does however promote a pattern of development in locations which are not well connected to larger centres and key services.

- a) The scoring could be improved by ensuring that more development is focussed to areas which have better access to public transport and other services.

HS5: Housing Mix

The proposal scored positively overall, with several significantly positive scores against social and economic objectives and little correlation with environmental objectives. It would provide much-needed housing to meet the needs of the local population. Two other options are considered, but this is the preferred option. No mitigation measures are required.

HS6: Design

The proposal scored positively overall, borrowing design criteria from a nationally established dataset. Whilst this policy may include additional guidelines to foster sustainable development, it is a relatively unknown tool. Following the previously used national approach, BfL should be advocated for developments >10 units, but given a degree of flexibility for smaller developments. Rural scores are less positive than urban in this assessment, accounting for the reduced scale of rural developments.

The sustainability criteria found no issue with the BfL criteria, the requirement for all new residential schemes to undertake this assessment may be overbearing. The following amendment would therefore be recommended:

- a) It would be therefore appropriate to amend the first paragraph of the policy to read "All development proposals should, where feasible, undertake a BfL assessment and are expected to perform well against this criterion.

HS7: Housing for Older People and Those in Need of Support

The policy scores generally positively against the sustainability indicators overall, with significantly positive scores against the social indicators and generally positive scores against the economic indicators. It has the potential to provide housing for specialist groups in the most suitable and sustainable locations, which in turn will have some positive effects on community sustainability, jobs and inward investment. The scores against the environmental indicators are relatively neutral with some potential negative implications if the draw of new development outweighs the protection of the built and natural environment. Additional wording could be added to the policy, which would ensure that environmental considerations are not outweighed by the draw of new development.

HS8: Essential Dwellings for Workers in the Countryside

The policy scores positively against the economic objectives, in particular at the rural scale and in the long term. It is likely the policy will sustain and strengthen rural businesses. The policy scores negatively against the social objectives as the developments it is permitting are likely to be located in rural and sometimes remote areas where the access to services and facilities is poor, and there is less of a sense of community. The policy scores relatively neutrally against the environmental objectives, with the potential for some negative effects, particularly in the long term, if the policy isn't enforced successfully to mitigate against them.

To mitigate against the potential environmental implications, an additional two criteria have been added. Their successful implementation will be essential.

- a) Where the siting and design of the dwelling is well related to existing buildings and the design respects and complements local tradition and setting.
- b) Where development will not have any significant impacts on local landscape, archaeological or conservation interests.

HS9: Self Build Housing and Community Land Trusts

It is difficult to determine the effects of this policy against a number of criterion, particularly the environmental indicators. Positive scores have been awarded against some of the social criteria, but the rural nature of the policy may lead to development in unsustainable locations.

HS10: Conversion of Employment Sites to Housing

This policy is awarded a mix of scores, as it is difficult to understand the locations that may come forward for redevelopment. The policy scores less well against social objectives, as rural employment sites are unlikely to be accessible to a range of services. This policy may encourage the reuse of existing buildings, which would enhance the built environment, and improve environmental conditions in rural areas.

Policy could be enhanced by including permitting development if "there are not strong economic or environmental reasons why it would be inappropriate".

HS11: Holiday Accommodation

This policy represents an improvement on previous policy documents, through encouraging holiday lets, and the conversion of holiday lets to affordable homes in sustainable locations. Following the locational hierarchy set in the Core Strategy will lead to a reduced need to travel, and promote farm diversification outside of the KSCs/LSCs. Though the policy directs holiday lets to more appropriate locations, the opportunity to convert rural units to affordable units may also lead to unsustainable outcomes. What is uncertain is whether there is a demand for holiday accommodation within our current settlement hierarchy, and whether land owners will choose to develop an open market unit if given the choice, as this may be a more profitable enterprise. The policy could be enhanced though the following inclusions:

- a) The reuse of traditional farm buildings is encouraged for holiday accommodation, provided there are not significant ecological reasons for doing so.
- b) The spread of converted units from holiday to affordable gives greater consideration to sustainable locations. As fuel poverty becomes more of an issue in Eden, conversions of holiday units should consider the end users needs, including accessibility.

HS12: Live/Work Units

This policy scored well against objectives relating to economic development, though poorly against other criterion. Though the inclusion of a live/work policy was considered the most appropriate solution, the flexibility of the policy may lead to unsustainable outcomes. The following inclusions would improve the sustainability of the policy:

- a) If located in a rural area, developers need to demonstrate why the needs of the business cannot be met in a more sustainable area.

- b) Small scale live/work developments will be permitted in KSC/LSCs, however in rural areas new businesses will be limited to owner occupiers. This would ensure that SMEs establish businesses not in inaccessible rural areas, but locations which encourage sustainable transport.

9. Monitoring

Monitoring Framework

Strategic Environmental Assessment Directive requires the significant effects of the Local Plan to be monitored. This will be achieved through using indicators to monitor the impacts on the environment, economy and social aspects of Eden. In particular monitoring will help to address the following questions:

- Were the assessment's predictions of sustainability effects accurate?
- Is the plan contributing to the achievement of desired SA objectives and targets?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

The monitoring will be undertaken on an annual basis and published in the Annual Monitoring Report. It should be noted that there may be some indicators that cannot be measured annually, depending on the type and nature of the indicator, and these will be monitored according to the timescales that are possible. The findings of these indicators will help measure how well the Local Plan: Preferred Housing Sites and Policies contribute to sustainable development, and inform future reviews of the document.

The table below sets out a list of targets to monitor potential significant effects of the preferred policy options, and the indicators that will be monitored to assess them.

Table 22: Monitoring Framework for housing sites and policies document

Sustainability Objective	Significant effect	Indicator
To increase the level of participation in the democratic process	HS1, HS2 and HS7 have the potential to have significant positive effects on the level of participation in the democratic process, largely by ensuring development is in close proximity to community facilities (inc. polling stations).	Election turn out rate
To improve access to services, facilities, the countryside and open spaces	SD1 and HS1 ensure development is located in sustainable locations and have the potential to have significant positive effects. HS3 and HS8 have the potential to have negative implications.	Distance of housing developments to services and open space
To provide everyone with a decent home	HS2, HS5, HS7 and HS8 have the potential to have significant positive effects on the supply of housing to meet the needs of all.	Housing completions Number of affordable housing completions Housing mix of new developments % of unfit stock
To improve the level of skills, education and training	HS1 ensures developments have good access to educational facilities and HS3 allows for the provision of new educational facilities to be planned for.	Qualification levels Number of adults with poor literacy/ numeracy skills
To improve the health and sense of well-being of people	HS2, HS3 and HS7 will have potential significant positive effects on health and wellbeing because of improved provision and access to health facilities. HS7 will have significant positive effects on the health and well being of the elderly and those in need of support.	Number of residents long term sick Mortality rates/ life expectancy
To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	SD1, HS1, HS2, HS3, HS5 and HS7 have the potential to improve social cohesion and community spirit.	Number of people who feel satisfied with the area they live

Sustainability Objective	Significant effect	Indicator
To protect and enhance biodiversity	SD1 will have significant positive effects, whilst HS4, HS7, HS8 and HS11 have the potential to have significant negative effects on biodiversity if the draw of development outweighs the protection of the environment.	Monitor BAP habitats
To preserve, enhance and manage landscape quality and character for future generations	SD1 and HS6 will have significant positive effects , whilst HS4, HS7, HS8 and HS11 have the potential to have significant negative effects on biodiversity if the draw of development outweighs the protection of landscape.	Landscape character assessments
To improve the quality of the built environment	SD1 and HS6 will have significant positive effects, whilst HS4, HS7, HS8 and HS11 have the potential to have significant negative effects on biodiversity if the draw of development outweighs the protection of the built environment.	Number of listings and number on heritage at risk register % of developments assessed as 'green' under Building For Life criteria
To improve local air quality and respond to the effects of climate change	SD1, HS1, HS2, HS6 will have significant positive effects by ensuring development is located to reduce the need to travel by car.	Domestic energy consumption per property Renewable energy deployment
To improve water quality and water resources	SD1 and HS6 will have significant positive effects, whilst HS4, HS7, HS8 and HS11 have the potential to have significant negative effects on biodiversity if the draw of development outweighs the protection of water resources.	Chemical and biological quality of water
To restore and protect land and soil	The sequential approach set out in the core strategy should ensure previously developed land is developed. However, HS4, HS7, HS8 and HS11 have the potential to have significant negative effects.	Percentage of development on previously developed land

Sustainability Objective	Significant effect	Indicator
To manage natural resources sustainably and minimise waste	New housing will undoubtedly increase waste, and therefore HS2, HS4, HS7, HS8, HS9, HS11 and HS12 have the potential to negatively effect the indicator. HS1 will ensure development is located in locations within close proximity to recycling facilities.	Amount of household waste per
To retain existing jobs and create new employment opportunities	HS2, HS8 and HS12 could have significant positive effects on the objective. However, HS9 has the potential to significantly negatively effect the indicator if the loss of employment space is too great.	Number of VAT registered businesses in district Monitor amount of land developed for employment
To improve access to jobs	SD1, HS1, HS7, HS8 and HS12 have the potential to positively effect access to jobs.	Employment/ unemployment figures Monitor methods and distance of travel to work
To diversify and strengthen the local economy	HS1, HS7, HS8, HS11, HS12 have the potential to positively effect the local economy.	Income Amount of land developed for employment by type