

CARLISLE DISTRICT LOCAL PLAN (2015 – 2030)

SUSTAINABILITY APPRAISAL INCORPORATING STRATEGIC ENVIRONMENTAL POST ADOPTION STATEMENT

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APPENDIX A

Consultation responses and how they were addressed in the Sustainability Appraisal report.

1. Introduction

- 1.1 This Sustainability Appraisal (SA) post adoption statement is published alongside the Carlisle District Local Plan 2015-2030 (the Local Plan), which was formally adopted by Carlisle City Council on 8th November 2016.
- 1.2 The Local Plan sets out a long term spatial vision, strategic objectives and policies, identifies land to accommodate new development and sets out detailed policies to guide new development in a positive, managed and sympathetic way, whilst ensuring the timely delivery of necessary infrastructure to support this growth. It will be at the heart of decision making on planning applications within the District.
- 1.3 SA is a process that is carried out as an integral part of developing a local plan with the aim of promoting sustainable development. The SA has been undertaken throughout the evolution of the Local Plan.
- 1.4 The purpose of this post adoption statement is to accord with the legislative requirements of European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004. Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive) states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes.
- 1.5 The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004) which requires the SA process to be applied to local development plan documents in accordance with section 19 (5) of the Planning and Compulsory Purchase Act 2004. In accordance with these regulations a SA and report was completed for the Local Plan.
- 1.6 Article 9 of the SEA Directive requires that when a plan or programme is adopted the Council makes available a statement summarising:

"... how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with".
- 1.7 This requirement has been transposed into UK law through Regulation 16 of the 2004 Regulations, which require the responsible authority to produce a statement containing the following information 'as soon as reasonably practical' after the adoption of a plan or programme:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to:
 - i) the invitation referred to in regulation 13(2)(d);
 - ii) action taken by the responsible authority in accordance with regulation 13(4) have been taken into account;
- how the results of any consultations entered into under regulation 14(4) have been taken into account;
- the reasons for choosing the plan or programme as adopted in the light of the other reasonable alternatives dealt with; and
- the measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme (regulation 16).

2. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE LOCAL PLAN

- 2.1 The SA process has involved assessing the Local Plan against a series of sustainability objectives to test whether it is likely to result in significant social, economic and environmental effects. These sustainability objectives are known as the sustainability framework.
- 2.2 The sustainability framework evolved from a Cumbria wide framework that was developed jointly with other local planning authorities in Cumbria. This initial approach evolved to incorporate further elements into the framework to ensure that the Carlisle specific sustainability issues that needed to be addressed through the Local Plan were enshrined throughout the SA process.
- 2.3 The sustainability framework was developed during the scoping stage for the SA by reviewing other policies, plans and programmes; social, environmental and economic baseline characteristics; and identifying wider and specific sustainability issues for Carlisle District.
- 2.4 In addition, consultation responses to the Scoping Report provided further information relating to the identification of sustainability issues. The Environment Agency, Natural England and Historic England were consulted on each draft during the development of the SA as statutory consultees. This has ensured that the SA framework addressed the key environmental considerations of other organisations. The analysis of sustainability issues has therefore been iterative as each round of stakeholder involvement and review of key issues has contributed to their evolution.
- 2.5 The key sustainability issues are set out in Table 4 of the Proposed Submission draft of the SA report (which was later 'submitted' unchanged). This table considers each of the environmental topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004).
- 2.6 The above framework has ensured that both wider and more locally specific environmental considerations in the District were integrated into the sustainability framework and, through the assessment (at each stage of the Plan's evolution) of its objectives; spatial strategy; each policy and land allocation, the full scope of environmental considerations was therefore integrated into the Local Plan.

3. HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

- 3.1 The purpose of the 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.
- 3.2 The SA work undertaken on the Local Plan is outlined below. In summary, Sustainability Appraisal Reports (incorporating strategic environmental assessment) have been published for comment alongside each draft version of the plan as it has evolved. As set out within the various SA Reports, the process was undertaken to inform decision making rather than to make the decisions themselves. The outcome of public engagement and consultation has been taken into account as part of the preparation of the plan.
- 3.3 Work on the Local Plan started in early 2011 with the publication of the Key Issues document. The production of this document included the collection and presentation of background information of relevance to the environmental, economic and social baseline of the District. This contained much of the information that was put together into the Core Strategy Issues and Options SA Scoping Report which was the subject of consultation between September – October 2011.
- 3.4 During the process of producing the Local Plan under the former guise of a Core Strategy, the National Planning Policy Framework (NPPF) was introduced (March 2012) which changed requirements at a national level from the development of a core strategy to the development of a whole local plan instead. Despite this the information contained within the Scoping Report was considered to remain relevant in terms of the key sustainability issues identified for the District through the Plans Policies and Programmes (PPP) review and collection of baseline data.
- 3.5 Responses to the Scoping Report consultation were analysed and background information was amended following this process. The Scoping Report was updated to reflect these amendments.
- 3.6 Work on the SA tasks including developing and refining Local Plan objectives and options and assessing their effects had been ongoing since the publication of the Council's "Issues and Options Paper" in September 2011 included consultations on;

- Local Plan Preferred Options Consultation (July-September 2013) including SA Report; and
 - Local Plan Preferred Options Stage Two Consultation (March-April 2014) including SA Report.
- 3.7 These previous stages of consultation and importantly the process of SA all helped to inform the selected preferred options for the Local Plan Proposed Submission Draft, including the strategic objectives and policies, detailed development management policies and site allocations. Work on finalising the Local Plan Proposed Submission Draft and SA Report was undertaken throughout 2014. This version of the Plan took into consideration the key actions and changes highlighted at the Preferred Options Stage Two consultation.
- 3.8 Changes to the Plan's objectives directly attributable to the process of SA are detailed within Table 6 of the submitted SA Report. Changes to Policies are detailed in Table 11 of the submitted SA Report. How the process has informed the strategic direction of the Plan is detailed at paragraphs 4.13 – 4.49 of the submitted SA Report. How the process has informed individual site allocations is detailed at Tables 12, 13 and 14 in the submitted SA Report.
- 3.9 Consultation on the proposed submission draft of the Plan, including the SA, took place between 4th March and 20th April 2015. This consultation allowed for representations to be made on the legal compliance and 'soundness' of the Plan and policies and proposals within in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Based on an analysis of the representations received, including those on the SA Report, both the proposed submission draft of the Plan and its accompanying SA Report were submitted unchanged to the Secretary of State for Communities and Local Government, via the Planning Inspectorate, for formal examination on 22nd June 2015.
- 3.10 The Local Plan examination process resulted in a number of proposed modifications (main and minor) to the Plan. Main Modifications were screened for any SA implications which concluded that a number did give rise to a need to subject them to a full SA assessment. The results of this SA work were incorporated into an SA Addendum Report and made available for public consultation, alongside the Main Modifications, between 14th March and 25th April 2016. Representations at this stage were considered by the Inspector and therefore incorporate into the Inspector's report and conclusions.

4. HOW THE OPINIONS RAISED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

- 4.1 The SEA Directive requires that the opinions put forward by consultees are taken into account during the preparation of the plan before its adoption. At each stage of the evolution of the Local Plan, all stakeholders, including the three statutory consultation bodies (Environment Agency, Historic England and Natural England), as well as Cumbria Wildlife Trust were informed of the SA consultation. Notification of these consultations was also sent to Scottish Natural Heritage as the District adjoins the border between England and Scotland.
- 4.2 Where consultees made comments in relation to particular aspects of the Plan or the sustainability appraisal, these were recorded and the Council reappraised the specific aspect referred to with a view to assessing whether change to the Plan or SA itself was warranted. Clear reasoning was always provided, and made public, to make clear why resultant changes were made or conversely why no change was deemed necessary.
- 4.3 Appendix A summarises the main points raised through the consultation on the SA, including the scoping stage, and shows the Council's consideration and response to the points raised.

5. REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN LIGHT OF OTHER ALTERNATIVES

- 5.1 The SA considered the reasonable alternatives to the policies and site allocations in the Local Plan, as required by the SEA Regulations. This process was undertaken as an iterative process and informed the development of the Local Plan throughout its evolution.
- 5.2 At both Preferred Options stage 1 and Preferred Options stage 2 of the Local Plan a number of options were further developed and consulted on, with both the preferred options and any reasonable alternatives having been subject to SA assessment.
- 5.3 Options were considered from three main perspectives throughout the Local Plan preparations process as follows:
- strategic options which related 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.
- 5.4 The SA at Task B3 evaluates the likely effect of the Local Plan and alternatives. The SA report explains how the reasonable options were identified, together with an assessment of the sustainability impacts of each option, and an explanation of the reasons for selecting the preferred option.
- 5.5 The Inspector's report on the examination of the Local Plan noted that the Plan had been subject to SA throughout its preparation and up to the time of the hearing sessions. The Inspector stated:
- "The Council's evidence base demonstrates that different options and alternatives have been addressed at all the relevant stages. At each stage of its development the emerging CDLP policies were assessed against SA objectives, to determine the likely effects of the policies and any reasonable alternatives. The SA was subject to consultation in the same way as the CDLP. The conclusion of the SA is that the CDLP is robust in terms of its sustainability and that its policies provide certainty and clarity. The main modifications have also been subject to SA. Therefore the CDLP has been subject to an adequate SA".*
- 5.6 Given that the Plan has been adopted inclusive of the modifications recommended by the examining Inspector, the Plan, as now adopted, can, in light of the Inspector's findings, clearly be seen to be the most sustainable in light of all reasonable alternatives, with the SA Report and subsequent Addendum supporting this conclusion.

6. MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE LOCAL PLAN

- 6.1 The likely significant effects of the Local Plan that have been identified in the SA will be monitored to evaluate their success. The mechanisms for monitoring the baseline evidence of the Local Plan are well established in the Authority Monitoring Report (AMR). Alignment between indicators used for monitoring the Local Plan with the SA indicators has been ensured as far as possible.
- 6.2 Chapter 11 and Appendix 2 of the adopted Local Plan outlines the indicators that will be used for monitoring both the Local Plan policies and the SA objectives. In addition the SA baseline itself will also be subject to regular review.
- 6.3 Any unforeseen adverse effects arising from the implementation of the Plan will be highlighted in the AMR and recommendations made regarding the need for revisions to any policies in the Local Plan or further interventions.
- 6.4 The SA Addendum, which sets out the results of the SA carried out on the Main Modifications sets out a commitment at paragraph 5.2 that the SA Post Adoption Statement will include the final version of the monitoring framework (Table 1 below).

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
SP 1	Timely approval of applications that represent sustainable development	% applications determined within statutory timescales	Sustained poor performance	Review circumstances with Development Management and identify further actions as necessary	All
		% Appeals dismissed			
SP 2	Delivery of at least 9,606 net additional dwellings between 2013 and 2030	Net cumulative total new dwelling completions	Negative deviation from Trajectory for a sustained 2 year period	<p>Depending on the scale and nature of the potential under-delivery / deviation, actions may include:</p> <ul style="list-style-type: none"> engaging with stakeholders; the preparation of an interim position statement; bringing forward additional allocations; and/or a partial review of the Local Plan. 	1, 2, 5, 6, 7, 11, 13, 16
		Projected rates of delivery as illustrated through the housing trajectory	Anticipated or actual shortfall in 5 year supply of housing land		
	Approximately 70% of new homes delivered in the Urban area	Urban/Rural split of gross housing completions	Actual and projected completions significantly deviating from target.		
	5 years of deliverable housing land at all times	Annual 5 Year Housing Land Supply Position Statement	Anticipated or actual shortfall in 5 year supply of housing land		
	Adequate delivery of and forward supply of employment land to support economic	Employment Land uptake [HA] and type [B1/B2/B8]	Uptake analysis	<p>Depending on the scale and nature of any shortfall, actions may include:</p> <ul style="list-style-type: none"> engaging with stakeholders; 	

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
	growth	Amount of employment land available [HA] and type [B1/B2/B8]	Diminishing forward supply of employment land [HA] and type [B1/B2/B8]	<ul style="list-style-type: none"> and/or a partial review of the Local Plan 	
	Realisation of the opportunity presented by the part commercialisation of MOD Longtown [Solway 45]	Progress toward the delivery and take up of the opportunity	Stalled progress		
	Take up of additional 18,700 m ² (net) additional comparison retail floorspace between 2012 and 2030	New (net) Comparison Retail Floorspace	Under delivery and no forward supply		
	Respond to opportunities and encourage development on previously developed land	Amount of development on previously developed land	Little or no reuse of previously developed land		
SP 3	Masterplan and infrastructure delivery strategy in place for Carlisle South	Progress against timetable set out in LDS	Deviation from LDS without legitimate reason (as reported in the AMR)	<ul style="list-style-type: none"> Review circumstances; engage with stakeholders; review LDS; and/or secure additional resources to accelerate delivery 	1, 13
	Housing delivery at Carlisle South in line with Masterplan	Actual dwelling completions at Carlisle South	Housing/infrastructure delivery not in accordance with Masterplan		

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
		Progress against delivery of required infrastructure		and/or <ul style="list-style-type: none"> partial Review of the Masterplan and IDP (including phasing) 	
SP 4	Protect and enhance the vitality and viability of the City Centre	City Centre Health Check	Sustained decline in health of city centre	Depending on the scale and nature of the decline/lack of progress, action may include: <ul style="list-style-type: none"> review circumstances; engage with stakeholders; and/or partial review of the Local Plan 	1, 2, 5, 6, 7, 11, 13, 16, 17
	Realisation of City Centre and Caldeu Riverside development opportunities	Progress towards the realisation of identified opportunities	Lack of published year on year progress towards implementation of a deliverable scheme		
SP 5	To protect and enhance the strategic connectivity of the District and support delivery of priorities as identified in the Infrastructure Delivery Plan and Local Transport Plan.	Progress towards delivery of identified priorities	Stalled progress	Engage with Stakeholders in particular in context with the IDP/LTP	1, 2, 4, 7, 11, 12
SP6	High quality design which supports/ creates a strong sense of place	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 9, 10, 12, 13, 14, 15, 16, 17
SP 7	To protect, enhance and enable the enjoyment of the District's Heritage and Cultural Assets	Net change in designated heritage assets	Negative Trends	Review circumstances, engage with stakeholders and consider options if necessary	1, 6, 16, 17
		Number of Conservation	Deviation from agreed programme		

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
		Areas with up to date Appraisals and Management Plans	for appraisals		
		Number of designated Heritage Assets considered to be at risk	Negative Trends		
SP 8	Protection and enhancement of an interconnected and multifunctional Green and Blue Infrastructure network	Policy Usage and S 106 Monitoring	Decision Monitoring	Engage with Stakeholders in particular in context with the IDP	1, 3, 4, 5, 6, 7, 11, 12, 14, 15, 16, 18, 19
SP 9	Improve the health and sense of wellbeing of the District's population, and reduce health inequalities	Health Profile/Joint Strategic Needs Assessment of the District	Negative Trends	Review circumstances, engage with stakeholders and consider options if necessary	1, 2, 4, 7, 8, 9, 11, 12, 13, 14, 19, 20
SP 10	To support efforts to up-skill the District's population	Levels of education attainment	Negative Trends	Review circumstances, engage with stakeholders and consider options if necessary	1, 2, 13, 20
Economy					
EC 1	To support economic growth and increase the level of high value jobs within the local economy through making land available for	Take up of the allocated 45HA employment land	No or limited prospect of take up of allocated land as reviewed annually	Depending on rate of delivery and/or speed of progress, actions may include: <ul style="list-style-type: none"> engaging with stakeholders; review evidence; and/or a Partial review of the Local Plan. 	1, 2

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
	employment land purposes.				
EC 2	To safeguard primary employment areas to ensure land and premises are available to provide the wide variety of sites required to meet the needs of businesses across the plan period.	Vacant floorspace [m2] and/or land on designated primary employment areas	Sustained net increase in vacancy rates	Depending on the scale and nature of the position, action may include: <ul style="list-style-type: none"> engaging with stakeholders; and/or review appropriateness of designation 	1, 2, 7, 20
		Loss of primary employment areas [HA] and/or floorspace [m ²] to non-employment [B1,B2,B8] uses	Sustained net loss of land [HA] and/or floorspace [m ²] to non-employment [B1,B2,B8] uses		
EC 3	To maintain the vitality and viability of Primary Shopping Areas through the retention of high levels of retailing [Use Class A1] at ground floor levels	% of ground floor units within the Primary Shopping Areas in A1 use	Negative Trend	Review circumstances and if appropriate review Policy and alternatives	1, 2, 5, 6, 7, 11
		% of ground floor units within designated Primary Shopping Frontages in A1 use			

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
EC 4	Delivery of a District Centre	Progress towards the delivery and take up of the allocation including foodstore anchor	Lack of published year on year progress towards implementation of a deliverable scheme	Depending on rate of delivery and/or speed of progress, actions may include: <ul style="list-style-type: none"> engaging with stakeholders; review evidence; and/or a partial review of the Local Plan. 	1, 2, 7, 11, 14
			Superseded master plan		
EC 5	To protect the vitality and viability of District and Local Centres	District and Local Centre Health Checks	Negative Trends	Review circumstances and if appropriate review Policy and designations	1, 2, 7, 11, 16, 20
EC 6	To protect the vitality and viability of defined retail centres through inappropriate out of centre retail and leisure developments	Retail Centre Health Checks	Negative Trends	Review circumstances and if appropriate review Policy and alternatives	1, 2, 5, 7, 11
		New Comparison Retail floorspace [m2] in out of centre locations			
EC 7	To help establish a strong sense of place through well designed shop fronts	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	7, 16, 17
EC 8	To facilitate the creation of a vibrant and viable food and drink offer across the District	Retail Centre Health Checks	Negative Trends	Review circumstances and if appropriate review Policy and alternatives	1, 2, 7, 11, 20
		Policy Usage	Decision Monitoring		

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
EC 9	To protect and enhance the District's arts, cultural, tourism and leisure offer	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 7, 11, 12, 14, 16
EC 10	To facilitate visitor accommodation in appropriate locations	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 4, 16, 17
EC 11	To enable rural diversification in order to support the rural economy	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 5, 16
EC 12	To support ongoing agricultural investment and activities within the District	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 16, 20
EC 13	To support ongoing equestrian investment and activities within the District	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 12, 16, 20
Housing					
HO 1	Site allocations contributing to housing delivery as anticipated	Delivery of site allocations in line with Policy	Cumulative reduction in indicative yields	Depending on the scale and nature of any potential under-delivery, actions may include: <ul style="list-style-type: none"> engaging with stakeholders; bring forward additional allocations utilising evidence from the SHLAA; and/or a partial review of the Local Plan 	1, 2, 5, 6, 7, 11, 12, 13
			Allocations not coming forward within the plan period indicated.		
HO 2	Annual average of at least 100 windfall	Actual and projected rates	Sustained lower windfall delivery rates	Review windfall rate employed in trajectory and land assessments	1, 2, 6, 9, 13

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
	dwelling completions	of windfall delivery			
HO 3	To preserve the character and quality of housing areas	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 9, 13, 14, 16
HO 4	To contribute towards meeting affordable housing needs through securing affordable homes from qualifying open market housing developments	No. of affordable homes delivered	Negative trends in percentages secured and delivered on sites.	Review circumstances and if appropriate: <ul style="list-style-type: none"> engage with stakeholders; review housing need and/or viability evidence; the preparation of an interim position statement; bring forward additional allocations utilising evidence from the SHLAA; and/or a partial review of the Local Plan. 	1, 6, 13, 14
		No. of affordable housing secured via Development Management process			
HO 5	To make provision for rural housing need	Policy Usage	Decision Monitoring	Review circumstances and engage stakeholders and if appropriate review Policy and alternatives	1, 2, 13
HO 6	To protect the open countryside from inappropriate housing development whilst recognising there may be special circumstances where new housing will be allowed	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 5, 13, 14
HO 7	To assist in protecting Heritage Assets	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 5, 6, 9, 13, 17, 20

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
HO 8	To assist in adaption of existing dwellings to meet changes in lifestyle	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 9, 13, 16, 20
HO 9	To contribute to the mix of housing offer within the District	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	6, 10, 13, 14
HO 10	To contribute to the mix of housing offer within the District	Policy Usage Number of additional specialist and/or supported housing units delivered	Decision Monitoring No additional specialist and/or supported housing units delivered	Review circumstances and engage stakeholders and if appropriate review Policy and alternatives	2, 7, 9, 11, 12, 13, 14
HO 11	To meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople	Net increase in permanent pitches and plots delivered	Progress towards the build out of the allocations Sustained increase in number of unauthorised pitches/developments	Review circumstances and if appropriate: <ul style="list-style-type: none"> engage with Stakeholders; review evidence; bring forward additional allocations; and/or a partial review of the Local Plan. 	11, 12, 13, 14
	Turnover on permanent sites	Lower than cumulative 10% turnover on rented sites within the District over a 2 year period			
	Net increase in transit pitches and plots delivered	Progress towards the build out of the allocations			
		Sustained increase in number of unauthorised			

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
			encampments		
HO 12	To protect the amenity of Primary Residential Areas	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 13, 14, 20
Infrastructure					
IP 1	To ensure timely delivery of infrastructure needed to support delivery of the Plan	Delivery mechanisms within IDP	Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	1, 3, 4, 6, 7, 11, 12, 14
IP 2	To minimise the impact of new developments on the transport network	Type, nature and location of new developments	Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	1, 2, 4, 7, 9, 11, 16, 18, 19, 20
IP 3	To ensure appropriate parking standards are adhered to	Compliance with any standards in operation	Deviation from LDS without legitimate reason (as reported in the AMR)	<ul style="list-style-type: none"> • Review circumstances; • engage with stakeholders; • review LDS; • secure additional resources to accelerate delivery; and/or • partial review of the Local Plan 	1, 2, 6, 9, 13, 14
	Adoption of SPD setting out parking standards	Progress against timetable set out in LDS			
IP 4	To ensure new developments benefit from access to high speed internet	Policy Usage	Decision Monitoring Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	1, 2, 13
		Infrastructure Delivery Plan			
IP 5	To reduce the level of waste and improve levels of recycling	Levels of residual household waste per household [kg]	Negative trend	Engage with stakeholders and review circumstances and if appropriate review Policy and alternatives	4, 10, 13, 19, 20
		Levels of household waste			

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
		sent for re-use, Recycling or Composting [%]			
IP 6	To ensure sufficient capacity for foul water drainage to support growth	Policy Usage	Decision Monitoring Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	3, 13, 20
		Infrastructure Delivery Plan			
IP 7	To facilitate the ongoing operation of Carlisle Airport	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2
IP 8	To secure any measures agreed as necessary to make development acceptable in planning terms	S106/CIL Monitoring as reported annually	Issues raised through the annual reporting	Depending on scale and nature of the issues, action may include: <ul style="list-style-type: none"> engage with stakeholders; and/or partial review of the Local Plan 	1, 7, 11, 12, 13, 14
Climate Change and Flood Risk					
CC1	To facilitate/enable development which contributes to generating renewable energy	Capacity in kW output of approved applications	Decline in the number of applications received and/or capacity kW output over a 5 year period	Depending on scale and nature of the decline, action may include: <ul style="list-style-type: none"> engage with stakeholders; and/or partial review of the Local Plan 	1, 2, 4, 8, 10, 19
		No of applications received			
CC 2	To facilitate/enable development which contributes to generating renewable energy from wind	Capacity in kW output of approved applications	Decline in the number of applications received and/or capacity kW output over a 5 year period	Depending on scale and nature of the decline, action may include: <ul style="list-style-type: none"> engage with stakeholders; and/or partial review of the Local Plan 	1, 2, 4, 8
		No of applications			

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
		received			
	DPD to identify suitable areas for wind energy development is in place	Progress against timetable set out in LDS	Deviation from LDS without legitimate reason (as reported in the AMR)	<ul style="list-style-type: none"> Review circumstances; engage with stakeholders; review LDS; and/or secure additional resources to accelerate delivery 	
CC 3	To ensure development proposals are energy efficient and resilient to the impacts of climate change	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	4, 8, 9, 10, 13
CC 4	No development which would be subject to flood risk or increase the possibility of flood risk elsewhere	Number of applications granted against flood authority advice	Negative trend	Engage with Stakeholders in particular in context with the IDP	1, 3, 4, 13, 14, 20
CC 5	Prioritisation of SUDs in new development sites	No of applications approved contrary to advice of appropriate bodies	Year on year increase in no of applications approved contrary to advice of appropriate bodies	Depending on the scale and nature of issues, actions may include: <ul style="list-style-type: none"> engage with stakeholders; and/or consider introduction of further guidance /SPD 	3, 4, 9, 12, 13, 14, 15
Health, Education and Community					
CM 1	Support New Health Care Provision	Type, nature and location of new healthcare provision	Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	11, 12, 14

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
CM 2	Support Educational Provision	Sufficient capacity to support proposed growth	Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	1, 2
CM 3	Avoid loss of valued community facilities and services	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 2, 7, 12, 14
		Number of facilities registered as a Community Asset	Increase of assets at risk		
CM 4	Design of Development deters crime	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 4
CM 5	To protect the environmental and residential amenity	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	3, 4, 5, 6, 10, 12, 13, 14, 15, 16, 18, 19, 20
CM 6	To facilitate and enable additional Cemetery and Burial Grounds	Type, nature and location of new cemetery provision	Continued deficit as identified in the IDP	Engage with Stakeholders in particular in context with the IDP	3, 4, 12, 18, 20
Historic Environment					
HE 1	To protect Hadrian's Wall World Heritage Site from inappropriate development	Policy Usage	Decision Monitoring	Review circumstances and engage with stakeholders	1, 12, 16, 17
HE 2	To protect scheduled and non-designated archaeological assets as a resource for research, education, leisure,	Net Change in Designated Heritage Assets	Negative Trends	Review circumstances and if appropriate review Policy and alternatives	1, 16, 17

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
	tourism and for their influence on perceptions of identity and sense of place				
HE 3	To protect buildings and/or structures that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest	Net Change in Designated Heritage Assets	Negative Trends	Review circumstances and if appropriate review Policy and alternatives	1, 6, 9, 16, 17
HE 4					1, 12, 15, 16, 17
HE 5					1, 12, 15, 16, 17
HE 6	To protect locally important heritage assets that have not been placed on the Statutory List of Buildings of Special Architectural or Historic Interest	Policy Usage	Decision Monitoring Negative Trends	Review circumstances and if appropriate review Policy and alternatives	1, 6, 9, 16, 17
		No of assets included on a Local List			
HE 7	To preserve or enhance the character and appearance of conservation areas	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 6, 9, 16, 17
Green Infrastructure					
GI 1	To protect against insensitive development	Policy Usage	Decision Monitoring	Review circumstances and if appropriate review Policy and alternatives	1, 12, 14, 15, 16, 20
GI 2	To protect and enhance the natural beauty and special characteristics	Policy Usage	Decision Monitoring	Review Policy and alternatives	1, 9, 12, 14, 15, 16, 17

Policy	Objective	Indicator	Trigger	Possible Action	SA Objective
	and landscape quality of the Solway Coast and the North Pennine AONBs				
GI 3	No net loss of Biodiversity or Geodiversity	Net Change in Designated Biodiversity and Geodiversity assets	Negative Trend	Review circumstances and if appropriate review Policy and alternatives	3, 4, 15, 16, 18, 19
GI 4	No unacceptable loss of public open space	Amount of public open space [HA] lost	Loss of public open space / failure to provide new provision contrary to advice of the Council's Green Spaces team	Depending on the scale and nature of issues, actions may include: <ul style="list-style-type: none"> engage with stakeholders; consider introduction of further guidance /SPD; and/or partial review of the Local Plan 	1, 4, 11, 12, 14, 15, 16, 18, 19, 20
	Ensuring new housing developments in excess of 20 units, where required, provide or contribute to the creation of additional public open space	Amount [Ha] of public open space secured on new housing development			
GI 5	No net loss of public rights of way	Amount of Public Rights of Way [Km]	Negative Trend	Review circumstances and if appropriate review Policy and alternatives	1, 2, 7, 11, 12, 14, 16, 18, 19
GI 6	No unauthorised loss of trees subject to a TPO or hedgerows qualifying as 'important' under the Hedgerow Regs 1997	Number of TPOs Amount of 'important' hedgerow	Negative Trend	Review circumstances and if appropriate review Policy and alternatives	4, 15, 16, 18, 19

APPENDIX A

Consultation Responses on draft SA Scoping Report	Summary of Council's Response
<ul style="list-style-type: none"> • Adding reference to Catchment Flood Management Plans (CFMP"s), Catchment Abstraction management Strategies (CAMS) and River Basin Management Plans (RBMPs), the White Paper on the Natural Environment, the North West Landscape Character Framework Project and Countryside Character Volume 2: North West under the relevant Sub Regional Plans and Programmes Section; • Refer to "Good Ecological Status" not "good biological status"; • Concern that the natural environment was not given enough weight as heritage and landscape in the document and that it should clearly identify the specific needs of and opportunities for biodiversity protection and enhancement; • The SA should include an environmental assets chapter; • The Biodiversity, Flora and Fauna section is inadequate; • Sustainability issues should refer to the information in the Cumbria Biodiversity Evidence Base; and • Welcome the use of Biodiversity Action Plan targets and related indicators 	<p>These comments resulted in changes which were incorporated into the update to the Scoping Report embedded within the main SA Report at PO1 Stage of the Plan's preparation.</p>
Consultation Responses to the Preferred Options (stage 1 and 2) draft SA Reports	Summary of Council's Response
Comments of support	Noted
SA doesn't mention protection and enhancing the District's existing arts and cultural facilities.	Policy amended to include reference to the protection of arts, cultural and leisure development. This Policy will be assessed as part of the SA for consultation on the Local Plan Preferred Options - Stage Two.
Support emphasis in Plan to achieving steady economic growth with policies that are also socially and environmentally sustainable. However, if the preferred options prove unaffordable, the alternative plans fall well short of meeting government targets, as highlighted in red	Where the SA has highlighted a policy/site as red (negative) against an SA objective this does not necessarily mean that a site/policy is unsustainable in the whole. Therefore, it is not considered appropriate to remove/amend a site or Policy from the plan where it

<p>(as a negative impact) in the accompanying SA tables. Even the Preferred Option contains issues causing a negative impact (scored red) in some key areas of planned development which is clearly undesirable and the Plan should seek to mitigate these by all reasonable means. The preferred options that score highly in the SA would generally be supported.</p>	<p>doesn't receive all positive outcomes. There can be other overriding reasons that could justify the inclusion of said policy or site.</p>
<p>Policy S1 should be reassessed, also readdress the Economic Policies</p>	<p>Policy S1 is prescribed by the Planning Inspectorate for inclusion within the Local Plan. In terms of economic policies, as with all other Policies contained within the draft Plan, this has been assessed against the SA objectives. It is therefore considered that equal weight is given to each of the strands of sustainability and it is not biased towards the positives of economic development to the detriment of social and environmental considerations.</p>
<p>Disagree with SA for Policy 64 (Biodiversity and Geodiversity) - is likely to have a positive effect on Objective 19</p>	<p>The SA for this Policy (now Policy 62 - Biodiversity and Geodiversity) has been reassessed.</p>
<p>The Draft SA highlights significant benefits of concentrating employment uses at Kingmoor Park, but also identifies the sustainable benefits that would result from the identification of an employment site to the south of the city.</p>	<p>Whilst Kingmoor Park is of significant importance in terms of strategic employment within the City, the Local Plan has to recognise that there is a significant unbalance between access to employment between the north and south of the City.</p>
<p>No plan to develop/redevelop existing housing stock/space above shops etc.</p>	<p>This is not something that the SA directly affects.</p>
<p>More relaxed approach needed for SA test for new housing in the rural areas.</p>	<p>It is important that housing is delivered in the rural area, be that market or affordable housing. The Affordable Housing Policy (19) requires affordable housing to be delivered/a contribution towards this across 2 zones, each requiring affordable housing whilst ensuring that this will not make a scheme unviable. Large scale housing development within a village may saturate it and not result in an appropriate social mix.</p>
<p>Struggle with technicality of document. A plan is only as good as its enforcement and I do not see any real rigour or commitment to the SA when faced with the political demands of government and building interests. Despite its formulaic approach I do not have confidence that</p>	<p>The SA is a technical document that supports the Local Plan however prior to publication of the Local Plan a non-technical document will be produced. The SA was consulted on for the same length of time as the Local Plan itself and was sent to all statutory consultees as</p>

<p>any SA plan will be implemented and enforced when faced with pressure from developers and political interests locally.</p>	<p>well as provided to the general public to comment, this includes Natural England, English Heritage and the Environment Agency. Any comments that have been received will be taken into account and the SA will be updated prior to the second Preferred Options Consultation.</p>
<p>If sites at Carl10 and Carl9 and Carl1 are sites that are preferred options to take forward as residential sites. How is this consistent with the arguments that have been used for Ca55 and Ca22 which state that there are junction capacity issues with Jct44 and schooling provisions in this location.</p>	<p>Sites Carl 1 and Carl 10 (Carl9 has been removed at the desire of the landowner), are better related to the built up area of the City. Ca50 & Ca22 are not completely discounted as a future development sites however their allocation is not proposed over this Plan Period. As highlighted within the site description, as development of the adjacent Crindledyke site progresses, the detached nature of this site will diminish and it could prove a strong allocation in the next plan period.</p> <p>In terms of J44 capacity issues and a lack of school places in north Carlisle it is correct that these same issues apply to Carl 1 and Carl10. As such this will be mentioned within the site descriptions for these sites.</p>
<p>I think the development [WAR1] would be much better on the other side of the A69 where all the facilities are located.</p>	<p>Noted. A number of alternative sites have come forward within Warwick Bridge and are currently being considered.</p>
<p>SA1 - No evidence given for actual employment opportunities. SA4 - Covering open green sites with buildings is bound to affect water drainage - maybe a full hydrological survey would be in order. SA7, 11 & 12 - No evidence about peoples' intentions or bus companies willingness to provide the service. SA8 & 9 - Council needs to be proactive to ensure builders do what is necessary. SA11 & 12 - Pie in the sky! Where is the evidence that proximity to the town edge encourages walking? SA13 - The population needs more starter homes (terraces?) and appropriately fitted bungalows for the elderly. SA14 - The comment is plain nonsense. SA15 - Planners need to be proactive to ensure builders provide more biodiversity in soil management and planting schemes. SA16 - Planner need to ensure that more open space is provided. Also housing design needs to be more thoughtful.SA18</p>	<p>SA1 - In terms of the SA, whilst it does not itself identify jobs, it does identify that there are employment opportunities close by within Brampton. SA4 – in relation to water drainage, the Council seeks advice from the Environment Agency and United Utilities. It is not considered that there are any issues that would cause a detrimental effect on drainage that could not be designed out at planning application stge. SA7, 11 and 12 discussions with Stagecoach have suggested that where there is new demand, bus routes can be altered, the location of this site would provide opportunities for people to walk/cycle to the centre of Brampton to access services. SA14- recognised that the move of the medical centre would have an effect on the majority of the residents of Brampton, it cannot be said that it would reduce</p>

<p>- Your comment contradicts the statement in SA7. Your comment - Overlooks the position of this site in relation to 2 major approach roads and therefore needs some sensitive planning. The southern boundary of this site projects beyond the current build line and is therefore detrimental to the town.</p>	<p>safety and well-being and have a completely negative effect as new development would result in the creation of a modern medical facility, providing the practice with the opportunity to expand and ensuring that the facility is capable of accommodating the future needs of the local population. SA15 – at detailed planning application stage more information would be available on planting, at this stage that level of detail is not yet available. SA16 – the level of open space provided is determined on a site by site basis. In terms of design, the Draft Local Plan contains a Policy on Design which encourages new development to follow design principles including; reinforcing local architectural features to promote and respect local character and distinctiveness. This should help to ensure that the design of a development is appropriate. SA18 recognises that where there is any new housing development there will be an increase in cars, regardless of where the site is located. Whilst SA7 states that there may be an increase in the range of bus routes, it is acknowledged that not everyone will choose this more sustainable option. It is therefore considered that any development has the potential to have a negative effect on local air quality however this may not necessarily be a detrimental effect.</p>
<p>The NPPF is concerned with improving living space, land use and traffic flow. This plan is not consistent with those aims.</p>	<p>The SA assesses the Plan by seeking to encourage the sustainable use of land whilst improving the availability and use of sustainable transport modes and encouraging the use of sustainable design and construction techniques.</p>
<p>It does not sufficiently inhibit the proliferation of wind turbines which are dominating the area, negatively impacting residents, property values and the amenity of the area.</p>	<p>The Plan cannot adopt a negative policy towards large scale wind as this would be against national policy and likely to fail the Government’s ‘test of soundness’. Additionally this stance would not help to promote national priorities or strategic objectives and would be contrary to the findings of the evidence base.</p>
<p>Once again the lack of the City Centre Masterplan makes it difficult to agree with the SA.</p>	<p>The City Centre Masterplan has now undergone its own consultation and as such Policies will be included within the second stage of preferred options</p>

	consultation. The SA will be used to assess any new Policies that are formulated for the City Centre, which will be consulted upon.
The SA if applied to any rural village, would prevent any houses being built in the rural villages at all.	It is not the role of the SA to block development in the rural area. The SA is used to ensure that the most sustainable options are taken forward when considering social, economic and environmental characteristics. The SA has helped to direct preferred housing allocations within the rural area to those settlements that have the most services and are the best served by public transport.
Preferred Options (Stage 2)	Council's Response
Site TH02 could provide additional housing to satisfy the acknowledged need for expansion of the village of Thurstonfield. The SA states that Sites TH04 and TH05 could provide some additional housing, but this would still leave a shortfall and site TH02 is available and deliverable.	The SA assesses sites against 20 SA Objectives. The SA does not select as there may be other reasons for a site to be considered positively, not just SA outcomes. All new sites submitted (and existing sites re-submitted) in response to the Local Plan consultation will be included within the SHLAA and have been subject to a re-assessment especially in the light of new evidence about infrastructure constraints and delivery etc, and representations made in response to the Local Plan consultation.
Apart from a reference to the food and drink offer in the north-west area of the city, food is not mentioned.	Further reference has been made to community food growing within the Strategic Health and Wellbeing Policy 'Promoting the role of community growing spaces such as allotments, community orchards, community gardens in providing access to healthy, affordable locally produced food as part of Carlisle's role as a Food City;'.
Priority should be given to brownfield sites over agricultural land. Brownfield site exists in the village.	The rate for developing on brownfield within the City has been high in recent years, however, this is more difficult in the rural areas. Given that the brownfield site in the village has not been submitted to the Council for consideration, we will not be including it as an allocation at this time.
I think there has been little thought given to important infrastructure requirements such as roads, which are all category B, and the density of traffic at peak times.	Infrastructure requirements across the whole Plan have been considered through the Infrastructure Delivery Plan (IDP). For infrastructure such as roads, the City Council has been working closely with the Highway Authority, including detailed technical modelling being undertaken. The Highway

	<p>Authority is undertaking a Carlisle Local Plan Transport Study. The aim of the study is to assess the traffic impacts of Carlisle City Council's Local Plan proposals. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p>
<p>There is no key for the colour coding in the SA tables. Natural England agrees with the conclusions reached in the SA. We note there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further in the next iteration of the SA as avoidance and/or mitigation measures may be required in order to reduce harm to the environment. As more information becomes available the findings should become more refined.</p>	<p>Comment regarding colour coding of the SA tables is noted and explanation of colour coding would sit appropriately at the start of the assessment tables. As further work is undertaken on the SA in preparation for Publication stage, greater explanation and investigation will be provided with regards to unresolved uncertainties and mitigation measures to reduce harm to the environment. A key will be provided with the SA assessment tables in order to clarify what the colour choices mean. Further information will also be provided with regards to unresolved uncertainties and mitigation measures.</p>
<p>There is no evidence of consultation with the highways authority, any development to the South of the city is going to impact on the already heavily congested A6. In order to reduce emissions of green house gases (1.9) there is a need to reduce the use of private vehicles. The cost of public transport is prohibitive for the working population to use for commuting from rural areas</p>	<p>There has been continuous engagement with the Highway Authority. Such considerations are being informed through the Council's Infrastructure Delivery Plan. The IDP is being developed with the full engagement of a wide array of Infrastructure providers.</p> <p>It is the intention of the Plan to identify opportunities for future development where sites are accessible by a range of transport options, particularly public transport in order to reduce emissions of green house gases from private transport. If there are a greater number of people using public transport, particularly in rural areas, this may help to sustain the service.</p>
<p>I feel that the development planned on both sides of the B6263 will make a busy road, rat run to M6, even more hazardous.</p>	<p>The Highway Authority is undertaking a Carlisle Local Plan Transport Study. The results of the study will be used to help identify potential measures to mitigate the impact of the proposals.</p> <p>The SHLAA is being updated before Publication stage of the Plan. All sites will be included within the SHLAA and will be subject to an initial assessment/re-assessment.</p>
<p>Carlisle is struggling to be sustainable in</p>	<p>In terms of existing services and</p>

<p>terms of services and employment. More houses require a more radical approach to integrate housing with employment and transport options. Infrastructure issues need to be addressed.</p>	<p>employment in Carlisle and overall sustainability, it is an ambition of this Council for the City to grow and prosper. One way to strive towards this is by identifying new areas for employment and housing opportunities Specifically relating to highways infrastructure and congestion, ensuring that the proposed development sites can be adequately serviced by the required infrastructure will be a key consideration in influencing which sites are taken forward. The Local Plan Transport Study assesses the traffic impacts of sites and will be used to help identify potential measures to mitigate the impact of the proposals.</p>
<p>The proposed two new large estates at the southern end of Wetheral Village will substantially increase car volumes through an already very restricted village centre. The two major supermarkets of Tesco and Asda will draw the majority of vehicles through the village to the detriment of all village residents.</p>	<p>The SA recognises there will be an increase in traffic as a result of new development. This has to be considered alongside other factors of sustainability. Highway infrastructure and capacity will be a key consideration in influencing which sites are taken forward. The IDP is being developed with the full engagement of a wide array of Infrastructure providers. Efforts are also continuing to engage with other relevant key service providers.</p>
<p>Wetheral was a farming community and the stripping of farm land is unbelievable. Why not use poor quality land</p>	<p>Sites are Grade 2 agricultural land. The NPPF states that LPAs should take into account the economic and other benefits of the best and most versatile agricultural land. It states that where significant development of agricultural land is demonstrated to be necessary, LPAs should seek to use areas of poorer quality land in preference to that of higher quality. To aid the transparency of the Local Plan site selection process however, the updated Strategic Housing Land Availability Assessment, which will be used to inform the final sites taken forward into the publication draft of the Local Plan, will include an assessment of the quality of agricultural land alongside other suitability considerations.</p>
<p>Policy S2: How can 665 new dwellings per annum be sustainable or needed with the large amount of empty properties already build in the Carlisle Area. What about greater use of brownfield sites rather than endorsing build on greenfield</p>	<p>Evidence supports the housing target in the Plan. The Local Plan has sought to deliver new homes on brownfield sites wherever possible, however, that there are not enough brownfield sites to accommodate</p>

<p>sites e.g. 100 dwellings Wetheral on two farm fields. We have concerns about the current capacity of schools (all age groups) which are already full in the outlying areas e.g. Scotby and Cumwhinton, and future as there does not seem to be sufficient indication to build new schools.</p>	<p>the required number of new homes across the Plan period. In some cases brownfield sites cannot be viably developed owing to abnormal costs. In terms of school provision developer contributions will be required to ensure appropriate mitigation can be provided.</p>
<p>In particular to the Cumwhinton map areas of surface water flooding have not been included.</p>	<p>Each of the sites included within the Local Plan as Preferred or Alternative Options have been assessed for a variety of issues and constraints, including surface water flood risk. Measures included at a planning application stage may be used to alleviate existing issues. In terms of the sustainability appraisal, each of the sites in Cumwhinton have scored neutral against SA Objective 4.</p>
<p>I do not believe that the Local Plan provides greater certainty for communities particularly in Rickergate where the City Centre Masterplan has identified it as a place for development i.e.. 'Mixed Use'. The findings of the Local Plan can be over-ridden by the NPPF's emphasis on economic growth taking precedence over social and environmental consideration regarding sustainable development. There also seems to be ambiguity over 106 agreements and CILs</p>	<p>The City Centre Development Framework (CCDF) constitutes evidence which will inform which sites will be identified within the Local Plan as City Centre development opportunities including the preferred option(s) to meet future retail and leisure needs across the plan period. Representations received in response to consultation on the CCDF will be used to influence the final draft, and, where relevant, equally used to inform the refinement of a 'publication draft' of the Local Plan.</p>

<p>Consultation Responses to the Proposed Submission Draft – Feb 2015 SA</p>	<p>Council's Response</p>
<p>Disagree with SA conclusion that proposed Policy HO7 will have a significant positive impact on the SA Objective 17. Reference made to the NPPF. It is considered that the Policy is considered to have a significant impact on the historic environment and on the achievement of the SA Objective on Heritage.</p>	<p>The principle of enabling development is well established in the NPPF at paragraph 55, bullet point 2 allowing housing in the open countryside as follows: " where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets ". SA conclusion considered robust.</p>
<p>No clear evidence from SA that other reasonable alternatives to the identification of Carlisle South have been considered. The potential for self-contained sites next to existing settlements to come forward early in the plan period does not appear to have</p>	<p>Task B3 – Evaluating the likely effects of the Local Plan and alternatives considers the main strategic options and how they were identified. The spatial distribution for growth is considered here, from Paragraph 4.14 onwards. This section states clearly that four options were</p>

<p>been considered. Questioned proposed approach as consider some sites could be delivered earlier and assist in providing an initial funding stream toward infrastructure. The amendments proposed by Carlisle Racecourse to Policies SP2 and SP3 would address this concern.</p> <p>Paragraph 4.65 of the SA advises that sites within the broad location of Carlisle South are not considered reasonable alternatives at this stage and will be subject to their own SA during the preparation of the Carlisle South masterplan. Due consideration should have been given to potential site allocations within the Carlisle South area given there are sites that are located adjacent to existing settlements which are deliverable in isolation from the wider Carlisle South area.</p>	<p>initially identified at the outset of the plan making process regarding this strategic issue which sought to explore how to accommodate sustainable growth.</p> <p>It is therefore clear that other reasonable alternatives to the identification of Carlisle South as a broad location for growth have been considered within the sustainability appraisal.</p> <p>However, bringing sites forward early, in the broad location of Carlisle South, in a piecemeal and ad hoc way could limit the delivery of the infrastructure required for a sustainable urban extension. The strategy of the Local Plan is to seek to avoid prejudicing the proper long term planning of Carlisle South, which the Local Plan makes clear is to be led by a masterplan.</p>
<p>The SA did not fully take into account the effect the proposed housing development would have on the local residents amenities, the scenery, its setting and its agricultural importance.</p>	<p>The SA considered the likely impact of this site on adjoining residents' amenities and on its landscape, its setting and agricultural value by assessing the site against 20 SA objectives. As a result the social, economic and environmental impacts of the development of this site were considered in detail and the results clearly published. The site performed largely neutral overall against the SA Objectives. Conclusions considered robust.</p>
<p>Dispute findings that 'cumulative impacts of the local plan policies in the SA objectives are positive' and question that no negative effects were identified. SA places too much weight on achieving economic development through a plan led approach of increasing land supply and ignores other critical contributory factors. [given] SA appears to completely ignore the importance of protecting good quality agricultural land and the part it plays in the nation's future food security. The amount of g/f land allocated for development will undermine the policy of encouraging urban regeneration. Future and continuing investment in neighbourhoods designated as Housing Improvement Areas in 1970/80's is absolutely vital if they are not to slip back into decline.</p>	<p>Cumulative impacts of local plan policies against the SA objectives are considered to be positive as a result of the early and transparent 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 stage of development.</p> <p>The SA Objectives are considered to be balanced in terms of assessing the social, economic and environmental implications of the Local Plan as there is a clear range of objectives, which have been designed to work towards the goal of sustainable development.</p> <p>SHLAA identifies that less than 10% of sites available are brownfield. Whilst it must be acknowledged that a proportion of these sites are unviable to develop due</p>

	to high remediation costs, the SHLAA demonstrates that the developable/deliverable brownfield sites would not be able to accommodate the level of housing required.
The SA report does not clearly show how the SA has informed the choice of the Rickergate area for large scale development.	Within the SA Report, the evaluation of the main strategic options demonstrates the importance of the SA in the choice and assessment of Rickergate as a preferred location for new retail development over the plan period. This is explicitly covered under Task B3 within the Report.
Draft Sustainability Appraisal Report & Non Technical Summary, we have considered the document and I can confirm that we are satisfied that it has been undertaken in line with guidance.	Noted.
The SA concludes that the landscape impact of the site if developed would be unacceptable as the site has a high landscape quality. It is considered that measures could be provided to mitigate any adverse landscape impact of the site and mitigation tree and hedgerow planting could be utilised to provide a rounding off of the settlement in conjunction with sites R1 and R2. In this regard, the SA should be revisited taking potential mitigation into account.	Brampton is the second largest settlement in the District with a population of approx 4000 and a wide range of services and facilities. The centre is largely built up and there are very few opportunities for brownfield development. Opportunities for expansion are generally going to be located on the edge of town. Of all the sites that have been promoted on the edge of Brampton throughout the evolution of the Local Plan, this site is considered to have the highest landscape quality. The Cumbria Landscape Character Guidance and Toolkit was referred to. It is considered that the landscape impact of developing this site would be unacceptable. Conclusions of the SA with regards to this specific site are considered robust.
We concur with the conclusions of the SHLAA (Site BR11) and SA. The site is well connected to existing services, schools and transport links. We agree that the site performs positively/neutrally against the sustainability appraisals objectives.	Comments noted.
We concur with the conclusion of the SHLAA and SA in respect of this site. In regard to SA it identifies a joint masterplan requirement with site U7. Not considered that a joint masterplan is required and due regard can be had through subsequent planning application determination on the relationship between site U7 and U6 if that is required . In addition, the sites are not	In the event that more land becomes available in this area, thus joining U6 and U7, a masterplanning approach would be inevitable for such a large development. The SA is supportive of this approach.

<p>immediately adjacent to each rendering an overall masterplan approach unachievable.</p>	
<p>The SHLAA is incorrect, as it discounts the land to the north (SC10) due to access constraints. Evidence has been submitted to the Council which demonstrates the site can be suitably accessed.</p> <p>In addition, an SA of land to the north will need to be carried out to ensure the Plan is sound.</p> <p>In respect of the parcel of the site which is currently allocated in the Local Plan (R15), we concur with the conclusions of the SHLAA and SA for the site.</p>	<p>Originally the Highway Authority considered that there were access issues.</p> <p>Since that time, the site promoter has provided evidence to indicate that satisfactory junction capacity exists, and satisfactory site access can be provided. The juxtaposition of these two sites, and given that the Council has accepted the principle of development on both sites, gives scope for a scheme which, through design and layout, minimises the impact on adjoining residents.</p> <p>This issue was consequently addressed through Main Modifications, in light of the new evidence presented, and re-appraised, the conclusions of which were published in the SA Addendum.</p>
<p>We strongly disagree with the SHLAA for the reasons set out in question 4. The SA should be updated to include the site. In addition the site should be considered in the Housing Site Selection Document.</p>	<p>The SHLAA noted that a significant issue relating to this site is the congested nature of the road at peak times for school drop off and pick up. At the time as there was no satisfactory layout of the site it was not proposed to allocate the site.</p> <p>Subsequently a planning application has been submitted for 22 houses, car parking and use of land for educational purposes, and approved subject to the signing of a S 106.</p>
<p>Do not concur with the SA in respect of this site. It is not sound in that it considers the site would be out of scale with the village. The Plan does not identify sufficient sites for delivery. This brownfield site should therefore be considered a sustainable extension to Houghton as there are no issues preventing the deliverability of the site. The SA does identify scope for development of part of the site. The allocation of this site will add to the vitality and viability of the area by way of S106 contributions that could be sought for the provision of education facilities and affordable housing provision.</p>	<p>Houghton has seen significant development over the last 20 or so years. The allocation R 10, has planning permission (reference 14/0390) for 99 dwellings. It is noted that the village has a good range of local services. However, the primary school is full and does not have capacity for further expansion.</p> <p>Whilst the site is formerly brownfield, and much hardstanding remains, it is being recolonised by vegetation, and is a designated County Wildlife Site.</p> <p>Houghton is a medium sized village, the majority of the development existing on the eastern side of Houghton Road. The recent permission for 99 dwellings has commenced on site. Further</p>

	<p>development to the south of this site would be considered to be not compatible with the scale, form and function of Houghton. Conclusions of the SA considered robust.</p>
<p>Disagree with the SA which rejects the site. The site is well related to the north of Houghton and strong landscaping would create a defined settlement boundary which is currently lacking on this side of the settlement. Finally, school capacity issues also referred to in the SA, could be dealt with via S106 payments if planning was progressed on the site.</p> <p>The site should also be considered in the Housing Site Selection document.</p>	<p>Houghton is a medium size village centred around a school, shop and community centre, with a central green area. The village lies between the M6 and the eastern edge of Carlisle. It is important to maintain its village identity. The majority of the housing lies on the eastern side of Houghton Road, although there are a smaller number of housing areas to the west. There is an allocated housing site to the south of the village, on brownfield land with planning permission for 99 houses. Houghton has seen recent significant housing development over the past 20 years.</p> <p>The capacity of Houghton to accommodate additional large scale housing development has probably been reached. The primary school is currently operating at capacity. There are a number of allocated housing sites proposed in the northern part of Carlisle, and a critical mass is required to trigger the development of a new primary school. None of the existing primary schools within north Carlisle have scope to physically expand. Conclusions of the SA considered robust.</p>
<p>Concur broadly with the conclusion of the SHLAA, Housing Site Selection and SA in respect of the site.</p> <p>In regard to SA it identifies a joint masterplan requirement with site U6. Do not consider that a joint masterplan is required and due regard can be had, through subsequent planning application determination on the relationship between site U7 and U6. In addition, the sites are not immediately adjacent to each other rendering an overall masterplan approach unachievable.</p>	<p>In the event that more land becomes available in this area, thus joining U6 and U7, a masterplanning approach would be inevitable for such a large development.</p> <p>The SA is supportive of this approach.</p>
<p>The site is immediately adjacent to proposed site allocation U2. The SA and Housing Site Selection Documents both consider the site U1 together with adjacent site U2. The documents state the sites need to have an integrated approach to development. The current</p>	<p>Comments noted and acknowledged that an integrated approach will be as a result of development management considerations.</p>

<p>planning application demonstrates that site U1 can be delivered independently to site U2, and the integrated approach will be as a result of Development Management considerations at planning application stage. Notwithstanding this however, we concur with the timescales for delivery with U1 in the short term (0 - 5 years).</p>	
<p>We concur with the conclusions of the SHLAA, Sustainability Appraisal and Housing Site Selection in respect of this site.</p>	<p>Noted</p>
<p>It is clear that the evidence base used to construct the recommendations in relation to site CA 47 was not sufficiently robust given the almost hysterical reference to 'excessive risk of flooding' and the totally inaccurate reference to there being 'little development over time' to give but two examples.</p>	<p>Etterby is a small village on the edge of Carlisle. The addition of 120 houses would more than double its size and be out of scale with this location.</p> <p>Two thirds of the site area lies within flood zone 2. Policy CC4 of the Local Plan requires that developments in such areas requires a sequential test, and an exception test if necessary. The remaining third of the site would not lend itself to housing development as it is of a long narrow shape which does not integrate with the adjacent settlement, would not be well contained within existing landscape features, and would intrude into the open countryside. These conclusions were upheld throughout the process of the examination.</p> <p>Subsequently the EA have undertaken detailed hydraulic modelling for this area and the site is no longer within Flood Zone 2. As such a small amount of housing in scale with the village is likely to be acceptable.</p>

<p>Summary of Consultation Responses to the Proposed Main Modifications accompanying SA Addendum Report March 2016</p>	<p>Council's Response</p>
<p>Comments of support that the SA process complies with guidance and conclusions are sound.</p>	<p>Noted.</p>
<p>Note some unsolved uncertainties within the SA. These should be explained and appropriate mitigation put in place to avoid negative impacts.</p>	<p>Robust monitoring framework in place to ensure documented uncertainties, which are considered to have been adequately explained, are kept under review. It is not considered appropriate to identify mitigation now as whether mitigation is</p>

	required and what form is not known. Uncertainties could for example result in positive as well as negative impacts.
Strongly object to SA addendum. Do not agree with the appraisal of the options for site R15 when assessed against the SA objectives.	The conclusions of the SA are considered robust with the examining Inspector having saw it appropriate to recommend the Main Modification relating to site R15 having considered all representations.