

The Carlisle District Local Plan 2015-2030

# Proposed Submission Draft

# Sustainability Appraisal Non-Technical Summary



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

### 1. Introduction

**1.1** A Sustainability Appraisal (SA) Report has been produced to explain how sustainability matters have been considered and taken into account in the preparation of the emerging Carlisle District Local Plan 2015-2030 and to ensure it contributes to sustainable development. Sustainable development is widely taken to mean 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. Sustainability covers environmental, social and economic matters.

**1.2** SA's are intended to support the selection of options in the preparation of plans, not to make the decision. This document is a summary of the SA Report which summarises how the SA has been carried out, its main findings and next steps.

**1.3** The purpose of SA is to promote the objectives of sustainable development within planning policy. This is done by appraising the social, environmental and economic effects of a plan from the outset and in doing so, helping to ensure that sustainable development is treated in an integrated way in the preparation of development plans. The SA is subject to the same level of public consultation and scrutiny as the Local Plan. As such the SA Report (including this summary) has been published alongside the Local Plan Proposed Submission Draft for consultation from  $4^{th}$  March –  $20^{th}$  April 2015.

**1.4** The SA incorporates the requirements of the Strategic Environmental Assessment Directive, by combining the more environmentally-focussed considerations of SEA with wider social and economic effects.

**1.5** The SA Report should be read in conjunction with the Proposed Submission Draft Local Plan. All documentation relating to the SA is available on the Council's website at <u>www.carlisle.gov.uk/localplan</u>.

#### Proposed Submission Draft Local Plan

**1.6** The Local Plan, when adopted, will set the framework for future development across Carlisle District from 2015-2030 and will replace the current Carlisle District Local Plan 2001-2016. Over this period there is an identified need for development within the District, including for housing and employment. Through the preparation of the emerging Local Plan, there has been consideration of what is the appropriate level of development for Carlisle District over the Plan period and where this development should happen.

**1.7** The Local Plan includes:

- an overall vision which sets out how Carlisle District will develop;
- Strategic objectives for the area focussing on key issues;
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- A delivery strategy for achieving these objectives, setting out how much development is intended to happen and where;
- Locations for development;
- Evidence of what physical, social and green infrastructure is needed; and
- Detailed planning policies to support the determination of planning applications;
- Arrangements for managing and monitoring the delivery of the strategy.

# 2. Sustainability Appraisal Methodology

**2.1** There are a number of stages to the SA process based on legal requirements, these are:

- Stage A Setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B Developing and refining alternatives and assessing effects;
- Stage C Prepare the SA Report
- Stage D Seek representations on the SA report from consultation bodies and the public.
- **2.2** Taking account of the above, the SA Report covers the following:
  - The findings of Stage A;
  - An assessment of the Local Plan objectives against the SA Objectives;
  - An assessment of the sustainability of the options and reasonable alternatives considered in the preparation of the emerging Plan;
  - The identification of the potential significant effects as a result of the implementation of the emerging Plan;
  - An outline of the proposed monitoring strategy to measure the effects of implementing the emerging plan.

**2.3** There is a requirement to describe how the assessment of the sustainability of the Draft Local Plan has been carried out and any difficulties that were encountered. This is provided in the main report of the SA.

**2.4** In undertaking the appraisal of alternatives, sustainability objectives have been used as a framework to consider the likely effect of options. The identification of alternative options and consideration of likely effects has been informed by evidence based studies, details submitted to the Council and professional judgement. Consideration has also been given to the potential for mitigation measures to be provided to lessen potential adverse effects. The Council has taken account of the outputs of this work, along with other considerations, as part of the preparation of the emerging Draft Local Plan.

# 3. Setting the Context and Objectives – Stage A

**3.1** In terms of the sustainability context, the National Planning Policy Framework (NPPF) sets out the Government's view of what sustainable development in England means in practice for the planning system and recognises that *'there are three dimensions to sustainable development: economic, social and environmental'*. It is, however, also important to review sustainability messages set out elsewhere. This was done as part of the context review and findings are presented within the SA Report and in associated Appendix 1. This process was invaluable in identifying the key sustainability messages for the District, including for example, the need to create opportunities for sustainable economic growth, ensure opportunities for all to live in decent and affordable homes and to protect and enhance the natural environment.

**3.2** A thorough review of the baseline information identified sustainability problems affecting the District In addition to the review of policies, plans and programmes, a review of the sustainability baseline data helped to identify the key sustainability issues for the area as well as allowing an understanding to be gained of the likely evolution of the District without implementation of the Local Plan. Without implementation of the Local Plan, the following trends were identified as likely to continue into the future:

- The population is projected to increase from 108,000 in 2012 to 129,000 by 2032 (based on the Experian jobs led forecast);
- Housing in Carlisle will continue to be more affordable in respect of house price/earning ratio at 4.1% than is the case nationally which is 6.0%;
- Delivery of Affordable Housing will be supported and encouraged through the planning system
- The majority of housing will continue to be built in the urban area;
- Development on Brownfield land will continue to decrease due to the level of historic development of brownfield sites and availability moving forward;
- Tourism will continue to be of significant importance to the District as a generator of economic prosperity.
- Some wards within the District may continue to suffer from multiple deprivation;
- Educational attainment would continue to be lower than that of Cumbria, the North West and England;
- Crime rates should continue to decline;
- Existing Levels of open space provision per 1,000 resident population will not decline;
- The value and quality of the District's wildlife and wild habitats will be maintained;
- Recycling rates will continue to increase but due to past success may not be at the same rate as previously recorded;

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• Residual household waste per household will continue to decline;

- CO2 emissions per capita will continue to be lower than that of figures for Cumbria, North West and UK; and
- Climate change will increase the risk of flooding to the District.

**3.3** Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus for SA, ensuring it remains focussed. It does not attempt to cover all the issues but identifies those that are considered to be a priority in terms of the sustainability of the area moving forward.

**3.4** Table 1 below (and Appendix 3 of the SA Report) identifies the sustainability issues that are considered relevant to the Local Plan. In addition to identifying the relevant issues, the table also explores how the Local Plan may contribute towards alleviating the problems associated with it.

| Issue                                                                                                                         | Evidence                                                   | How can the Local Plan address this?                                                                                                                                                    |  |  |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| Economic                                                                                                                      |                                                            |                                                                                                                                                                                         |  |  |
| Surplus of<br>employment land<br>largely concentrated in<br>the north of Carlisle<br>City                                     | Carlisle Employment Sites<br>Study 2010 & Carlisle<br>AMRs | The Local Plan can seek to<br>promote the development of<br>employment sites across the<br>City to help to balance this<br>disparity and enhance the<br>offer.                          |  |  |
| The majority of<br>employment land<br>unsuited to modern<br>needs: quality, type<br>and location                              | Carlisle Employment Sites<br>Study 2010 & Carlisle<br>AMRs | Through providing a<br>promotional framework to<br>enable and encourage<br>investment in existing sites<br>and to supplement the<br>District's offer through<br>additional allocations. |  |  |
| Salaries/weekly<br>earnings are lower<br>than the regional<br>average and<br>significantly lower than<br>the national average | ONS Nomis data                                             | Through the identification of a diverse range of locations and sites for inward investment including those which will contribute to the creation of a high skilled economy.             |  |  |
| Out migration of young<br>economically active<br>people                                                                       | Cumbria Observatory                                        | Support the development of<br>higher education and<br>employment opportunities for<br>young people, as well as an<br>appropriate housing offer and                                      |  |  |

#### Table 1 - Sustainability Issues and Potential of Local Plan to Address These

|                                                                                  |                                                                                                                                                                                                                                                                                                                     | attractive environment to help<br>retain school leavers and<br>graduates.                                                                                                                               |
|----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Education, skills and training depravation                                       | As of 2013 – 12.3% of<br>residents aged 16-64 have<br>no educational<br>qualifications which is<br>higher than the national<br>figure of 9.3%. A<br>Community Plan for<br>Carlisle and District 2011-<br>2016.                                                                                                      | Ensure provision of and<br>access to education facilities<br>and training opportunities                                                                                                                 |
| Visitor and<br>development pressure<br>affecting sites of<br>biodiversity value. | Carlisle's Green<br>Infrastructure Strategy:<br>The Big Green City (2011)                                                                                                                                                                                                                                           | Ensure development does not<br>result in a net loss of<br>biodiversity assets and that<br>opportunities to enhance<br>biodiversity and Geodiversity<br>are maximised.                                   |
| Social                                                                           |                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                         |
| Ageing population                                                                | ONS & Housing Needs<br>and Demand Study 2011                                                                                                                                                                                                                                                                        | Ensure that all housing needs<br>are catered for and<br>accessibility issues are<br>addressed.                                                                                                          |
| Pockets of deprivation                                                           | 19% of Carlisle's Lower<br>Super Output Areas<br>(LSOAs) are in the 20%<br>most deprived nationally.<br>ONS & Census 2011                                                                                                                                                                                           | Contribute to the creation of<br>sustainable communities<br>through using development as<br>a catalyst for wider investment<br>in the social wellbeing of an<br>area.                                   |
| Pockets of health<br>deprivation                                                 | Carlisle is ranked 109 <sup>th</sup><br>most deprived out of 326<br>nationally. Five of the<br>District's Super Output<br>Areas are in the worst 10%<br>nationally. Over 18,000<br>people in the district live<br>within areas considered to<br>be the most deprived.<br>Cumbria Observatory<br>Health Profile 2013 | Ensure provision of and<br>access to health facilities as<br>well as ensuring that planning<br>is at the forefront of decision<br>making with regards to all<br>aspects of development and<br>planning. |
| Life expectancy is lower than the national                                       | Cumbria Observatory<br>Health Profile 2013                                                                                                                                                                                                                                                                          | Ensure provision of and access to health facilities as                                                                                                                                                  |

| average<br>Shortage of Affordable<br>housing                                                                          | Carlisle AMR 2013<br>Housing Needs and<br>Demand Study Nov 2011                                                                                                                                                                                                                                                                          | well as ensuring that planning<br>is at the forefront of decision<br>making with regards to all<br>aspects development and<br>planning.<br>Through putting in place a<br>framework to enable the<br>delivery of affordable homes<br>and to secure affordable units<br>from qualifying residential<br>developments where viable to<br>do so. |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environmental                                                                                                         | I                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                             |
| Protection &<br>enhancement of<br>biodiversity and<br>geodiversity assets                                             | There are significant<br>nature conservation, wider<br>green infrastructure and<br>geodiversity assets in the<br>District – 9 SSSI's and a<br>number of internationally<br>recognised sites.<br>Cumbria Biodiversity<br>Evidence Base. Natural<br>England. Carlisle Green<br>Infrastructure Strategy-<br>'The Big Green City'<br>(2011). | Ensure development does not<br>result in a net loss of<br>biodiversity and geodiversity<br>assets and opportunities to<br>enhance biodiversity and<br>geodiversity are maximised.                                                                                                                                                           |
| Protection and<br>enhancement of the<br>historic environment &<br>landscape and<br>townscape character<br>and quality | There is a significant<br>number of historic assets<br>in the District and a<br>number of<br>buildings/monuments have<br>been identified as being in<br>a vulnerable or<br>deteriorating condition.<br>English Heritage. Carlisle<br>AMR 2013.                                                                                           | Ensure development does not<br>adversely affect the<br>significance of heritage assets<br>and conversely that<br>opportunities to enhance their<br>significance and secure their<br>preservation are maximised.                                                                                                                             |
| Pollution, air quality<br>and climate change                                                                          | Six air quality management<br>areas have been declared<br>in the urban area. Air<br>quality monitoring shows<br>that the annual mean for<br>nitrogen dioxide in the air                                                                                                                                                                  | Ensure the location and<br>design of new development<br>does not worsen air quality<br>within the District.                                                                                                                                                                                                                                 |

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|                                                                                                                                                      | remains above the<br>objective level at one or<br>more monitoring points in<br>these areas. 2011 Air<br>Quality Progress Report,<br>Carlisle City Council.<br>Emissions levels in the<br>District remain higher than<br>the regional and national<br>average. |                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High car use and dependency                                                                                                                          | Census 2011                                                                                                                                                                                                                                                   | Ensure that new development<br>is in locations accessible by<br>means other than the private<br>car, and opportunities to<br>encourage more sustainable<br>modes of travel are<br>maximised. |
| Quality of rivers                                                                                                                                    | Environment Agency                                                                                                                                                                                                                                            | Ensure that new development does not worsen the quality of water in the District.                                                                                                            |
| Position of Carlisle at<br>the meeting point of<br>three rivers, the Eden,<br>Caldew and Petteril<br>makes it vulnerable to<br>the risk of flooding. | Carlisle SFRA November<br>2011                                                                                                                                                                                                                                | Ensure that new development<br>is directed away from areas at<br>risk of flooding and that new<br>development does not<br>increase the risk of flooding<br>elsewhere.                        |

**3.5** The final stage of this process was to produce a SA Framework, including a set of sustainability objectives which could be used to test proposals within the Draft Local Plan using the information gathered through the review of policies, plans and programmes, collection of baseline data and the identification of sustainability issues and problems.

**3.6** Sustainability appraisal objectives are different in concept and purpose from the objectives of the Local Plan, though there is a degree of overlap in terms of key themes. Table 2 below lists the SA Objectives and demonstrates how the SA Framework for Carlisle District meets the requirements of the SEA Regulations 2004.

| Table 2 – Sustainability Appraisal Objectives |
|-----------------------------------------------|
|-----------------------------------------------|

| No. | SA Objective                                                                                                                                                                                                                    | SEA Directive Topic<br>Area/SA Subject Issue |  |  |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--|--|
| 1   | Provide opportunities to strengthen and diversify the economy                                                                                                                                                                   | Population                                   |  |  |
| 2   | Improve access to employment                                                                                                                                                                                                    | Population                                   |  |  |
| 3   | Protect and improve the quality of water resources                                                                                                                                                                              | Water                                        |  |  |
| 4   | Act to mitigate the causes and impacts of climate change including minimising flooding                                                                                                                                          | Water<br>Climatic factors                    |  |  |
| 5   | Encourage sustainable use of previously developed land                                                                                                                                                                          | Land; soil                                   |  |  |
| 6   | Encourage urban regeneration                                                                                                                                                                                                    | Population                                   |  |  |
| 7   | Improve the availability & use of sustainable transport modes                                                                                                                                                                   | Population; Air;<br>Material assets          |  |  |
| 8   | Promote the development & use of sustainable and renewable energy resources                                                                                                                                                     | Climatic factors;<br>Material assets         |  |  |
| 9   | Increase the use of sustainable design and Climatic factors;<br>construction techniques Material assets                                                                                                                         |                                              |  |  |
| 10  | Minimise the production of waste & increase reuse and<br>recycling ratesSoil;<br>Material assets                                                                                                                                |                                              |  |  |
| 11  | Encourage healthier lifestyles by promoting more Population;<br>sustainable means of transport including public Human Health<br>transport, walking and cycling                                                                  |                                              |  |  |
| 12  | Maintaining and enhancing human health, including<br>enhanced health from access to green spaces and<br>improved equitable access to a healthier, happier and<br>more sustainable lifestyle.                                    | Population;<br>Material assets               |  |  |
| 13  | Ensure opportunities for all for living in decent and Population affordable homes                                                                                                                                               |                                              |  |  |
| 14  | Improve people's sense of safety and well-being<br>Human health                                                                                                                                                                 |                                              |  |  |
| 15  | Protect and enhance biodiversity and geodiversity, as<br>well as creating and restoring biodiversity where<br>possible and enhancing internationally, nationally and<br>locally designated wildlife sites and priority habitats | Biodiversity; Fauna; Flora                   |  |  |
| 16  | Protect and enhance the quality and distinctiveness of                                                                                                                                                                          | Landscape                                    |  |  |

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|    | landscapes, townscapes and locally designated wildlife sites and priority habitats                                                                                                                            |                             |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 17 | Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural importance and their settings                                                                              | Landscape                   |
| 18 | Protect and improve local air quality                                                                                                                                                                         | Air; Human health           |
| 19 | Reduce emissions of gases which contribute to climate<br>change by limiting our pollution to levels that do not<br>damage natural systems, including human health, and<br>enabling adaption to climate change | Climatic factors            |
| 20 | Reduce potential for environmental nuisance                                                                                                                                                                   | Population;<br>Human health |

# 4. Assessing the Effects of Alternative Options

**4.1** One of the key stages of the SA process is to consider the likely effects of different options for achieving the plan's objectives. This is intended to help the Council understand the potential implications of the options.

#### **Testing the Local Plan Objectives**

**4.2** The first part of testing the sustainability of the Plan is to appraise the compatibility of the Draft Local Plan objectives against the sustainability objectives. This identified that in general the Local Plan objectives are generally complementary to the sustainability objectives with relatively minor changes being recommended to the housing, infrastructure, climate change, health and green infrastructure objectives. No direct conflicts were identified and as such it is considered that the Local Plan Objectives are likely to contribute to achieving sustainable development. In some cases uncertainties have been identified where implications may depend on the implementation of objectives. This is inevitable considering the need to balance social, economic and environmental objectives and to accommodate development whilst protecting the high quality environment of the District. The assessment is set out in Figure 1 below.

# Figure 1 – Assessment of Local Plan Objectives and the Sustainability Appraisal Objectives

|    | Spatial Strategy and<br>Strategic Policies | Economy | Housing | Infrastructure | Climate<br>Change and<br>Flood Risk | Health,<br>Education<br>and<br>Community | Culture and<br>Heritage | Green<br>Infrastructure |
|----|--------------------------------------------|---------|---------|----------------|-------------------------------------|------------------------------------------|-------------------------|-------------------------|
| 1  | ++                                         | ++      | ++      | ++             | ?                                   | +                                        | +                       | +                       |
| 2  | 0                                          | ++      | 0       | +              | 0                                   | ++                                       | 0                       | ?                       |
| 3  | +                                          | 0       | 0       | 0              | +                                   | +                                        | 0                       | ++                      |
| 4  | ++                                         | ?       | +       | +              | ++                                  | +                                        | 0                       | ++                      |
| 5  | +                                          | 0       | 0       | 0              | 0                                   | 0                                        | +                       | 0                       |
| 6  | +                                          | 0       | 0       | 0              | 0                                   | 0                                        | +                       | +                       |
| 7  | +                                          | 0       | 0       | ++             | 0                                   | 0                                        | 0                       | ++                      |
| 8  | +                                          | 0       | 0       | 0              | ++                                  | 0                                        | 0                       | 0                       |
| 9  | 0                                          | 0       | +       | 0              | 0                                   | 0                                        | 0                       | +                       |
| 10 | ++                                         | 0       | 0       | +              | 0                                   | 0                                        | 0                       | 0                       |
| 11 | +                                          | 0       | 0       | ++             | 0                                   | ++                                       | 0                       | ++                      |
| 12 | ++                                         | 0       | 0       | +              | +                                   | ++                                       | +                       | ++                      |
| 13 | ++                                         | 0       | ++      | 0              | 0                                   | ++                                       | 0                       | 0                       |
| 14 | +                                          | 0       | 0       | 0              | +                                   | ++                                       | 0                       | ++                      |
| 15 | ++                                         | 0       | 0       | 0              | 0                                   | 0                                        | 0                       | ++                      |
| 16 | ++                                         | 0       | +       | 0              | 0                                   | 0                                        | ++                      | ++                      |
| 17 | ++                                         | +       | 0       | 0              | 0                                   | 0                                        | ++                      | 0                       |
| 18 | +                                          | 0       | 0       | ?              | ++                                  | +                                        | 0                       | +                       |
| 19 | ++                                         | 0       | +       | +              | ++                                  | +                                        | 0                       | +                       |
| 20 | ++                                         | 0       | +       | 0              | 0                                   | +                                        | 0                       | +                       |

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#### **Developing and Appraising Options**

**4.3** The SEA Directive requires assessment of the likely significant effects of implementing the Plan, and 'reasonable alternatives'. Developing options/alternatives is an important part of both the plan-making and SA process. For development plan documents such as the Local Plan, the reasonable alternatives are the different options put forward during the preparation of the plan.

**4.4** Given the duty on authorities preparing Local Plan's to contribute to sustainable development, Carlisle City Council began developing options from the start of the Local Plan preparation in 2010. The SA process has run concurrently with the Local Plan in refining options and working with SEA consultation bodies (Natural England, Environment Agency, English Heritage) and key stakeholders to form the refined options contained within the Draft Plan.

**4.5** Options have been considered from three main perspectives throughout the process of plan preparation as follows:

- strategic options which relate to the broad development strategy for the district;
- options around specific policies to meet defined objectives; and
- site options in the context of the land allocations needed to respond to development needs.

**4.6** A key part of the appraisal is the consideration of the level of development required over the plan period, this includes for residential, economic and other uses. Where a need is identified there is then consideration as to where this need should be met. This assessment has also been informed by the evidence base supporting the Draft Plan which helped to guide the identification of options. At each stage interim SA Reports were prepared with a view to informing consultation on the options and subsequent selection of preferred options/drafting of policy.

#### What are the Appraisal Findings at this Current Stage?

#### **Strategic Options**

**4.7** An appraisal of the strategic options and therefore an evaluation of the likely effects of the Local Plan and alternatives is presented within section 4 of the SA Report and associated Appendix 5. Alternatives to address each of the strategic options were thereafter assessed against the SA objectives and recommendations made as to the most sustainable options to take forward within the Plan. The appraisal of strategic options relates to:

- the spatial distribution for growth;
- the level of new housing provision to be planned for;
- the distribution of housing growth within the District; and

• the preferred location for accommodating the required level of new retail floorspace within the City.

#### **Policy Options**

**4.8** The impact of the Local Plan on the sustainability baseline was assessed (see appendix 6 of the SA Report). The assessment shows that in a number of cases, it is possible that the Local Plan will have a positive impact. The likely significant positive effects of the Local Plan considered to be of significance are set out in Table 3. No significant uncertain or negative effects have been identified.

| SA Objective &<br>Indicators                                                                                                                                                                                                                                                                                                                       | Can the<br>effect be<br>quantified<br>?                                        | Targets<br>(Where<br>available)                                                                                                                                                                                            | Comments/Explana<br>tion                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol> <li>Provide<br/>opportunities to<br/>strengthen and<br/>diversify the<br/>economy</li> <li>Amount of<br/>employment<br/>floorspace<br/>developed by type<br/>(sqm);</li> <li>Amount of<br/>Employment land<br/>available for<br/>development by<br/>type (HA);</li> <li>Amount of major<br/>retail floorspace<br/>developed (sqm).</li> </ol> | Yes – will<br>be<br>measured<br>through<br>the Annual<br>Monitoring<br>Report. | The Local<br>Plan makes<br>provision for<br>45ha of<br>employment<br>land over the<br>Plan period<br>and identifies<br>a need to<br>accommodat<br>e a minimum<br>of 18,200sqm<br>of<br>comparison<br>retail<br>floorspace. | The Local Plan<br>makes provision for<br>employment land<br>and new retail<br>floorspcae, directing<br>such development to<br>existing employment<br>areas and Carlisle<br>City respectively.                                   |
| <ul> <li>6. Encourage Urban<br/>Regeneration</li> <li>% of new homes<br/>urban Area;</li> <li>% new employment<br/>floorspace (gross)<br/>in Urban Area.</li> </ul>                                                                                                                                                                                | Yes – will<br>be<br>measured<br>through<br>the Annual<br>Monitoring<br>Report. | The Local<br>Plan<br>allocates<br>70% of new<br>dwellings to<br>the urban<br>area.<br>The Local<br>Plan<br>allocates<br>45ha of<br>employment<br>land in the<br>urban area.                                                | The Local Plan<br>seeks to direct the<br>majority of new<br>development to the<br>most sustainable<br>locations where<br>there is a greatest<br>concentration of<br>people and access<br>to transport and job<br>opportunities. |

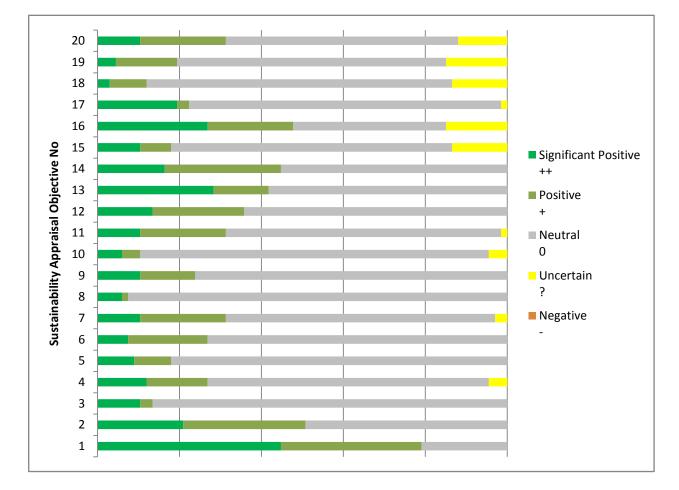
#### Table 3 - Likely Significant Positive Effects of the Local Plan on SA Baseline

| <ul> <li>7. Improve the availability &amp; use of sustainable transport modes</li> <li>% completed dwellings within 30 minutes travel time by public transport of key services</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                      | Yes – will<br>be<br>measured<br>through<br>the Annual<br>Monitoring<br>Report. | There is no<br>target for the<br>number of<br>dwellings<br>completed<br>dwellings<br>within 30<br>minutes<br>travel time by<br>public<br>transport of<br>key services           | The Local Plan<br>allocates new<br>housing<br>development<br>towards the most<br>sustainable locations<br>therefore affording<br>the<br>choice/opportunity to<br>access key services<br>by public transport.                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul> <li>13. Ensure<br/>opportunities for all<br/>for living in decent<br/>and affordable homes</li> <li>Projected Increase in<br/>the population</li> <li>Projected Increase in<br/>Household Figures</li> <li>Net Additional<br/>Dwellings;</li> <li>Identified Affordable<br/>Need;</li> <li>No. of Affordable<br/>Homes built and as<br/>% of all completions;</li> <li>No of Travelling<br/>Showpeople, Gypsy<br/>and Traveller<br/>pitches/plots<br/>delivered.</li> <li>Yes – will<br/>be<br/>measured<br/>through<br/>the Annual<br/>Monitoring<br/>Report.</li> </ul> |                                                                                | The Local<br>Plan has an<br>annual<br>housing<br>target of 565<br>dwellings and<br>9 gypsy and<br>traveller<br>pitches to<br>accommodat<br>e the<br>anticipated<br>future need. | The Local Plan<br>identifies a level of<br>growth in relation to<br>the requirement for<br>new residential<br>development in order<br>to enable the<br>accommodation of<br>anticipated future<br>household growth.<br>The Plan also<br>contributes towards<br>securing a<br>percentage of<br>qualifying housing<br>developments as<br>affordable and<br>allocates 9<br>permanent pitches to<br>meet an identified<br>need for Gypsies<br>and Travellers. |
| <ul> <li>15. Protect &amp; enhance<br/>biodiversity and<br/>geodiversity, as well<br/>as creating and<br/>restoring biodiversity<br/>where possible and<br/>enhancing<br/>internationally,<br/>nationally and locally<br/>designated wildlife<br/>sites and priority<br/>habitats.</li> <li>Net change in<br/>designated</li> </ul>                                                                                                                                                                                                                                            | Yes – will<br>be<br>measured<br>through<br>the Annual<br>Monitoring<br>Report. | No net loss of<br>designated<br>biodiversity or<br>geodiversity<br>assets.                                                                                                      | The Local Plan<br>contains specific and<br>strong policies to<br>protect designated<br>biodiversity and<br>geodiversity assets<br>including priority<br>species and habitats<br>from development<br>pressures. The Plan<br>has also been<br>developed alongside<br>a Habitats<br>Regulations                                                                                                                                                             |

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| biodiversity and<br>geodiversity assets | Assessment. |
|-----------------------------------------|-------------|
|-----------------------------------------|-------------|

**4.9** In order to determine the impacts of the Local Plan in its entirety, each Local Plan policy was then assessed against the SA Objectives. The assessment is set out in Appendix 7 and Figure 2 below clearly demonstrates that the cumulative impacts of the Local Plan Policies on the SA Objectives are positive. The Local Plan is identified as having a significantly positive effect on the SA objectives relating to sustainable development, ensuring opportunities for all to live in decent and affordable homes and protecting and enhancing the quality and distinctiveness of landscapes and townscapes for example. No negative effects were identified. Where unknown effects were identified, this was either due to questions over detailed implementation or where possible mitigation measures (in terms of amendments to the policies) were identified. Ultimately, the significance of an effect is a matter of judgement, making best use of available evidence, and requires no more than a clear and reasonable justification.



# Figure 2 - Cumulative Impact of Local Plan Policies on Sustainability Appraisal Objectives

**4.10** This assessment only resulted in a small number of minor changes to policies within the Local Plan, due to early consideration of a full range of sustainability objectives in the drafting of the Local Plan Objectives and the document itself as well as the front loading of consultation particularly with regards to the two preferred options stages of development.

#### **Site Allocation Options**

**4.11** In order to arrive at the assessment of reasonable housing sites, a number of sources have been used. This includes the extensive evidence base that has been compiled, which includes the Strategic Housing Land Availability Assessment and the Housing Site Selection Document which has established a pro-forma for detailed assessment of each site. In order to draw information together in an accessible form, and reach an overall conclusion on the merits of the housing sites assessed, key elements from the sites pro-forma and SA assessment have been combined in a series of summaries, split into housing market areas. This summary can be found in Table 12 within the SA Report. Of the sites initially identified, 42 sites were identified as having development potential for housing. Sites submitted to the SHLAA within the broad location of Carlisle South are not considered to constitute reasonable alternatives at this stage and will be subject to their own SA during the preparation of the Local Plan for Carlisle South which will bring forward development in this identified broad location. The completed SA assessment of each of these sites is contained within Appendix 8 of the SA Report.

**4.12** The SA of Site Allocations has played an important role in the evaluation of and decision-making around the selection of sites / land allocations. Each of the sites have been assessed against the SA Framework. The SA framework attempts to predict and evaluate the likely significant effects of the draft allocations and considers ways of mitigating adverse effects and maximising beneficial effects, including considering the potential effects of sites coming forward in-combination rather than piecemeal development.

**4.13** One site has been considered to meet the identified needs within the District for Gypsy and Traveller accommodation. No other alternative sites were put forward for this use through any of the previous consultations, nor has any other source identified land with such potential. The identified site is therefore considered to be the only reasonable site to respond to the identified needs. The site scores neutrally overall against the Objectives of the SA. See table 13 of the SA Report and full assessment in Appendix 8.

**4.14** Employment sites were identified using the existing Carlisle District Local Plan 2001-2016 which have not been developed; and the Employment Land Review (2010). This resulted in two sites being identified, one at Brunthill and the other at Morton, both existing employment allocations within the Carlisle District Local Plan 2001-2016 which remain undeveloped. The approach to take these sites forward and

not to identify further land for allocation is in line with the primary evidence base supporting the Local Plan employment section, the Carlisle Employment Sites Study 2010. Both sites score positive/neutral against the objectives of the SA. See Table 14 within the SA Report and full assessment in Appendix 8.

**4.15** The appraisal supports that the sites proposed for housing would be likely to have a positive impact on the local economy and on town or village centres. All of the sites considered for housing score significantly positively against the SA Objective that relates to ensuring opportunities for all for living in decent and affordable homes and a number also score significantly positively against the objective that relates to encouraging urban regeneration. In terms of employment provision, the sites score significantly positive against SA Objectives 1 and 2, providing opportunities to strengthen and diversify the economy and improve access to employment respectively.

# 5. Identifying the Effects of the Draft Local Plan

**5.1** The SEA Directive requires an assessment of the 'likely significant effects... taking into account the objectives and geographical scope of the plan or programme'. It is, therefore, necessary to assess those effects of the Local Plan that are likely to be significant, not all possible effects. In the SA Report, the social, environmental and economic effects of all strategic policies, detailed local Plan policies and site allocations have been predicted and evaluated for their significance.

5.2 In predicting and evaluating the effects of the draft Local Plan against the baseline indicators, it was found that in a small number of cases the draft Plan could possibly have a negative impact on a number of indicators being considered as a direct result of development (e.g. CO<sub>2</sub> emissions per capita). In all cases it was considered however that the possible negative impacts would be largely mitigated by the presence of other policies within the Plan which place these issues at their fore. In undertaking an assessment of each policy and site against the SA Objectives some potentially uncertain effects were identified, but these were not considered to be significant as it was felt that the cumulative effect of all of the Policies in the Plan would afford protection against these effects, and the subsequent potential effects of development, through the planning application process. It is also worth noting that some of the mitigation measures identified through the SA in relation to uncertainties identified are not necessarily appropriate for consideration under this assessment, but will instead be taken into account at the planning application stage when sites come forward for development.

**5.3** Overall, the assessment of Local Plan Policies with improvements and the assessment of selected sites as set out in the Proposed Submission Draft Local Plan have not identified any overall negative outcomes or significant adverse effects. It is therefore not considered necessary at this time to propose any further mitigation measures.

**5.4** These benefits can be considerably enhanced by ensuring that development undertakes consultation with the local communities that will be affected the most from new development and ensuring that appropriate infrastructure is in place to meet the needs of local people. Ultimately, there will be significant benefits in terms of housing and employment provision, and associated infrastructure that can contribute towards resolving a number of existing issues.

#### Mitigation

**5.5** A range of mitigation measures have been recommended to be included within the Draft Local Plan. This applies to both the consideration of planning applications and bringing forward proposed site allocations. It will be important for the Draft Plan to be read as a whole, to ensure policies that cover these matters are taken into account. When accounting for the potential mitigation measures, it is likely that there will be some remaining impacts as a result of the Draft Local Plan. The landscape and settlement character of parts of the District will change, both in the urban and rural areas.

# 6. Monitoring & Next Steps

#### Monitoring

**6.1** Monitoring plays an important role in assessing the actual effects of any plans. The success and effectiveness of the SA process will be monitored by the continued collection of data according to identified indicators in the sustainability framework. Chapter 11 and associated Appendix 2 of the Proposed Submission Draft Local Plan sets out a monitoring strategy, with the identified measures and indicators being reported annually within the Annual Monitoring Report (AMR). Any unforeseen adverse effects arising from implementation of the Policies will be highlighted in the AMR and recommendations made regarding the need for revisions to any policies in the Local Plan. In addition, the SA baseline itself will also be subject to regular review.

#### Next Steps

**6.2** Once the period for public representations on the Local Plan Proposed Submission Draft has finished, the main issues raised will be identified and summarised by the Council, who will then consider whether the Plan can still be deemed to be 'sound'. Assuming that this is the case, the Plan (and the summary of representations received) will be submitted for Examination.

**6.3** At Examination the Inspector will consider representations (and findings presented in the SA Report) before then reporting back on the Plan's soundness. If found to be 'sound', or capable of being found sound through modifications, the Plan will be formally adopted by the Council.