

**Eden District Council  
Proposed Submission Draft  
Sustainability Appraisal Report  
September 2015**

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# 1 Introduction

- 1.1 The new Eden Local Plan (2014-2032) (to be referred to as ‘the Local Plan’) will be the driving document in shaping the District including the main settlements and the rural area and how it will develop over the next fifteen years. The Local Plan sets out a long-term spatial vision and strategic objectives to support the development of the District, identifying land which can accommodate new houses and jobs and managing these in a positive way which protects the special and unique landscape and environment in which the District sits. The Local Plan will provide a framework against which to assess future planning applications.
- 1.2 The Local Plan therefore:
  - Sets out the vision of the type of place Eden will be in 2032 if the policies are fully implemented;
  - Identifies a set of objectives which will help to realise the vision;
  - Provides a set of policies and allocations which will guide future growth and decision taking on proposals which come forward ;
  - Ensures that development in the District integrates with other key programmes and targets;
  - Protects the special qualities of the District in terms of landscape quality, biological and geological features.
- 1.3 The Sustainability Appraisal (to be referred to as the ‘SA’) accompanies the Proposed Submission Draft of the Local Plan. SA is carried out as an integral part of developing the policies of the Local Plan and promoting a sustainable development framework. It provides a mechanism to consider the likely effects of the Plan and any alternatives. This enables the Local Plan to avoid and, if necessary, provide mitigation for any adverse effects maximising positive outcomes. The SA is a mandatory requirement and is subject to the same levels of public consultation and the Local Plan itself.
- 1.4 SA is required to be undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 which transposed the EU Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).
- 1.5 The SA process is set out by European and National legislation including:
  - The requirements of European Directive 2001/42/EC (the Strategic Environmental Assessment (SEA) Directive) which requires the preparation of a report which considers the significant environmental effects of a plan or programme. This is supported in UK law by The Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633 (SEA Regulations);

- The Planning and Compulsory Purchase Act 2004 which requires SA of emerging Development Plan Documents and Supplementary Planning Documents;
- The Town and County Planning (Local Planning) (England) Regulations 2012 which highlight SA as a required submission document for local plans; and
- The National Planning Policy Framework 2012 (NPPF) which requires planning policies to be based upon up-to-date information about the natural environment including a SA which should be an integral part of the plan preparation process and consider all the likely significant effects on the environment, economic and social factors (para 165).

1.6 This SA incorporates the requirements of the SEA Directive by combining the more environmentally focussed considerations with wider social and economic effects of the proposed Plan. Guidance on undertaking an SA throughout the Local Plan preparation process is now set out in the Government's Planning Practice Guidance which was introduced in 2014.

### **Purpose of the SA Report**

1.7 The SA process is designed to promote the objectives of sustainable development within planning policy. In order to achieve this, the social, environmental and economic effects of a plan are considered from the outset with the aim of embedding sustainable development in an integrated and successful manner. The SA provides an opportunity to identify likely significant effects of implementation of the Plan and the policies and proposals within it against a number of sustainability objectives. The SA requires the identification of likely significant effects which may come from implementing the Plan.

### **Process of Carrying out the SA**

- 1.8 SA is an iterative process and this report builds on previous work which has been carried out throughout the development of the Local Plan. A Scoping Report was produced in 2014 which was consulted upon and led to amendments in the SA Framework to reflect the comments received.
- 1.9 Work has continued on the SA throughout the development of the Local Plan. A draft SA was publicised with the Preferred Options Local Plan and consulted upon which has been used to inform the development of the Local Plan to its current iteration. The Preferred Options SA should be used in conjunction with this document as it provides SA information on sites which were received throughout the process.
- 1.10 Previous stages have all aided in the formulation of the Submission Draft Document. Earlier versions of the Draft SA are available online at [www.eden.gov.uk](http://www.eden.gov.uk).

## Consultation

- 1.11 The initial SA scoping report consultation documents were sent to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and Cumbria Wildlife Trust. Subsequent stages involved consulting required stakeholders and the wider community. The document was made available on the Council's website and hard copies available on request at the Council's offices and Local Links.

## Eden District Local Plan (2014-32)

- 1.12 The Proposed Submission Draft Eden Local Plan forms a long term vision and the objectives which will be implemented to support the development of a successful Eden District area, accommodating new development necessary to house the population and deliver economic growth in a positive and managed way alongside the delivery of infrastructure needed to support growth. The Plan has been prepared in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Plan) Regulations 2012.

- 1.13 The Local Plan seeks to achieve the following vision between now and 2032;

Eden will build on its strengths and address its weaknesses to deliver improved quality of life for its next generation of residents, an improved experience for its visitors, and will be better placed to attract investment and jobs into the district.

It will continue to prize the natural and built assets which make it unique, and will protect them not only for their own sake, but also as a means of attracting investment and visitors to the area. Eden's towns and villages will have retained the characteristics that provide their character and charm.

By 2032 Eden will have created a more diverse and sustainable population, particularly in terms of age. The provision of housing, jobs, facilities and transport will be based on evidenced need both to meet the needs of older people and to encourage younger people to stay in the district or relocate from elsewhere.

Eden's population will have easy access to a good range of services, facilities and a range of housing to meet its needs, including affordable housing.

The population will continue to enjoy high employment rates and have good access to job opportunities, however, the district will be able to offer a more diverse range of employment opportunities, and contain a better paid, more highly skilled work force.

New employment development will be located to take advantage of Penrith's excellent transport links and the campus at Newton Rigg in Penrith will have developed to provide high quality training, education and research relevant to learners of all ages within and beyond Eden district.

Agriculture and forestry will continue to be important to the economic base of the area with rural diversification playing a significant role in supporting these

industries. A vibrant and thriving tourist and service sector will still significantly contribute to the local economy, attracting day and staying visitors.

Services and facilities will continue to be supported and prized in the rural villages. A sense of local community and belonging will be maintained and reinforced, with decisions made at community level as far as possible.

- 1.14 In order to support the achievement of this vision, there are 17 objectives which provide a context for the strategic and more focussed development management policies. These objectives have been tested against the Sustainability Framework and where necessary amended. The Plan is a strategic document and as such, some detailed issues will require consideration at a later stage (i.e. through the planning application process). The strategic nature of the document is reflected in the scope of the SA.
- 1.15 The objectives of the Eden Local Plan 2014-2032 are as follows:

### **Development in the Right Place**

#### **Objective 1**

To make sure the majority development is focussed into areas where services are available, and where facilities can be supported (**Policies LS1, LS2, PEN1 & 2, AL1, AP1, KS1, RUR1**)

#### **Objective 2**

To make the best and most efficient use of already developed land and buildings (**Policies DEV1 & RUR2**)

#### **Objective 3**

To assist in the development and provision of an accessible and sustainable transport system whilst reducing the need for travel. (**Policies LS1, LS2, DEV3**)

#### **Objective 4**

To encourage high quality, sustainable and safe design for places and spaces, in both the private and public realm, and which respects the character, natural environment and local distinctiveness of Eden. (**Policy DEV5**)

#### **Objective 5**

To guide changes in the built environment in a way that takes proper account of climate change, reducing greenhouse gas emissions and promoting energy efficiency in design and construction of all new developments, reducing current flood risk and effectively managing risk. (**Policies LS1, LS2, DEV1, ENV5**)

## **Meeting Housing Need**

### **Objective 6**

To meet local housing needs and aspirations by seeking a concentration of development within or adjacent to the main towns of Penrith, Appleby, Kirkby Stephen and Alston and the key hubs, whilst giving recognition to the need for development in rural areas to support rural communities and services. **(Policies LS1, LS2, PEN1 & 2, AL1, AP1, KS1, RUR1)**

### **Objective 7**

To support the development and maintenance of a variety of decent, affordable housing which meets the needs of all local people (including the older population) and supports economic and community development. **(Policies HS1-7)**

## **A Strong Economy**

### **Objective 8**

To support and develop an economically sustainable and prosperous area where investment is encouraged, skills are developed and retained and new and existing businesses are supported. **(Policies EC1-7)**

### **Objective 9**

To develop the local economy and meet local employment needs by providing a sufficient number and variety of employment locations and opportunities, at the same time ensuring the specific qualities of the local environment are not damaged. **(Policies EC1-7)**

### **Objective 10**

To promote sustainable tourism by seeking to maximise social and economic benefits in a manner which is acceptable to the local community and does not reduce environment quality. **(Policies EC4 & 5)**

## **A Rich Environment**

### **Objective 11**

To protect and enhance the outstanding natural environment, landscape and historic environment of the District, especially the North Pennines AONB, achieving an acceptable balance between facilitating essential development and maintaining the amenity of settlements and the countryside. **(Policies ENV1-3)**

### **Objective 12**

To protect and enhance the District's biodiversity and in particular its important species and habitats, making them more accessible to the public where appropriate. (Policy ENV1 & 3)

### **Objective 13**

To encourage the harnessing of renewable energy sources wherever they have the prospects of being economically viable and environmentally and socially acceptable, and promoting a low carbon economy. (Policy ENV6 & 7)

### **Objective 14**

To promote the heritage and unique landscape qualities of Eden locally, nationally and internationally. (**Policy ENV2**)

## **Thriving Communities**

### **Objective 15**

To improve the health and well-being of our communities by reducing health inequalities, promoting healthy living and supporting locally accessible, high quality health care. (**Policy COM3**)

### **Objective 16**

To protect and enhance community facilities and services and maximise accessibility to them. (**Policy COM2**)

### **Objective 17**

To encourage and facilitate a sense of community and belonging, and make sure decisions are made at community level as far as possible (**through implementation of this plan and through Neighbourhood Planning**)



## 2 Appraisal Methodology

2.1 The SA has taken account of the most up to date guidance contained within Planning Policy Guidance (PPG) which was provided by the Department of Communities and Local Government in 2014. Whilst acknowledging that the PPG forms the most up to date guidance available, other guidance has been taken into account in the formulation of the SA. This includes:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM 2005);
- A practical Guide to the Strategic Environmental Assessment (SEA) Directive (ODPM 2005);
- Planning Advisory Service (PAS) Sustainability Appraisal Guidance contained within the Communities and Local Government Plan Making Manual.

2.2 The key stages of the SA of the Local Plan as defined within the PPG are:

Table 1: Stages and key tasks of the SA

Stage	Key Tasks
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B	Developing and refining alternative and assessing effects
Stage C	Preparation of Sustainability Appraisal Report
Stage D	Seek representations on the sustainability appraisal report from consultation bodies and the public
Stage E	Post adoption reporting and monitoring

2.3 The SA is an iterative process which is used to identify and report on the likely significant effects of the plan focussing on the environmental, economic and social impacts that are likely to be significant. The intention is to fully integrate the SA into the plan making process from the earliest stage, informing the Plan. The following reports are set out in the guidance as preparation:

- Scoping Report – used for consultation on the scope of the SA at the early stages at the early stages of plan preparation (Stage A);

- SA Report – used in public consultation on the draft Local Plan. The SA Report encompasses the requirement to produce an Environmental Report under the SEA Directive (documenting Stage A and B).

2.4 A Scoping Report, meeting the requirements of Stage A and partially Stage B was published in February 2014 and is discussed further in Section 3.

### **Strategic Environmental Assessment Directive and Regulations**

2.5 Strategic Environmental Assessment (SEA) is a distinct process from SA, focussed primarily on environmental effects. SA considered that plan's wider economic and social effects in addition to its potential environmental impacts. The requirements of the SEA have been met in the delivery of the SA and as such as separate SEA is not provided for on the basis that the document meets the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004.

### **3 SA Scoping Stage**

#### **Overview of the Scoping Process**

- 3.1 This stage of the SA involves the compiling of background information needed to inform the SA. It established an evidence base for ongoing appraisal work and culminated in a framework of sustainability objectives and baseline indicators.
- 3.2 Key tasks in this evidence included:
- Identifying relevant policies, plans and programmes;
  - Collecting baseline information;
  - Identifying key sustainability issues in the Plan area;
  - Establishing sustainability objectives;
  - Consulting the prescribed consultation bodies on the scope of the SA report and the key findings of earlier scoping.
- 3.3 The key elements of the Scoping Report are described below. The full version which has been previously consulted on can be viewed online at the planning policy pages of the district's website

#### **Relationship with Other Plans and Programmes and Baseline Evidence**

- 3.4 The Local Plan adopts a spatial planning approach, taking into account (and where possible and appropriate aiding) other relevant strategies, plans and programmes. A thorough review of other relevant plans, policies and programmes was undertaken and presented in the Scoping Report. This met the requirement of the SEA Directive to take account of environmental protection objectives and to gather information which could influence options to be considered in preparation of the Plan. The reviewed material is available to view in the Scoping Report, where consultees suggested amendments these were incorporated. The list of other plans, policies and strategies is included at Appendix A.
- 3.4 Plans, policies and programmes which were reviewed ranged between international, national, regional and local documents. Those documents considered relevant related to the following issues:
- Air quality
  - Biodiversity, fauna and flora
  - Character and quality of landscape
  - Climatic factors, energy and flooding
  - Community Safety

- Cultural heritage
- Education
- Housing
- Human Health
- Leisure
- Local economy and employment
- Population
- Soil and land resources
- Transport
- Water quality and resources

3.5 Baseline information was considered to identify what is currently happening in the District. This provided a baseline for predicting and monitoring effects and aids in the identification of sustainability issues and alternative means of dealing with them. The baseline identifies what is currently happening in the District and the likely future state of the area if current trends continue.

3.6 The SEA Directive requires the Council to consider the likely evolution of the District if plans or programmes were not implemented. The baseline data can provide information as to what may happen without the intervention of the Local Plan. The Council currently operates under a Core Strategy and the saved policies of the 1996 Local Plan. There are no current allocations available for development and, in the absence of any other plans which identify, co-ordinate and guide development opportunities, there would not be a framework for the District to develop into.

3.7 The following trends are likely to continue into the future without the implementation of the Local Plan:

- The population is expected to increase by 194-206 dwellings per year based on jobs forecasts;
- Delivery of affordable housing would still happen as it is encouraged through the planning system;
- It is likely that the majority of housing would be built outside Penrith following past trends;
- Tourism and agricultural will remain key elements of the economy;
- Existing levels of play space per 1000 residents are expected to decline.

3.8 This enabled the identification of key sustainability issues for Eden District. On the basis of the issues which were identified, a number of sustainability appraisal objectives have been defined with which to test how likely the

proposals in the Local Plan (with alternative options where appropriate) are to lead to sustainable outcomes.

## Key Sustainability Issues

- 3.9 Drawing on review of the sustainability context and baseline, a range of sustainability issues were drawn up for the SA focus. This section describes the key issues faced by Eden considered to be priority in moving the District forward.
- 3.10 The SEA Directive requires that any environmental report under the Directive should include: *“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(birds) and 92/43/EEC(Habitats)”*(Annex1(d)).
- 3.11 A review of baseline and contextual data and the consultation responses to the Scoping Report have aided in the identification of sustainability issues. Table 2 below identifies the sustainability issues considered relevant to the Local Plan and how those issues may be answered.

Table 2: Key sustainability issues and Local Plan response

Issue	How the Local plan will address the issue
Low inward Investment	By providing a positive framework to enable and encourage investment in existing sites and provide opportunities for businesses considering moving in.
Wages lower than the regional and national average	Supporting investment which would contribute to the creation of a high skilled workforce, particularly through the development of Newton Rigg
Outward migration of younger economically active persons	Support for the development of the higher and further education centre at Newton Rigg, provision of housing for first time buyers and the provision of recreation, leisure and retail offers to make the area attractive to younger people.
An aging population	Ensure housing is available for all members of society.
Affordable housing provision	Ensuring mechanisms are in place to support the delivery of affordable housing units

Issue	How the Local plan will address the issue
Protect and enhance the bio and geo-diversity of the District	Make provision to ensure that development does not lead to a net loss to either bio or geo diversity and that wherever possible these assets are enhanced.
Protect and enhance the historic environments including landscape setting and the general quality of the built environment	Make provision to ensure that historic assets are properly considered and where possible enhanced
Climate change and pollution	The District has one AQMA at present and policies can be put in place to positively manage emissions and encourage the development of new renewable technologies.
Flooding due to the River Eden and its tributaries	Promote policies which direct new development away from areas at risk of flooding and which could increase the risk of flooding in other areas.

### **Limitations of The Information And Assumptions Made**

- 3.12 A key issue in undertaking the Sustainability Appraisal for the Local Plan is the strategic nature of the document and the uncertainty as to precisely how the policies contained within it will be implemented and achieved in practice. As a result, it is assumed that the policies within the Local Plan will be fully implemented as written.
- 3.13 Inevitably, a degree of judgement must be taken in undertaking policy appraisals when determining the significance of effects. Sustainability relies on expert judgement guided by knowledge of the likely impacts of the Plan, available baseline data and responses and information provided by consultees and other stakeholders throughout the process.
- 3.14 The inclusion of qualitative information such as proximity to services, open space, employment and areas of flood risk has allowed for a fully informed appraisal.

### **Sustainability Appraisal Framework**

- 3.15 Following consideration of other plans etc. and the baseline information, a list of sustainability objectives was compiled. These were developed using the agreed set of Cumbrian SA objectives which were agreed between Cumbrian Authorities to meet the requirements of the SEA Directive whilst reflecting the local distinctiveness of the County. The framework has been used

consistently to appraise the likely significant effects of the 2010 Eden Core Strategy and earlier versions of the site allocations.

- 3.16 In addition to the base Cumbrian SA objectives, these have been further refined to meet the requirements of Eden District and following the feedback from stakeholders refined further still building on the Scoping stage of the Plan. This helps to ensure that the specific sustainability issues that need to be addressed through the Local Plan are embedded in the SA Framework. This resulted in a total of 16 objectives (which have been further broken down into sub-objectives) which collectively cover the 12 SEA Directive topic areas and fit with the three dimensions of sustainable development as confirmed through the NPPF (Social, Economic and Environmental).
- 3.17 Sustainability appraisal objectives are different in concept and purpose to the objective of the Local Plan although there may be a degree of overlap in terms of key themes. Table 2 below lists the SA objectives and demonstrates how the Framework meets the requirements of the SEA Regulations 2004.

Table 3: Eden District Sustainability Objectives in Relation to the SEA Directive Topic Areas

No	SA Objective	SEA Directive Topic Area
1	To increase the level of participation in the democratic process	Population, Human health
2	To improve access to services, facilities, the open countryside and open spaces	Population, Human health,
3	To provide everyone with a decent home	Population, Human health
4	To improve the level of skills, education and training	Population
5	To improve the health and sense of well-being of people	Population, Human health
6	To create vibrant, active, inclusive, open-minded communities with a strong sense of local history	Population, Human health
7	To protect and enhance biodiversity and geodiversity	Biodiversity, Flora, Fauna
8	To preserve, enhance and manage landscape character and quality for future generations	Land, soil, material assets, Landscape
9	To improve the quality of the built environment	Population, Human health, climatic factors

No	SA Objective	SEA Directive Topic Area
10	To improve local air quality and reduce greenhouse gas emissions	Air, Human health
11	To improve water quality and resources	Water
12	To restore and protect land and soil	Soil
13	To manage mineral resources sustainably and minimise waste	Soil, climatic factors, material assets
14	To retain existing jobs and create new employment opportunities	Population
15	To improve access to jobs	Population
16	To diversify and strengthen the local economy	Population

### Comments Received on the SA Scoping Report

3.13 The SA Scoping Report was consulted upon between February and March 2014.

3.14 Five responses to the SA Scoping Report were received. Those who commented were: Natural England, English Heritage, Friends of the Lake District (CPRE), Lake District National Park Planning and South Lakeland District Council.

3.15 Comments received to the Scoping Report included:

- Clarification over some referencing
- Comments on some formatting issues
- Recommended widening of the section on 'Relationships and Influences on the Local Plan' to include references to all protected wildlife and protected/priority species
- Inclusion of references and potential objective in relation to Green Infrastructure
- Adding reference to Cumbria Landscape Character Guidance and Toolkit, Wildlife and Countryside Act 1981 and NERC Act S41
- Incorporate potential for undesignated heritage assets in the baseline
- Recommendation of some additional monitoring indicators
- Welcome of inclusion of geodiversity



- Welcome inclusion of recognition of requirements of NPPF in relation to enhancing and protecting biodiversity, protecting and enhancing public access and most versatile soils

3.16 In relation to the comments made regarding Green Infrastructure, Objective 2 includes access to the countryside and open space which are the spaces which make up Green Infrastructure. The Local Plan recognised this incorporating a Green Infrastructure policy with the Preferred Options Document.

### **Comments Received on the SA Preferred Options Report**

3.17 The SA was subject to further consultation during the Preferred Options Consultation which ran from 21 July 2014 to 26 September 2014. This document builds upon the SA consulted upon at Preferred Options. Comments were received from Natural England, English Heritage (now Historic England) and an individual (in relation to marking of a particular site). Comments received included:

- Natural England agrees with the conclusions reached in the SA, the SA clearly outlines both negative and uncertain impacts. However, suggested that negative and uncertain effects should be explored further as avoidance and/or mitigation measures may be required in order to reduce harm to the environment;
- Questions regarding the assessment of sites in comparison to others in the locality;
- Ensuring that sites are considered using up to date coal mining activity mapping;
- Concern that the SA does not have a strategy for the conservation and enhancement of the historic environment;
- Lack of consideration of setting of historic assets.

## 4 Developing and Refining Alternatives and Assessing Effects

### Local Plan Objectives and the Sustainability Appraisal

- 4.1 The objectives the Local Plan is striving to achieve were published for public consultation at Preferred Options. These objectives have been assessed against the SA objectives. Appendices B, C, D E, F and G, contain the results of the assessments for both policies and site selection.
- 4.2 Where appropriate, some amendments have been made to the objectives of the Plan. The following table notes where changes have been made:

Table 4: Changes to Local Plan Objectives following SA

Objective	Amendments following Appraisal
<p>Development in the Right Place</p> <p>Objective 4 read:</p> <p>To encourage high quality, sustainable and safe design for places and spaces in both the private and public realm, and which respects the character and local distinctiveness of Eden (Policy DEV5)</p>	<p>Amended objective</p> <p>To encourage high quality sustainable and safe design for places and spaces for both the private and public realm and which respects the character, <b>natural environment</b> and local distinctiveness of Eden.</p>
<p>A Strong Economy</p> <p>Objective 10 read:</p> <p>To promote the principles of sustainable tourism by seeking to maximise social and economic benefits in a manner which is acceptable to the local community and does not reduce environmental quality (Policies EC4 and 5)</p>	<p>Amended objective</p> <p>To promote sustainable tourism by seeking to maximise social and economic benefits in a manner which is acceptable to the local community and does not reduce environmental quality.</p>
<p>A Rich Environment</p> <p>Objective 11 read</p> <p>To protect and enhance the outstanding natural environment and historic heritage of the District, especially the North Pennines AONB, achieving an acceptable balance between facilitating essential development and maintaining the amenity of settlements and the countryside (Policies ENV1-3)</p>	<p>Amended objective</p> <p>To protect and enhance the outstanding natural environment, <b>landscape and historic environment</b> of the District, especially the North Pennines AONB, achieving an acceptable balance between facilitating essential development and maintaining the amenity of settlements and the countryside.</p>

Objective	Amendments following Appraisal
<p>Objective 12 read</p> <p>To protect and enhance the District's biodiversity and in particular its important species and habitats, making them more accessible to the public (Policy ENV1 and 3)</p>	<p>Amended objective</p> <p>To protect and enhance the District's biodiversity and in particular its important species and habitats, making them more accessible to the public <b>where appropriate.</b></p>

## Development for Options and Reasonable Alternatives (Task B)

- 4.3 The process of undertaking SA (including SEA) requires that an appraisal of the likely significant environmental effects of implementing a plan or programme and any reasonable alternatives is undertaken. It is usual when devising a plan that several different ways of achieving its objectives are proposed. In planning this is generally referred to as 'options'. Therefore, an approach to the identification and selection of options has been undertaken throughout the process.
- 4.4 Options tested can include scenarios which include no plan and carrying on as usual. The baseline considered therefore has been the continuation of the policies of the Eden Core Strategy 2010, the saved policies of the Eden Local Plan and the wider policies of the National Planning Policy Framework.
- 4.5 The Local Plan has been an evolving document subject to separate stages of consultation in regards to policy formation and alternatives. The plan has undergone an Issues and Options consultation in regards to housing and employment sites through August and October 2007. This formed part of the wider consultations on what would have been a Local Development Framework Plan Document as an allocations document. This set out initial thinking on the allocation of land and provided a first opportunity for people to share their views on proposals.
- 4.6 Subsequent to this paper, a consultation on alternative housing sites was carried out relating to new sites which had been proposed through the issues and options consultation. This was carried out to allow people to comment on the additional sites through May to June 2008. This allowed the Authority to determine all realistic and reasonable options for addressing issues in relation to allocation.
- 4.7 This exercise was carried out alongside the Core Strategy work which was being undertaken to provide the District with a strategic planning framework. The Core Strategy was adopted in 2010.
- 4.8 Following the adoption of the Core Strategy, separate consultations were undertaken in relation to housing and employment land allocations during early to mid 2013.

- 4.9 The results of the consultations and the backdrop of the Core Strategy evolved into a consultation for Preferred Options carried out throughout the summer of 2014. A targeted consultation on the Land Availability Assessment, Strategic Housing Market Assessment and Proposed Changes to the Settlement Hierarchy was carried out through August 2015. Throughout this process, a number of reasonable options have been tested and alternatives subjected to ongoing SA. In line with good practice, an SA accompanied the Preferred Options stage document.
- 4.10 Options were considered around the following areas:
- Options for the strategic development of the District;
  - Options in regards to wording and requirements for policies;
  - Options in regards to the provision of land allocations in order to meet the District's housing needs.

## **Consideration of the Likely Effects of the Local Plan and Reasonable Alternatives (Task B)**

### **Strategic Development of the District**

- 4.11 The Plan looks to deliver the development strategy for the District over a minimum of a 15 year period. In Eden, it is considered that the main strategic considerations are:
- Distribution of Development; and
  - Level of New housing provision.

These elements have been considered throughout the development of the Plan in order to arrive at a position which will provide for the District's development requirements in the best way.

### **Spatial Distribution of Growth**

- 4.12 Options initially identified within the Plan regarding this fundamental issue sought to address the distribution of housing through Eden which is a fundamentally rural district. Options were:
- Growth focussed in Penrith, moderate scale development in the three other towns and small scale development in 20 Key Hubs with exception housing outside these areas;
  - Proportional growth of settlements which would see less growth in Penrith, similar growth levels in the three other towns and larger growth in the rural area;
  - Retention of the same criteria as the Core Strategy which would provide 60% of development in Penrith, similar development levels in the three other towns and 20% in an expanded list of 38 local service centres;

- Based on past trends this would again reduce development in Penrith to 33%, keeping similar levels in the three other towns and increase development in 20 Key Hubs.

- 4.13 The decision was taken to ensure that Penrith remained the focus for development as the main town in the District. This reflects the range of services which are available within Penrith and also that Penrith is well placed to provide strategic connectivity with easy access to the M6 and the West Coast Mainline.
- 4.14 Consideration has been given to the amount of development Penrith can reasonably accommodate given the land supply available. Subsequently the decision has been taken to accommodate 50% of the proposed housing growth within Penrith. This provides for the development of a number of greenfield strategic sites on the edge of Penrith.
- 4.15 Further consideration was given to the distribution of housing through the rural area. Options have been considered which have increased and decreased the percentage of housing to be delivered and also the settlements which would form hubs with the criteria for defining a key hub being revisited.
- 4.16 Consequently, a decision has been taken not to allocate in the key hubs and also to revisit the list of key hubs following a change to the criteria, introducing a consideration in regards to the size of villages and a minimum size of 100 dwellings.

Table 5: Comparison of Housing Distribution Options

SA Objective	Option 1 – Penrith Priority	Option 2 – Proportional Growth	Option 3 – Retain Criteria	Option 4 – Past Trends
1 Participation in democratic process	0	0	0	0
2 Improve access to services	+	0	0	0
3 Provide all with a decent home	++	++	++	++
4 Improve skills and education	+	+	+	+
5 Improve health and sense of well being	++	++	+	+

SA Objective	Option 1 – Penrith Priority	Option 2 – Proportional Growth	Option 3 – Retain Criteria	Option 4 – Past Trends
6 Create vibrant, inclusive communities	+	+	+	+
7 Protect and enhance biodiversity	0	-	-	-
8 Landscape quality	+	0	-	-
9 Built environment quality	0	0	0	0
10 Air quality and greenhouse gases	-	-	-	-
11 Water quality	0	0	0	0
12 Restore and protect soil	-	-	-	-
13 Mineral resources	-	-	-	-
14 Employment opportunities	+	0	-	0
15 Access to jobs	++	-	-	-
16 Strengthen local economy	++	+	+	+

- 4.17 It is apparent from the above that there are a number of common negative effects. These are generally brought as general effects of development. For example development will result in car journeys which will potential have a negative effect on air quality although there is not generally an issue within the District. In addition, development is generally greenfield whether in Penrith or the wider District. This is due to the nature of the District which has very limited ability to deliver on brownfield land.
- 4.18 Option 1 performs better in relation to access to job, strengthening the local economy and improving the health and sense of well-being of the population. This is as more new homes would be created in Penrith which would give access to existing and new employment within the town, certainty over development for developers and access to the wider health services which are available in the town and less available through the rest of the District including health and leisure activities.
- 4.19 Options 3 and 4 provide more negative impacts due to spreading out development in a less strategic approach, resulting in housing which does not have such good links to employment, and would potentially have greater landscape impacts by changing more of the landscape within the District and having a greater incremental effect.
- 4.20 Consequently, the more targeted approach of delivering greater housing numbers in Penrith with a limited amount of housing outside the towns and key hubs will allow for local growth and maintain rural communities. Option 1 is therefore considered to provide the greatest degree of positive social, economic and environmental benefits.

### **Average Annual Housing Target**

- 4.21 Evidence has been gathered through the production of an up to date Strategic Housing Market Assessment (SHMA). This resulted in a range of options:
- Option 1 – Meeting Market and Affordable Need at 200pa;
  - Option 2 – Meeting Household Projections and Undersupply at 160pa;
  - Option 3 – Past Trends at 143pa;
  - Option 4 – POPGROUP Employment Driven Figures at 307pa.
- 4.22 The range of figures has been assessed in order to consider the most appropriate. A comparison of the options is outlined below:

Table 6: SA of Alternatives of Housing Delivery Numbers

SA Objective	Option 1 – Meeting market and affordable need (200pa)	Option 2 – Meeting Household Projections and Undersupply (160pa)	Option 3 – Past Trends (163pa)	Option 4 – POPGROUP Employment Driven (307pa)
1 Participation in democratic process	0	0	0	0
2 Improve access to services	0	0	0	0
3 Provide all with a decent home	++	++	++	++
4 Improve skills and education	0	0	0	0
5 Improve health and sense of well being	0	0	0	0
6 Create vibrant, inclusive communities	+	+	+	+
7 Protect and enhance biodiversity	0	0	0	0
8 Landscape quality	0	0	0	0
9 Built environment quality	0	0	0	0
10 Air quality and greenhouse gases	0	0	0	0



SA Objective	Option 1 – Meeting market and affordable need (200pa)	Option 2 – Meeting Household Projections and Undersupply (160pa)	Option 3 – Past Trends (163pa)	Option 4 – POPGROUP Employment Driven (307pa)
11 Water quality	0	0	0	0
12 Restore and protect soil	0	0	0	0
13 Mineral resources	0	0	0	0
14 Employment opportunities	0	0	0	0
15 Access to jobs	0	0	0	0
16 Strengthen local economy	+	+	+	++

4.23 The above have been considered as reasonable alternatives although it is acknowledged that the band width is quite narrow although this is as a result of the findings of the SHMA. These figures are the most up to date and therefore are considered to be the most reasonable alternatives in moving forward.

4.24 In SA terms, the greater figure of 307 performs slightly better due to the more positive benefit in meeting the POPGROUP forecasted employment need. However, it has been considered through the SHMA that the 200pa is more appropriate. This will meet expected employment needs for the land which is to be allocated in the Local Plan and meet the need for affordable housing. The policy which expresses housing numbers (LS2) explains that the numbers therein are a minimum target and therefore it is considered that should higher housing delivery numbers be required due to increased employment, land could be brought forward in order to meet the need.

### Consideration of Local Plan Policies

4.25 The impact of the Local Plan policies on the indicators within the SA was assessed individually. The following table gives an overview of the policies in relation to the SA objectives:

Table 7 – Overview of SA Objectives in Relation to Policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
LS1	+	+	+	0	+	+	0	+	0	-	-	-	0	+	+	+
LS2	0	+	+	0	+	+	0	+	0	-	-	0	0	++	0	+
PEN1	0	+	++	0	+	+	0	0	0	-	-	-	-	+	+	++
PEN2	+	++	++	0	+	+	0	+	+	0	-	-	0	+	0	+
PEN3	0	0	0	+	+	0	-	?	0	-	0	-	0	0	0	+
AL1	0	+	++	0	+	0	0	0	0	-	0	--	0	-	0	+
AL2	0	0	0	0	0	+	0	++	++	-	0	++	+	0	0	0
AP1	0	++	+	0	+	0	0	0	0	-	-	--	-	++	+	++
KS1	0	+	+	0	+	0	0	0	0	-	-	--	0	++	+	++
RUR1	0	0	0	0	0	+	+	-	0	-	0	--	0	+	0	0
RUR2	0	0	+	0	0	+	-	++	+	-	0	0	+	0	0	0
RUR3	0	0	0	0	+	+	0	+	0	-	0	0	0	+	0	+
DEV1	0	+	++	0	++	++	++	0	+	0	0	0	0	+	+	+
DEV2	0	0	0	0	0	0	+	0	++	0	+	0	0	0	0	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
DEV3	0	+	+	0	+	0	0	0	0	+	0	0	0	+	+	+
DEV4	0	0	0	+	+	0	0	0	+	--	+	--	0	+	+	0
DEV5	0	0	++	0	++	++	++	0	+	0	0	0	+	+	0	++
HS1	0	0	++	0	++	++	0	0	0	--	--	--	-	+	0	0
HS2	0	0	+	0	+	+	-	0	0	-	0	-	-	+	0	0
HS3	0	-	0	0	0	+	0	0	0	0	0	0	0	+	0	0
HS4	0	0	++	0	+	+	0	0	0	0	0	0	0	+	0	+
HS5	0	0	++	0	+	+	0	0	0	0	0	0	0	0	0	0
HS6	+	0	+	0	+	+	0	-	?	0	0	-	0	0	0	0
HS7	0	+	+	+	++	+	+	?	+	0	0	?	0	0	0	0
EC1	0	0	0	0	+	+	0	0	0	-	-	--	0	++	++	++
EC2	0	0	0	0	+	+	0	+	+	-	+	+	0	++	0	++
EC3	0	0	0	+	+	+	0	?	0	-	-	?	0	+	++	++
EC4	0	+	0	0	+	+	--	+	+	-	-	-	0	+	+	+
EC5	0	+	0	0	0	0	+	+	++	0	0	0	0	+	+	+

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
EC6	0	+	0	0	0	++	+	-	-	0	0	0	0	+	0	++
EC7	0	++	0	0	+	+	0	+	+	-	-	++	+	++	+	++
ENV1	0	0	0	0	++	++	++	0	0	+	0	++	0	+	0	+
ENV2	0	0	0	0	+	+	++	++	0	+	0	+	0	0	0	0
ENV3	0	0	0	0	0	+	++	++	0	0	0	++	0	0	0	0
ENV4	0	+	+	0	+	+	++	++	0	+	+	+	0	0	+	+
ENV5	0	0	++	0	0	+	0	+	++	++	+	0	0	0	0	0
ENV6	0	0	0	0	0	+	+	0	+	++	0	0	+	+	0	+
ENV7	0	0	++	0	++	0	+	0	0	+	0	0	0	0	+	0
ENV8	0	0	+	0	++	0	0	0	0	0	+	+	0	0	0	0
ENV9	0	0	++	0	++	0	0	0	0	0	++	0	0	0	0	0
ENV10	0	0	0	0	+	+	0	0	++	0	0	0	0	0	0	+
COM1	0	+	0	0	+	+	+	?	+	0	0	?	0	+	+	+
COM2	0	0	0	0	++	++	0	0	0	0	0	+	0	0	+	+
COM3	0	+	+	0	++	++	+	0	0	0	0	0	0	0	0	+
COM4	0	+	0	++	++	++	0	0	0	-	-	?	0	++	0	++

- 4.26 The SA has been carried out throughout the evolution of the Plan and considered all policy options through the stages and reasonable alternatives to policies where they existed. The SA has positively contributed to the Plan and has informed the decision –making on policy writing. Table 7 shows some negative effects. These are largely as a result of policies which will require a change of use of land in order to be implemented such as housing. These elements are a fundamental indicator of success of the Plan however and as such other policies in the plan seek to minimise impacts for example by ensuring appropriate landscaping schemes or drainage schemes are in place.
- 4.27 Unknown effects are also demonstrated in the SA, these have been identified where the impacts of the policies cannot be identified due to insufficient information at the time of SA. In general, these are criteria based policies and the unknown element relates to uncertainty over where developments under such policies will occur.
- 4.28 Full policy assessment sheets are available in Appendix B.
- 4.29 The following table sets out the amendments which have been carried out to the Local Plan as a result of the SA process.

Table 8 Amendments to Policies Following SA

Policy	Suggestion	Amended wording
AL2 – Renovation in Alston Moor	Add in biodiversity	Point 6 has been added: “It can be demonstrated that there is no significant impact on local biodiversity including protected habitats and species.”
RUR2 – Re-Use of Existing Buildings in Rural Areas	Change wildlife species to biodiversity	Point 5 has been amended: “It can be demonstrated that there is no significant impact on local biodiversity including protected habitats and species.”
RUR3 – Employment Development and Farm Diversification in Rural Areas	Add in good design to point 6	Point 6 has been amended “Would respect and reinforce local landscape character and built heritage and not cause harm to the natural environment, through the use of good design”
DEV2 – Water Management and Flood Risk	Remove wording in relation to FRAs	Wording in relation to FRA requirements for sites over 1 ha has been removed.

Policy	Suggestion	Amended wording
DEV5 – Design of New Development	Remove 10 dwelling reference	Wording in relation to number of dwellings has been removed and the policy is now relevant to all developments
HS3 – Essential Dwellings for Workers in the Countryside	Include reference to profitability of businesses in order to ensure that dwellings will be required into the future	Point 2 was amended “Where the agricultural or rural business is profitable and has been in operation for at least three years and can financially support the construction of a dwelling”
EC2 – Protection of Employment Sites	Queries were raised over whether the benefits which would outweigh the loss of employment should be expanded	The policy has been left as originally written as the benefits will be bespoke to each site.
EC3 – Employment Development in Existing Settlements	Either include expected ratings to be achieved or remove	Reference to BREEAM has been removed
EC6 – Telecommunications Structures	Move point 3 to point 1 and reword new point 3	Point 1 now reads “Proposals should make use of existing sites and structures wherever possible”  Point 3 now reads “Equipment should respect sensitive areas, including: areas of ecological interest or areas designated for their nature conservation interest; archaeological sites; conservation areas; building of architectural or historic interest; and areas of landscape importance, especially the north Pennines Area of Outstanding Natural Beauty”

Policy	Suggestion	Amended wording
EC7 – Town Centres	SA suggested reordering and rewording for clarity	All suggestions were incorporated at Preferred Options Stage
ENV2 – Protection and Enhancements of Landscapes and Trees	SA suggested rewording for more positive policy and some layout changes for clarity	All suggestions were incorporated at Preferred Options Stage
ENV4 – Green Infrastructure Networks and Recreational Land	SA suggested defining green infrastructure types	The policy has been significantly reworded for clarity following the Preferred Options Stage. Definitions of green infrastructure have been inserted into the policy explanation text
ENV5 – Environmentally Sustainable Design	SA suggested incorporating waste disposal into the policy	Policy now includes “Providing well-designed and visually unobtrusive outdoor waste storage areas to promote recycling”
COM1 – Principles for Services and Facilities	SA suggest some wording changes	In line with SA, point 2 now reads: “It respects the local built environment, character and conservation interests”, point 3 now reads “It is compatible with residential amenity”
COM2 – Open Space, Sport, Leisure and Recreation Facilities	SA raised issues over clarity of policy and aim of such	Policy has been rewritten and split into two in line with the findings of the SA to refine the requirement and enhance the clarity of the policy

- 4.30 The changes above may be considered minor in relation to the alterations which have been carried out to the policies which reflects that the SA has been an iterative process through policy writing and incorporated at all stages. The findings of the SA have largely been integrated into the Local Plan document.
- 4.31 This will be subject to further consultation through the Submission Draft Consultation process.

## **Appraisal of Site Allocations**

- 4.32 The Local Plan includes not only policies in relation to Strategic policy direction, Development Management policies and Site Allocations. The SA of the strategic policies considered the potential impacts of increased levels of development and consequently the SA of sites concentrated more on issues relating to the location and use of the site.
- 4.33 The SA of sites has been carried out using the SA base with the same scoring system which had been employed for policies: positive (++), minor positive (+), negative (-), minor negative (--) or neutral (0). This enables a consistent assessment between all options. In relation to Penrith, the choice of sites was underpinned by the Penrith MasterPlan work which was undertaken by AECOM Plc to identify directions for strategic growth.
- 4.34 Alternative sites have all been appraised in accordance with the requirements of the SEA Directives to identify, describe and evaluate the likely significant effects of such. Table 9 below includes the sites which have been considered throughout the process and where measures for the prevention and reduction of any adverse impacts are necessary or have been identified. Full SA scoring for the sites which have chosen as allocations is available at Appendix C,D,E and F. Sites that have not been allocated were assessed at Preferred Options stage using the same methodology.

## **Identification of Sites**

- 4.35 The following sources were used to identify potential housing allocations sites:
- Undeveloped allocated sites within the current Eden Local Plan 1996;
  - Sites identified through consultations on Housing allocations during 2007/8 as submitted by landowners, developers or agents;
  - Sites publically owned which were no longer required for any purpose.
- 4.36 There have been some changes to the sites which were contained within the Preferred Options document. The main change relates to the decision not to allocate sites within the Key Hubs and also to expand the list to a total of 27 settlements following a reconsideration of the criteria on which they should be defined. The criteria were amended as follows:
- Over 100 existing properties;
  - Three of the following services including:
    - A shop
    - A school
    - A pub
    - A village hall
    - A church



- A GP

4.37 The decision was taken on a policy basis to aid the flexible delivery of housing within the rural area and also reflect the changing nature of rural public transport which has been significantly affected by withdrawal of public funding in the rural areas. These sites are subsequently not considered through the SA and only sites within the 4 towns subject to testing. In addition, sites which have subsequently received planning permission have been removed.

4.38 The SA tested impacts of development in relation to, but not confined to:

- Flood Risk, informed by the Environment Agency flood maps;
- Impacts on the historic environment, identifying sites which lay within or adjacent to a Conservation Area, adjacent to any listed buildings or Scheduled Ancient Monuments (SAM), sites affected by such were reviewed by the Council's Conservation advisor to ensure there were no reasons why the site should not come forward and what mitigation would be necessary;
- Impacts on the natural environment, identifying sites of nature conservation. This is also considered separately within the Habitats Regulations Assessment including mitigation.

4.39 Sites have been determined as allocations based on the findings of the SA as well as factors such as relationship to the settlement and availability of land which is not considered through the SA. Allocated sites are represented in bold.

Table 9 – Summary of Site Selection

Penrith 9a

Site Reference	Sustainability Objective				Comment
	Social	Environmental	Economic	Overall	
E1: Carleton Fields, Penrith	+ / ++	+	++ / N	+ / ++	Edge of settlement developments which would round off the area and respect Carleton village. Mitigation may need to be considered in respect of Penrith AQMAs, heritage assets present to west
E3: Carleton, Penrith	+ / ++	-	++ / N	++	Edge of settlement development, mitigation required in respect of run-off to Eden, AQMA issue in Penrith
E4: Land at Carlton Hall Farm, Penrith	+ / ++	+ / -	++ / N	+ / ++	Edge of settlement development, mitigation required in respect of run-off to Eden, AQMA issue in Penrith
N1: Salkeld Road, Fairhill, Penrith North	+	+ / -	++ / N	+	Edge of settlement site but well related to town but would extend settlement into open countryside. Roman road known to cross centre of site and archaeological impact study may be required prior to any application, AQMA issue in Penrith
N1a: Salkeld Road, Fairhill, Penrith North	+	+ / -	++ / N	+	Edge of settlement site but well related to town but would extend settlement into open countryside. Roman road known to cross centre of site and archaeological impact study may be required prior to any application, AQMA issue in Penrith
N2: White Ox Farm, Penrith North	+	+ / -	++ / N	+	Adjacent to existing Traveller's site and scrapyard. Mitigation would be required. Trees on site should be retained and some wildlife mitigation may be needed. Would need further consideration at a planning application. AQMA issue with Penrith
N3: Raiselands, Penrith North	+	+ / -	++ / N	+	Site abuts WCML, would have to consider noise and vibration impact. AQMA issue in Penrith
N4: Raiselands North, Penrith North	+	+ / -	++ / N	+	Site unsuitable if N3 does not come forward. Adjacent to WCML so consideration of noise and vibration impact would be needed. Site is visible from M6 but unlikely to have significant landscape issues. Wildlife surveys would be needed. AQMA issues in Penrith
N5: Inglewood North, Penrith North	+ / -	-	++ / N	+	Site only appropriate after development of N2, less well related in terms of services and facilities. Possible wildlife issues. AQMA issue in Penrith

Site Reference	Social	Environmental	Economic	Overall	Comment
TC1: Old London Road, Penrith East	++/+	+	++/N	++/+	Centrally located brownfield site which would provide land remediation. Design would have to consider urban frontage. Archaeological impacts would have to be considered (13thC Augustian Friary) AQMA issues in Penrith
P2: Gilwilly Road, Penrith East	++	++	++/N	++	Well located brownfield site, contamination issues will require consideration
P5: Chancery Lane, Penrith East	++	+	++/N	++	Well located site but acts as green corridor for birds, bats and potentially red squirrels. Would need assessing prior to a planning application
P8: Myers Land, Penrith West	++	++	++/N	++	Well located brownfield site. Consideration needs to be given to relationship to WCML, the listed railway station and Penrith Castle (SAM), also to contamination due to past history
P17: Fairhill Playing Field, Penrith North	+/-	+	++/N	+	Well located to town but in use as a playing field. Potential wildlife issues on site and potential contamination issues from past uses
P31: Salkeld Road Extension, Penrith North	+/-	+/-	++/N	+	Site would form extension to N1 but not suitable in isolation, in prominent location and has visual impact implications. Roman road runs through site.
P34: Stampers depot, Penrith South	++	++	++/N	++	Brownfield site within Penrith, well located for access to facilities
P35: Land off Robinson Street	++/+	++	++/N	++	Brownfield site within Penrith, well located for access to facilities
P39: Land adj Lynwood Cottage, Penrith North	+	+	++/N	++/+	Well located for facilities but poorly related visually to town
P54: Bellevue Farm, Penrith North	+	+	++/N	++/+	Site would extend N1, not suitable in isolation. Has potential wildlife implications which would require consideration prior to planning.
P57: Fields adj Mile Lane, Penrith West	-	+/-	++/N	+	Site more remote from facilities and services. Potential significant impacts on local biodiversity and contamination likely to north of site

Site Reference	Social	Environmental	Economic	Overall	Comment
<b>P61: Garage on Roper Street, Penrith East</b>	+	++	++/N	++	<b>Brownfield site well related to facilities in town. Surface water requires further investigation</b>
P64: Depot, Lark Lane, Penrith West	++/+	+	++/N	++/+	Brownfield site within Penrith, well located for access to facilities
P65: Land North of Gilwilly industrial estate, Penrith West	+	+	++/N	+	Services are accessible but site isolated from other residential uses and adjacent to potential industrial extension. Partially affected by priority habitat and red squirrel buffer zone.
<b>P71: Brent Road Garages, Penrith East</b>	++	++	++/N	++	<b>Brownfield site within Penrith, well located for access to facilities. Existing group of trees to Brent Road would need retention and may have an impact on developability.</b>
<b>P93: Barn and Yard, Brunswick Road, Penrith North</b>	++	++	++/N	++	<b>Brownfield site within Penrith, well located for access to facilities</b>
<b>P94: QUEGS annex, Penrith South</b>	+	+	++/N	++/+	<b>Well located for access to services. Adjacent to woodland which would need further consideration and impact on Penrith Castle SAM. Would need to consider mitigation of loss of building</b>
P101: Land at Pategill Walk, Penrith	++/+	+	++/N	++/+	Site well located in town for access to services
P102: Land at Croft Terrace, Penrith North	++/+	+	++/N	++/+	Site close to facilities but issue over loss of amenity space. Prominent area of trees would have to be considered
P103: Land At Fell Land, Penrith North	++/+	++	++/N	++	Site close to facilities but issue over loss of amenity space. Prominent area of trees would have to be considered. Development would represent a sizeable loss.
P104: Land at Clifford Park, Penrith South	++/+	+	++/N	++/+	Site close to facilities but issue over loss of amenity space. Prominent area of trees would have to be considered. Development would represent a sizeable loss, also issues over loss of woodland
P106: Land adj Fairhurst, Beacon Edge, Penrith North	++/+	+	++/N	++/+	Site is well located for services. Development with a strong frontage presence could enhance Penrith Conservation Area
P107: Westview Farm/Training Centre, Penrith North	+	+	++/N	++/+	Site has access to services and facilities within Penrith but would result in considerable extension into countryside and depend on sites to south coming first. Potential significant landscape impacts. Half of site designated as floodplain grazing marshland.

Site Reference	Social	Environmental	Economic	Overall	Summary
P108: Land at Green Lane, Penrith North	+/-	+	++/N	+	Would form extension to N1, extends into open countryside. Currently used as golf driving range and considered outside town limits
P110: Land west of Milestone House, Penrith North	-	+/-	++/N	+	Extension beyond proposed northern masterplan. Poorly related to town and some potential contamination related to WCML potentially on site
P111: Land at Scaws Drive, Penrith East	++/+	+	++/N	+++	Close to facilities but is amenity green space. Trees on site would need consideration.
P112: Land off Clifford Road, Penrith South	++	++	++/N	++	Site performs well but would involve removal of play equipment.
P114: Land adj Cookson Court, Newton Road, Penrith West	++/+	++	++/N	++	Site close to facilities, brownfield site within boundaries of town
<b>P115: Land at Brentfield Way</b>	++/+	++	++/N	++	<b>Brownfield site within Penrith, well located for access to facilities</b>
<b>Gilwilly 2A (EMPLOYMENT)</b>	+	+	N/+	+	<b>The Site expands an existing employment site, there are habitat issues which would need to be explored in order to correctly place open space and allow enhanced biodiversity potential</b>
<b>MPC – Skirsgill (EMPLOYMENT)</b>	+/N	+++	N/+	+	<b>The proposal would extend an existing depot area with immediate links onto the M6. North Bank, a Grade II listed building is 200m to the east and Mayburgh Henge SAM 450m to the SE. It is anticipated that any development would be no greater than 10m in height in which case the impacts on the heritage assets would be marginal. Any development would need to incorporate SUDS and appropriate buffer treatment to protect the River Eamont.</b>
GT1 – Land at Maidenhill (Potential Gypsy & Traveller site)	+	+/-	++/N	+	Site is outside settlement
<b>GT2 – Land at Lake View (Potential Gypsy and Traveller</b>	+	+/-	++	+	<b>Site is adjacent to an existing facility and has been confirmed as available</b>

## Penrith Summary

Sites have been chosen to provide for continuity of supply. Strategic edge of town sites have been allocated to ensure that Penrith has a supply of sites which will provide a sustained and secure housing supply and be of a size to meaningfully contribute to infrastructure requirements. Sites which function as amenity open space have not been allocated although they may have scored well generally.

### Alston 9b

Site Reference	Sustainability Objective				Comment
	Social	Environmental	Economic	Overall	
AL1: Jollybeard Lane	++/+	+/-	++	++	<b>Some evidence of surface water to northern edge of site. Site is well related but would extend current form of development. Some wildlife implications with Black Grouse and Water Vole potentially on site. Strong frontage could improve design at this location.</b>
AL3: Scrap Yard	++	+	++	++	Northern edge of site affected by Flood Zone 3. Remainder of site unaffected although buildings in floodplain. Site would require remediation from previous scrap use. Some wildlife implications with Black Grouse and Water Vole potentially on site. Two listed buildings within 100m of site. Redevelopment could enhance northern entrance to town improving this brownfield site.
AL4: Bruntley Meadows	++	+	++	++	Greenfield site within the town. Some wildlife implications with Black Grouse and Water Vole potentially on site. Potential visual impact with slight to moderate impacts. Site within the North Pennines AONB and within 100m of Alston Conservation Area. Good links to adjacent Ruth Lancaster James hospital. Previous planning application was withdrawn following issues with loss of meadows on site
AL6: The Wardaway	+	+/-	++	+	Small watercourse runs through site. Some wildlife implications with Black Grouse and Water Vole potentially on site. TPO'd trees present on site which contribute to settlement and require retention. Site would extend settlement into countryside and has potential impacts on North Pennines AONB.
AL8: Tyne Café and Garage Buildings	++	++	++	++	Right of way passes edge of site, also appear to be right of access for the site for school, garages and a dwelling. Redevelopment of site would involve change of use from garage. Site backs onto secondary school, which may result in disturbances during term time, though effects are unlikely to be significant. Brownfield site, which is clearly within the historical form of the town. Number of key species potentially on site, including black grouse and water vole. The northernmost tip of this site falls within Alston conservation area. It is likely that new development would lead to significant effects. The buildings associated with the site are currently in a state of disrepair and appropriate development could lead to enhancements to the area which may benefit the character of the conservation area

Site Reference	Social	Environmental	Economic	Overall	Comment
AL9:Raisebank West	+	+	++	+ / ++	Site detracts from the current form of development, splintering the character of the settlement. Site moving away from town, diluting the vernacular of the area, and affecting the setting within the AONB.
AL10: Station Road Garage	+/-	++	++	++	Northern edge of site is within Flood Zone 3. Opposite AL3 site. Some wildlife implications with Black Grouse and Water Vole potentially on site. Redevelopment could improve gateway into town
<b>AL11: Land south of primary school</b>	++	+/-	++	++	<b>Prominent site which would change skyline of Alston and therefore have impact on North Pennines AONB. Some wildlife implications with Black Grouse and Water Vole potentially on site.</b>
<b>AL12: Hill Mill (MIXED USE)</b>	++/+	++	++	++	<b>Brownfield site within the town boundary. Buildings would require survey for protected species. Important building within conservation area. Would require further archaeological assessment.</b>
<b>AL13: Land at Clitheroe</b>	+/-	++	++	++	<b>Site has good links to employment opportunities. Undeveloped site which would extend the boundaries of the town and therefore potentially affect the North Pennines AONB.</b>
AL14: Land adj Towerhill, The Raise	+	+/-	++	++/+	Greenfield site which is poorly related to built development of Alston unless other land built out. In close proximity to Hall Hill SAM. Some wildlife implications with Black Grouse and Water Vole potentially on site.
AL15: St Paul's Mission	++	++/+	++	++	Brownfield site within the boundaries of the town. Site is within conservation area and re-use of the building would enhance the surroundings. Would need survey to check for protected species prior to planning application, has planning approval.
<b>AL16: Land south of Primary School</b>	++	+/-	++	++	<b>This is a greenfield site immediately adjacent to the Primary School. Care will need to be taken in relation to building height and the impact on the views into the Conservation Area and in particular the relationship with the school which is on the immediate boundary.</b>
<b>Skelsgillside Workshops (EMPLOYMENT)</b>	+/N	+	++/N	+	<b>A greenfield extension to an existing site, Alston does not perform well in logistic terms due to its isolated nature but it is important that it retains its ability to grow the employment base in order to retain the vitality and viability of the town.</b>

### Alston Summary

Sites have been chosen to provide for continuity of supply and to attract development to the town whilst considering the surrounding North Pennines AONB.

## Appleby 9c

Site Reference	Sustainability Objective				Comment
	Social	Environmental	Economic	Overall	
AP2: Drawbriggs Lane, Bongate	++	++	++/N	++	Well located for access to facilities and within town boundaries. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration. Previously developed site and redevelopment would enhance character of area
AP4: Site adj to cemetery, Bongate	++/+	++/+	++/N	++/+	Located within town boundaries. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration
AP6: Cross Croft, Bongate	+	++/+	++/N	++/+	Currently located outside town boundary but well related following development of other land (AP4, 5 and 16). Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration.
AP7: Banks Nursery, Bongate	+	++/+	++/N	++/+	Well located for access to facilities and within town boundaries
AP8: Land at Battlebarrow, Bongate	++/+	++	++/N	++/+	Well located for access to facilities and within town boundaries. Currently in industrial use and would enhance surroundings if well designed residential use. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration.
AP9: Land adj to Castle Bank Lodge	++	+/-	++/N	++/+	Located on edge of settlement but not well related to pattern of development. In close proximity to working farm and adjacent livestock handling area although it is not considered that this would cause significant issues
<b>AP10: Land to south of Station Road, Bongate</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>++/+</b>	<b>Located on the edge of and well-related to the existing settlement. Adjacent to A66 so consideration of noise, light and vibration required.</b>
<b>AP11: Fields at the Coal Yard, Bongate</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>++/+</b>	<b>Located on the edge of and well-related to the existing settlement. Adjacent to A66 so consideration of noise, light and vibration required.</b>
AP12: Field adj Barrowmoor Road	+/-	+/-	++/N	+/-	Site located on edge of settlement and well related to recent developments but would extend town into open countryside



Site Reference	Social	Environmental	Economic	Overall	Comment
AP13: Field adj Margaret's Way	+/-	++/+	++/N	+++	Site is detached from settlement unless AL14 developed.
AP14: Land to rear of Rampkin Pastures	+	++/+	++/N	++	All of site within flood zone 3b. Surface water present on majority of site. The site is edge of settlement but well related to existing settlement.
AP16: Land behind Cross Croft	+++	++/+	++/N	++	The site is outside of the town boundaries but would be well related if AP4 and 5 were built out. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration. Commercial garage also on boundary which may impact amenity
AP17: Land at A66	+++	++/+	++/N	++	Located on the edge of and well-related to the existing settlement. Adjacent to A66 so consideration of noise, light and vibration required.
AP18: Land at Battlebarrow	++	++/-	++/N	++/-	Southern area of site within Flood Zone 2 and 3b. South of site border River Eden. The north of the site is adjacent Appleby Grammar School with potential noise and traffic issues. Site borders the Appleby Conservation Area and envelopes the Grade II listed Kingston House with other listed buildings in close proximity. Strong design and mitigation would be required.
AP19: Field adj Barrowmoor Road, junction	+++	++/-	++/N	++/-	Without the development of adjacent sites (AP13 and 14) the site is detached from the main settlement. Trees should be retained as far as possible and new hedge planting to link into the rural setting with retention of existing hedges.
AP20: Land adj High House Farm	+++	++/-	++/N	++/-	Without the development of adjacent sites (AP13, 14 and 19) the site is detached from the main settlement. Trees should be retained as far as possible and new hedge planting to link into the rural setting with retention of existing hedges.
AP21: Land adj Rose Cottage, Bongate	+++	++/--	++/N	++/--	Site is on edge of settlement and would extend existing settlement into countryside. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration.
AP22: The Gate Hotel	+++	++/+	++/N	+++	The site is outside the settlement but could be well related pending AP4, 5, 6 and 16 being built out. Its development would extend the settlement boundary. Adjacent to railway so requires consideration of impacts in terms of noise, light and vibration.
<b>19: Cross Croft Industrial Estate</b>	+	N/-	N	N	<b>A greenfield Site which is available for redevelopment, the land is adjacent to the A66 and views would be available from this main arterial route. However, the site is not within the setting of any listed buildings or conversation areas. The Site scores poorly in relation to access to the M6 however, it has good access to the A66 which offers access to the M6 and the wider north east.</b>

Site Reference	Social	Environmental	Economic	Overall	Comment
21: The Old Creamery	+	++/N	+/N	+	A brownfield Site which is available for redevelopment, the land is adjacent to the Settle-Carlisle Conservation Area and holds the opportunity to improve the setting of the conservation area through the removal of the large buildings which are currently on site. The Site scores poorly in relation to access to the M6 however, it has good access to the A66 which offers access to the M6 and the wider north east.
23: Shire Hall	+	++/+	+/N	+	The Site is a brownfield inner town Site with part of the building in use. Further use of the Site for additional employment uses would be supported. The building is Grade II listed and any development will have to be mindful of the building fabric

### Appleby Summary

Land in Appleby has been allocated to provide housing which is well related to facilities such as the primary school, consideration has also been given to flood issues as the River Eden flows through the town.

### Kirkby Stephen 9d

	Sustainability Objective				
Site Reference	Social	Environmental	Economic	Overall	Comment
KS2: Hobson's Lane	++/+	++	++/N	++	Partial brownfield site (approx. 20%). Situated within town boundary but next to employment uses which may have impacts on residents and require further consideration. Site is within 250m of the River Eden SAC and there is potential for species such as bat to be present on site.
KS3: Whitehouse Farm	++/+	++/-	++/N	++	Well related to existing development and in keeping with the pattern of development within the town. Development could alter the landscape character of this area which is formed by fields, mature trees and hedges. Adjacent to the main road therefore may be affected by issues of noise and light. Removal of trees would be detrimental. Now has planning permission
KS4: Land at Croglam Land	++/+	++/N	++/N	++/N	The site is a play area within the existing settlement. Site 250m (if footpath delivered) to play area at Kirkby Stephen Primary School.
KS5: Land Adj Mountain Rescue post	++/+	++/-	++/N	++/+	The site is on the edge of the settlement and would not be well related unless KS2 is development. Adjacent to employment area and therefore impacts of this on residents would have to be considered.

Site Reference	Social	Environmental	Economic	Overall	Comment
KS6: Greenfield at Christian Head	++/+	++/-	++/N	++	The site is on the edge of the settlement and would not be well related unless HS2 and KS5 developed.
KS7: Mark John's Motors	++/+	++/+	++/N	+++	The site is currently in use as a residential garage. Residential development could improve the gateway to the town in this location. The site borders the River Eden SAC and could have impacts in terms of run-off; in addition its position next to the main road requires further exploration in terms of noise and light pollution.
KS9: Field adj to The Crescent	++/+	++/+	++/N	+++	The site is on the edge of the settlement but well related to the town and in keeping with the pattern of development. A suitable infill if KS8 is development
KS10: Land to Bollom Land	++/+	++/+	++/N	+++	Located outside the main settlement. Development of this site is likely to change the landscape character of the area.
KS11: Land adj Park Terrace	++/+	++/+	++/N	+++	The site is on the edge of the settlement but well related. Currently a green gap on South Road. Site borders main road and consideration would be needed to noise and light pollution during any planning application. Mature trees whose removal would be detrimental constrain development.
<b>KS13: Land to west of Faraday Road</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>+++</b>	<b>Greenfield site on edge of settlement.</b>
<b>KS15: Land adj Croglam Lane</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>+++</b>	<b>The site is located to the edge of the settlement and would form a natural extension to the development boundary at this location but would extend the settlement. The site is well screened by existing features. Boundary hedging should be retained.</b>
<b>KS17: Land to rear of Park Terrace</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>+++</b>	<b>Site is on edge of settlement and well related given the development of KS1 which is currently underway. Mature trees whose removal would be detrimental constrain development.</b>
<b>KS18: Land adj Croglam Park</b>	<b>++/+</b>	<b>++/+</b>	<b>++/N</b>	<b>+++</b>	<b>Site is on edge of settlement and development would extend town. In close proximity to industrial uses including recycling/scrap metal centre which would require mitigation. Site within 70m of Croglin Castle SAM.</b>

Site Reference	Social	Environmental	Economic	Overall	Comment
KS19: Land behind The Crescent	++/+	++/+	++/N	+++	The site is on the edge of the settlement but is well related to surrounding residential developments. Forms part of natural progression of existing development. Mitigation would be required to ensure no visual impact from River Eden and footpaths.
KS20: Whitehouse Farm extension	++/+	++/+	++/N	+++	Site is on the edge of the settlement and would only be well related if site KS3 was developed. Would require the development of site KS3 to be considered acceptable. Even then the landscape character (tight field pattern, mature trees and boundary hedging) is likely to be negatively affected by development. Mature trees on site constraining development- removal would be detrimental. TPO to be considered if development proposed.
KS21: Land at Edensyde	++/+	++/+	++/N	+++	Site within flood zone 2. Site borders main road. Residents could face noise, light and pollution disturbance. The site is outside the main settlement- and is not well connected. Development of KS7 would improve the connectivity of the site, but it would still be located outside of the settlement. Site is adjacent to the River Eden SSSI and consideration of impacts of surface water run-off would be required
KS22: Land at Mellbecks	++/+	++/+	++/N	+++	Site is generally well related to the settlement, but given its scale, in its entirety it extends outside of the settlement somewhat. Site at boundary of Flood Zone, and 8m from body of water at places. Need to protect some significant trees with appropriate design- consider TPO. Given the very large scale of the site, it is likely to have a dramatic impact on the landscape character of the area. In particular the visual impact from the River Eden and footpaths will be great.
KS23: Land adj the cemetery	++/+	++/+	++/N	+++	North eastern tip of site within Flood Zone 2. Site borders main road. Residents could face noise, light and pollution disturbance. The site is outside the main settlement- and is not well connected. Parts of the site are as little as 20m from River Eden SAC/ SSSI. Given the very large scale of the site, it is likely to have a dramatic impact on the landscape character of the area. In particular the visual impact from the River Eden and footpaths will be great.
KS24: Land adj Manor Court	++/+	++/+	++/N	+++	The site is on the edge of the settlement but is well related to surrounding residential developments. Mature trees on site constraining development- removal would be detrimental. TPO to be considered if development proposed. Site forms part of tight field pattern with mature trees and hedges. Development has the potential to dramatically alter the landscape character of the area.
KS25: Land west of Nateby Road	++/+	++/+	++/N	+++	Located outside of the main settlement on Nateby Road, and of a scale out of character with previous development. Mature trees on site constraining development- removal would be detrimental. TPO to be considered if development proposed. Development of the site is likely to change the landscape character of the area. The site and surroundings currently have a rural feel, with dispersed detached housing. The site is of a large scale, out of character with previous development.

Site Reference	Social	Environmental	Economic	Overall	Comment
KS26: Land at Christian Head	++/+	++/+	++/N	+++	The site is generally well related to the settlement and is of a scale that's in keeping with the surroundings. Site is in close proximity to auction mart, fire station and school which could result in some disruption from noise and traffic. Near to Kirkby Stephen Conservation Area. Number of Listed buildings in close proximity to site.
<b>33: Kirkby Stephen Business Park</b>	++	+	N/+	+	<b>The Site is greenfield which is the best option due to the restrained amount of brownfield land in Kirkby Stephen. The land is not considered to be constrained by conservation interest and there is sufficient land to enable the use of SUDS to ensure that there are no adverse impacts on the River Eden.</b>

### Kirkby Stephen Summary

Kirkby Stephen has been considered in relation to dwellings which are well related to the facilities within town and those which have the least landscape impact. As with most other settlements, the River Eden runs through the town and therefore consideration has been given to both flooding and potential pollution impacts.

## **Conclusions of Impacts of Site Allocations**

- 4.40 Allocation of strategic sites within Penrith in particular provides for an approach which will have the greatest possibility of securing the required scale of development and allow for the effective planning of infrastructure to support growth and its funding.
- 4.41 Appraisal supports the allocation of sites for housing and employment as they would be likely to have a positive impact on the local economy and provide social benefits. This is particularly evident in meeting the SA objective which relates to the provision of decent and affordable homes for all to live in and furthermore in strengthening, diversifying and improving access to employment.

## **Uncertainty**

- 4.42 There are some uncertainties which have been identified through the SA. These are generally where it is unable to consider the location of potential development. However, taken holistically, the Plan contains policies which will deal appropriately with the uncertainties and contain adequate protection against inappropriate development. In some cases, it is noted that mitigation will be required through the planning application process for example in the designing and provision of SUDS.

## **Negative Impacts and Mitigation**

- 4.43 Negative impacts have been identified in relation to change of use of land from greenfield and also potential impacts on air quality and use of energy. However, the nature of the District is that there is very limited potential supply of brownfield land. Wherever possible, brownfield has been considered and included as part of the offer of the Local Plan and supported, it is not possible however to meet the identified needs of the District through brownfield redevelopment.
- 4.44 In relation to air quality and energy consumption, additional development will doubtless have an impact on these elements. However, there are policies within the Plan which seek to minimise these impacts and the detail will be provided through any planning application. It is not an option for the District not to meet its needs in relation to housing and employment opportunities and it is considered that the sites allocated provide the best solution. Sites where mitigation could not be achieved, for example due to flood risk or unacceptable landscape impacts, were discounted.

## **Mitigating Potential Adverse Effects and Maximising Benefits**

- 4.45 Sustainability Appraisal guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the Local Plan. The Preferred Option Local Plan intends to provide for the employment and housing needs of the District whilst protecting its environmental quality, promoting social inclusion and enabling lower carbon developments to come forward.

- 4.46 Air quality has been raised as an issue, particularly with developments in Penrith. The rural nature of the district means that the private car will tend to be relied on but policies should be embedded to promote cycling and walking links to offer real alternatives as far as possible.
- 4.47 Whilst policies and sites are appraised individually, the reality is that a number of policies will be combined in the decision making process which will require a number of mitigating measures to be put in place for development from ecological to flooding. In addition, some major development may separately trigger an Environmental Impact Assessment and would be subject to further scrutiny.
- 4.48 The analysis of policies confirms that they strike the right balance of providing sustainable growth. The process has been iterative and policies have reflected concerns raised in the SA feedback process to shape the current proposals. Further information will be required in the infrastructure deficit plan which ensures further mitigation is provided.
- 4.49 Policies within the Local Plan have been amended in line with the findings of the Sustainability Appraisal throughout the writing of the policies. This provides for the best consideration of meeting the social, environmental and economic aspirations. Monitoring is provided throughout the Plan to assess the effectiveness of the policies.

### **Monitoring**

- 4.50 The SA process is iterative and ongoing throughout the implementation of the Plan. Moving forward, the success of the Plan will be in how policies interact with each other and are implemented by the local planning authority.
- 4.51 A mechanism for monitoring is established through the Annual Monitoring Report (AMR). Subsequently, indicators which are already established have been used in order to monitor the SA through established processes.
- 4.52 Appendix G outlines the monitoring procedures and will be subject to regular review to ensure the effectiveness of the Plan or highlight the requirement for alterations or revisions.

## **5 Conclusion and Next Steps**

- 5.1 It is concluded that the SA supports the policies within the Local Plan and that appropriate alterations have been made to maximise the sustainability of the document.
- 5.2 The SA will be made available for public inspection and comment during the six week consultation for the Eden Local Plan 2014-32.