

Carlisle District Local Plan 2015-2030

Sustainability Appraisal Addendum

March 2016



Images courtesy of Andrew Paterson, D&H Photographers and Jason Friend

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Non-Technical Summary

This Addendum Report sets out the results of the Sustainability Appraisal (SA) carried out on the Main Modifications proposed to the Carlisle District Local Plan 2015-2030 following the close of Examination Hearing Sessions in January 2016. In light of discussions at the hearings, the Inspector has identified the need for Main Modifications to the Plan. The Main Modifications are the more substantial changes that materially affect the soundness of policies and/or sites. Whilst a number of Main Modifications were highlighted through the Hearing sessions, they were also identified through consultation at Regulation 19 and Representations made pursuant to Regulation 20. On the whole the proposed modifications do not deviate from the range of options previously assessed. None of the proposed Main Modifications have been subject to SA before now.

Sustainability Appraisal must inform the process of 'modification-making'. SA is a legally required process that is to be undertaken alongside plan-making with a view to fully considering and communicating likely sustainability effects of the preferred approach and alternatives. Specifically, in this instance SA has involved an initial screening of the proposed main modifications and thereafter an appraisal of the 'likely significant effects' associated with those identified as having potential SA implications, with a view to informing the consultation and subsequent plan finalisation.

This SA Report should be read alongside the submitted version of the Carlisle District Local Plan [Library Ref: SD 001], the associated SA Report and Appendices [Library Ref: SD 003], the Sustainability Appraisal Non-Technical Summary [SD 004], as well as the Proposed Schedule of Main Modifications [EL4 001].

Government Guidance states that where Main Modifications have not already been subject to SA (as in this case) only those which are likely to have a significant effect should be appraised. Carlisle City Council has considered the effects of the Main Modifications and of the few that had potential to have SA implications. Further SA work has highlighted that none of the main modifications have been identified as giving rise to any significant effects. For transparency, the initial screening and further appraisal assessments are contained within Appendix A and B of this report.

1. Introduction

Purpose of this report

1.1 This Carlisle District Local Plan (2015-2030) (CDLP) Main Modifications Sustainability Appraisal (SA) Report Addendum has been produced following the close of the CDLP examination hearing sessions. Hearing sessions took place between December 2015 and January 2016 and examined the soundness of the Plan.

1.2 Proposed Main Modifications to the CDLP have now been prepared [EL4 001]. These are required to ensure that the Plan is sound and legally compliant. This report sets out the SA of the Proposed Main Modifications as a supplement to previous SA Reports on the CDLP, particularly the submission SA Report [SD 003]. The process of SA has been undertaken, where relevant, in tandem with the preparation of the Proposed Main Modifications. The process followed also accords with government guidance on SA and incorporates the requirements of the Strategic Environmental Assessment Directive 2001/42/EC.

Sustainability Appraisal Background

1.3 SA has been carried out for the CDLP at all stages in its preparation and the results were available for comment during every public consultation on the Plan. A report on the SA process for the whole Plan (the Carlisle District Local Plan Sustainability Appraisal Report [Library Ref: SD 003]) formed part of the Submission documents in June 2015.

1.4 The Main Modifications are the proposed changes to the submitted Plan. These are the more substantial changes that materially affect the policies. As a modification may alter the economic, social or environmental effects of a Policy, the previous SA for that particular policy may need to be revised accordingly. However, only those policies affected by the proposed Main Modifications need to be reviewed to see if they require a new SA. If no changes are proposed to a particular policy, then the submission SA will still be relevant.

1.5 This SA treats the proposed Main Modifications as if they had been made and should be read in conjunction with:

- the Submitted Plan [Library Ref: SD 001]; and
- the SA Report [Library Ref: SD 003].

Habitats Regulations Assessment

1.6 A Habitats Regulations Assessment on the effects of the Carlisle District Local Plan 2015-2030 was undertaken and a report submitted alongside the Plan [Library Ref: SD 005].

1.7 An assessment of the effects of the Proposed Main Modifications on internationally designated sites in Carlisle District has been carried out separately and the results are

presented in the Habitats Regulations Assessment Addendum (March 2016), which has been published alongside this report and the Schedule of Proposed Main Modifications (March 2016).

Consultation on this Report

1.8 Representations may be made on the SA of the proposed Main Modifications as well as on the modifications themselves.

1.9 The consultation period will run for 6 weeks, from Monday 14th March until Monday 25th April 2016 at 5pm.

1.10 Comments regarding SA must relate to the proposed Main Modifications and should be made as described in the Guidance Note accompanying the Representation Form.

2. Appraisal methodology

Deciding which proposed Main Modifications require SA

2.1 The National Planning Practice Guidance states that *'If the local planning authority assesses that necessary changes are **significant**, and were not previously subject to **sustainability appraisal**, then further sustainability appraisal may be required'*.

2.2 None of the proposed Main Modifications to the Carlisle District Local Plan 2015-2030 have been previously subject to SA so they all meet the second criterion, however, not all of them meet the first criterion as they are not all significant. For instance, some of the proposed Main Modifications provide clarification, relate to consistency across the Plan or ensure that policy wording aligns with the terminology employed by statutory consultees. As these modifications do not significantly change the effects of the policies or sites, they do not require SA.

2.3 In order to determine which of the proposed Main Modifications are likely to have a significant effect, regard was had to the criteria from Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

2.4 Appendix 1 of this report sets out the screening assessment undertaken and clearly demonstrates which proposed Main Modifications are considered to require further, more detailed Sustainability Appraisal as well as the reasoning for the conclusions reached. It identifies that Main Modifications MM39 & MM87 (the allocation of additional land at Scotby (an extension to the existing proposed allocation R15 – Land to the North of Hill Head, to include land to the east of Scotby Road) and MM49 & MM86 (modifications to Policy HO11 – Gypsy, Traveller and Travelling Showpeople Provision) are considered by the Council to have the potential to have a significant effect and thus are the only Main Modifications that require a detailed assessment and the consideration of alternatives.

2.5 There are however further proposed Main Modifications where additional clarification and justification is considered beneficial in relation to the conclusion reached by the Council that the potential implications of the following modifications do not require further SA assessment; MM01 (Policy SP2), MM33 & MM84 (deletion of Allocation U19 – Land at Carleton Clinic) and MM38 & MM83 (deletion of Allocation R13 – Linstock North).

Implications of proposed Main Modification MM01 – Introduction of a Stepped Approach to Housing Delivery

In evaluating the likely effects of the Local Plan and alternatives, the original SA Report detailed, between paragraphs 4.13 and 4.49, the main strategic options considered and how these were identified. One strategic option considered was the ‘level of new housing provision to be planned for’ with an assessment of two reasonable alternatives undertaken.

The two alternatives considered were the two rates of housing delivery recommended by the most up to date Strategic Housing Market Assessment (SHMA), expressed as annualised average rates of delivery net of clearance. What was therefore assessed, whilst not necessarily explicit within the original SA, was the delivery of 8,160 new homes versus 9,605 new homes across the same time period (2013 and 2030). The latter of these was deemed to be the more sustainable of the two options and as such the annualised rate of delivery of 565 net new homes was that which was taken forward as the preferred option within the Plan.

Main Modification MM01 proposes to amend the Plan with regards to the level of new housing provision to be planned for through amending criterion 1 of Policy SP2 as follows:

*1. Sufficient land will be identified to **accommodate** support the delivery of an annualised average of at least ~~565~~ **9,606** net new homes between ~~2015~~ **2013** and 2030 **including a minimum annualised average of:***

- **478 net new homes between 2013 and 2020; and**
- **626 net new homes between 2020 and 2030 (adjusted to have regard to delivery in the 2013 – 2020 period).**

The amended base date can be seen to align with that employed by the relevant evidence (SHMA) and that which was, in any event, being worked to by the City Council in practice, as demonstrated by the Five Year Housing Land Supply Position Statement [Library Ref: EB007]. In this regard the alignment simply acts to provide greater clarity and transparency within the Plan with respect to the need to adjust delivery targets within future land supply assessments to reflect any under/over supply which has occurred since the base date. This alignment does not alter the overarching objective of the Policy nor does it have any

material implications such as necessitating the release of additional land. It is not therefore considered to give rise to a need to revisit any aspect of the original SA or its conclusions.

In terms of the stepped approach (and differentiation between the rate of delivery between 2013 and 2020 and that between 2020 and 2030) it is important to recognise that it has been introduced to address concerns with respect to a five year supply of housing land with the change, particularly in the absence of any other reasonable alternatives in this regard, a necessity. Its purpose is however confined to introducing a means by which a more accurate assessment of whether delivery is on course to meet objectively assessed needs can be conducted in the future, with the overall headline level of new homes being planned for remaining unchanged (i.e. 9,606¹). In this latter regard the modification can be seen to not alter or result in a different strategic option to that which has already been assessed through the SA process to date.

Whilst it is acknowledged that the stepped approach can validly be interpreted as representing a different way of achieving the strategic option it is considered of critical importance to note that its purpose is **not** to hold back and therefore phase development. The Plan (inclusive of the proposed modifications) is considered to make this explicitly clear with reference to a “minimum” annualised average which is key in this regard. The supporting text makes clear that should the conditions for growth be more favourable than anticipated in the earlier years of the Plan period, then growth can genuinely be accelerated. Relevant in this regard is that none of the allocations within the Plan are phased and could in theory be brought forward in advance of the indicative timescales provided should the conditions be favourable to do so.

It is the Council’s belief that for the matter in hand the focus of the SA should be on the strategic nature of the option which in this instance is evidently the delivery of 9,606 net new homes between 2013 and 2030. The high level nature of SA is such that it would, in the Council’s opinion, be difficult and therefore of limited value to seek to assess through the process of SA the detailed implementation options (a stepped approach versus the benefits of a flat rate of delivery) within the broader strategic option. The relevance of doing so in any event, in the circumstances outlined, would not be considered necessary.

In conclusion it is therefore considered that the level of housing proposed by the Plan continues to be supported by the SA and that importantly the introduction of the stepped approach would not, in the circumstances, be likely to materially alter the previously identified likely effects of the preferred option.

¹ Rounded to 9,606 (from 9,605) following introduction of stepped approach

Implications of proposed Main Modifications MM33 & MM84 - deletion of allocation U19 – Land at Carleton Clinic

The proposed Main Modification to delete site allocation U19 is reflective of current circumstances in that the site is no longer available for development as indicated by the site owner/promoter. It is not considered that this modification will have SA implications as it does not result in the requirement to allocate additional land at this time, owing largely to the fact that an adjacent site has recently been granted planning permission for a larger site area than indicated through the submitted Local Plan and thus taken into account in the Modification to update the housing trajectory (U14 – Land north of Carleton Clinic, east of Cumwhinton Drive -'9.3' Ha for the site area (updated from 4.20), an indicative yield of '189' (updated from 126)).

Implications of proposed Main Modification MM38 & MM83 - deletion of allocation R13 – Linstock North.

The proposed Main Modification to delete site allocation R13 – Linstock North, is reflective of current circumstances in that the site is no longer available for development as indicated by the site owner/promoter. It is not considered that this modification will have SA implications as it does not result in the requirement to allocate additional land at this time, and, the site is not of a scale of any strategic significance. Additionally, opportunities for development of a similar size and scale could be brought forward as 'windfall' development through the provisions of Policy HO2 which has already been subject to SA. It is therefore not considered that this modification would give rise to any SA implications

Carrying out the SA

2.6 The proposed main modifications identified as having a potentially significant effect are MM49 & MM86 (Policy HO11 – Formal allocation of Traveller transit provision at Low Harker Dene) and MM39 & MM87 (Extension of Site R15 at Scotby). Both proposed modifications have been appraised against the 20 Sustainability Appraisal Objectives that have been consistently used for appraisal throughout the development of the Plan.

2.7 The assessment of these modifications is provided in Appendix B. From this it can be seen that the assessments conclude that it is not considered that these Modifications will have a significant effect on the sustainability of the Plan.

Implications of proposed Main Modifications MM39 and MM87 – Expansion of site allocation R15 – Land North of Hill Head, Scotby

Main Modifications MM39 and MM87 propose to amend the Plan with regards to site allocation R15 – Land North of Hill Head, Scotby, to expand it to the north. This will result in the indicative yield increasing from 50 to 90, and the site size

from 2.4 to 3.7 hectares. In evaluating the likely effects of the Local Plan and alternatives, the submitted SA Report [Library Ref: SD 003] predicted and evaluated, in Appendix 8, the effects of the Local Plan Draft Site Allocations. This included an assessment of R15 – Land north of Hill Head, Scotby.

At an earlier stage of plan preparation, Preferred Options Stage Two, the proposed extension to this site was considered through the sustainability appraisal as a preferred option for residential development in Scotby, SCOT1 – Land East of Scotby Road. This was however discounted as a reasonable alternative in the intervening period due to highways concerns which were at the time deemed to amount to a ‘showstopper’. These issues have however since been demonstrated as capable of being resolved following further and more detailed surveying and modelling.

As a result, this land (that north of the R15 allocation within the submitted Plan and referred to as SCOT1 in earlier stages of the Plans preparation and associated SA) is once again considered to constitute a reasonable alternative which furthermore, in previous assessments, was deemed to be more sustainable than the preferred option taken forward in the Plan. In light of this there is a need to reappraise the options in relation to this land at Scotby with three reasonable alternatives as follows:

- Option 1 (previously SCOT1) – Land East of Scotby Road in isolation;
- Option 2 (submitted allocation R15) – Land North of Hill Head in isolation; and
- Option 3 (Proposed Main Modification MM39 & MM87) – Land East of Scotby Road and Land North of Hill Head.

It was not considered necessary to reappraise Option 2 which was that contained in the Plan as submitted and as such that which has already been previously assessed within the original SA Report [SD 003]. Option 1 and Option 3 have however been appraised with the results of these appraisals set out in Appendix B of this report – Option 1 on the basis that whilst appraised previously at an earlier stage of the Plans preparation was not on a consistent basis with the appraisal undertaken of Option 2 at publication stage and Option 3 on the basis that this is a new option which has not previously been appraised at any point in the process to date.

It is not considered appropriate to assess the above three options against any other sites in Scotby as the modification is concerned with the most sustainable option for the land in question prevailing as opposed to for example being driven by a need to find additional land to accommodate the Plan’s needs. Notwithstanding this, no new reasonable alternatives were in any event forthcoming through the process of the Examination.

There are clearly identifiable sustainability benefits achievable from pursuing Option 3 and it is this option which has been taken forward. This Option is considered to be the most sustainable and logical in that it would allow for a better design and layout to be achieved, in relation to the surrounding uses which include residential (both one and two storey, agricultural land and road frontage). It is also considered that a larger site area would provide the opportunity for more creative design of the development to reduce any negative impacts on neighbouring properties. It also provides scope for the provision of on-site open space which would be of benefit to the new development and also the existing surrounding community.

Other than to maintain R15 as submitted and not to extend the site, the only other reasonable alternative is to allocate only the north of the site (Option 1). The SA assessment demonstrates however that neither of these options are as sustainable and this, coupled with the documented logic of progressing Option 3 which would not apply to either site in isolation, is the reasoning Option 1 and Option 2 have been discounted. Appendix C sets out the assessment results side by side to allow a comparison to be made easily (with the results for Option 2 replicated from the main SA Report [SD003]).

In conclusion, the proposed main modification to the original site allocation R15 is supported by the SA and importantly the expansion of this site is not considered to materially alter the previously identified effects of taking this option forward. The site with modification (Option 3) performs largely neutral overall against the objectives of the SA.

Implications of proposed Main Modifications MM49 and MM86 – Formal allocation of Traveller transit provision at Low Harker Dene

The Plan as submitted did not include an allocation for transit Traveller provision, despite the need for such provision having been identified through the Gypsy and Traveller Accommodation Assessment (GTAA). The decision not to include such an allocation reflected that a review of how best to respond to meeting such needs was ongoing by the Council. It was agreed however through the process of examination that notwithstanding this review a formal allocation should be made, to provide assurances that a firm fall-back is in place should no preferable means of responding to needs be forthcoming.

The GTAA identifies that there is already a significant number of transit pitches available on privately managed Traveller sites. In order to most effectively respond to unauthorised encampments there is therefore agreement with stakeholders that publicly accessible / managed provision should be provided. The Council previously secured planning permission for such provision at Low Harker Dene, adjacent to an existing publicly owned permanent site which is proposed through the Local Plan to be extended. This site remains available for

use and importantly is therefore regarded as deliverable and a reasonable alternative for allocation. It also remains in public ownership.

Throughout the process of the Plan's preparation, including numerous call for sites, no additional sites have been put forward for or confirmed as available for Traveller use including transit provision. As such it is not considered that there are any additional reasonable alternatives beyond the available land at Low Harker Dene. Consequently an allocation for transit provision on the land at Low Harker Dene has been taken forward as the preferred option.

For clarity it should be noted that design work supports that a transit site can be delivered to accommodate up to fifteen transit pitches without compromising the land take required to deliver an extension of the permanent provision at Low Harker Dene.

The assessment included at Appendix B concludes that the preferred option scores positive/neutral against the objectives of the SA with no need therefore for any mitigation measures.

Considering alternative options

2.8 The sustainability appraisal process requires a consideration of alternative options and an assessment of the sustainability implications of these. The CDLP preparation process involved the identification of alternative options which were assessed against the sustainability appraisal objectives at various stages in the Plan's production.

2.10 2.9 The majority of the proposed Main Modifications comprise alterations to the policies and supporting text in the Submitted Carlisle District Local Plan to ensure the soundness of the Plan and thus there are no reasonable alternatives to those Proposed (i.e. it is not reasonable to progress with an unsound policy/plan). With regards to the assessment of the proposed Main Modification considered to require further sustainability appraisal work, the requirement to consider alternative options has been discussed in the preceding paragraphs. The SA of the Modifications therefore fulfils the requirement to assess the sustainability implications of alternative options where there are considered to be reasonable alternatives.

3. Mitigation measures and Monitoring

3.1 The sustainability appraisal process is intended to identify any significant effects of the policies or site allocations promoted through the Plan. The appraisal shows that there are no likely negative or significant negative effects from the proposed Main Modifications and consequently no mitigation is required.

3.2 As the appraisal shows that there are no additional significant effects of the Main Modifications, the Plan will continue to be monitored as described in Task B5, paragraphs 4.78-4.81 of the Sustainability Appraisal Report [SD 003].

4. Conclusion

4.1 This SA Addendum details the approach to and findings of the assessment of the proposed Main Modifications in relation to their impact on the overall sustainability of the Plan. This process has also enabled consideration of the cumulative impact of the Proposed Main Modifications which are unlikely to have a significant impact. The two proposed Main Modifications were considered to require additional sustainability appraisal have been demonstrated to be more or equally sustainable as the Plan as submitted. Whilst there are effects from increased development, they are not considered to be significant effects. Additionally, it is important to remember that the Sustainability Appraisal is just one piece of the evidence that helps to inform the plan-making process and as such, it should not be considered in isolation.

5. Next Steps

5.1 All of the representations, including those relating to the SA, will be considered by the examining Inspector. The Inspector will then aim to conclude the examination and issue the Council with a report which concludes whether or not the Plan, subject to the main modifications, is sound.

5.2 Providing the Local Plan can progress to adoption, an SA Post Adoption Statement will be produced. This will summarise how environmental and sustainability considerations have been integrated into the Local Plan, including the reasons for choosing the plan as adopted in light of other reasonable alternatives dealt with. It will also include the final version of the monitoring framework.

Appendix A – Initial Sustainability Appraisal Screening of all Proposed Main Modifications to the Plan (March 2016)

This assessment considers whether there are any impacts relating to the Sustainability Appraisal as a result of any proposed Main Modifications to the Submission version of the Local Plan.

Listed in Appendix A is the Main Modifications to make the Local Plan sound and alongside these is an initial appraisal of the potential SA implications and whether any further assessment is required.

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
MM0 1	34	SP 2	<p><i>Amend criterion 1 as follows:</i></p> <p>2. Sufficient land will be identified to <u>accommodate</u> support the delivery of an annualised average of at least 565 <u>9,606</u> net new homes between 2015 <u>2013</u> and 2030 <u>including a minimum annualised average of:</u></p> <ul style="list-style-type: none"> • <u>478 net new homes between 2013 and 2020;</u> • <u>and</u> • <u>626 net new homes between 2020 and 2030</u> 	To introduce a stepped approach to housing delivery and be explicit that the base date for planning for housing is 2013 which aligns with that employed by the supporting evidence (SHMA Update 2014). Proposed wording aligns with that suggested by the Inspector during the	This modification introduces a stepped approach to housing delivery. The overall quantum of development over the plan period remains unchanged and the rates of delivery are expressed as minimums with delivery not therefore restricted. As such the modification is consistent with the options already tested, particularly given the strategic nature of the assessment process, and the modification is not	No however further justification and reasoning to support this conclusion is considered beneficial and should be set out in the addendum.

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			<u>(adjusted to have regard to delivery in the 2013 – 2020 period).</u>	course of the relevant hearing session.	considered to have any implications for the sustainability appraisal.	
MM0 2	34	SP 2	<p><i>Amend criterion one, sub bullet points a. and b. as follows:</i></p> <p>a. <u>approximately</u> 70% of this growth will be focused on the urban area of Carlisle, with <u>approximately</u> 30% in the rural area; and...</p> <p>b. specific sites have been identified within the Plan, alongside an allowance for windfall developments, to accommodate the <u>majority of growth required until 2025</u>. Carlisle South has been identified as a broad location to accommodate <u>additional housing growth beyond this period in accordance with Policy SP 3</u>.</p>	In response to the agreed need for flexibility with respect to the urban/rural distribution and release of Carlisle South.	This modification relates to ensuring flexibility within the Plan in relation to spatial distribution, directing growth to the most sustainable locations. The modification does not result in a material departure from the options tested and as such no further assessment is required.	No
MM0 3	35/36	Paragraphs 3.8 – 3.10	<p><i>Amend Paragraphs 3.8 to 3.10 as follows:</i></p> <p>3.8 Policy SP 2 makes provision for an annualised average of at least 565 net new homes between 2015 and 2030, equating to a total <u>minimum of 8,475 9,606 dwellings across this 15 year period between 2013 and 2030</u>. The District of Carlisle...</p>	To reflect the proposed modification to Policy SP 2.	The options tested within the SA were annualised average rates of delivery, drawn from the required housing between 2013-2030 in any event. The adjustment to align the base date, and therefore the fact that no additional housing is proposed, is not considered to give rise to any SA implications.	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p>3.9 The annual housing requirement <u>and time period to which it relates of 565</u> is consistent with the <u>base date and</u> findings of the Carlisle Strategic Housing Market Assessment (SHMA) Update 2014...</p> <p>3.10 ...The proposed annual housing requirement pursued by the Plan can be seen to align with this evidence of 565 is both within the ranges of both sets of housing projections identified in the POPGROUP modelling and SHMA and is considered reflective of the requirements set out in paragraph 47 of the NPPF.</p>				
MMO 4	36	New paragraphs after 3.10	<p><i>Insert 2 new paragraphs after existing para 3.10:</i></p> <p><u>To ensure the supply of new homes does not constrain economic growth, a minimum number equating to an annual average of 478 net new homes is required between 2013 and 2020. Beyond this and for the remainder of the plan period, between 2020 and 2030, a minimum number equating to an annual average of 626 net new homes is required. This stepped approach reflects that job-growth is generally expected to be stronger post 2020 (and hence a greater increase in</u></p>	To reflect the proposed modification to Policy SP 2 and specifically to explain the rationale for and how the stepped approach in policy will operate.	This modification constitutes supporting text which provides the rationale for the introduction of the stepped change in housing delivery and how such an approach will be implemented. Being consequential to the change to Policy SP2 it does not in itself entail any SA implications.		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p><u>population would be required from this point). Aside from aligning with the evidence in the form of the jobs-led projection within the SHMA which has influenced the housing requirement, the introduction of a stepped approach importantly affords an opportunity for the development industry to mobilise and increase its capacity within Carlisle, necessary given the migration from a historically lower housing requirement in preceding plan periods and industry base position.</u></p> <p><u>It must be stressed that the 'minimum' requirements are exactly that and should the conditions be in place to exceed these and/or frontload supply earlier in the plan period then such opportunities will be positively responded to. To ensure supply keeps pace with demand it is important that any shortfall within the 2013 to 2020 period is addressed within this same period. Beyond 2020 the annualised average employed for assessment purposes should similarly be adjusted to have regard to any under or over provision in the preceding seven year period.</u></p>				
MM0 5	36	3.11	<i>Amend Paragraph 3.11 as follows:</i>	To provide enhanced clarity	This modification constitutes supporting text which		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			3.11 <u>Excluding Carlisle South</u> The spatial strategy seeks to focus the majority (<u>approximately 70%</u>) of new housing growth <u>within or on the edge of</u> on the City of Carlisle...	regarding the exclusion of Carlisle South from the approximate 70/30 urban/rural distribution and in relation to the extent of the urban area.	provides the rationale for the introduction of the stepped change in housing delivery and how such an approach will be implemented. Being consequential to the relevant change to Policy SP2 it does not in itself entail any SA implications.	
MM0 6	36	3.12	<i>Amend Paragraph 3.12 to read:</i> 3.12 Specific allocations have been identified within the Local Plan to contribute, alongside existing commitments and an allowance for windfall, to meeting the <u>majority of</u> growth required for the first ten years of <u>across the Plan period until 2025</u> . Beyond this Carlisle South, which is subject to the provisions of Policy SP 3, has been identified as a broad location to accommodate <u>additional</u> housing growth in the latter years of the Plan and beyond <u>within and beyond the Plan period</u> .	To better reflect reality and the source of forward supply.	Change to supporting text to provide greater clarity and does not in itself therefore give rise to any SA implications.	No
MM0 7	37	Table 1	<i>Amend Table 1 to read:</i> Table 1 – Summary of Housing Land Supply (as at 1st October 2014) <u>(as at 1st April 2015)</u>	To reflect the proposed modifications to allocations within Policy HO1 and	Change reflects revised figures based on a more up to date base position and relevant modifications to housing allocations and	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?														
			<table border="1"> <thead> <tr> <th>Source</th> <th>No. Of Dwelling</th> </tr> </thead> <tbody> <tr> <td>Delivery to date (2013 – 2015)</td> <td>609</td> </tr> <tr> <td>Outstanding Planning Permissions</td> <td>4,063 3,884</td> </tr> <tr> <td>Proposed Local Plan Allocations*</td> <td>3,472 4,017</td> </tr> <tr> <td>Windfall Provision [@ 100 dwellings per annum across the plan period]</td> <td>1500</td> </tr> <tr> <td>Strategic Allocation – Carlisle South</td> <td>1450</td> </tr> <tr> <td>Total Supply</td> <td>10,485 11,460</td> </tr> </tbody> </table> <p>* Excludes the capacity of those allocations which have an outstanding planning permission in place in order to avoid double counting.</p>	Source	No. Of Dwelling	Delivery to date (2013 – 2015)	609	Outstanding Planning Permissions	4,063 3,884	Proposed Local Plan Allocations*	3,472 4,017	Windfall Provision [@ 100 dwellings per annum across the plan period]	1500	Strategic Allocation – Carlisle South	1450	Total Supply	10,485 11,460	reflect the most up to date evidence.	does not in itself therefore give rise to any SA implications.	
Source	No. Of Dwelling																			
Delivery to date (2013 – 2015)	609																			
Outstanding Planning Permissions	4,063 3,884																			
Proposed Local Plan Allocations*	3,472 4,017																			
Windfall Provision [@ 100 dwellings per annum across the plan period]	1500																			
Strategic Allocation – Carlisle South	1450																			
Total Supply	10,485 11,460																			
MM0 8	38	Figure 1	<i>Replace Figure 1 with new trajectory and updated caption. New trajectory attached as Appendix One to this schedule</i>	To reflect the proposed modifications to Policy SP 2, the allocations within	Change reflects revised figures based on a more up to date base position and relevant modifications to housing allocations and	No														

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
				Policy HO1 and the most up to date evidence.	does not in itself therefore give rise to any SA implications.	
MM09	43	SP 3	<p><i>Amend Paragraph 1 of Policy SP3 to read:</i></p> <p>A broad location for growth for a <u>major mixed use urban extension development</u>, focusing on housing, is identified on the Key Diagram at Carlisle South. The urban extension is expected to be delivered from 2025 onwards. <u>The release and phasing of Carlisle South will be informed by a Development Plan Document inclusive of an infrastructure delivery strategy.</u></p> <p><i>Amend bullet point 1 of fourth paragraph to read:</i></p> <p>1. To provide more detail on how <u>and when</u> the strategic...</p>	To reflect that it will be the outcomes of the subsequent DPD as opposed to a specific date which informs the release and phasing of Carlisle South. Also affords flexibility (from a design perspective) as to whether development is brought forward as an urban extension, new settlement(s) or combination of options.	Change relates to providing a more effective trigger for the release of land at Carlisle South but the overall policy objectives remain unchanged. As such it does not give rise to any SA implications.	No

MM1 0	43	SP 3	<p><i>Amend third paragraph to read:</i></p> <p><u>To enable a comprehensive and co-ordinated development approach, Piecemeal or unplanned</u> development proposals within the area which are likely to prejudice its delivery including the large scale infrastructure required for the area will not be permitted.</p>	To more explicitly convey the need for a comprehensive and coordinated approach to bringing development forward.	Change relates solely to providing greater clarity and explanation on why piecemeal development will not be permitted.	No
MM1 1	43	SP 3	<p><i>Amend fourth paragraph to read:</i></p> <p>The development of this area will be in accordance with a masterplan which will be approved as a Development Plan Document. <u>The study area for the masterplan will include the whole of the undeveloped extent beyond the city's existing southern edge and any existing allocations.</u></p>	To be more explicit about the intended geographic focus of the masterplan.	Change relates to providing clarity with respect of implementation and does not in itself therefore give rise to any SA implications.	No
MM1 2	44	3.31	<p><i>Amend para 3.31 as follows:</i></p> <p>3.31 ... alongside an allowance for windfall developments, to accommodate the <u>majority of growth required until 2025</u>. Policy SP 3 makes provision for the development of <u>additional housing</u> (and associated infrastructure) from 2025 and beyond, by setting out a broad location for growth at Carlisle South.</p>	To align with modifications to Policy SP3.	Change relates to providing clarity with respect of implementation and does not in itself therefore give rise to any SA implications.	No
MM1 3	44	3.34	<p><i>Amend para 3.34 as follows:</i></p>	To align with modifications to	Change relates to providing a more effective trigger for	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			3.34 ...the scale and nature of the development and its boundaries and consideration afforded to the infrastructure necessary to support growth. <u>This process would also inform the release date and phasing of development in this area.</u> Maintaining adequate distances between any urban...	Policy SP3.	the release of land at Carlisle South but the overall policy objectives remain unchanged. As such it does not give rise to any SA implications.	
MM1 4	45	3.35	<i>Add to paragraph 3.35 as follows:</i> 3.35 ...It would then set the policy framework for any future planning applications <u>and make clear the requirement for individual applications to demonstrate how they align with the masterplan including how they will contribute to the delivery of strategic infrastructure.</u>	To be more explicit about the intended scope of the subsequent Local Plan.	Change relates to providing clarity with respect of implementation and does not in itself therefore give rise to any SA implications.	No
MM1 5	45	3.37	<i>Amend Paragraph 3.37 to read:</i> 3.37 It would prejudice the strategy of the Plan if individual sites within the Carlisle South area came forward incrementally within the first 10 years of the Plan period until such time as the intended Development Plan Document, inclusive of an infrastructure delivery strategy, is adopted. It would also prejudice the delivery of infrastructure.	To align with modifications to Policy SP3 and provide important clarification on this specific aspect.	Change relates to providing a more effective trigger for the release of land at Carlisle South but the overall policy objectives remain unchanged. As such it does not give rise to any SA implications.	No

MM1 6	Various		<i>All references to Carlisle south 'urban extension' to be amended to read 'major mixed use development'.</i>	To ensure consistency throughout the plan with the proposed modifications to Policy SP3.	Wording change for consistency and as such not considered to give rise to any SA implications.	No
MM1 7	46	SP 4	<p><i>Amend 5th paragraph as follows:</i></p> <p>...its overall attractiveness. Development proposals for <u>main town centre uses on this site</u> will be considered on their merits, with any proposed main town centre uses being subject to <u>and should be accompanied by a sequential and impact test in accordance with policy EC 6, to ensure that any proposed scheme does not threaten the delivery of sequentially preferable sites and the health of the City Centre Primary Shopping Area.</u> Development proposals should demonstrate how they would contribute to <u>the delivery</u> of the comprehensive redevelopment of the wider site and also respond to the opportunity to positively interact with the River Caldeu, including...</p>	To afford greater protection to the City Centre Primary Shopping Area.	Modifications relate to providing greater clarity with respect to conforming with other Local Plan policies and do not therefore give rise to any SA implications.	No

MM1 8	49	3.50	<p>Delete existing paragraph 3.50 in its entirety and replace with:</p> <p><u>“While this location does present a real opportunity to deliver a transformative mixed use development (for a variety of main town centre uses, alongside residential, educational or institutional uses), realising this will not be without challenges. Development will need to respect the historic character and fabric of the site, and comprehensive development will be dependent on assembling a number of leases. Reflecting these characteristics, it may be that the redevelopment of this site will need to take place on a phased basis.”</u></p>	To better reflect current aspirations and more recent work to better understand the constraints and opportunities of the site.	Change more accurately reflects currently anticipated timescales within which the opportunity presented by this site may be brought forward. Change has no bearing on the Policy objectives and as such does not give rise to any SA implications.	No
MM1 9	50	3.52	<p>Amend paragraph 3.52 as follows:</p> <p>3.52 ...Planning permission is in place for a food superstore on part of the site with the consent for this having been lawfully implemented <u>but not currently progressed.</u> There remains a degree of uncertainty at the current time however as to whether this superstore will be delivered. <u>Based on the level of need identified in the Carlisle Retail Study the site is not relied upon to accommodate any main town centre uses.</u></p>	To align with modifications to Policy SP 4 and be more explicit about the evidence base underpinning it.	Change is confined to providing clarity with respect to the evidence base and current on the ground situation. Change has no bearing on the Policy objectives and as such does not give rise to any SA implications.	No
MM2 0	50	3.53	<p>Amend paragraph 3.53 as follows:</p> <p>3.53 ...the proposed extension of the Primary Shopping Area and the</p>	To align with modifications to Policy SP 4 and be more explicit about	Provides greater clarity and reflects the reality of how proposals would be viewed in any event given other	No

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			<p>redevelopment of the Citadel complex. <u>The delivery of main town centre uses on these sequentially preferable sites will be given clear priority over Caldew Riverside.</u> In these circumstances development proposals for the site will be considered on their merits <u>and be expected to having regard to deliver the potential to enhanced existing walking and cycling links and in to aiding the overall attractiveness of the City Centre through the delivery of uses which would complement those found within it.</u> This approach is also considered to recognise the need for flexibility if the opportunity presented by the site is to be realised.</p>	the evidence base underpinning it.	policies in the Plan. Change has no bearing on the Policy objectives and as such does not give rise to any SA implications.	
MM2 1	62	SP9	<p><i>Amend criterion 3 to read:</i></p> <p>3. encouraging the development of decent homes that are adaptable for the life course of the occupiers, meeting Lifetime Homes Standards where possible;</p>	Standard referred to no longer exists.	Change required for accuracy and does not affect the overriding policy objective. As such change does not give rise to any SA implications.	No
MM2 2	64	3.85	<p><i>Amend paragraph 3.85 to read:</i></p> <p>3.85 Lifetime Homes is one aspect where <u>Health and wellbeing can be improved by ensuring that homes are accessible, inclusive and incorporate design features which add to the comfort and convenience of the home and support the changing</u></p>	Standard referred to no longer exists but the principle remains justified and possible by the existence of new national technical standards which	Consequential changes to the supporting text reflecting changes to Policy SP9. These are not considered in themselves to give rise to any SA implications.	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p>needs of individuals and families at different stages of life, their life-course. Bringing Lifetime Homes standards, or elements of them, into the general housing stock should, overtime, <u>This type of development would allow older people to stay in their own homes for longer, reduce the need for home adaptations and give greater choice to disabled people who cannot achieve independent living due to lack of suitable housing. Lifetime Homes are all about flexibility and adaptability; they are not 'special', but are thoughtfully designed to create and encourage better living environments for everyone. The Local Plan encourages the development of decent homes that are adaptable for the life course of the occupiers Lifetime Homes, given that the numbers of residents in the three oldest age bands (60-74, 75-84 and 85+) are projected to increase (Cumbria Observatory, Spring 2014) across the plan period. The Council will seek to ensure that consideration will be given to the needs of the community on a site by site basis and an appropriate mix of dwellings agreed through the Development Management process.</u></p>	<p>subsume Lifetime Homes standards into Building Regulations M4(2) (Accessible and Adaptable Dwellings), and M4(3) (Wheelchair user dwellings).</p>			
MM2	78	EC 4	<i>Amend policy as follows:</i>	To reflect that the	Modifications	relate to	No

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3			Land is allocated at Morton for a District Centre to accommodate a foodstore with a capacity of 8,175 m2 gross anchor. Proposals for additional retail, leisure, local services and community facilities will be supported within the District Centre site providing they are of a scale and nature commensurate with its intended catchment and would aid its vitality and viability. <u>Proposals for comparison (Class A1) retail which exceed 500sqm (gross) will need to be accompanied by a retail impact assessment to demonstrate that there would be no significant impact on the City Centre Primary Shopping Area.</u>	permission for a foodstore of the size referred to has now lapsed and that owing to reality of future convenience retailing patterns a further proposal of this scale is unlikely. To provide additional safeguards with respect to protecting the City Centre Primary Shopping Area from inappropriate comparison (Class A1) retail proposals outwith it.	providing greater clarity with respect to the information required to support proposals. Change has no bearing on the Policy objectives and as such does not give rise to any SA implications.	

MM2 4	78	4.18	<p><i>Add new final sentence to paragraph 4.18 as follows:</i></p> <p><u>“Proposals for class A1 comparison retail will be required to undertake an impact assessment which reflects the need to exercise caution particularly in respect of fashion retailing and the potential negative effect that proposals of this nature may have upon the City Centre Primary Shopping Area.”</u></p>	To align with modifications to Policy EC 4.	Consequential changes to the supporting text reflecting changes to Policy EC 4. These are not considered in themselves to give rise to any SA implications.	No
MM2 5	81	EC 6	<p><i>Amend first two paragraphs of Policy EC 6 to read:</i></p> <p>Development proposals for new retail and main town centre uses should in the first instance be directed towards defined centres, and for comparison (non-food) retailing proposals the defined Primary Shopping Areas <u>(where designated)</u> within these centres, in accordance with the hierarchy set out in Policy SP 2.</p> <p><u>In line with national policy – Proposals outside defined centres which exceed 200m² will be required to undertake a sequential test and impact test in accordance with national policy proportionate to the scale and nature of the proposal. In addition, locally set impact thresholds for retail floorspace have been set for the urban area and will be required for proposals which exceed 1000sqm</u></p>	In response to updated evidence in the form of the retail impact threshold update (Sep 15) and inaccuracy in respect of applying the sequential test as advocated by national policy.	Despite revised thresholds to reflect updated evidence, the overall objective of this Policy, and those previously subject to SA, remain unchanged.	No

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			<u>(gross) for convenience retail and 500sqm (gross) for comparison retail. A separate impact threshold of 300sqm (gross) for convenience and comparison retail proposals has been set for Brampton, Dalston and Longtown.</u>			
MM2 6	81	Paragraph 4.26	<p><i>Amend paragraph 4.26 to read:</i></p> <p>The Carlisle Retail Study (2012) found that there was limited spare capacity in the initial years of the plan period and therefore any development should aim to reinforce the City Centre as the prime retail location. In order to achieve this with the limited capacity available, the study recommended that a threshold of 200m² should be employed with regards to the sequential and impact tests, in the context of both convenience and comparison retailing. The sequential and impact test should be carried out in accordance with national policy with the approach also proportionate to the scale and nature of the proposal being progressed. <u>proposals for new retail and main town centre uses will, in line with national policy, have to undertake a sequential test. A locally set threshold has also been established for undertaking retail impact assessments which</u></p>	To align justification with modifications to Policy EC 6.	Consequential changes to the supporting text reflecting changes to Policy EC 6. These are not considered in themselves to give rise to any SA implications.	No

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			<u>addresses the requirements of National Planning Policy Guidance (NPPG) and updates the threshold set in the 2012 study.</u>			
MM2 7	81	New paragraphs after 4.26	<p><i>Insert 3 new paragraphs after paragraph 4.26 and before 4.27 as follows:</i></p> <p><u>The Retail Impact Threshold update (September 2015) recommends that in respect of the urban area of Carlisle separate retail thresholds for convenience and comparison retailing should be applied to enable sufficient opportunity to robustly assess the impact of any future edge / out of centre proposal on existing urban centres.</u></p> <p><u>In respect of the District Centres of Brampton, Dalston and Longtown a threshold has been set in order to reflect the nature of these centres which are occupied by small scale operators orientated towards top up provision.</u></p> <p><u>The sequential and impact tests should be carried out in accordance with national policy (and in respect of impact test in line with the thresholds set out) with the approach being proportionate to the scale and nature of the proposal being</u></p>	To align justification with modifications to Policy EC 6 and be more explicit about the evidence base underpinning it.	Consequential changes to the supporting text reflecting changes to Policy EC 6. These are not considered in themselves to give rise to any SA implications.	No

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			progressed.			
MM2 8	87	Paragr aph 4.41	<i>Remove last sentence of Paragraph 4.41:</i> It must also be able to demonstrate a connection with an established tourist attraction.	To be in conformity with the NPPF which does not detail such a requirement.	Change to the supporting text which is not considered to have any SA implications.	No

MM2 9	96	HO 1	<p><i>Amend criterion 1 as follows:</i></p> <p>1. deliver the allocations set out in this Policy and contribute to achieving <u>the Plan's</u> an average annual District housing target of at least 565 houses per year. Any unallocated...</p>	To reflect and ensure consistency with modifications to Policy SP2.	This modification relates to ensuring consistency with modifications to SP2 and as such it is not in itself considered to have any implications for the sustainability appraisal.	No
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MM3 0	96	HO 1	<p><i>Amend criterion 2 as follows:</i></p> <p>2. ...developers will need to demonstrate that they <u>have provided a their proposals contribute to the overall mix</u> of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development...</p>	To improve the effectiveness of the policy in securing a mix of dwellings.	Change confined to providing greater clarity on expectations. Not considered to give rise to any SA implications	No
MM3 1	96	HO 1	<p><i>Amend penultimate paragraph as follows:</i></p> <p>The following table sets out allocated housing sites in the urban and rural areas. These sites are identified on the Local Plan Policies Map. The sites make provision to deliver the main part of the housing target to 2025. From 2025 onwards, development will be in the broad location of Carlisle South, (as detailed in Policy SP 3), which will include a sustainable urban extension and delivery of the strategic rural requirement.</p>	Consequential to the changes to Policies SP 2 and SP 3 and ultimately to remove unnecessary repetition within the Plan.	Consequential changes reflecting modifications to Policies SP2 and SP3, required for consistency. Not considered to give rise to any SA implications	No
MM3 2	97	HO 1	<p><i>New paragraph inserted before final paragraph as follows:</i></p> <p><u>“Proposals should be brought forward having regard to and addressing any issues set out in Appendix 1.”</u></p>	To reflect the Inspector’s request regarding Appendix 1.	Change relates to providing clarity regarding issues identified in bringing each individual site forward. As each site has been individually assessed it is not considered that this	No

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					modification gives rise to any SA implications.	
MM3 3	97	Housing Allocations Schedule	<i>Remove Housing allocation Site U 19 – Land at Carleton Clinic</i>	Removed to reflect that this site is no longer available for development.	Modification relates to site removal due to availability issues. Not considered to give rise to any SA implications as removal does not necessitate the requirement for additional housing land to be identified. This is partly owing to planning permission being granted on an extended adjacent site (U14).	No
MM3 4	97	Housing Allocations Schedule	<i>Amend U14 to record '9.3' Ha for the site area (updated from 4.20), an indicative yield of '189' (updated from 126) and an indicative plan period of '0-5' years (revised from 6-10).</i>	To reflect the land now being taken forward for development at this location post the grant of planning permission.	Factual update reflecting the grant of planning permission. Not considered to give rise to any SA implications.	No
MM3 5	97	Housing Allocations Schedule	<i>Amend U4 to record an indicative plan period of '0-5' years (revised from 6-10).</i>	To reflect that this site is likely to be progressed sooner given the recent grant of planning permission and confirmation of the land owners intentions.	Factual update to reflect the likelihood of development occurring sooner. Not considered to give rise to any SA implications.	No

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MM3 6	97	Housing Allocations Schedule	<i>Amend the Allocated sites Urban Carlisle Total Capacity (dwellings) figure to read "2,779"</i>	Revised total consequential to deletion of Site Ref U19 and amendments to Site Ref U14.	Change reflects revised figures based on relevant modifications to housing allocations and does not in itself therefore give rise to any SA implications	No
MM3 7	98	Housing Allocations Schedule	<i>Amend the Allocated sites Rural Total Capacity (dwellings) figure to read "1,409"</i>	Revised total consequential to deletion of Site Ref R13 and amendments to Site Ref R15.	Change reflects revised figures based on relevant modifications to housing allocations and does not in itself therefore give rise to any SA implications	No
MM3 8	98	Housing Allocations Schedule	<i>Remove Housing allocation Site R 13 – Linstock North</i>	Removed to reflect that this site is no longer available for development.	Modification relates to site removal due to availability issues. Not considered to give rise to any SA implications as removal does not necessitate the requirement for additional housing land to be identified.	No
MM3 9	99	Housing Allocations Schedule	<i>Amend existing R15 allocation (Land north of Hill Head, Scotby) to include land to the north of this site (east of Scotby Road). Schedule to include revised site size (3.7 ha), indicative yield (90) and indicative plan period (0 – 5).</i>	To reflect that progressing this wider site is now the most reasonable and sustainable option following a reappraisal owing to previously identified constraints (in respect of access	Modification relates to an extension to site R15, however this provides a new and reasonable alternative option to that already considered. Further assessment required.	Yes

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				from Scotby Road) no longer applying.		
MM40	99	Housing Allocations Schedule	<i>Amend R17 to record an indicative plan period of '0-5' years (revised from 6-10).</i>	To reflect that this site is likely to be progressed sooner given the recent grant of planning permission and confirmation of the land owners intentions.	Factual update to reflect the likelihood of development occurring sooner. Not considered to give rise to any SA implications.	No
MM41	107	HO 4	<p><i>Amend Criteria of Policy as follows:</i></p> <ol style="list-style-type: none"> 1. within Zone A, all sites of six <u>five</u> units and over will be required to provide 30% of the units as affordable housing; <u>and</u> 2. within Zone B, all sites of 44 <u>10</u> units of over will be required to provide 20% of the units as affordable housing; <u>and</u> 3. within Zone C, all sites of 11 or over will be required to provide 30% of the units as affordable housing. <p><i>Delete first sentence of fourth paragraph as follows:</i></p> <p>For sites of between six and ten units, the affordable housing contribution will be</p>	To have regard to local evidence in light of the removal of nationally imposed thresholds from National Practice Guidance.	Subtlety of changes are considered such that there would be no significant implications from an SA perspective.	No

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			sought in the form of cash payments which will be commuted until after completion of units within the development. For sites of 11 units or over, †The affordable housing...			
MM4 2	107	HO 4	<i>Amend third paragraph of Policy HO 4 as follows:</i> ...A lower proportion and/or different tenure split may be permitted where it can be clearly demonstrated by way of a financial appraisal that the development would not otherwise be financially viable <u>or where the proposed mix better aligns with priority needs.</u> Early dialogue with the Council on this <u>these</u> matters is essential.	To provide greater flexibility to better align proposed provision with needs, reflecting the reality of current practice.	Change acts to strengthen the ability to ensure new housing responds better to need. Having already scored very positively against the relevant SA objective in this regard, further SA is not considered to be required.	No
MM4 3	107	HO 4	<i>Add new final paragraph as follows:</i> <u>Policy HO 4 will operate within the context of national policy and will be implemented with regard to any relevant future changes including to the national definition of affordable housing.</u>	Considered necessary to help future proof the Policy particularly in light of forthcoming changes to the definition to include Starter Homes.	Change seeks to add clarity with regards to how the policy relates to national guidance. It is not considered to give rise to any SA implications.	No
MM4 4	107	Paragraph 5.26	<i>Amend 3rd sentence and delete last 2 sentences of paragraph 5.26:</i> “...using a residual valuation appraisal. Zones A, and B and C (which depict differences in viability within the District) have therefore been defined having regard	To have regard to the implications arising from revised National Practice Guidance following the removal of national thresholds.	Consequential changes reflecting modifications to Policy HO4. Not considered to give rise to any SA implications	No

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			to the evidence as set out in the Carlisle AHEVA, and government policy set out in the Planning Practice Guidance regarding the thresholds for seeking planning obligations including affordable housing. The introduction of Planning Practice Guidance, which introduces national thresholds has necessitated the identification of the built up area of Brampton as Zone C. This reflects that the town of Brampton is not a 'designated rural area' as described under section 157(1) (c) of the Housing Act 1985. However, the viability evidence supports that development sites in Brampton can support 30% of the units as affordable."				
MM4 5	109	Paragraph 5.35	<i>Amend start of 1st sentence of paragraph 5.35:</i> 5.35 For sites of eleven units or over t The Council's expectation will be that affordable housing...	Reflects local preference following removal of nationally imposed thresholds from National Practice Guidance.	Consequential changes reflecting modifications to Policy HO4. Not considered to give rise to any SA implications.		No
MM4 6	112	Paragraph 5.45	<i>Amend paragraph 5.45 to read as follows:</i> 5.45 The S106 must include the name of the parish <u>or parishes within the appropriate area (usually the relevant Housing Market Area)</u> where the local <u>affordable housing</u> need has been identified. It may also include a list of	Enhanced clarity to reflect the flexibility and reality of current practice.	Change to supporting text confined to providing greater clarity. Not considered to give rise to any SA implications		No

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			neighbouring parishes, <u>wards</u> or wider <u>geography</u> to be referred to if, at some point in the future, one or more of the houses become vacant and there are no applicants from the <u>original parish or parishes</u> .			
MM4 7	116	Policy HO 7	<p><i>Amend policy to read:</i></p> <p>Enabling development in the form of new housing, where it would otherwise be contrary to planning policy, that would secure the future <u>conservation</u> of a heritage asset will be acceptable providing that the following criteria are met:</p> <ol style="list-style-type: none"> 1. <u>it is necessary as a last resort to resolve problems arising from the inherent needs of the place;</u> 2. the <u>any</u> harm caused to the significance of the heritage asset and its setting should be <u>is outweighed against by</u> the public benefits of the proposal; 3. sufficient grant or subsidy to secure the future of the heritage asset is not available from any other source; 4. the proportion of enabling development proposed is the minimum required to secure the <u>long term</u> future of the heritage 	To ensure greater consistency with the NPPF and improve the effectiveness of the Policy in line with previous suggestions from Historic England.	Change is considered to act to further protect heritage assets. Having already scored very positively against the relevant SA objective in this regard, and without any obvious detriment to any other SA objectives further SA is not considered to be required.	No

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			<p>asset; and</p> <p>5. the development secures the long term future of the heritage asset, and this outweighs any negative effects of conflict with the <u>disbenefits of departing from any other planning policies; and</u></p> <p>6. the new development makes a positive contribution to local character and distinctiveness.</p>				
MM4 8	123	5.86	<p><i>Amend paragraph 5.86 to read:</i></p> <p><u>Proposals for the development of homes that are adaptable for the life course of the occupiers in line with Building Regulations M4(2) (Accessible and Adaptable Dwellings), and M4(3) (Wheelchair user dwellings) Lifetime Homes, or which include an element of lifetime homes,</u> will help to ensure a supply of adaptable and accessible homes that can respond to the changing needs of individuals and families. Lifetime Homes are ordinary homes designed to include 16 design criteria that can be applied to new homes at minimal cost. Each design feature is <u>Adaptable homes are</u> intended to add to the comfort and convenience of the home, and support the changing needs</p>	In light of the new national technical standards which subsume Lifetime Homes standards into Building Regulations M4(2) (Accessible and Adaptable Dwellings), and M4(3) (Wheelchair user dwellings).	Factual changes to reflect current standards and regulations and which do not in themselves give rise to any SA implications		No

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			of those who live there at different stages of their lives. Lifetime Homes are intended to be flexible and adaptable. They are designed to create and encourage better living environments for everyone, from small children to coping with temporary or permanent disability, or reduced mobility in later life. The Lifetime Homes website has further information on the 16 design criteria.				
MM49	124	HO 11	<i>Amend second paragraph to read:</i> Land has been allocated adjacent to Low Harker Dene for nine <u>permanent</u> pitches <u>and up to 15 transit pitches</u> to meet identified needs over the Plan period for Gypsies and Travellers <u>provision</u> .	To reflect the need for a definitive allocation of transit provision in response to identified needs.	Modification relates to the allocation of up to 15 transit pitches. This was not previously assessed, nor were any reasonable alternatives. As such this proposed modification has the potential to give rise to SA implications. SA assessment is required.		Yes
MM50	124	HO 11	<i>Amend third paragraph as follows:</i> Proposals which contribute to achieving additional provision of transit <u>and</u> permanent and temporary pitches, and sites for Travelling Showpeople, in addition to...	Recognition that no 'temporary' needs (aside from Transit provision) are known to exist within the District.	Change confined to removing an unnecessary and unjustified reference within the Policy. Deletion entails no obvious SA implications.		No
MM51	124	HO 11	<i>Delete existing criterion one and four and replace with a new criterion one which reads:</i>	To ensure consistency with national guidance in	Change confined to providing greater clarity and consistency with national		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			<p><u>“the location, scale and design would allow for integration with, whilst not dominating or unacceptably harming, the closest settled community to enable the prospect of a peaceful co-existence between the site and the local community;”</u></p> <p><i>Amend existing criterion 6 as follows:</i></p> <p>6. the site <u>is well planned to be contained within</u> has existing landscape screening features, or can be <u>appropriately</u> landscaped to minimise any impact on <u>the surrounding countryside area;</u></p>	the form of Planning Policy for Traveller Sites and logical consolidation.	policy. Not considered to give rise to any SA implications as the overall objectives remain unchanged.	
MM5 2	124	HO 11	<p><i>Delete existing criterion 8 in its entirety:</i></p> <p>8. site management measures are included in the proposals;</p>	Accepted as not necessary.	Change confined to removing an unnecessary and unjustified reference within the Policy. Deletion entails no obvious SA implications.	No
MM5 3	125	5.90	<p><i>Amend paragraph 5.90 as follows:</i></p> <p>5.90 The total pitch requirement across the District, based on the current supply of pitches, and views expressed by Gypsy and Traveller households, is 15 <u>17</u> pitches up to 2028 <u>2030</u>. It is...</p>	To accurately reflect the evidence in the form of the Gypsy and Traveller Accommodation Assessment.	Marginal increase in pitch numbers to reflect the timeframe as indicated and align with the evidence upon which the Plan is in any event founded. Not considered to give rise to	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
					any SA implications.	
MM5 4	125	5.93	<p><i>Amend paragraph 5.93 as follows:</i></p> <p>5.93 ... which helps to address on-going unauthorised encampment activity. <u>The transit allocation adjacent to Low Harker Dene provides sufficient land to accommodate up to 15 pitches.</u> Any <u>additional</u> proposals for transit provision will be assessed against the criteria in the policy.</p>	To reflect the need for a definitive allocation of transit provision in response to identified needs.	Consequential changes reflecting modifications to Policy HO11. Not considered to give rise to any SA implications.	No
MM5 5	132	IP 2	<p><i>Additional Text to end of Criteria 4:</i></p> <p><u>.....green transport routes; and contributes to creating a multifunctional and integrated green infrastructure network;</u></p>	In response to and in agreement with Friends of the Lake District and their request to see mention of green infrastructure links within the policy in order to provide better coordination with Policy SP 8 (Green and Blue Infrastructure).	Limited to providing greater clarity and consistency with other Local Plan policies. Not considered to give rise to any SA implications.	No
MM5 6	141	IP 6	<p><i>Amend policy to read:</i></p> <p>Development should not be permitted where inadequate foul water treatment and drainage infrastructure exists, or where such provision cannot be made within the</p>	In response to and in agreement with the Environment Agency and their request to strengthen the	Overriding policy objective remains unchanged. Wording revised to provide greater clarity and better align with the terminology employed by United Utilities,	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			<p>time constraints of planning permission unless the developer can demonstrate acceptable alternative private solutions.</p> <p><u>Where there are concerns that inadequate foul water treatment and drainage infrastructure exists to serve a proposed development, or where such provision cannot be made within the time constraints of planning permission, it is the responsibility of the developer to demonstrate how foul drainage from the site will be managed.</u> In some circumstances, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. In certain circumstances, a new development will be required to discharge foul water to the public sewerage system at an attenuated rate.</p> <p>Where United Utilities can demonstrate that connection to the public sewerage system is not possible, alternative on-site treatment methods and septic tanks associated with a new development will be permitted provided they are of an environmental standard to the satisfaction of the Environment Agency.</p>	<p>policy dealing with foul water treatment, making it more consistent with the National Planning Policy Guidance.</p>	<p>the Environment Agency and Cumbria County Council as Lead Local Flood Authority. Not considered to give rise to any SA implications.</p>	

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<u>The first presumption will be for new development to drain to the public sewerage system. Where alternative on-site treatment systems are proposed, it is for the developer to demonstrate that connection to the public sewerage system is not possible in terms of cost and/or practicality and provide details of the responsibility and means of operation and management of the system for its lifetime to ensure the risk to the environment is low.</u>				
MM5 7	144	IP8	<i>Amend second paragraph as follows:</i> ...to and necessary to make the development acceptable. <u>This These will be identified through the development management process and achieved secured through use of planning conditions and obligations.</u>	To be more explicit in how the policy will operate in practice.	Changes limited to providing greater clarity and do not in themselves give rise to SA implications.		No
MM5 8	144	IP8	<i>Re word penultimate paragraph of Policy IP8 and replace:</i> In accordance with national policy 'small-scale' and 'self-build' development will be exempt from any tariff style planning obligations (section 106 planning obligations). Small-scale in the context of the District of Carlisle is defined in the glossary.	To have regard to the implications arising from revised National Planning Practice Guidance and to future proof the policy in this respect.	Changes limited to providing greater clarity and do not in themselves give rise to SA implications.		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			<u>Certain forms of development, where prescribed by national policy and guidance, will be exempt from any tariff-style planning obligations.</u>			
MM59	148	CC 1	<p><i>Amend criterion one as follows:</i></p> <p>1. Do not have a significant adverse <u>unacceptable</u> impact on the location, in relation to visual impact caused by the scale of development, on the character and sensitivity of the immediate and wider landscape, townscape or historic environment <u>heritage assets</u> and their settings;</p>	Revised terminology at the request of Historic England.	Changes confined to better aligning terminology with that employed by Historic England and which do not therefore alter the objective or scope of the Policy. Not considered to give rise to any SA implications.	No
MM60	148	CC1	<p><i>Insert new paragraph post criterion 5 as follows:</i></p> <p><u>In addition to the criteria set out above, applications for wind energy development should accord with policy CC2.</u></p>	In response to the WMS on wind energy development; to ensure that policy approach (CC1 and CC2) is consistent with national planning policy.	Changes limited to providing greater clarity and consistency with other Local Plan policies. Not considered to give rise to any SA implications.	No
MM61	149	Paragraph 7.1	<p><i>Amend paragraph 7.1 as follows:</i></p> <p>“...be that large scale or micro-renewable schemes (where planning permission is required). Policy CC 2 ‘Energy from Wind’ should <u>must</u> also</p>	In response to the WMS on wind energy development; to ensure that policy approach (CC1 and	Limited to providing greater clarity and consistency with other Local Plan policies. Not considered to give rise to any SA implications.	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			be <u>satisfied</u> referred—to when considering...”	CC2) is consistent with national planning policy.		
MM6 2	152	CC2	<i>Amend first paragraph as follows:</i> “Proposals for the development of wind turbines will be supported where they <u>accord with national policy and guidance, and where it can be demonstrated</u> , through identifying and...”	In response to the WMS on wind energy development; to ensure that policy approach is consistent with national planning policy and effective.	Limited to providing greater clarity with respect to national policy. Not considered to give rise to any SA implications.	No
MM6 3	152	CC2	<i>Replace 'significant adverse' with 'unacceptable' in Criterion 1:</i> 1. a significant adverse <u>an unacceptable</u> impact on....	Revised terminology at the request of Historic England.	Changes confined to better aligning terminology with that employed by Historic England	No
MM6 4	152	CC2	<i>Insert new paragraph post criterion 6 as follows:</i> “ <u>The criteria listed above will also be used as a basis for future identification of suitable area/s for wind energy development.</u> ”	In response to the WMS on wind energy development; to ensure that policy approach is consistent with national planning policy and effective.	Changes limited to providing greater clarity. Not considered to give rise to any SA implications.	No
MM6 5	154	New paragraphs after	<i>Insert new paragraphs between existing 7.11 and 7.12 as follows:</i> <u>In addition to the criteria set out in policy</u>	In response to the WMS on wind energy development; to	Consequential changes reflecting modifications to Policy CC 2. Not considered to give rise to any SA	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
		7.11	<p><u>CC2 wind energy development will be required to follow national policy and therefore, as appropriate, it will be necessary to define suitable areas for wind energy development. Furthermore, applications should demonstrate that they have addressed the planning concerns of the local community and therefore have their backing. Using this evidence the Council will consider the extent to which the applicant has addressed community concerns and make a planning judgement of the community backing.</u></p> <p><u>Until such time as the suitable areas are identified in a subsequent development plan document (on a district basis or through collaboration with adjoining districts) or neighbourhood plan, proposals for wind energy development will be considered against other local plan policies, together with national policy and guidance.</u></p>	ensure that policy approach is consistent with national planning policy and effective.	implications		
MM6 6	158	7.27	<p><i>Amend para 7.27 as follows:</i></p> <p>7.27 The NPPF recognises the important role of planning in supporting a move to a low carbon future. As well as striving for energy efficiency improvements in existing and proposed buildings, the Government</p>	To bring in line with the Governments' current position with regards to zero carbon.	Factual changes to reflect current standards and regulations and which do not in themselves give rise to any SA implications.		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p>advises that local standards for a building's sustainability should be consistent with the Government's zero carbon buildings policy and should adopt these nationally described standards. Building Regulations set the minimum standards for the design and construction of new buildings (and extensions) with energy efficiency standards dealt with under Part L. Progress towards 'zero carbon' will be made through progressive tightening of Building Regulations. Changes to Building Regulations and the move to zero-carbon buildings will increase energy efficiency and encourage greater use of decentralised and renewable energy. <u>Development proposals will be assessed against the relevant Building Regulations prevailing at the time. The Code for Sustainable Homes and BREEAM's (Building Research Establishment Environmental Assessment Method) integrated approach to construction uses the principle of the energy hierarchy to maximise cost effectiveness and minimise fuel costs. The Council will...</u></p>				
MM6 7	159	CC 4	<p><i>Amend Criteria 1 as follows:</i> ...within Flood Zone 1 which has critical</p>	In order to emphasise the importance of	Changes confined to providing greater clarity as to when the Policy will apply.		No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			drainage problems <u>surface water flooding concerns or is listed as an area of concern in the Lead Local Flood Authority local flood risk management strategy;</u> all proposals...	surface water drainage and ensure most up to date terminology is employed.	The objective and scope of the Policy remains unchanged and as such the change is not considered to give rise to any SA implications.	
MM6 8	159	CC 4	<i>Amend Criteria 1. f) as follows:</i> ... drainage and sewerage networks can accommodate new development <u>have been considered in liaison with the relevant statutory bodies for water and wastewater, to establish the impact of development on infrastructure;</u> and...	At the request of United Utilities to reflect their current working practices.	Changes confined to providing greater clarity as to who should be engaged. The objective and scope of the Policy remains unchanged and as such the change is not considered to give rise to any SA implications.	No
MM6 9	161	Paragraph 7.32	<i>Amend wording within Paragraph 7.32 as follows:</i> ...flooding problems elsewhere. <u>Developments should be sustainable and use building methods that promote the use of permeable surfacing.</u> <u>However, in order to provide solutions to the potential negative effects of new development, a site-specific flood risk assessment (FRA) will be required. The FRA should follow guidance in the Planning Practice Guidance and the Environment Agency and Lead Local Flood Authority Standing Advice...</u>	At the request of the Lead Local Flood Authority to highlight solutions to counter the potential negative effects of new development.	Changes confined to providing greater clarity with respect to expectations. Not considered to give rise to any SA implications.	No

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MM70	163	CC5	<p><i>Amend Policy text as follows:</i></p> <p><u>Development proposals should prioritise the use of sustainable drainage systems.</u> Surface water should be managed at the source, not transferred and discharged in the following order of priority:</p> <ol style="list-style-type: none"> 1. <u>Into the ground (infiltration at source);</u> a soakaway or some other form of infiltration system (using Sustainable Urban Drainage principles); or 2. an <u>a</u>Attenuated discharge to <u>a surface water body;</u>watercourse; or 3. an <u>a</u>Attenuated discharge to surface water sewer, <u>highway drain or another drainage system;</u> or and as an absolute last resort 4. an <u>a</u>Attenuated discharge to <u>a combined sewer.</u> <p><u>The approach to surface water drainage should be based on evidence of an assessment of site conditions and any surface water discharge solution should reflect the non-statutory technical</u></p>	To ensure an effective policy following post submission discussions with United Utilities and Cumbria County Council as Lead Local Flood Authority.	Overriding policy objective remains unchanged. Wording revised to provide greater clarity and better align with the terminology employed by United Utilities, the Environment Agency and Cumbria County Council as Lead Local Flood Authority. Not considered to give rise to any SA implications.	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p><u>standards for sustainable drainage (March 2015) or any subsequent replacement national standards. Measures intended to assist with surface water management should be made clear as part of any submission.</u></p> <p><u>Where there is no alternative option but to discharge surface water to a combined sewer, applicants will need to demonstrate why there is no alternative and submit clear evidence that the discharge of surface water will be limited to an attenuated rate, including an allowance for climate change, agreed with the appropriate bodies.</u></p> <p>Measures intended to assist with surface water management, including landscape proposals, should be made clear as part any submission. Where Sustainable Urban Drainage Systems (SUDs) are incorporated, a drainage strategy should be submitted detailing:</p> <p>4. <u>a) the type of SUDs and/or measures proposed;</u></p>				

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			<p>2. <u>b)</u> hydraulic design details/calculations;</p> <p>3. <u>c)</u> Pollution prevention and water quality treatment measures together with details of pollutant removal capacity as set out in the CIRIA SUDs Manual C697 or equivalent and updated local or national design guidance; and</p> <p>4. <u>d)</u> the proposed maintenance and management regime.</p> <p><u>Drainage requirements including detailed maintenance and management arrangements for the lifetime of the development will be secured by way of planning conditions and and/or planning obligations.</u></p> <p>Applicants will need to submit clear evidence demonstrating why there is no alternative option but to discharge surface water to the sewerage system. In this instance applicants will need to demonstrate that the discharge of surface water will be limited to an attenuated rate, including an allowance for climate change, agreed with the sewerage company. This</p>				

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			<p>will be secured by planning condition or a planning obligation.</p> <p>On greenfield sites, applicants will be expected to demonstrate that the likely natural discharge solution from a site once developed will be no greater than the existing discharge rate. On previously developed land applicants should target a reduction in surface water discharge.</p>			
MM7 1	164 - 165	7.37 – 7.42	<p><i>Add to and split paragraph 7.37 as follows::</i></p> <p>7.37 Surface water management is a key principle of sustainable development. SUDs aim to reduce flooding by using devices or a series of complementary devices to control surface water run-off as near to its source as possible. <u>The Flood and Water Management Act 2010 defines a sustainable drainage system (SuDS) as: 'a structure for dealing with rainwater that is not a sewer or watercourse'. Development increases impermeable surfaces which increase the risk of downstream flooding. Underground piped systems have focussed on the rapid removal of surface water from sites to the</u></p>	<p>To ensure an effective policy following post submission discussions with United Utilities and Cumbria County Council as Lead Local Flood Authority.</p>	<p>Changes limited to providing greater clarity. Not considered to give rise to any SA implications.</p>	No

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			<p><u>receiving watercourse or sewer with little consideration to the downstream environment. SuDS seek to replicate natural drainage flow patterns with retention of peak runoff and additional flow volumes on site. This ensures that the risk of flooding is not increased. The natural processes which happen in many SuDS techniques traps and passively treats many pollutants and helps to prevent the settlement of contaminants such as dust, oil, litter and organic matter which otherwise tends to flow rapidly into the sewer system, by mimicking natural features that slow down the rate that water drains away thereby reducing the amount of surface run-off entering into sewers.</u></p> <p><u>SUDs</u> These can <u>also</u> help to reduce the need...</p> <p><i>Amend 7.38 as follows:</i></p> <p>7.38 ...landscaping scheme. SUDs also help to prevent the settlement of contaminants such as dust, oil, litter and organic matter which otherwise tends to</p>				

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			<p>flow rapidly into the sewer system, by mimicking natural features that slow down the rate that water drains away thereby reducing the amount of surface run-off entering into sewers. <u>Key considerations at this stage should be:</u></p> <ul style="list-style-type: none"> • <u>Layout</u> • <u>Density</u> • <u>Site access</u> • <u>Topography</u> • <u>Ground Conditions</u> • <u>Discharge destinations</u> <p><i>Insert new paragraph between existing paragraphs 7.39 and 7.40:</i></p> <p><u>It is recommended that pre-application discussions take place before submitting an application to the local planning authority. In the context of the Policy, the appropriate bodies are Cumbria County Council as Lead Local Flood Authority, Environment Agency and United Utilities.</u></p> <p><i>Amend paragraph 7.41 as follows:</i></p> <p>7.41 ...or Cumbria County Council as Lead Local Flood Authority (LLFA). Under</p>				

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			<p>the Flood and Water Management Act 2010, Cumbria County Council is established as a LLFA. This has given the County Council new powers and duties for managing flooding from local sources, namely Ordinary Watercourses, surface water (overland run-off) and groundwater in the administrative area of Cumbria. In accordance with national policy, the Council will work with the LLFA seeking their advice on <u>all major scheme designations consisting of 9 houses or more on sites greater than 0.5ha, or locations where local flooding affects land to be developed. Early pre planning discussions with the LLFA is strongly advised with regard to the risk of flooding from any proposed development and the suitability of a more sustainable drainage approach to the disposal of surface water.</u></p> <p><i>Delete existing paragraph 7.42 and replace in its entirety with new paragraph to read:</i></p> <p><u>Standards for dealing with Sustainable Drainage are outlined within the non-statutory technical standards for sustainable drainage (March 215) (or any subsequent replacement national standards). Reference should also be</u></p>				

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			<u>made to Cumbria County Council's SuDs Requirements document when published.</u>			
MM7 2	168	CM 1	<p><i>Add a second Paragraph to the Policy:</i></p> <p><u>Development at the Cumberland Infirmary for hospital, health care and related ancillary uses will also be supported. Non-health care related development at this location will be supported on surplus land subject to the compliance with other relevant policies within the Plan.</u></p>	To ensure an effective policy following post submission discussions with North Cumbria University Hospitals NHS Trust regarding future development opportunities at the Cumberland Infirmary and the benefit of a clear framework to guide future proposals.	Changes confined to providing greater clarity with respect to any development at the Cumberland Infirmary and the need for such to comply with other relevant Local Plan policies. The objective and scope of the Policy remains unchanged and as such it is not considered to give rise to any SA implications.	No
MM7 3	168	New Paragraph after 8.3	<p><i>Add an additional paragraph after existing paragraph 8.3:</i></p> <p><u>It is acknowledged that over the plan period there is likely to be a requirement for some redevelopment and reconfiguration at the Cumberland Infirmary. This may result in some land and/or buildings being identified as surplus to current and future healthcare requirements. This Policy is supportive of development and reconfiguration at the Cumberland Infirmary, particularly where</u></p>	To ensure an effective policy following post submission discussions with North Cumbria University Hospitals NHS Trust regarding future development opportunities at the Cumberland Infirmary and the benefit of a clear	Consequential changes reflecting modifications to Policy CM 1. Not considered to give rise to any SA implications	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<u>this will enable the hospital to meet future health needs of the City and deliver improved facilities. Redevelopment of surplus land and/or buildings, identified through the process of an asset review, will be supported for alternative non health care uses subject to compliance with other relevant policies within the Plan.</u>	framework to guide future proposals.			
MM7 4	182	HE 1	<i>Amend 2nd Paragraph of Policy to read:</i> New development will not <u>normally</u> be permitted on currently open land on the line of the wall.	A necessary addition identified by Historic England which reflects that there will be some circumstances where development on the line of the wall may be allowed.	Changes confined to better aligning terminology with that employed by Historic England.		No
MM7 5	182	HE 1	<i>Add a new final paragraph to the Policy:</i> <u>Where development proposals would result in less than substantial harm to the site's Outstanding Universal Value, this harm will need to be assessed against the public benefit by way of reference to the above objectives.</u>	A necessary addition to ensure full consistency with national policy as identified by Historic England.	Overriding policy objective remains unchanged. Wording revised to provide greater clarity and better align with the terminology employed by Historic England. Not considered to give rise to any SA implications.		No
MM7 6	186	HE 3	<i>Amend first paragraph as follows:</i> ...the public benefits of the proposal	A necessary amendment to ensure full	Change confined to ensuring consistency with national policy and therefore		No

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			clearly outweighs the significance <u>harm</u> .	consistency with national policy as identified by Historic England.	is not considered to give rise to any SA implications.	
MM7 7	191	HE 7	<i>Addition to end of first paragraph of the Policy:</i> ... special character and appearance of the conservation area <u>and its setting</u> .	A necessary addition to ensure full consistency with national policy as identified by Historic England.	Change confined to ensuring consistency with national policy and therefore is not considered to give rise to any SA implications.	No
MM7 8	210	11.1	<i>Amend paragraph 11.1 to read:</i> 11.1 Monitoring is an integral part of the planning process and an important tool to help understand the wider social, environmental and economic issues affecting an area, and the key drivers of spatial change. The Local Plan needs to not only be able to respond to changing circumstances across the District over its intended duration, but to know when such a response is required <u>action needs to be taken</u> . Fundamentally <u>There also</u> needs to be a way of measuring the effectiveness of policies and sites within the Local Plan, and of understanding progress towards <u>that they are</u> meeting the Plan's strategic objectives and ultimately its vision. If it turns out that a policy is not doing what was intended <u>contributing</u>	To be more explicit about the intended monitoring approach and to provide greater assurances over its effectiveness.	The monitoring framework is not a policy or proposal would not therefore exert any 'likely effects'. No SA implications.	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Implications	Appraisal	Further SA Work Required?
			<p>to these objectives, or if a site simply isn't being delivered, there needs to be a way of recognising this in order to instigate remedial actions. <u>Depending on the scale and/or nature of the ineffectiveness, Such actions could may include: amending a policy, introducing guidance to aid its implementation, substituting a site or reviewing the evidence upon which the policy or site in question is founded.</u></p> <ul style="list-style-type: none"> • <u>reviewing the circumstances and engaging with stakeholders as appropriate;</u> • <u>reviewing the policy(ies) concerned and their implementation mechanisms which may lead to a formal partial review of the Plan and/or the supporting evidence base;</u> • <u>in the case of take up of development land, consider interventions which may assist in overcoming barriers if identified; and/or</u> • <u>identify reasonable alternative land through further Development Plan Documents and/or Neighbourhood</u> 				

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
			<u>Development Plans.</u>			
MM79	229	Appendix 1	Updated to include technical aspects currently set out in the Housing Site Selection Paper [SD 015]. These modifications are attached as Appendix Two to this schedule.	To ensure the Local Plan will be effective in securing the delivery of development of the scale and nature envisaged on each site, having regard to any constraints and mitigations required, as anticipated in the Housing Site Selection document.	Factual site information. As each site has been subject to sustainability appraisal, it is not considered that this modification would give rise to any SA implications.	No
MM80	236	Appendix 2	<i>Monitoring Framework to be updated to include more explicit indicators, trigger and possible actions with the objectives also having been refined where necessary. Such modifications are confined to the entries for Policies SP 2, SP 3, SP 4, EC 1, EC 2, EC 4, HO 1, HO 2, HO 11, IP 3, IP 8, CC 2, CC 5 and GI 4. These modifications are attached as Appendix Three to this schedule.</i>	Necessary to ensure a more effective monitoring framework which provides greater clarity regarding the timing and nature of any necessary future interventions.	The monitoring framework is not a policy or proposal and would not therefore exert any 'likely effects'. Reference to and links with SA objectives remain unchanged. No SA implications.	No
MM81	Maps	Map Two	<i>Amendment to Harraby Green Business Park – now to be shown as Primary Employment designation rather than just white-land. See Appendix Four - Policy Map Modification No. 1.</i>	To recognise the primary employment role of the Business Park.	Change confined to reflecting the current use of this site. The designation simply identifies where the provisions of Policy EC2	No

Mod Ref	Page No	Policy/ Para	Proposed Main Modification	Rationale	Sustainability Appraisal Implications	Further SA Work Required?
					would apply. As Policy EC2 has already been subject to SA, it is not considered that this modification would give rise to any SA implications.	
MM8 2	Maps	Map Two	<i>Amendment to workshops on South John Street, Robert Street, Water Street and James Street to include them within the Primary Employment designation. See Appendix Four - Policy Map Modification No. 2.</i>	To recognise the primary employment role of the workshops in the area.	Change confined to being a minor, modest extension of the Primary Employment Area, reflecting the current use of this site. The designation simply identifies where the provisions of Policy EC2 would apply. As Policy EC2 has already been subject to SA, it is not considered that this modification would give rise to any SA implications.	No
MM8 3	Maps	Map Two	<i>Delete Housing Allocation R13 Linstock North. See Appendix Four - Policy Map Modification No 3</i>	Removed to reflect that this site is no longer available for development.	Deletion of this site is not considered to have an implication on sustainability issues as it does not result in the requirement to allocate additional land at this time. Opportunities for development of a similar size and scale could be brought forward through Policy HO2. It is therefore not considered that this	No

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					change would give rise to any SA implications.	
MM8 4	Maps	Map Two	<i>Delete Housing Allocation U19 Land at Carleton Clinic. See Appendix Four - Policy Map Modification No 4</i>	Removed to reflect that this site is no longer available for development.	Deletion of this site is not considered to have an implication on sustainability issues as it does not result in the requirement to allocate additional land at this time, owing largely to the fact that an adjacent site has recently been granted planning permission.	No
MM8 5	Maps	Map Two	<i>Amendment to Housing Allocation U14 Land north of Carleton Clinic. See Appendix Four - Policy Map Modification No 5</i>	To reflect the land now being taken forward for development at this location post the grant of planning permission.	Site now benefits from planning permission and this change to align with this is therefore not considered to give rise to any SA implications.	No
MM8 6	Maps	Map Two	<i>Amendment to existing Traveller allocation (Low Harker Dene) to differentiate between permanent and transit elements of allocation. See Appendix Four - Policy Map Modification No 6</i>	To be clear about delineation between permanent and transit elements of allocation following decision to formally allocate transit provision through Policy HO11.	Modification relates to the allocation of up to 15 transit pitches. This was not previously assessed, nor were any reasonable alternatives. As such this proposed modification has the potential to give rise to SA implications. SA assessment is required	Yes
MM8	Maps	Map 4	Expansion of Housing Allocation R15 Land	To reflect revised	Modification relates to an	Yes

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7		Scotby Inset	north of Hill Head, Scotby. <i>See Appendix Four - Policy Map Modification No 7</i>	preferred option for site development.	extension to site R15, however this provides a new and reasonable alternative option to that already considered. Further assessment required.	

Appendix B: Further SA Assessment

Key

++	Significantly Positive
+	Positive
0	Neutral
?	Uncertain
-	Negative

SA of Alternative Scotby Option – Option 1 - Land East of Scotby Road

Land East of Scotby Road (Scotby Option 1)			
No	Objective	Colour	Notes/Comments
1	Provide opportunities to strengthen and diversify the economy	+	Provides new housing – key tool in the Government’s economic recovery plan.
2	Improve access to employment	0	
3	Protect and improve the quality of water resources	0	
4	Act to mitigate the causes and impacts of climate change including minimising flooding.	0	
5	Encourage sustainable use of previously developed land	-	Greenfield site
6	Encourage urban regeneration	0	
7	Improve the availability & use of sustainable transport mode	+	Site is within walking distance of public transport services and within walking distance of the village centre and so there would be opportunities for utilising sustainable transport. Proximity of Scotby to Carlisle also provides the opportunity for cycling.
8	Promote the development & use of sustainable and renewable energy resources	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites
9	Increase the use of sustainable design and construction techniques	0	Promoted through other policies within the Local Plan at a

			stage when more detailed discussions are taking place on individual sites
10	Minimise the production of waste & increase reuse and recycling rates	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites
11	Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	+	Site is within walking distance of public transport services and within walking distance of the village centre and so there would be opportunities for utilising sustainable transport. Proximity of Scotby to Carlisle also provides the opportunity for cycling.
12	Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	+	Access to green spaces and opportunities to walk/cycle to use local services/facilities. Also safe walking and cycle routes to Carlisle.
13	Ensure opportunities for all for living in decent and affordable homes	++	Housing allocation where a mix of housing would be provided, built to modern standards.
14	Improve people's sense of safety and well-being	0	
15	Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	The introduction of residential gardens has the potential to create a more habitat rich environment
16	Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	0	Site is partly screened by existing residential properties.
17	Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	0	
18	Protect and improve local air quality	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals
19	Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals.

20	Reduce potential for environmental nuisance	0	Housing unlikely to exert an adverse impact on any adjacent land uses.
<p>Summary: This is a greenfield site which is sustainably located close to Carlisle and within a village with good service provision. The one negative SA outcome is reflective of that associated with the development of a greenfield site. This site therefore performs largely positive/neutral overall against the objectives of the SA.</p>			

SA for Proposed Main Modification MM86 (Scotby Option 3) - R15 Land to the east of Scotby Rd and Land north of Hill Head, Scotby

Land east of Scotby Road and Land north of Hill Head, Scotby (Scotby Option 3)			
No	Objective	Colour	Notes/Comments
1	Provide opportunities to strengthen and diversify the economy	+	Provides new housing – key tool in the Government’s economic recovery plan.
2	Improve access to employment	0	
3	Protect and improve the quality of water resources	0	
4	Act to mitigate the causes and impacts of climate change including minimising flooding.	0	
5	Encourage sustainable use of previously developed land	-	Greenfield site
6	Encourage urban regeneration	0	
7	Improve the availability & use of sustainable transport mode	+	Site is within walking distance of public transport services and within walking distance of the village centre and so there would be opportunities for utilising sustainable transport. Proximity of Scotby to Carlisle also provides the opportunity for cycling.
8	Promote the development & use of sustainable and renewable energy resources	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites
9	Increase the use of sustainable design and construction techniques	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites
10	Minimise the production of waste & increase reuse and recycling rates	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites
11	Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	+	Site is within walking distance of public transport services and within walking distance of the village centre and so there would be opportunities for utilising sustainable transport. Proximity of Scotby to Carlisle also provides the opportunity

			for cycling.
12	Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	++	Access to green spaces and opportunities to walk/cycle to use local services/facilities. Also safe walking and cycle routes to Carlisle. Larger site area provides potential for access to on site open space and improves permeability to/from the site.
13	Ensure opportunities for all for living in decent and affordable homes	++	Housing allocation where a mix of housing would be provided, built to modern standards.
14	Improve people's sense of safety and well-being	0	
15	Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	The introduction of residential gardens has the potential to create a more habitat rich environment
16	Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	0	Site is well screened by existing residential properties. Larger site area creates the opportunity for more creative design and layout of the site
17	Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	0	
18	Protect and improve local air quality	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals
19	Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals.
20	Reduce potential for environmental nuisance	+	Housing unlikely to exert an adverse impact on any adjacent land uses. The larger footprint of the site gives scope for greater setback from existing properties. Additionally, two access routes to the site would potentially reduce the intensity of use of each access and would therefore reduce any negative impact from vehicular noise and/or emissions. The site is also of a size where appropriate mitigation measures, for example

			with regards to attenuating noise from the A69, can be designed in.
<p>Summary: This is a greenfield site which is well screened by existing development. It is sustainably located close to Carlisle and within a village with good service provision. The one negative SA outcome is reflective of that associated with the development of a greenfield site. Assessment of the whole site demonstrates that it is considered to be a more sustainable option than the alternatives of development of either the north or south of the site only. This is emphasised by the consideration that a larger site area would provide the opportunity for more creative design of the development to reduce any negative impacts on neighbouring properties. It also provides scope for the provision of on site open space which would be of benefit to the new development and also the existing surrounding community.</p> <p>This site performs largely positive/neutral overall against the objectives of the SA.</p>			

SA for Proposed Main Modification MM49 Policy HO11 – Gypsy, Traveller and Travelling Showpeople Transit Provision

MM49 – Transit Allocation at Harker Dene			
No	Objective	Colour	Notes/Comments
1	Provide opportunities to strengthen and diversify the economy	0	
2	Improve access to employment	++	Very positive for the Travelling community as provides the opportunity to travel to and stay within the area to pursue short term work opportunities
3	Protect and improve the quality of water resources	0	
4	Act to mitigate the causes and impacts of climate change including minimising flooding.	0	
5	Encourage sustainable use of previously developed land	-	Greenfield site
6	Encourage urban regeneration	0	
7	Improve the availability & use of sustainable transport mode	?	Site lies on an existing bus route however current services are fairly infrequent.
8	Promote the development & use of sustainable and renewable energy resources	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites.
9	Increase the use of sustainable design and construction techniques	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites.
10	Minimise the production of waste & increase reuse and recycling rates	0	Promoted through other policies within the Local Plan at a stage when more detailed discussions are taking place on individual sites.
11	Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	?	Site lies on an existing bus route however current services are fairly infrequent. There is good access to the open countryside for walking and cycling however access to services is likely to be via the use of the private car.
12	Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	++	Clear health and wellbeing benefits from access, whilst travelling, to a safe and secure transit site with basic amenities.
13	Ensure opportunities for all for living in decent and affordable homes	++	Clear safety and wellbeing benefits through the provision of a safe and secure transit site when compared to the alternative risks associated with illegal encampments.
14	Improve people's sense of safety and well-being	++	Clear safety and wellbeing benefits through the provision of a safe and secure transit site when compared to the alternative

			risks associated with illegal encampments.
15	Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	Other policies within the Plan would seek to ensure consideration is afforded to protecting and enhancing biodiversity and geodiversity when assessing detailed proposals.
16	Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	0	The site is fairly well screened by existing boundary treatment.
17	Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	0	
18	Protect and improve local air quality	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals.
19	Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	0	Unlikely to have an effect in isolation. Other policies within the Plan would seek to ensure consideration is afforded to this issue when assessing detailed proposals.
20	Reduce potential for environmental nuisance	++	Clear benefits in terms of reducing environmental nuisance from provision of a
<p>Summary: Modifications to the plan to include the allocation of land for up to 15 transit pitches to meet identified needs over the Plan period for Gypsies and Traveller provision scores significantly positively against a number of the sustainability appraisal objectives. This relates largely to the allocation improving safety and wellbeing by providing a transit site with amenities therefore enhancing access to basic facilities and/or services. The modification also scores significantly positively against the SA objective of improving access to employment as this would have the potential to provide a base to explore temporary employment opportunities whilst travelling. The modification scores largely neutral overall.</p>			

Appendix C – Comparison of Alternative Options for Scotby

No	Objective	Colour		
		Option 1 - Land East of Scotby Road	Option 2 - Land North of Hill Head (reproduced from original SA [SD 003])	Option 3 - Land East of Scotby Road and Land North of Hill Head
1	Provide opportunities to strengthen and diversify the economy	+	+	+
2	Improve access to employment	0	0	0
3	Protect and improve the quality of water resources	0	0	0
4	Act to mitigate the causes and impacts of climate change including minimising flooding.	0	0	0
5	Encourage sustainable use of previously developed land	-	-	-
6	Encourage urban regeneration	0	0	0
7	Improve the availability & use of sustainable transport mode	+	+	+
8	Promote the development & use of sustainable and renewable energy resources	0	0	0
9	Increase the use of sustainable design and construction techniques	0	0	0
10	Minimise the production of waste & increase reuse and recycling rates	0	0	0
11	Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	+	+	+
12	Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	+	+	++
13	Ensure opportunities for all for living in decent and affordable homes	++	++	++
14	Improve people's sense of safety and well-being	0	0	0
15	Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	0	0
16	Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	0	0	0

17	Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	0	0	0
18	Protect and improve local air quality	0	0	0
19	Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	0	0	0
20	Reduce potential for environmental nuisance	0	0	+