

**As submitted**  
[22 June 2015]  
for Examination in  
accordance with  
Regulation 22 of the  
Town and Country  
Planning (Local Planning)  
(England) Regulations  
2012.



## The Carlisle District Local Plan 2015-2030

# Proposed Submission Draft

# Sustainability Appraisal Report



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

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## **1. Introduction**

**1.1** The new Carlisle District Local Plan (2015 - 2030) (the Local Plan) will be at the forefront of shaping how the District, its many settlements and vast rural area will develop between now and 2030. The Plan sets out a long-term spatial vision and strategic objectives to support the development of a thriving District through the identification of land to accommodate new development and policies to achieve this growth in a positive, managed and sympathetic way, whilst ensuring the timely delivery of the infrastructure necessary to support growth. Once adopted the new Local Plan will replace the existing Carlisle District Local Plan 2001-2016 (adopted 2008) and will provide a positive and proactive approach to managing development in the District. It will be the Plan against which future planning applications within the District will be assessed.

### **1.2 The Local Plan:**

- establishes a vision of what Carlisle District will be like in 2030 if the Local Plan and its policies are implemented;
- identifies a set of objectives to realise this vision;
- sets a series of policies and site allocations to guide future growth and day-to-day decision taking on development proposals in the District that both complement and integrate with other key plans, policies and programmes related to development; and
- ultimately, facilitates sustainable development.

**1.3** This Sustainability Appraisal (SA) Report has been published to accompany the Proposed Submission Draft of the Local Plan. SA is a process that is carried out as an integral part of developing the Local Plan, with the aim of promoting sustainable development. It is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. It is a mandatory requirement and is subject to the same level of public consultation and scrutiny as the plan itself.

**1.4** Local authorities are required to undertake a SA on all development plan documents to ensure that sustainable development is integrated into spatial planning and into policies developed in the Local Plan. It is a requirement that the SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).

**1.5** The SA process is therefore governed by European and national legislation, supported by government policy, which includes:

- the requirements of European Directive 2001/42/EC (often known as the Strategic Environmental Assessment (SEA) Directive);
- the Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633 (SEA Regulations);
- the Planning and Compulsory Purchase Act 2004 (as amended) which requires SA of emerging Development Plan Documents;
- the Town and Country Planning (Local Planning) (England) Regulations 2012 which highlights the SA as one of the submission documents for local plans; and
- the National Planning Policy Framework (2012) which states that planning policies should be based on up-to-date information about the natural environment and other characteristics of the area including a SA which meets the requirements of the European Directive on strategic environmental assessment which should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

**1.6** Guidance on undertaking an SA within the context of local plan preparation is set out in the Government's Planning Practice Guidance, introduced in 2014.

### **Purpose of the Sustainability Appraisal Report**

**1.7** 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. The SA identifies the likely significant effects of implementing the Local Plan, and the specific policies and proposals within, against a number of sustainability objectives using a SA Framework. The SA only requires the identification of any likely *significant effects* of implementing the Plan on achieving sustainable development.

### **When the Sustainability Appraisal was carried out**

**1.8** SA is an ongoing process and this report builds on a number of previous stages which have been developed in parallel with the Local Plan as it has emerged. 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.

**1.9** During the process of producing the Local Plan under the former guise of a Core Strategy, the National Planning Policy Framework 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.

**1.10** 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.

**1.11** Work on the SA tasks including developing and refining Local Plan objectives and options and assessing their effects has been ongoing since the publication of the Council's „Issues and Options Paper“ in September 2011 and has 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.

**1.12** These previous stages 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. Earlier versions of the Draft SA reports are available at [www.Carlisle.gov.uk/localplan](http://www.Carlisle.gov.uk/localplan).

#### **Who was consulted, when and how**

**1.13** The Core Strategy SA Scoping Report (which detailed the methodology and the SA Framework) consultation documents were sent to the three statutory consultation bodies (Environment Agency, English Heritage and Natural England) as well as Cumbria Wildlife Trust. At subsequent stages a letter was sent informing all potential stakeholders of relevance and those who had been involved in the process to date that the Local Plan and SA consultation was being undertaken and that the documents were available on the Council's website, or in hard copy on request at the Council's main offices and the District's local libraries. Notification of these consultations was also sent to Scottish Natural Heritage given that the District abuts the Scottish border.

## **Carlisle District Local Plan (2015 - 2030)**

**1.14** The Proposed Submission Draft Plan sets out a long-term spatial vision and strategic objectives to support the development of a thriving District through the identification of land to accommodate new development and policies to achieve this growth in a positive, managed and sympathetic way, whilst ensuring the timely delivery of the infrastructure necessary to support growth. It has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Plan) Regulations 2012.

**1.15** The Local plan will be at the forefront of shaping how the District, its many settlements and vast rural area will develop between now and 2030 as outlined within the spatial vision –

***In 2030.....** The District of Carlisle, with the City at its heart, is successfully asserting its position, as a centre for activity and prosperity, as the capital and economic engine for a region encompassing Cumbria, the western fringes of Northumberland and extending into South West Scotland.*

*People are attracted to visit, live, work, invest and importantly remain in the District of Carlisle, a key driver of which is the setting of the historic City, as well as the district's market towns and villages, within a stunningly beautiful rural backdrop much of which is characterised by a rich and unrivalled collection of natural and cultural assets. The more significant of these assets, including Hadrian's Wall and the Solway Coast and North Pennines Areas of Outstanding Natural Beauty, continue to underpin a thriving visitor economy, as too does Carlisle's proximity and ease of access to the Lake District National Park.*

*Key to Carlisle's ongoing success has been an increased supply of new high quality market and affordable homes, the delivery of which have been instrumental in attracting and retaining an economically active workforce and in supporting thriving rural communities. Capitalising on excellent strategic transport connections, including Carlisle Airport, land has similarly been made available to support the delivery of new business premises and jobs. Continued innovation and development within agriculture has acted to ensure farming remains economically vibrant. Economic performance across the district has been underpinned by continued investment in higher and further education. This has resulted in a skilled and responsive workforce which exhibits high levels of entrepreneurship, with the University of Cumbria having been at the forefront of these efforts.*

*Policies and proposals have succeeded in strengthening and diversifying the City Centre offer, ensuring that its expanded retail and leisure focus is underpinned by a strong cultural offer which can be enjoyed by all. Opportunities have similarly been taken to support thriving rural communities through sustaining and enhancing a network of centres across the districts rural towns and villages.*

*Growth has been achieved through a framework which has sought to protect and enhance the very assets that make Carlisle unique, including its important natural landscapes; wildlife species, habitats and geodiversity; and its cultural and heritage relics. Furthermore it has been enabled through a co-ordinated approach to the timely delivery of supporting infrastructure, adding to the availability of essential local services, facilitates and connections.*

*Careful consideration has been afforded to the design of all new development in order to ensure that proposals have enhanced their immediate setting, strengthened local distinctiveness and helped to create environments which are safe and resilient to the effects of climate change. New developments and the regeneration of brownfield sites within the City have proved a valuable catalyst for addressing social inequalities and deprivation, and as a recognised Healthy City, a firm commitment to continue positively improving health and wellbeing outcomes for all of the District's residents has been at the forefront of decision making.*

*Looking to the future a Masterplan is in place to guide the continued realisation of a sustainable urban extension at Carlisle South, in doing so ensuring that Carlisle is well placed to continue responding to the growth needs of its next generation. The district in its widest sense continues to be alive to its potential and capable of harnessing momentum to turn this into reality.*

**1.16** It is essential that the Local Plan provides measurable objectives designed to implement the Local Plan vision. They set the context for the spatial strategy and strategic policies as well as the detailed development management policies. The Local Plan's strategic and main Objectives have been tested against the Sustainability Framework Objectives and amendments recommended accordingly (see Appendix 4). It is important to emphasise that the Plan is strategic in nature and even the allocation of sites should be considered a strategic undertaking i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

**1.17** The Local Plan document is structured around the strategic objective headings to help outline how the policies in each chapter help towards achieving these objectives.

**1.18** The Local Plan Objectives post the process of SA are as follows:

- **Spatial Strategy and Strategic Policies-**
  - To promote a sustainable pattern of development, which will contribute to building a strong, responsive and competitive economy, to support the vision for managed growth;
  - To support strong, vibrant and healthy communities, by meeting the housing needs of present and future generations, in a high quality environment with accessible local services;
  - To contribute to protecting and enhancing our natural, built and historic environment (including improving biodiversity), using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.
  
- **Economy –**
  - Foster the right conditions to stimulate inward investment through increasing the working age population, strengthening and expanding the skills base available, diversifying the economy and improving enabling physical infrastructure.
  - To create opportunities for economic growth by making land available to meet the current and future quantitative and qualitative needs of the business community and to maintain Carlisle’s role as an economic driver for a wider geographical area.
  - To focus new retail and leisure floorspace within the City Centre, and take opportunities to strengthen and diversify its offer, in order to enhance its role as a sub-regional service centre and leisure and cultural destination.
  
- **Housing –**
  - To enable the development of a range of high quality, energy efficient housing, in a variety of appropriate locations, to meet the aspirations of the existing residents, including those with a need for affordable housing, and those wishing to move to the area.
  - To make land available to boost significantly the supply of housing to support economic growth, whilst ensuring new housing supports the creation of thriving communities.
  
- **Infrastructure –**
  - To ensure the provision of efficient and integrated infrastructure networks, and their timely delivery, including sustainable transport, where needed to



support new and existing development, facilitate economic growth and deliver the plan strategy.

- **Climate Change and Flood Risk –**
  - To reduce emissions of greenhouse gases, including through securing energy from renewable sources, and avoid inappropriate development in areas at risk of flooding in order to ensure that the District is more resilient and less vulnerable to the effects of climate change and can successfully adapt to its effects.
  
- **Health, Education and Community –**
  - To create a thriving, successful and healthy community for all by promoting cohesive mixed communities and ensuring that everyone can have a decent home, in a safe environment, with good access to health care, educational provision and other community facilities by sustainable transport modes, including walking and cycling.
  
- **Culture and Heritage –**
  - To conserve, enhance and promote Carlisle's culture, heritage and important historic landscapes whilst ensuring that development proposals respect and enhance Carlisle's historic and cultural assets.
  
- **Green Infrastructure-**
  - To protect, enhance and increase the provision of the green and blue infrastructure across the District to create and maintain multifunctional, interconnected and attractive ecological networks for the benefit of residents, businesses, visitors and the wider natural environment.

## 2. Appraisal Methodology

2.1 The methodology for the SA was developed principally in accordance with Planning Practice Guidance (PPG) (DCLG 2014). Whilst recognising that the most up to date guidance is contained within the PPG, regard has also been had to „SA of Regional Spatial Strategies and Local Development Documents“ (ODPM, 2005) given that this is considered to still constitute a useful interpretation of meeting the requirements of the Strategic Environmental Assessment (SEA) Directive in the development of SA of Local Plans. Planning Advisory Service (PAS) SA guidance contained online under the „Principles of Plan Making“ also provided further information which regard has been had to.

### Sustainability Appraisal Methodology

2.2 The SA that has been undertaken was based on the five-stage approach set out in PPG. The stages of this methodology are shown in Table 1 below.

**Table 1 Stages of sustainability appraisal methodology**

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	Preparing the SA Report
Stage D	Seek representations on the SA report from consultation bodies and the public
Stage E	Post adoption reporting and monitoring

2.3 Guidance emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, economic and environmental objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it. The guidance also sets out the requirement for the preparation of the following reports:

- **Scoping Report** (documenting Stage A work) which should be used for consultation on the scope of the SA at the early stages of plan preparation; and
- **SA Report** (documenting stages A and B) which should be used in the public consultation on the draft Local Plan. The SA Report fully encompasses the requirement to produce an Environmental Report under the SEA Directive.

**2.4** A Scoping Report, meeting the requirements of Stage A and part of Stage B was published in September 2011 and updated in March 2012. The framework established through the scoping process provides a way in which sustainability effects can be described, analysed and compared, and forms the basis of the appraisal of Local Plan effects. More detail is provided on this scoping stage in Section 3 of this report. The framework of sustainability objectives is presented in Table 5 for completeness and ease of use with all key information contained within one document.

### **Compliance with the Strategic Environmental Assessment Directive and Regulations**

**2.5** There is a distinct difference between the methodologies for SA and SEA. SEA is primarily focussed on environmental effects, SA however widens the scope of the appraisal to assess its effects for a plan to include social and economic as well as environmental topics. This SA has been undertaken so as to also meet the requirements of the SEA Directive for environmental assessment of plans. The table below sets out where specific SEA requirements have been met in this SA Report.

**Table 2 – Schedule of SEA Requirements**

<b>SEA Directive Requirements</b>	<b>Where covered in this report</b>
A) An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.	Paras 1.1-1.18 (pages 3-9 & Appendix 1)
B) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.	Paras 3.8-3.9 (pages 18-19)
C) The environmental characteristics of areas likely to be significantly affected.	Paras 4.51-4.15, Table 10 and Appendix 6 (pages 42-44)
D) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC.	Paras 3.3-3.5 & Appendix 1 (pages 13-17)
E) The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.	Appendix 1
F) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna,	Appendix 4-8

flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and longterm, permanent and temporary, positive and negative effects.	
G) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan.	Paras 4.73-4.76 (Page 94)
H) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Paras 4.13-4.68 (Pages 32-93)
I) A description of measures envisaged concerning monitoring (in accordance with Article 10);	Paras 4.77 – 4.80 & Appendix 2 of the Draft Local Plan document (Page 95)
j) A non-technical summary of the information provided under the above headings.	Forms separate document

### 3. Overview of the SA Scoping Stage

**3.1** This stage of the SA (shown as stage A in Table 2) involves the compiling of background information needed before a SA can be undertaken. This Scoping stage established an evidence base for ongoing appraisal work and culminated in a framework of sustainability objectives and baseline indicators. The Scoping Report for the Core Strategy was originally consulted upon in 2011. Elements of the scoping exercise have recently been updated (in 2012 and again in 2014) however it is important to note that the overall scope is not considered to have materially changed. Earlier versions of the Scoping report as a stand alone document can be viewed online at:

[http://www.carlisle.gov.uk/planning\\_and\\_buildings/planning\\_policy/the\\_new\\_local\\_plan/local\\_plan\\_evidence\\_base.aspx](http://www.carlisle.gov.uk/planning_and_buildings/planning_policy/the_new_local_plan/local_plan_evidence_base.aspx)

**3.2** Key tasks in the scoping process included:

- Task A1 - Identifying relevant policies, plans and programmes (see appendix 1);
- Task A2 - Collecting baseline information (see appendix 2);
- Task A3 - Identifying key sustainability issues in the plan area (see appendix 3);
- Task A4 – Developing the SA framework; and
- Task A5 – Consulting the consultation bodies on the scope of the SA report and the key findings of earlier scoping tasks.

Each of these stages is considered in turn in the preceding paragraphs.

#### **Stage A Task A1 - Review of other policies, plans and programmes (policy context) and baseline evidence**

**3.3** The Local Plan has to adopt a spatial planning approach, taking into account and where possible and appropriate aiding the delivery of other relevant strategies and programmes. A thorough review was undertaken at the outset of the scoping stage of other relevant plans, policies and programmes and this was presented in the Scoping Report. The purpose of this was to meet the requirement of the SEA Directive, to take account of environmental protection objectives and to gather other information that would influence options to be considered in plan preparation. An update of the review was carried out in October 2014 and is detailed in appendix 1 to reflect changes to the national and regional policy landscape.

**3.4** The review studied a range of international, national, regional and local documents that should be taken into account during the preparation of the Local

Plan. Those policies, plans and programmes deemed to be of relevance were generally those relating to the following matters:

- Population
- Human Health
- Housing
- Community Safety
- Leisure
- Education
- Transport
- Local Economy and Employment, including Tourism
- Cultural Heritage
- Biodiversity, Fauna and Flora
- Soil and Land Resources
- Character and Quality of Landscape
- Water Quality and Resources
- Air Quality
- Climatic Factors, Energy and Flooding

3.5 Table 3 outlines, in no particular order, the key messages emerging from the review of policies, plans and programmes. The full review is contained in Appendix 1. Many of the key issues overlap and all of the documents of relevance might not be listed – just those which deal with the key issues as a major consideration.

**Table 3 – Key Sustainability Messages**

<i>Key Message</i>	<i>Source</i>
<b>Promote and actively contribute towards the achievement of sustainable development</b>	Johannesburg Declaration on Sustainable Development, The Rio Declaration on Environment and Development, Renewed EU Sustainable Development Strategy, European Spatial Development Perspective, UK Sustainable Development Strategy, National Planning Policy Framework (NPPF), Scotland’s Third National Planning Framework, Sustainable Cumbria 2004 to 2024: A strategy for growth and progress for Cumbria.
<b>Create opportunities for sustainable economic growth</b>	The Plan For Growth, National Planning Policy Framework (NPPF), Cumbria Local Enterprise Partnership Strategic Economic Plan: The Four Pronged Attack, Carlisle Plan 2013/2016, Cumbria County Council Plan 2014-2017,

	Economic Review of Carlisle (2013), Cumbria M6 Corridor Initiative (2012), Cumbria Economic Strategy 2009-2019, Cumbria Sub-Regional Employment Sites (SRES) Study 2008, Growing Carlisle – An Economic Strategy for the Carlisle City Region 2008.
<b>Provide efficient and integrated infrastructure to meet the needs of new and existing development which reduces the need to travel by car</b>	National Planning Policy Framework (NPPF), Cutting Carbon, Creating Growth - Making Sustainable Local Transport Happen, The Future of Transport: A network for 2030. White Paper, 3 <sup>rd</sup> Cumbria Local Transport Plan (LTP 3 2011-2026). Moving Cumbria Forward: Cumbria Transport Plan Strategy, Carlisle Plan 2013/2016, Cumbria M6 Corridor Initiative, Economic Review of Carlisle, Carlisle Employment Sites Study: Implications for M6 Corridor 2010.
<b>Create sustainable, thriving and successful communities that promote principles of social justice and inclusion</b>	National Planning Policy Framework (NPPF), Planning policy for traveller sites, Cumbria Community Strategy 2008-2028, Cumbria County Council Plan 2014-2017, Carlisle Plan 2013/2016, Carlisle Partnership Community Plan 2011-2016 – „A Community Plan for Carlisle & District“, Designing Out Crime SPD 2009.
<b>Ensure opportunities for all for living in decent and affordable homes</b>	National Planning Policy Framework (NPPF), Planning Policy for traveller sites, Cumbria Sub Regional Housing Strategy & Investment Plan 2011-2015 - Cumbria Housing Group, Cumbria Strategic Housing Market Assessment (2009), Cumbria Gypsy and Traveller Accommodation Needs Assessment 2013, Housing Strategy Action Plan for Carlisle 2010 – 2014, Strategic Housing Land Availability Assessment (ongoing), Achieving Well Designed Housing SPD 2011, Strategic Housing Market Assessment Update 2014, Housing Needs and Demand Study Nov 2011.
<b>Recognise the impacts of climate change, reduce its causes and locally mitigate against its effects</b>	Kyoto Agreement on Climate Change, Climate Change Act 2008, European Directive 2001/91/EC Energy Performance of Buildings, National Planning Policy Framework (NPPF), The UK Renewable Energy Strategy, Energy White

	Paper – Meeting the Challenge, The UK Low Carbon Transition Plan – National strategy for climate and energy, Cumbria Climate Change Action Plan 2009 – 2014, Carlisle Climate Change Strategy 2008-2012
<b>Promote and improve the health and wellbeing of the population</b>	National Planning Policy Framework (NPPF), The Green Infrastructure Guide for the North West, Cumbria County Council Plan 2014-2017, Carlisle Plan 2013/2016, Carlisle Open Space, Sports and Recreation facilities Audit, The Big Green city – The Green Infrastructure Strategy for Carlisle City and District.
<b>Contribute towards the protection and enhancement of the built and historic environment including the conservation of heritage assets and historic landscapes</b>	National Planning Policy Framework (NPPF), Ancient Monuments and Archaeological Areas Act 1979, The Government’s Statement on the Historic Environment for England, Countryside Character Volume 2: North West, Streets for All – A Regional English Heritage guide to the management of streets and public open spaces, Cumbria Historic Landscape Character Assessment, Hadrian’s Wall World Heritage Site Management Plan 2008-2014.
<b>Enhance and promote the natural environment, safeguarding the unique characteristics of the landscape</b>	European Landscape Convention, National Planning Policy Framework (NPPF), The Natural Choice: Securing the Value of Nature, The Natural Environment White Paper, Natural Environment and Rural Communities, North West Landscape Character Framework Project, Cumbria Landscape Character Guidance and Toolkit, North Pennines AONB Management Plan 2014-2019, Draft Solway Coast AONB Management Plan Review 2015-2020 .
<b>Improve air and water quality</b>	Directive on Ambient Air Quality and Cleaner Air for Europe, EU Bathing Water Directive, EU Water Framework Directive, EU Directive on the protection of groundwater against pollution and deterioration, National Planning Policy Framework (NPPF), The Air Quality Strategy for England, Scotland, Wales, and Northern Ireland, Future Water: The Government’s water strategy for England, Water for Life and Livelihoods –



	Managing water for people, business, agriculture and the environment, Air Quality Action Plan - Carlisle City Council (2012)
<b>Minimise the impacts of flooding and flood risk alongside the impacts of climate change</b>	EU Floods Directive, National Planning Policy Framework (NPPF), Eden Catchment Flood Management Plans, Solway Tweed River Basin Management Plan, Carlisle Strategic Flood Risk Assessment.
<b>Protect and enhance biodiversity, geodiversity, habitats and the natural environment</b>	EU Habitats Directive, National Planning Policy Framework (NPPF), Biodiversity 2020: A strategy for England's wildlife and ecosystems services, Safeguarding our Soils: A Strategy for England, The Conservation (Natural Habitats, &c.) (Amendment) (England and Wales) Regulations, Wildlife and Countryside Act 1981, Guidance for Local Authorities on Implementing the Biodiversity Duty, North Pennines AONB Management Plan 2014-2019, Draft Solway Coast AONB Management Plan Review 2015-2020, The Big Green city – The Green Infrastructure Strategy for Carlisle City and District.
<b>Minimise waste and achieve more sustainable methods of waste management</b>	EU Sustainable Development Strategy, UK Sustainable Development Strategy, National Planning Policy Framework (NPPF), National Planning Policy for Waste, The emerging Cumbria Minerals and Waste Local Plan 2014-2029, Cumbria Strategic Waste Partnership – Joint Municipal Waste Management Strategy 2008 – 2020.

## **Task A2 - Description of the social, environmental and economic baseline characteristics and the predicted future baseline**

**3.6** Establishing baseline information provides a basis for predicting and monitoring effects of plans and proposals and helps identify sustainability problems and alternative ways of dealing with them. The evidence base compiled for the purposes of this task consists mainly of quantitative indicators, but qualitative information has also been relied upon where able.

**3.7** Establishing baseline information was originally carried out as part of the scoping report for the Core Strategy however this has been recently updated to reflect

more up to date information and further trend analysis (October 2014, see appendix 2). The baseline identifies what is currently happening in the District and the likely future state of the area if current trends were to continue. It provides the basis for predicting and monitoring effects.

**3.8** The SEA Directive requires that the likely evolution of the District without implementation of the plan or programme should be identified. The baseline data gives the current state of the area, whereas extrapolation of trends can provide clues as to what would happen without Local Plan intervention. Whilst the Council has an existing development plan, it is nearing the end of its intended life (2016) and as a consequence the majority of sites that were allocated for development as part of this plan have been built out. Therefore, in the absence of any regional/sub-regional policy guidance, there would not be a framework to coordinate and guide future development locally.

**3.9** Whilst the adopted Local Plan and other plans and programmes will have an influence, without implementation of the Local Plan, the following trends are 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;
- 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.

### **Task A3 – Identifying Sustainability Issues**

**3.10** 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. This section describes the current situation and highlights the key issues faced within Carlisle. 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.

**3.11** The requirement to identify sustainability problems and issues arises from the SEA Directive, where the Environmental Report required under the Directive should include: *“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds) and 92/43/EEC (Habitats)”* (Annex I (d)).

**3.12** The key sustainability issues for Carlisle have been derived by analysing the baseline data and contextual information from other plans and assessing what the likely significant issues will be over the longer term i.e. 15 - 20 years. The key sustainability issues relevant to the Local Plan were identified in the following ways:

- Analysis of the objectives and issues highlighted in other plans and programmes that are relevant to Carlisle and its communities;
- Analysis of the baseline data and trends.

**3.13** In addition to this, the consultation responses to the Scoping Report provided further information relating to the identification of sustainability issues for the Council area from the consultees who responded. The analysis of sustainability issues has been iterative and as such further stakeholder involvement and a review of the key issues has contributed to the evolution of this section.

**3.14** Table 4 below (and Appendix 3) 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.

**Table 4 - Sustainability Issues and Potential of Local Plan to Address These**

Issue	Evidence	How can the Local Plan address this?
<b><u>Economic</u></b>		
Surplus of employment land largely concentrated in the north of Carlisle City	Carlisle Employment Sites Study 2010 & Carlisle AMRs	The Local Plan can seek to promote the development of employment sites across the City to help to balance this disparity and enhance the offer.
The majority of employment land unsuited to modern needs: quality, type and location	Carlisle Employment Sites Study 2010 & Carlisle AMRs	Through providing a promotional framework to enable and encourage investment in existing sites and to supplement the District's offer through additional allocations.
Salaries/weekly earnings are lower than the regional average and significantly lower than 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 economically active people	Cumbria Observatory	Support the development of higher education and employment opportunities for young people, as well as an appropriate housing offer and attractive environment to help retain school leavers and graduates.
Education, skills and training deprivation	As of 2013 – 12.3% of residents aged 16-64 have no educational qualifications which is higher than the national figure of 9.3%. A Community Plan for Carlisle and District 2011-2016.	Ensure provision of and access to education facilities and training opportunities
Visitor and	Carlisle's Green Infrastructure	Ensure development does

development pressure affecting sites of biodiversity value.	Strategy: The Big Green City (2011)	not result in a net loss of biodiversity assets and that opportunities to enhance biodiversity and Geodiversity are maximised.
<b><u>Social</u></b>		
Ageing population	ONS & Housing Needs and Demand Study 2011	Ensure that all housing needs are catered for and accessibility issues are addressed.
Pockets of deprivation	19% of Carlisle's Lower Super Output Areas (LSOAs) are in the 20% most deprived nationally. ONS & Census 2011	Contribute to the creation of sustainable communities through using development as a catalyst for wider investment in the social wellbeing of an area.
Pockets of health deprivation	Carlisle is ranked 109 <sup>th</sup> most deprived out of 326 nationally. Five of the District's Super Output Areas are in the worst 10% nationally. Over 18,000 people in the district live within areas considered to be the most deprived. Cumbria Observatory Health Profile 2013	Ensure provision of and access to health facilities as well as ensuring that planning is at the forefront of decision making with regards to all aspects of development and planning.
Life expectancy is lower than the national average	Cumbria Observatory Health Profile 2013	Ensure provision of and access to health facilities as well as ensuring that planning is at the forefront of decision making with regards to all aspects development and planning.
Shortage of Affordable housing	Carlisle AMR 2013  Housing Needs and Demand Study Nov 2011	Through putting in place a framework to enable the delivery of affordable homes and to secure affordable units from qualifying residential developments where

		viable to do so.
<b><u>Environmental</u></b>		
Protection & enhancement of biodiversity and geodiversity assets	<p>There are significant nature conservation, wider green infrastructure and geodiversity assets in the District – 9 SSSI"s and a number of internationally recognised sites.</p> <p>Cumbria Biodiversity Evidence Base. Natural England. Carlisle Green Infrastructure Strategy- „The Big Green City“ (2011).</p>	Ensure development does not result in a net loss of biodiversity and geodiversity assets and opportunities to enhance biodiversity and geodiversity are maximised.
Protection and enhancement of the historic environment & landscape and townscape character and quality	<p>There is a significant number of historic assets in the District and a number of buildings/monuments have been identified as being in a vulnerable or deteriorating condition. English Heritage. Carlisle AMR 2013.</p>	Ensure development does not adversely affect the significance of heritage assets and conversely that opportunities to enhance their significance and secure their preservation are maximised.
Pollution, air quality and climate change	<p>Six air quality management areas have been declared in the urban area. Air quality monitoring shows that the annual mean for nitrogen dioxide in the air remains above the objective level at one or more monitoring points in these areas. 2011 Air Quality Progress Report, Carlisle City Council.</p> <p>Emissions levels in the District remain higher than the regional and national average.</p>	Ensure the location and design of new development does not worsen air quality within the District.
High car use and dependency	Census 2011	Ensure that new development is in locations accessible by means other than the

		private car, and opportunities to encourage more sustainable modes of travel are maximised.
Quality of rivers	Environment Agency	Ensure that new development does not worsen the quality of water in the District.
Position of Carlisle at the meeting point of three rivers, the Eden, Caldew and Petteril makes it vulnerable to the risk of flooding.	Carlisle SFRA November 2011	Ensure that new development is directed away from areas at risk of flooding and that new development does not increase the risk of flooding elsewhere.

### **Limitations of the information and assumptions made**

**3.15** Wherever possible the most up to date data has been considered in undertaking Task A3. There are some omissions in the data where it has not been possible to identify an appropriate data source or figures or monitoring mechanisms are not currently in place. Work will continue on compiling the base line information in order to rectify some omissions. There are also gaps in terms of regional and national comparators. Again, work will continue on trying to fill these information gaps. These gaps are not however considered of a significance which compromises the robustness of this part of the SA process.

**3.16** The tables will be updated on a regular basis and care will be taken to ensure, as far as possible, that data is collected in the same format in order to establish trends and to be able to make reliable comparisons.

### **Task A4 – The Sustainability Appraisal Framework, including Objectives, Targets and Indicators**

**3.17** The SA Framework consists of sustainability objectives which provide a way in which the effects of the Local Plan can be described, analysed and compared. The Framework has evolved from a Cumbria wide SA Framework that was developed jointly with other planning authorities in the Cumbria sub region. This approach recognised that many sustainability issues are common to all authorities within Cumbria and that there is a need to share resources. Whilst the Cumbria wide SA Framework was used as a starting point, it would have been inappropriate to apply this to the appraisal of the Local Plan unchanged. It was therefore necessary to incorporate further elements into the framework; building on the results of Task A1

(Review of other policies, plans and programmes and baseline evidence), Task A2 (social environmental and economic baseline characteristics and the predicted future baseline) and Task A3 (identifying Sustainability Issues). This has helped to ensure that the specific sustainability issues that need to be addressed through the Local Plan are enshrined throughout the SA Framework. In total 20 objectives have been identified which collectively cover the 12 SEA Directive topic areas and fit with the three dimensions of sustainable development as advocated by the NPPF.

**3.18** SA 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 5 below lists the SA Objectives and demonstrates how the Sustainable Development Framework for Carlisle District meets the requirements of the SEA Regulations 2004. The compatibility between SA Objectives and the objectives of the Local Plan have been assessed and details are available in Appendix 9. This exercise demonstrates that the two sets of objectives are generally complementary. No direct conflicts were identified.

**Table 5 Carlisle District Sustainability objectives in relation to the SEA Directive Topic Areas**

No.	SA Objective	SEA Directive Topic 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 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; Material assets
8	Promote the development & use of sustainable and renewable energy resources	Climatic factors; Material assets
9	Increase the use of sustainable design and construction techniques	Climatic factors; Material assets
10	Minimise the production of waste & increase	Soil;



	reuse and recycling rates	Material assets
11	Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling	Population; Human Health
12	Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	Population; Material assets
13	Ensure opportunities for all for living in decent and affordable homes	Population
14	Improve people's sense of safety and well-being	Population; Human health
15	Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally and locally designated wildlife sites and priority habitats	Biodiversity; Fauna; Flora
16	Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	Landscape
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 change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change	Climatic factors
20	Reduce potential for environmental nuisance	Population; Human health

## **Comments received on the SA Scoping Report (2011) and Draft SA Report (2013 & 2014)**

**3.19** The SA Scoping Report was consulted on for six weeks alongside the Issues and Options for the Core Strategy, between September and October 2011.

**3.20** Natural England, the Environment Agency and others, including Cumbria Wildlife Trust, made comments on the SA Scoping Report. These comments resulted in changes which were incorporated into the update to the Scoping Report.

**3.21** Comments received to the SA Scoping Report included:

- 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.

**3.22** During the consultation on the Preferred Options – Stage One (2013) and Stage Two (2014), the accompanying draft SA (which this document updates) received a number of comments which where relevant have helped the SA process to evolve. Comments were received from the Environment Agency, Friends of the Lake District (CPRE), parish councils and local sustainability group Sustainable Brampton. Scottish Natural Heritage responded to say that they didn"t have any comments and that on such matters relating to England they defer to Natural England. Comments received from both previous consultations included:

- Natural England agrees with the conclusions reached in the previous SA, however suggested that negative and uncertain effects should be explored further as avoidance and/or mitigation measures may be required in order to reduce harm to the environment;

- Concern that the SA makes no mention of protection and enhancing the District's arts and cultural facilities;
- Comment that the development of brownfield land should be given priority over Greenfield land;
- Questions regarding the assessment of sites in comparison to others close by;
- Comments that the language of the document is too technical and formal to understand;
- Suggestion that a number of policies should be reassessed as the impact of the plan is focussed too much towards economic development to the detriment of social and economic issues;
- concern that more development creates more traffic congestion, fumes, carbon footprint and destroys fields where animals and wildlife live;
- comment of concern that the NPPF emphasises economic growth over social and environmental considerations regarding sustainable development;
- suggestion that reference should be made to food and community food growing within the SA as this has social, economic and environmental implications;
- Suggestion that the housing target identified is not sustainable given the large amount of empty properties in the Carlisle area; and
- Comment that existing services and employment in Carlisle are struggling to be sustainable and that a more radical approach is required to integrate housing with employment and transport options.

## 4. Developing and Refining Alternatives and Assessing Effects

### Task B1- Testing the Local Plan Objectives against the Sustainability Appraisal Framework

**4.1** The Objectives of the Local Plan that were published for consultation at Preferred Options Stage Two, including any changes considered necessary following consultation and internal review, have been assessed against the SA Objectives. The results of these assessments are set out in detail in Appendix 4.

**4.2** The assessment of the Local Plan Objectives resulted in a number of issues to consider. In such instances, either the objectives have been amended or these issues have been taken into account in the drafting of the Local Plan. The following table sets out where changes to the Local Plan objectives have occurred as a result of the SA objective assessment.

**Table 6 Changes to the Local Plan Objectives as a result of Sustainability Appraisal Objective Assessment**

Objectives	Amendments owing to Sustainability Appraisal
<p><b>Housing Objective</b></p> <ul style="list-style-type: none"> <li>To enable the development of a range of high quality, energy efficient housing, in a variety of locations, to meet the aspirations of the existing residents, including those with a need for affordable housing, and those wishing to move to the area.</li> <li>To make land available to boost significantly the supply of housing to support economic growth, whilst ensuring new housing supports the creation of thriving communities</li> </ul>	<p><b>SA process concluded that ‘appropriate’ should be added to the objective to recognise the importance of developing additional housing in appropriate locations.</b></p> <p><b><i>Amended objective:</i></b></p> <ul style="list-style-type: none"> <li>To enable the development of a range of high quality, energy efficient housing, in a variety of <b><u>appropriate</u></b> locations, to meet the aspirations of the existing residents, including those with a need for affordable housing, and those wishing to move to the area.</li> <li>To make land available to boost significantly the supply of housing to support economic growth, whilst ensuring new housing supports the creation of thriving communities.</li> </ul>
<p><b>Infrastructure Objective</b></p> <ul style="list-style-type: none"> <li>To ensure the provision of efficient and integrated infrastructure networks and their timely delivery, where needed to support new and existing development, facilitate economic</li> </ul>	<p><b>SA process considered that it was important to recognise sustainable transport specifically in the infrastructure objective in relation to its contribution to sustainable development.</b></p>

<p>growth and deliver the plan strategy.</p>	<p><b>Amended objective:</b></p> <ul style="list-style-type: none"> <li>To ensure the provision of efficient and integrated infrastructure networks and their timely delivery, <b><u>including sustainable transport</u></b>, where needed to support new and existing development, facilitate economic growth and deliver the plan strategy.</li> </ul>
<p><b>Climate Change and Flood Risk Objective</b></p> <ul style="list-style-type: none"> <li>To reduce emissions of greenhouse gases and avoid inappropriate development in areas at risk of flooding in order to ensure that the District is more resilient and less vulnerable to the effects of climate change and can successfully adapt to its effects.</li> </ul>	<p><b>SA process considered that it was important to make reference to energy from renewable sources as this is a key part of the chapter which was missing reference in the objective.</b></p> <p><b>Amended objective:</b></p> <ul style="list-style-type: none"> <li>To reduce emissions of greenhouse gases, <b><u>including through securing energy from renewable sources</u></b>, and avoid inappropriate development in areas at risk of flooding in order to ensure that the District is more resilient and less vulnerable to the effects of climate change and can successfully adapt to its effects.</li> </ul>
<p><b>Health, Education and Community Objective</b></p> <ul style="list-style-type: none"> <li>To create a thriving, successful and healthy community for all by promoting cohesive mixed communities and ensuring that everyone can have a decent home, in a safe environment, with good access to health care, educational provision and other community facilities.</li> </ul>	<p><b>SA process considered that it was important to recognise sustainable transport specifically in the health, education and community objective in relation to the contribution walking and cycling can make to improving the health of communities.</b></p> <p><b>Amended objective:</b></p> <ul style="list-style-type: none"> <li>To create a thriving, successful and healthy community for all by promoting cohesive mixed communities and ensuring that everyone can have a decent home, in a safe environment, with good access to health care, educational provision and other community facilities <b><u>by sustainable modes, including walking and cycling.</u></b></li> </ul>
<p><b>Green Infrastructure Objective</b></p> <ul style="list-style-type: none"> <li>To protect, enhance and increase the</li> </ul>	<p><b>SA process concluded that it was important that the multifunctional</b></p>

<p>provision of the green and blue infrastructure across the District for benefit of residents, visitors and the wider natural environment.</p>	<p><b>nature of green and blue infrastructure was recognised, as well as a need for this to be interconnected. It was also considered that an explicit reference to ecology and the recreational benefit of GI should be added, as too should recognition of the positive impact that the natural environment can have on businesses and the attractiveness of the area to businesses.</b></p> <p><b><i>Amended objective:</i></b></p> <ul style="list-style-type: none"> <li>• To protect, enhance and increase the provision of the green and blue infrastructure across the District <b><u>to create and maintain multifunctional, interconnected and attractive recreational and ecological networks</u></b> for the benefit of residents, <b><u>businesses</u></b>, visitors and the wider natural environment.</li> </ul>
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**4.3** The objectives outlined above have been subsequently amended to reflect testing against SA objectives.

## **Task B2 – Developing Options and Reasonable Alternatives**

**4.4** The process of SA (inclusive of the SEA requirement) requires an appraisal of the likely significant environmental effects of implementing the plan or programme and any reasonable alternatives. It is normal practice when developing a plan or programme to propose different ways of fulfilling its objectives. The term „options“ is often used in this regard. The SEA Directive (Annex I (h)) specifically requires *“an outline of the reasons for selecting the alternatives dealt with”* to be contained within the SA report. The SA Report responds to this by detailing the approach to the identification and selection of options.

**4.5** Previous, but what remains helpful, ODPM guidance on undertaking SA states that *“Given the duty under the Act on those preparing a DPD to contribute to sustainable development, it is essential for it to set out to improve on the situation which would exist if there were no DPD. It should also aim to improve on the effects of existing DPD or saved plan”*. It goes on to state, however, that *“To test this, options considered often include scenarios termed “no plan” and “business as usual”*. An assessment in these latter regards provides the baseline against which the effects of the Local Plan itself can be considered. The baseline for the purposes of this Sustainability Appraisal

consists of the saved policies of the Carlisle Local Plan (2001 - 2016) which would continue to operate within the wider context of the National Planning Policy Framework.

**4.6** Whilst the existing Local Plan (and therefore saved policies) were subject to an SA incorporating the requirements of the SEA, which concluded that the Plan itself was broadly sustainable, the intended longevity of some critical aspects of the existing Plan are now nearing the end of their intended period of coverage (2016). This coupled with the high level and strategic nature of the NPPF is considered to give rise to a number of strategic issues including, significantly, a lack of direction regarding the level of growth to be planned for and the approach to the distribution of this growth across the District.

**4.7** Reflective of the importance of these issues from a strategic planning perspective, and drawing on the conclusions set out in paras 3.8 and 3.9 of this SA Report, it is not considered that the “*no plan*” or “*business as usual*” scenario constitutes a reasonable alternative at the outset. This reflects a belief that it would simply not be conducive to opt not to progress a new Local Plan as the resulting policy vacuum this risks would entail no guarantees that the situation would improve on the effects in comparison to the existing baseline situation. Consequently it is asserted that the current situation could only be improved through the introduction of a new Local Plan which responds to the above and any other key issues identified.

**4.8** At the outset of the preparation of the Carlisle District Local Plan (2015 - 2030) the City Council produced and consulted on a Key Issues Paper in early 2011. This constituted the first stage in the process of developing a new planning framework for the District. It made people aware of the council’s intention to prepare a new Local Plan and set out the Council’s initial thinking on the key issues that should be addressed: Social [housing, support services in rural areas, health and services for older and younger people]; Economic [creating jobs, education, new technology, leisure, retail and tourism] and Environmental [transport, pollution, green spaces, conservation and flood risk]. This exercise provided an opportunity for interested parties to share views on the issues and challenges facing the District and the priorities to be tackled.

**4.9** Subsequent to the Key Issues paper the City Council then prepared and consulted on an Issues and Options Paper in late 2011. This consultation built on the responses made to the Key Issues and set out what were regarded to be the key spatial planning issues moving forward as well as „options” on how planning policy could encourage desired outcomes to address these. This exercise sought to ensure that all the main issues that needed to be addressed by the Local Plan were identified and that all the realistic and reasonable options for addressing those issues were afforded consideration.

**4.10** Beyond these initial options a Preferred Option Stage One and consequently a Preferred Option Stage Two draft of the Local Plan were prepared. Throughout this process of evolution a number of options were further developed and consulted on with both the preferred options and any reasonable alternatives throughout this process having been subject to an SA.

**4.11** 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.

**4.12** Options in the above terms are considered in turn in the preceding sections where, in accordance with the requirements of the appraisal process and specifically Task B3, their likely effects are evaluated.

## **Task B3 – Evaluating the likely effects of the Local Plan and alternatives**

### **Main strategic options considered and how they were identified**

**4.13** There is often a need to appraise in broad terms the effects of „strategic options“ prior to these being appraised in more detail as these options are translated into policy. Based on reference to a need to deliver an improvement on the current situation, the key issues identified throughout the plan preparation process which are regarded to constitute strategic options are as follows:

- 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.

### ***Spatial distribution for growth:***

**4.14** Four options were initially identified at the outset of the plan making process regarding this strategic issue which sought to explore how to accommodate sustainable growth, as follows:

- a) growth should be focussed within the existing built extent of the urban area of Carlisle;
- b) extend the urban area to the south to allow for a significant expansion incorporating a wide range of uses including employment land to help address the imbalance in distribution of employment sites between the north and south of the city;
- c) extend development to make use of the improved highway infrastructure that will be in place once the Carlisle Northern Development Route is operational; or
- d) Distribute growth around all edges of the main urban area.



**4.15** A preposition in identifying the above options is that the City of Carlisle should continue to constitute the focus for responding to the majority of development needs moving forward. This preposition logically follows that the City has historically and remains best placed to continue being the dominant settlement within the District and therefore its administrative and service capital. It also reflects that the City is best placed in terms of wider strategic connectivity and additional existing infrastructure. This approach has not been challenged throughout the process to date.

**4.16** As the Local Plan evidence base was developed, and particularly successive Strategic Housing Land Availability Assessments, it became apparent that constrained land supply across the city was such that none of the above options on their own would deliver even the minimum development requirements demonstrated as necessary by the evidence. Consequently none of the original options set out were therefore regarded to constitute reasonable options moving forward. Instead it transpired that in order to respond to evidenced needs, a hybrid of the above options would be necessary and this is the basis of the option which has been carried forward into the Plan.

**4.17** This hybrid option sees growth concentrated predominantly on the edges of the City (to the north, west and east) with opportunities however being taken to secure development within the existing built envelope of the City where these exist. It is apparent however that in order to meet longer term development needs a more strategic urban extension is required with the south of the City having emerged as the only reasonable option to accommodate this notion. This decision again reflects the availability of land as well as the character of the land and the boundaries of the City.

**4.18** From the outset of the Local Plan process land at Carlisle south was promoted by landowners and agents, whilst land of the same scale was not promoted to the north, west or east of Carlisle. The M6 motorway skirts the eastern boundary of the city, and filling the gap up to this major strategic transport route is not considered a realistic option due to constraints imposed by noise generation, flood plain, or, in the case of the north eastern part of the city, the impact on the village of Houghton (including risk of coalescence with the City) which lies between the M6 and the city boundary. Also of relevance is the acknowledged infrastructure constraints elsewhere in the City, particularly to the north of the City including the capacity of J44 of the M6, and employment land evidence which supports that in the longer term the opportunity should be taken to address the imbalance between employment opportunities being concentrated in the north but with the majority of the City's residents living in the south.

**4.19** To the north of the City the M6 (and similarly to the northwest the West Coast rail line) forms a physical and visual barrier to development. Any development of the scale required immediately beyond these physical barriers would, it is considered, be evidently disconnected from the rest of the urban area. To the west expansion is considered to be constrained by the CNDR and the alignment of significant electrical overhead lines which constitute physical barriers.

**4.20** The likely social, economic and environmental effects of the preferred option taken forward into the Plan were assessed by appraising it against the agreed sustainability objectives. This assessment is contained in appendix 5. In summary the assessment supports that the preferred option would result in largely positive effects on several fronts, including from an economic perspective; maximising the reuse of previously developed land and in acting as a catalyst for regeneration; accessibility benefits in terms of making the most of existing established transport infrastructure and with regards to maximising opportunities for all for living in decent and affordable homes (as supply would not be constrained). Conversely no negative or uncertain effects are deemed to arise from the implementation of the preferred option.

**4.20** To ensure that the strategic allocation at Carlisle south is developed in as sustainable a manner as possible, a masterplan will be produced. The purpose of the masterplan will be as follows:

- to provide more detail on how the strategic requirements will be delivered;
- to set a framework to guide the preparation of future planning applications;
- to provide a framework against which future planning applications will be assessed;
- to enable and support the co-ordination and timely delivery of infrastructure provision;
- to facilitate the delivery of land release to help address the imbalance of employment land between the north and south of the city.

**4.21** Any masterplan will be approved as a Development Plan Document, with commitments to this effect in the Plan. As such the development of the broad location would be subject to its own Sustainability Appraisal in due course as part of the plan preparation process.

***Annual average housing target:***

**4.23** Evidence in the form of the most up to date Strategic Housing Market Assessment (SHMA) and POPGROUP modelling supports that a housing target in the range of 480 to 565 net new homes per annum should be pursued through the Local Plan. The differentiation within the range reflects that the lower figure is driven purely by demographic trends where as the higher end of the range is that likely in order to meet anticipated job growth forecasts.

**4.24** Both ends of the range are considered to constitute reasonable alternatives which could be taken forward, and both have therefore been assessed for their likely effects through the process of the SA. Whilst it is acknowledged that in theory further options could be argued to exist at any point between the lower and upper limits of the range, it is not considered that the size of the range is such that these would result in any great variance from the assessments undertaken.

**4.25** Whilst throughout the evolution of the Plan figures outwith the range have been consulted upon and as such assessed through the process of SA previously (450 - 665 dwellings per annum), these were at a time when these figures were supported by the most up to date evidence at a previous given point in time. Given that these figures are no longer supported by the updated evidence, it follows logically that these figures no longer constitute reasonable alternatives moving forward.

**4.26** The likely social, economic and environmental effects of the two options identified (i.e. growth at 480 per annum and growth at 565 per annum) were assessed by appraising them against the agreed sustainability objectives. These assessments are contained in Appendix 5 but are summarised in Table 7.

**Table 7 - Comparison of Housing Delivery (quantum) Options**

<b>SA Objective</b>	<b>Option A (480 New Homes)</b>	<b>Option B (565 New Homes)</b>
1. Provide opportunities to strengthen and diversify the economy	+	++
2. Improve access to employment	+	+
3. Protect and improve the quality of water resources	0	0
4. Act to mitigate the causes and impacts of climate change including minimising flooding.	0	0
5. Encourage sustainable use of previously developed land	+	+
6. Encourage urban regeneration	+	+
7. Improve the availability & use of sustainable transport mode	0	0
8. Promote the development & use of sustainable and renewable energy resources	0	0
9. Increase the use of sustainable design and construction techniques	0	0
10. Minimise the production of waste & increase reuse and recycling rates	0	0
11. Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	0	0
12. Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	0	0
13. Ensure opportunities for all for living in decent and affordable homes	++	++
14. Improve people's sense of safety and well-being	0	0
15. Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally,	0	0

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

**4.27** Whilst both options perform well and can be seen to result in likely positive effects against the broad range of economic, social and environmental issues, Option B (565 new homes) can be seen to perform marginally better from an economic perspective. This reflects, as supported by the evidence, that the higher level of housing is required if economic aspirations are to be achieved and forecasts met. Inherent in this is also a concern that with an ageing population and conversely a diminishing economically active workforce, a greater level of growth is required to continue to fill existing jobs in the future in addition to strengthening and diversifying the economy.

**4.28** The SHMA supports that both levels of need would act to ensure that affordable needs could be met across the plan period, in tandem with the role that the private rented sector in meeting the needs of some households, and as such both options score very positively in this regard.

**4.29** Consequently it is clear that Option B as the higher figure of 565 new homes constitutes the most sustainable option and has been taken forward on this basis. Conversely the lower option – Option A – has been rejected on the basis that it would not secure the same degree of positive economic benefits and as such is not regarded, in comparison, as sustainable.

***Distribution of housing growth within the District:***

**4.30** Three options were initially identified at the outset of the plan making process regarding this strategic issue which sought to explore how to accommodate sustainable housing growth, as follows:

- a) equally distributed across the urban and rural areas (Option A);
- b) a higher proportion for the urban area (Option B); or
- c) a higher proportion for the rural area (Option C).

**4.31** Option C was later discounted as a reasonable option on the basis that the City of Carlisle should continue to constitute the focus for responding to the majority of development needs moving forward. This preposition logically follows that the City has historically and remains best placed to continue being the dominant settlement within the District and therefore its administrative and service capital. It also reflects that the City is best placed in terms of wider strategic connectivity and best served by additional existing infrastructure. This approach has not been challenged throughout the process to date. In this regard it also considered pertinent to note that the evidence in the form of the most up to date SHMA supports that the majority of the District's population is concentrated in the urban area (built envelope of the City) and that as such the majority of new need arising also occurs in the City.

**4.32** Whilst the same reasoning for discounting Option C could arguably be applied to Option A, it was nevertheless considered that option A constituted a reasonable alternative that warranted appraisal, alongside option B.

**4.33** The likely social, economic and environmental effects of the two reasonable alternatives identified (i.e. options A and B) were therefore assessed by appraising them against the agreed sustainability objectives. These assessments are contained in appendix 5 but are summarised in Table 8.

**Table 8 - Comparison of Housing Distribution Options**

<b>SA Objective</b>	<b>Option A Equal Distribution</b>	<b>Option B Higher proportion for urban area</b>
1. Provide opportunities to strengthen and diversify the economy	+	+
2. Improve access to employment	+	+
3. Protect and improve the quality of water resources	0	0
4. Act to mitigate the causes and impacts of climate change including minimising flooding.	0	0
5. Encourage sustainable use of previously developed land	0	0
6. Encourage urban regeneration	+	+
7. Improve the availability & use of sustainable transport mode	-	+
8. Promote the development & use of sustainable and renewable energy resources	0	0
9. Increase the use of sustainable design and construction techniques	0	0
10. Minimise the production of waste & increase reuse and recycling rates	0	0
11. Encourage healthier lifestyles by promoting more sustainable means of transport including public	-	+

transport, walking and cycling.		
12. Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	0	0
13. Ensure opportunities for all for living in decent and affordable homes	+	++
14. Improve people's sense of safety and well-being	0	0
15. Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	0
16. Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	0	0
17. Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	0	0
18. Protect and improve local air quality	?	?
19. Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	?	?
20. Reduce potential for environmental nuisance	0	0

**4.34** It is immediately apparent from Table 8 that Option B has the potential to address more comprehensively the broad range of economic, social and environmental issues. The key differences between the options can be seen to relate to concerns regarding accessibility in terms of making the most of sustainable modes of travel, which reflects that public transport services are more restricted in rural areas and that opportunities to use other sustainable modes to access services and facilities beyond the settlement more limited i.e. the city offers greater access to jobs, schools, shops and other services including public transport. Whilst it is acknowledged that additional housing can help to create more demand and a higher critical mass to support an increase in some service provision, given the level of housing to be planned for it is considered that this is unlikely to have a significant effect. In these regards Option A can be seen to entail a number of likely negative effects, where as Option B scores positively in these terms.

**4.35** Option B can also be seen to score more positively in terms of SA objective number 13 (ensuring opportunities for all for living in decent and affordable homes). This reflects that the majority of the District's housing need arises in the urban area which this option would directly respond to.

**4.36** Both options A and B record uncertainties with regards to SA objectives 18 and 19. These uncertainties arise in relation to air quality, but in either instance as explained

in the individual assessments these uncertainties are considered to be mitigated by specific policies within the Plan which seek to secure a reduction in emissions and to protect air quality.

**4.37** It is considered important to note that the preferred option recognises that within the rural area there are a number of larger settlements and market towns, including Brampton, Longtown and Dalston, which offer a range of employment, retail, education and community facilities and services, and which therefore have the capacity to accommodate further development, which will maintain the vitality of these settlements.

**4.38** Option B has therefore also been generally supported through consultations on the Plan to date, with acknowledgement that a degree of housing in rural areas is still a positive move forward given the moratorium based approach inherent in previous planning policies.

**4.39** Consequently it is clear that Option B constitutes the most sustainable option and has been taken forward on this basis. The actual percentage split of 70/30% is further considered through the appraisal of Local Plan Policy SP2 and is a figure supported by evidence in the form of the most up to date Strategic Housing Market Assessment (SHMA). Conversely Option A has been rejected on the basis that it would not secure the same degree of positive social, economic and environmental benefits and as such is not regarded, in comparison to Option B, as sustainable.

***Preferred location for accommodating the required level of new retail floorspace within the City:***

**4.40** Following the identification of a need to plan to deliver an additional 18,700 sqm within the plan period, as evidenced by the Carlisle Retail Study (2012), the Carlisle City Centre Development Framework (2015) (CCDF) identified a number of options to accommodate this growth through a potential expansion of the Primary Shopping Area (PSA). The ability to accommodate retail development needs in this manner is considered to constitute a strategic issue given the scale of development needs and that it represents an issue at the heart of the development strategy.

**4.41** In terms of the locations and therefore options considered by the CCDF to accommodate growth, these were as follows:

- a) land to the north of Lowther Street including Rickergate (Option A);
- b) land comprising of the Citadel locality (Option B); and
- c) land at Caldew Riverside (Option C).

**4.42** At the outset it should be noted that the process of the CCDF adhered to the requirements in national policy to adopt a sequential approach to the identification of land for retail and main town centre uses. Given that the CCDF supports that a suitable, available and developable option exists on the edge of the existing PSA, the

consideration of an out of centre option was not considered to constitute a reasonable alternative.

**4.43** The CCDF recommends that Option A should be taken forward as the preferred option to respond to the evidenced needs and is supported by analysis. This reflects, amongst other matters, that there are a number of uncertainties regarding the availability of the full extent of the Citadel opportunity (Option B) within the plan period and also reflects its backland nature in parts and the significance of the historic assets in question which limit opportunities to enhance the retail frontage. With regards to Caldey Riverside (Option C) this constitutes a sequentially less preferable site which is also subject to various constraints including land ownership, land contamination and the risk of flooding. Opportunities to improve linkages with the City Centre are also considered to be limited. Given that the CCDF supports sequentially preferable options are available, Option C above is not considered to constitute a reasonable alternative and has not therefore been subject to SA.

**4.44** Whilst concerns regarding the availability of the opportunity at the Citadel could validly discount this option as a reasonable alternative at this stage, recognition of efforts to accelerate delivery of the opportunity are such that it is considered a reasonable alternative which should be subject to SA.

**4.45** The likely social, economic and environmental effects of the two reasonable alternatives identified (i.e. options A and B) were therefore assessed by appraising them against the agreed sustainability objectives. These assessments are contained in Appendix 5 but are summarised Table 9.

**Table 9 - Comparison of options to accommodate retail growth**

<b>SA Objective</b>	<b>Option A - Area to the North of Lowther St inc Rickergate</b>	<b>Option B - Citadel Area</b>
1. Provide opportunities to strengthen and diversify the economy	++	++
2. Improve access to employment	++	++
3. Protect and improve the quality of water resources	0	0
4. Act to mitigate the causes and impacts of climate change including minimising flooding.	0	0
5. Encourage sustainable use of previously developed land	++	++
6. Encourage urban regeneration	++	++
7. Improve the availability & use of sustainable transport mode	++	++
8. Promote the development & use of sustainable and renewable energy resources	0	0



9. Increase the use of sustainable design and construction techniques	0	0
10. Minimise the production of waste & increase reuse and recycling rates	0	0
11. Encourage healthier lifestyles by promoting more sustainable means of transport including public transport, walking and cycling.	+	+
12. Maintaining and enhancing human health, including enhanced health from access to green spaces and improved equitable access to a healthier, happier and more sustainable lifestyle.	+	0
13. Ensure opportunities for all for living in decent and affordable homes	0	0
14. Improve people's sense of safety and well-being	0	0
15. Protect and enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally, regionally and locally designated wildlife sites and priority habitats.	0	0
16. Protect and enhance the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats	?	?
17. Preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage and their settings	?	?
18. Protect and improve local air quality	0	0
19. Reduce emissions of gases which contribute to climate change by limiting our pollution to levels that do not damage natural systems, including human health, and enabling adaption to climate change.	0	0
20. Reduce potential for environmental nuisance	?	0

**4.46** Both options can be seen to perform well and contribute positively to the SA objectives. Option A is deemed marginally more positive through reference to SA objective 12 which reflects that it entails an opportunity to significantly enhance linkages between the PSA and the City's principal parks including the River Eden.

**4.47** Both options A and B record uncertainties with regards to SA objectives 16 and 17. These uncertainties reflect that both locations are of clear heritage value owing to being within designated conservation areas and given the presence of a number of individual heritage assets of significance. Whilst English Heritage did not object to the principal of these locations through the process of the SA, the uncertainties reflect that until firm proposals emerge the precise effects of any specific design approach remain unknown. Other more detailed policies within the Plan are in place however to ensure that any adverse effects are avoided or mitigated.

**4.48** Option A also records an uncertainty against SA objective 20 which is concerned with reducing potential for environmental nuisance. This reflects that there is a more diverse mix of uses in the area covered by Option A, and a need therefore again to ensure that any firm proposals pursue a design approach which acts to prevent any potential conflict. Other more detailed policies within the Plan, which seek to protect residential and environmental amenity, are however in place to ensure that any adverse effects are avoided or mitigated.

**4.49** Based on the evidence in the form of the CCDF (regarding suitability, availability and developability), and as supported by the appraisal which supports that Option A is marginally more sustainable, Option A has been selected as the preferred option in terms of the broad location for a potential expansion of the Primary Shopping Area (PSA). Whilst only marginally less sustainable, Option B has been rejected which reflects concerns about the ability of the location to accommodate major retail development, particularly within the life of the plan given uncertainties in relation to the sites availability which reflect existing lease arrangements.

### **Appraisal of Local Plan Policies**

**4.50** The impact of the Local Plan on each indicator was assessed (see appendix 6). In each case any impact identified has been assessed as to whether it is positive or negative, direct or indirect, how it could be monitored and if there are any secondary, cumulative or synergistic effects. A conclusion has been reached as to the significance of the impact of the Local Plan on the issue the indicator considers.

**4.51** The assessment shows that in a number of cases, it is possible that the Local Plan will have a positive impact. In many cases whilst the overall trends can be monitored, it would be difficult to measure direct effects of the Local Plan itself. It is only necessary to assess those effects that are likely to be significant, not all possible effects, as such, these impacts were not considered to be significant, but will help to create sustainable communities. In a small number of cases the potential impact of the Local Plan against a number of indicators could be negative (e.g. CO<sub>2</sub> emissions per capita). In these cases it should be borne in mind that appropriate policies are included in the Plan to ensure that development would incorporate mitigation measures that would ensure that CO<sub>2</sub> emissions, for example, are minimised.

**4.52** The likely significant positive effects of the Local Plan considered to be of significance are set out in Table 10. No significant uncertain or negative effects have been identified.

**Table 10 - Likely Significant Positive Effects of the Local Plan**

<b>SA Objective &amp; Indicators</b>	<b>Can the effect be quantified ?</b>	<b>Targets (Where available)</b>	<b>Comments/Explanation</b>
<b>1. Provide</b>	Yes – will	The Local	The Local Plan

<p><b>opportunities to strengthen and diversify the economy</b></p> <ul style="list-style-type: none"> <li>• Amount of employment floorspace developed by type (sqm);</li> <li>• Amount of Employment land available for development by type (HA);</li> <li>• Amount of major retail floorspace developed (sqm).</li> </ul>	<p>be measured through the Annual Monitoring Report.</p>	<p>Plan makes provision for 45ha of employment land over the Plan period and identifies a need to accommodate a minimum of 18,200sqm of comparison retail floorspace.</p>	<p>makes provision for employment land and new retail floorspace, directing such development to existing employment areas and Carlisle City respectively.</p>
<p><b>6. Encourage Urban Regeneration</b></p> <ul style="list-style-type: none"> <li>• % of new homes urban Area;</li> <li>• % new employment floorspace (gross) in Urban Area.</li> </ul>	<p>Yes – will be measured through the Annual Monitoring Report.</p>	<p>The Local Plan allocates 70% of new dwellings to the urban area.</p> <p>The Local Plan allocates 45ha of employment land in the urban area.</p>	<p>The Local Plan seeks to direct the majority of new development to the most sustainable locations where there is a greatest concentration of people and access to transport and job opportunities.</p>
<p><b>7. Improve the availability &amp; use of sustainable transport modes</b></p> <ul style="list-style-type: none"> <li>• % completed dwellings within 30 minutes travel time by public transport of key services</li> </ul>	<p>Yes – will be measured through the Annual Monitoring Report.</p>	<p>There is no target for the number of dwellings completed dwellings within 30 minutes travel time by public transport of key services</p>	<p>The Local Plan allocates new housing development towards the most sustainable locations therefore affording the choice/opportunity to access key services by public transport.</p>
<p><b>13. Ensure</b></p>	<p>Yes – will</p>	<p>The Local</p>	<p>The Local Plan</p>

<p><b>opportunities for all for living in decent and affordable homes</b></p> <ul style="list-style-type: none"> <li>• Projected Increase in the population</li> <li>• Projected Increase in Household Figures</li> <li>• Net Additional Dwellings;</li> <li>• Identified Affordable Need;</li> <li>• No. of Affordable Homes built and as % of all completions;</li> <li>• No of Travelling Showpeople, Gypsy and Traveller pitches/plots delivered.</li> </ul>	<p>be measured through the Annual Monitoring Report.</p>	<p>Plan has an annual housing target of 565 dwellings and 9 gypsy and traveller pitches to accommodate the anticipated future need.</p>	<p>identifies a level of growth in relation to the requirement for new residential development in order to enable the accommodation of anticipated future household growth. The Plan also contributes towards securing a percentage of qualifying housing developments as affordable and allocates 9 permanent pitches to meet an identified need for Gypsies and Travellers.</p>
<p><b>15. Protect &amp; enhance biodiversity and geodiversity, as well as creating and restoring biodiversity where possible and enhancing internationally, nationally and locally designated wildlife sites and priority habitats.</b></p> <ul style="list-style-type: none"> <li>• Net change in designated biodiversity and geodiversity assets</li> </ul>	<p>Yes – will be measured through the Annual Monitoring Report.</p>	<p>No net loss of designated biodiversity or geodiversity assets.</p>	<p>The Local Plan contains specific and strong policies to protect designated biodiversity and geodiversity assets including priority species and habitats from development pressures. The Plan has also been developed alongside a Habitats Regulations Assessment.</p>

**4.53** In order to determine the secondary/cumulative impacts of the plan in its entirety, each Local Plan policy was then assessed against the SA Objectives. These assessments are set out in appendix 7.

**4.54** Figure 1 shows the proportion of the Local Plan Policies that have a very positive, positive, unknown or negative effect on each of the SA Objectives and where the Policies are not expected to have any effect on the SA Objectives (neutral).

**Figure 1 Cumulative Impact of Local Plan Policies on Sustainability Appraisal Objectives**



**4.55** The interim stages of the SA process has considered numerous policy options as well as all reasonable alternatives, and the findings and recommendations made at these interim stages have informed the decision-making which has resulted in the policies that form the Proposed Submission Draft of the Local Plan. Figure 1 clearly demonstrates that the cumulative impacts of the Local Plan Policies on the SA Objectives are positive. 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. The full policy assessments are available in Appendix 7 and resulting amendments to the policies are set out in Table 11 below.

**Table 11 - Resulting Amendments to Policies Following Assessments**

Policy	Issue Identified	Original Wording	Amended Wording
SP5	Suggestion that the first criteria should be amended to seek to increase provision for walking and cycling across the District and	1. increase the provision for walking and cycling, including improved connectivity across the City.	1. Increase the provision for walking and cycling, including improved connectivity across the <b>District</b> .

	not only across the City.		
<b>IP3</b>	Possible need to broaden the title of the Policy from „car parking“ as the policy text is wider and makes provision for cycle parking also, recognising sustainable transport options.	Policy IP3 – Car Parking	Policy IP3 – <b><u>Parking Provision</u></b>
<b>CM1</b>	Policy text should perhaps be broadened to include reference to sustainable transport modes such as walking and cycling as a means of ensuring that proposals for the development of health care facilities are in the most accessible locations.	Proposals for the development of health care facilities will be supported where the scale and location of the proposal is appropriate for the catchment it is intended to serve and is or can be made accessible by public transport.	Proposals for the development of health care facilities will be supported where the scale and location of the proposal is appropriate for the catchment it is intended to serve and is or can be made accessible by <b><u>walking and cycling and public transport.</u></b>
<b>CM3</b>	Suggestion that consideration should be given to widening the scope of the policy to „sustaining community facilities and services“ as access to services and facilities is vital for the whole community, not just rural communities.	<b>Policy 44 - Sustaining Rural Facilities and Services</b> The change of use of rural facilities such as a rural shop, public house, doctor’s surgery, dental surgery, school, bank, church/chapel, village hall, allotments or other facility considered important to the community will only be permitted where it can be demonstrated that: 1. Its current use is no longer viable and there is currently no requirement for an alternative community use; and 2. There is adequate	<b>Policy CM 3 - <u>Sustaining Community Facilities and Services</u></b> <b><u>Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:</u></b> <b><u>1. its current use is no longer viable or there is adequate alternative provision in the locality to serve the local</u></b>

		<p>alternative provision in the locality to serve the local community; and 3. All options for their continuance have been fully explored (e.g. marketing); and 4. any asset listed on a Community Asset Register has satisfied the requirements under this obligation.</p>	<p><b><u>community; and</u></b> <b><u>2. all options for their continuance have been fully explored, including any scope for alternative community uses;</u></b> <b><u>and</u></b> <b><u>3. any asset listed on a Community Asset Register has satisfied the requirements under this obligation.</u></b></p>
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**4.56** Although the exercise of predicting and evaluating effects has resulted in only minor changes to policies within the Local Plan, this is considered to be 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.

**4.57** The minor changes that resulted from the exercise of predicting the effects have been incorporated into the policies that will be consulted on during the Proposed Submission Draft Consultation.

## **Appraisal of Site Allocations**

**4.58** The SA relates to a whole or comprehensive Local Plan which includes proposed Strategic Policies, Development Management Policies and Site Allocations. The SA of Strategic Policies has already considered the potential impacts of increased levels of development, the proposed locations for growth and change (City Centre) and detailed policies that will guide development of all types. For this reason, the SA of Site Allocations has attempted to focus only on impacts relating to the precise location or proposed uses of sites.

## **Approach to the Appraisal of Sites and Summary of Findings**

**4.59** 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 Sustainability Framework. The SA framework attempts to predict and evaluate the likely significant effects of the draft allocations and consider ways of mitigating adverse effects and maximising beneficial effects, including considering the potential effects of sites coming forward in-combination rather than piecemeal development.

**4.60** The SA of sites consisted of a rating system to enable comparison between sites in terms of their overall sustainability. Within each matrix, sites are assessed against the SA Objectives to consider if they perform significantly positively (++), positive (+), negatively (-), neutral (0) or uncertain (?). This rating system has enabled clear comparison between site options. The judgement forming the basis of the assessment has also been informed by the Rural Masterplanning work undertaken across the rural area which provides information on access to services and facilities and in which local people helped to identify sites that they would like to come forward with development.

**4.61** With reference to the requirements of the SEA Directive outlined above, options/alternatives for the Local Plan have been appraised and their likely significant effects “identified, described and evaluated”. The sustainability assessment (Appendix 8) and Tables 12-14 below include an explanation of why different options were selected and the possible measures envisaged to prevent, reduce and as fully as possible offset any likely adverse effects.

## **Housing Sites**

**4.62** The following sources were used to arrive at an initial list of reasonable site options for potential housing allocations:

- sites allocated within the existing Carlisle District Local Plan 2001-2016 which have not been developed;
- sites identified as deliverable or developable in the Strategic Housing Land Availability Assessment (SHLAA) 2008-present;



- any sites submitted during previous stages of consultation by landowners, developers or their agents; and
- any public sector land identified by the Council's own internal directorates or that of Cumbria County Council.

**4.63** Potential sites for housing development then went through an initial „sift“ that involved removing:

- sites located in the open countryside (this includes sites which may be close to a settlement, but poorly related to it);
- sites with planning permission which were under construction;
- sites where there is no realistic prospect of the landowner making it available;
- those less than 0.4ha (sites of less than 0.4ha in size have been assessed as part of the SHLAA, but will not be allocated in the Local Plan because they are not of strategic size);
- sites where the Highways Authority has raised significant objections;
- sites that were not considered to be reasonable because they were designated as open space, did not have a suitable access or had significant constraints such as high flood risk which were deemed to be insurmountable.

**4.64** After the initial „sift“ of housing sites, this resulted in a list of 68 reasonable site options for housing. A number of sites that were referred to at Preferred Options Stage One and Two already have at least outline planning permission, some have full planning consent and some are now under construction. Where development has not yet commenced on a site, the intention is to take these sites forward into the new Local Plan to secure their future use and as such they are assessed within this document. The SA of housing sites was also informed by the Housing Site Selection document which established a pro-forma for detailed assessment of each site. This also includes planning and deliverability criteria which do not necessarily relate to the SA. The SA helped to identify:

- Impacts of development – Many such impacts (e.g. on climate change mitigation, resource use and pressure on open space) are not specific to a particular site, rather they could apply to any development, and thus are addressed by the policies within the Proposed Submission Draft Local Plan. The principal site specific impacts identified based on available information were:
  - Flood risk – Data from the Carlisle Strategic Flood Risk Assessment (SFRA), the Environment Agency and Cumbria County Council was used to assess the sites and to highlight where flood risk from any source is present;
  - Impacts of sites on the Historic Environment – a number of the sites lay within or adjacent to a conservation area, listed building or are within the buffer zone for Hadrian's Wall World Heritage Site, as such there is the potential to impact upon these assets. The SA reviewed such sites and highlighted that where there is potential for impact on a heritage asset, other policies in the plan would provide mitigation;

- Impact on Sites of Importance for Nature Conservation – A number of sites are located in proximity to such sites of Nature Conservation and therefore have the potential to have an effect upon them. The Habitats Regulations Assessment has identified where this may be the case and detailed information for each site has been provided within the Site Selection Document to ensure that ecology and biodiversity are fully considered.

**4.65** 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 below. Of the sites initially identified, 42 sites were identified as having development potential for housing, albeit with some constraints or adverse impacts (with an overall score of positive or neutral). The non-preferred sites were found to be constrained in a number of ways, the details of which and therefore reasons for rejection at this time are contained within Table 12, along with details of the level of development considered to be appropriate in various settlements (please note that the site numbering has changed compared to previous versions for a variety of reasons, including the amalgamation of sites, withdrawal at the request of the landowner or further information leading to the deletion of some sites from the process). 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 pro-formas for all of the (reasonable) site options are presented in the Housing Site Selection – Proposed Submission Draft Document. The completed SA assessment of each of these sites is contained within Appendix 8 of this report. It is worthwhile noting that in the context of site selection, the SA helps to inform the Local Plan but does not itself dictate selection for allocation within the Local Plan. Sites are selected for allocation looking at a number of sources as, whilst a site may not be the most sustainable in terms of the SA, there may be other overriding factors which lead to it being taken forward within the Plan.

**Table 12 – Summary of Residential Site Selection**

Development sites have been submitted in the following housing market areas	Development is considered appropriate in the following locations	The Following Sites were available for each location	The following sites have been taken forward for the following reasons -	The following sites have not been taken forward (i.e. been rejected) for the following reasons -
<b>Carlisle</b>	<b>Carlisle North</b>	U1 – Land to the south east of Junction 44, Kingstown U2 – Land north of California Road, Kingstown U10 – Land off Windsor Way U11 – Land east of Landsdowne Close/ Landsdowne Court U16 – Land at Deer Park, Belah CA22 – Land at High Crindledyke CA50 – Land at Middle Farm, Crindledyke CA47 – Land at Etterby	<b>U1 – Land to the south east of Junction 44, Kingstown &amp; adjacent site U2 – Land north of California Road, Kingstown –</b> Both sites are considered to form a logical extension to the City, adjacent to a major route which provides good public transport services. There are also a good range of services within easy reach of these sites and quick and convenient access onto the CNDR and M6. The two sites would need an integrated approach to development, to ensure that access, design and other infrastructure requirements are delivered successfully. These sites perform largely positive/neutral against the	CA22 – Land at High Crindledyke & adjacent CA50 – Land at Middle Farm, Crindledyke– the sites are currently considered to be detached from the urban area and would intrude into the open countryside. They do not integrate with the existing urban form of north Carlisle to the same degree as U1 and U2. Development here could be achievable post 2030 as development of Crindledyke progresses. Development of these sites would require comprehensive master planning and new infrastructure connections. These sites perform largely positive/neutral against the objectives of the sustainability

			<p>objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p><b>U10 – Land off Windsor Way &amp; adjacent site U11 – Land east of Landsdowne Close/Landsdowne Court –</b></p> <p>Both sites are considered to form a logical extension to the urban area, adjacent to an area of established housing. The site would be able to access public transport to the city centre where there is the largest range of services. Careful consideration would need to be given to the relationship/boundary between the two sites, to ensure that the future development of U11 is not prejudiced. Whilst further development in this location could have an impact on existing flooding issues to the north east of these sites, development here may help to attract funding to ease the situation. These sites perform largely positive/neutral</p>	<p>appraisal. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p>CA47 – Land at Etterby – Whilst this site scores neutral overall in SA terms, it has not been taken forward as there are a number of constraints that would need to be overcome relating to flood risk and sewer flooding in the area. The site lies 250m south of an operating scrap yard and 300m north of Carlisle’s main waste water treatment works. The site has poor accessibility to services and facilities within Carlisle, and the local road is not considered adequate to support this scale of development. Where uncertainties or potential negative outcomes exist, mitigation measures are suggested.</p>
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			<p>against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p><b>U16 – Land at Deer Park, Belah</b>  – it is considered that this site sits well within the urban form of Carlisle and is well connected to existing services and facilities as well as employment opportunities adjacent and those accessible via the A689. There will be a need for a buffer between any new housing and the small industrial estate to the north of the site, to minimise the potential for any loss of amenity for future residents. There are a number of trees within the site which are protected by a TPO. These trees provide mature landscape features and should be retained, with adequate separation distances between the trees and any new houses. A buffer zone will also be required between any houses on the western boundary</p>	
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			<p>of the site and the Kingmoor Sidings Nature Reserve. This site performs largely positively against the objectives of the SA.</p> <p>Development of sites U1, U2, U10, U11 and U16 could cumulatively lead to the development of a new primary school in the north of the City which is required to facilitate their release.</p>	
	<b>Carlisle South East</b>	<p>U3 – Site of Pennine Way Primary School, Pennine Way/Edgehill Road</p> <p>U4 – Land North of Moorside Drive/Valley Drive</p> <p>U5 – Land between Carleton Road and Cumwhinton Road</p> <p>U13 – Land east of Beverley Rise, Harraby</p> <p>U14 – Land north of Carleton Clinic, east of Cumwhinton Drive</p> <p>U15 – Former Dairy Site, Holywell Crescent, Botcherby</p>	<p><b>U3 – Site of Pennine Way Primary School, Pennine Way/Edgehill Road</b> – this is a brownfield site which is well related to the existing primary residential area and has good access to a wide range of services and facilities. Redevelopment of this site may help to alleviate an existing surface water flood risk issue. This site scores positively against the objectives of the SA.</p> <p><b>U4 – Land North of Moorside Drive/Valley Drive</b> – this site is well related to the existing urban form of the area and provides a</p>	<p>CA51 - Depot at London Road - This is an existing employment site, located in the Carlisle/Settle Conservation Area, and lying on a primary route into the City. The building is of poor quality and it is considered that there is a surplus of employment sites within the City of a similar quality. Residential use here would be compatible with neighbouring land uses. The site scores positively overall against the objectives of the SA. It has not been allocated as the site is currently being marketed for sale for a variety of uses, but the site</p>

		<p>U18 - Land opposite Rosehill Industrial Estate</p> <p>U19 – Land at Carleton Clinic</p> <p>U20 – Land south of Durranshill Road, Botcherby</p> <p>CA51 - Depot at London Road</p> <p>CARL60 – Land off Beverly Rise, Harraby (Site area remaining after U13)</p>	<p>logical infill opportunity. Careful consideration will need to be given to the design and layout of the site to ensure that the boundaries between the existing housing and the new development integrate in design terms, whilst giving adequate separation distances. The site is located in a neighbourhood that benefits from access to a range of services and performs largely positive/neutral against the objectives of the SA.</p> <p><b>U5 – Land between Carleton Road and Cumwhinton Road</b> – this site is physically and visibly well connected to the existing built edge of Carlisle, and benefits from some existing landscaping in the form of mature hedgerows on its northern, southern and eastern boundaries, and within the site. The single track road (Sewells Lonning) which borders the south eastern boundary of the site forms an effective edge between the site and the open countryside</p>	<p>is not being promoted by the vendor for housing, and there have been no approaches to the Council by prospective purchasers to develop the site for housing. Therefore currently there is no realistic prospect of the site being developed for housing. Additionally, the impact of ground contamination of the site is as yet unknown.</p> <p>CARL60 – Land off Beverly Rise, Harraby (Site area remaining after U13) - This is a greenfield site on the edge of the urban area. Little offer of protection from the railway line and motorway which could generate environmental nuisance however other policies within the Plan will help to mitigate this. Whilst there are a number of positive outcomes against the objectives of the SA, overall the site performs largely neutral.</p>
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			<p>beyond. There is a primary school 1.3km away at Petteril Bank Road. The site scores largely positive/neutral against the objectives of the sustainability appraisal.</p> <p><b>U13 – Land east of Beverley Rise, Harraby</b> – this is a greenfield site on the edge of the urban area. It relates well to the established residential area adjacent which has a good range of local facilities. Whilst a buffer may be required to attenuate noise from the railway line and motorway. Whilst there are a small number of positive outcomes against the objectives of the SA, the site scores neutrally overall.</p> <p><b>U14 – Land north of Carleton Clinic, east of Cumwhinton Drive</b> -</p> <p>This site forms part of a long term development strategy at Carleton Clinic, with land to the north having been redeveloped for housing over recent years. There are a range of services within</p>	
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			<p>close proximity of this site and its parkland setting makes this area very attractive. Whilst there are a number of positive outcomes against the objectives of the Sustainability Appraisal, the site performs largely neutral overall.</p> <p><b>U15 – Former Dairy Site, Holywell Crescent, Botcherby</b> – this brownfield site is very well related to the urban area and has good access to a range of services, including a primary school, and green spaces. It benefits from planning permission for 66 dwellings. It performs positively against the objectives of the sustainability appraisal objectives.</p> <p><b>U18 - Land opposite Rosehill Industrial Estate</b> – site is considered to be well related to the edge of Carlisle in terms of accessing a range of services and facilities, and the wider road and public transport network. Part of the site will be required to be set aside for noise attenuation measures from the motorway.</p>	
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			<p>Whilst there are a number of positive outcomes against the objectives of the SA, this site scores largely neutral overall.</p> <p><b>U19 – Land at Carleton Clinic –</b> This site forms part of a long term development strategy at Carleton Clinic, with land to the north having been redeveloped for housing over recent years. There are range of services within close proximity of this site. The parkland setting and large number of mature trees protected by a TPO makes this area very attractive. There are also three attractive, sandstone, three storey buildings within the site which should be retained. This site performs largely positively against the objectives of the SA.</p> <p><b>U20 – Land south of Durranshill Road, Botcherby -</b> This site scores largely neutral against the SA objectives. It is considered to be well related to the urban area, including public transport, primary schools and an employment area at Rosehill. It is also adjacent to</p>	
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			a recently developed housing site to the north west. These two sites together were allocated in the 2008 adopted Local Plan for housing. Whilst there are a number of positive outcomes against the objectives of the SA, this site scores largely neutral overall.	
<b>Carlisle West</b>	<p>U6 – Land at Garden Village, west of Wigton Road</p> <p>U7 – Land at Newhouse Farm, south-east of Orton Road</p> <p>U8 – Land north of Burgh Road</p> <p>U9 – Former Morton Park Primary School, Burnrigg</p> <p>U12 – Land to the rear of the Border Terrier, Ashness Drive</p> <p>U17- Land to the south west of Cummersdale Grange Farm</p> <p>U21 – Former Laings Site, Stanhope Road</p> <p>CA75 – Former Printworks, Newtown Industrial Estate</p>	<p><b>U6 – Land at Garden Village, west of Wigton Road</b> – this site is located on the edge of the urban area, adjacent to a housing site to the north which is currently under construction. It has good access to a range of local services, including a secondary school, and is close to the A689 which provides quick access to a range of employment opportunities at Kingstown and Kingmoor Park. Whilst there are a number of positive outcomes against the objectives of the SA, the site scores largely neutral overall.</p> <p><b>U7 – Land at Newhouse Farm, south-east of Orton Road</b> – this site is located on the edge of the</p>	<p>CA75 – Former Printworks, Newtown Industrial Estate – this is a vacant, low quality employment site, adjacent to a residential development. The site scores positive/neutral overall against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures may be available and further information has been provided.</p> <p>The original occupation of the premises ended approximately 15 years ago. There have been a number of subsequent uses, but the building is now vacant. Whilst the site was originally promoted through the Preferred Options</p>	

			<p>urban area, bounded to the north by residential development and to the south west by the A689, which provides quick access to a range of employment opportunities at Kingstown and Kingmoor Park. Development of this site should be considered as part of a masterplanning approach including the adjacent U6, to ensure a comprehensive development is delivered in terms of phasing, design, layout, highways and other infrastructure. Whilst there are a number of positive outcomes against the objectives of the SA, the site scores largely neutral overall.</p> <p><b>U8 – Land north of Burgh Road</b> –</p> <p>This site is a logical extension to the urban area. It is in close proximity to existing employment areas and has good access to open pathways alongside the River Eden. It also has good access onto the western bypass and the employment areas to the</p>	<p>stage 1 for housing development, the site owner continues to market the site for industrial or logistics use, and there has been no further promotion of the site for housing. It has therefore not been allocated for housing development as there is not considered to be a reasonable prospect of the site coming forward for housing.</p>
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			<p>north of the city. Power lines which cross adjacent to this site provide a definite edge to the City. Archaeological assessment of this site may be required due to the course of Hadrian's Wall running to the direct north of this site. The site scores largely positively against the objectives of the SA.</p> <p><b>U9 – Former Morton Park Primary School, Burnrigg</b> – this is a brownfield site within a residential area, almost immediately adjacent to a primary school and within close proximity to a range of neighbourhood services, including shops, open space and a community centre. The site scores positively against the objectives of the Sustainability Appraisal.</p> <p><b>U12 – Land to the rear of the Border Terrier, Ashness Drive</b> – the site was granted planning permission for 18 affordable dwellings in January 2015. The site lies within an established housing area close to</p>	
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			<p>neighbourhood shops, a primary school and public open space. This site performs largely neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p><b>U17- Land to the south west of Cummersdale Grange Farm</b> – site lies on the edge of the urban area, surrounded by land allocated as part of the Morton Masterplan. Once the Morton development is completed, this site will have a good range of facilities within close proximity. The site performs positively against the objectives of the SA.</p> <p><b>U21 – Former Laings Site, Stanhope Road</b> – this is a brownfield site in a central location with good access to services. The site is cleared and has been unused for a significant period of time. It is surrounded by security fencing, and its development would provide the</p>	
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			<p>opportunity to improve the environment of the local area. Therefore redevelopment provides the opportunity for urban regeneration. The adjacent land has planning permission for the development of a food store, (subject to the signing of a section 106 agreement). Site scores positively/neutral against the objectives of the SA.</p>	
<b>Rural East</b>	<b>Brampton</b>	<p>R1 – Land South of Carlisle Road  R2 – Land west of Kingwater Close  R3 – Land north of Greenfield Lane  BR14 – Land off Greenhill Road,  BR01 – Land off Old Church Lane  BR07 - Land East of Gelt Rise</p>	<p><b>R1 – Land South of Carlisle Road -</b>  The site is on the edge of the built up area of Brampton and lies adjacent to land identified for the potential development of a new medical centre for the town. The site is also within walking distance of a range of services, including primary and secondary schools and public transport. It performs positively/neutral against the objectives of the SA.  <b>R2 – Land west of Kingwater Close –</b> This site is well related to the built form of Brampton, close to a range of services and facilities and adjacent to existing</p>	<p>BR14 – Land off Greenhill Road-  This is a greenfield site on the edge of the town. This site performs largely positive/neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p>However, of all the sites on the edge of Brampton, this site is considered to have the highest landscape quality, and is part of a wider high quality landscape classified in the Cumbria Landscape Classification as</p>

			<p>residential properties. The landscape has the capacity to absorb additional development without significant impacts. The land is surplus public sector land, which is a valuable source of land to achieve the building of new homes. It performs positively/neutral against the objectives of the SA.</p> <p><b>R3 – Land north of Greenfield Lane</b> - This site is well related to the built form of Brampton and within walking distance of a range of services, including a primary and secondary school, a range of local shops and open space. Its location on the edge of the town has the potential to enhance the approach to Brampton. The site performs neutral/positive against the objectives of the SA. Where an uncertainty has been identified, mitigation measures are in place and further information has been provided.</p>	<p>“open, undulating and rolling topography with lowland agricultural landscape dominated by pasture, hedges and hedgerow trees common on lower ground.”</p> <p>The views out into the countryside from the edge of Brampton at this point are particularly attractive, and help frame the edge of town. It is considered that the landscape impact of developing this site would be unacceptable.</p> <p>BR01 – Land off Old Church Lane - Very prominent site, the majority of the site being visibly and physically separated from Brampton by Kirkby Moor School and playing fields. This site is more so than others identified within Brampton and so could have a potentially negative landscape impact. The site is also isolated from existing residential areas. Overall the site scores largely neutral. This site performs</p>
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				<p>largely neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures could be put in place and further information has been provided.</p> <p>BR07 - Land East of Gelt Rise - Small infill site well related to the centre of Brampton. Performs largely neutral/positive against the objectives of the SA, particularly in relation to access to services and open space. However, the site is not currently allocated in the Local Plan for housing development as there are questions over its availability following the death of the landowner and subsequent arrangements for ownership.</p>
	<b>Longtown</b>	<p>R4 – Site of former Lochinvar School</p> <p>R5 – Land off Old Road, Longtown</p> <p>LO03 – Land off Moor Road</p> <p>LO07 – Land to the South</p>	<b>R4 – Site of former Lochinvar School</b> – This brownfield site is well contained within the existing built form of Longtown. It is within close proximity of a range of services and facilities, including the local primary school and	<p>LO03 – Land off Moor Road – This is a greenfield site on the edge of the town. The site suffers from flooding in part. From Moor Road there are large ranging views across this site to the North Pennines AONB, and to the hills</p>

		of Scaurbank	<p>playing fields. The site performs positively against SA objectives due to its brownfield nature and central location. The site performs largely positive/neutral overall.</p> <p><b>R5 – Land off Old Road, Longtown</b> – This is a greenfield site on the edge of Longtown, with opportunities to integrate with the built form of the town. Development here could contribute to balancing the physical extent of the town, and be designed to provide more variety in type and size of house, and contribute to bringing green infrastructure and wildlife, cycle and footpath connections between the centre and the site. There are a range of services within walking distance. This site performs largely neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p>	<p>in the Lake District National Park. Whilst the site itself is rather flat and featureless, these views are important to frame the edge of Longtown in this location. The site is not considered to integrate well with the existing built form or scale of Longtown in the location. This site performs largely neutral against the objectives of the SA. Negative outcomes are reflective of the risk to this site from flooding.</p> <p>LO07 – Land to the South of Scaurbank - This is a greenfield site on the edge of the settlement. The site suffers from flooding in part. It is also significant in landscape terms as there are open views across the site and the adjacent River Esk to the north west. The site is fronted by an established roadside hedge. There are mature trees in the gardens of Scaurbank, a substantial sandstone house to the north of the site, and these trees help</p>
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				<p>frame the edge of the site. Of all the sites on the edge of Longtown, this one is particularly sensitive to landscape impact. This site performs largely neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures could be put in place and further information has been provided.</p>
<b>Harker</b>	<p>R11 – Kingmoor Park Estate OC53 – Heathlands Industrial Estate, Kingmoor</p>	<p><b>R11 – Kingmoor Park Estate -</b> This is a large brownfield employment site made up of old industrial buildings, detached from the urban area. Development here would help to improve the immediate local setting and would lead to the remediation of a contaminated site. The buildings on the site are outdated and pose maintenance problems for modern employment uses. The site lies within 1.5 km of junction 44 of the M6, and the western bypass, giving quick and easy access to Carlisle and beyond. The site is therefore considered to present an</p>	<p>OC53 – Heathlands Industrial Estate, Kingmoor - This site is in active use as an employment site, the loss of which could have a significant impact on access to employment. Whilst the buildings are dated, and may not meet current requirements for all businesses, the site provides a base for a number of businesses with less specific requirements. Additionally the site is physically detached from the urban area with no public transport. It is not linked to or part of any existing rural community with services and facilities, apart from the adjacent small development of</p>	

			<p>opportunity for the sustainable redevelopment of a brownfield site and to make a positive contribution to the local environment through good design and layout. This site performs largely positive/neutral against the objectives of the SA. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p>	<p>houses.</p> <p>On the whole this site performs neutrally as, whilst it is detached from the urban area, its redevelopment would provide an enhancement for adjacent residents and would remediate a potentially contaminated site. Where uncertainties or potential negative outcomes exist, mitigation measures are in place and further information has been provided.</p>
	<b>Cumwhinton</b>	<p>R9 – Land to the west of How Croft R8 - Land adjacent to Beech Cottage</p>	<p><b>R9 – Land to the west of How Croft</b> -This is a greenfield site on the edge of the settlement. There is good access to local services including a primary school, pub, village hall, small post office and shop and to J42 of the M6. The site is well contained within the landscape and related well to the built form of the village in this location. The site performs largely positive/neutral overall against the objectives of the SA.</p> <p><b>R8 - Land adjacent to Beech Cottage</b> - This is a greenfield site</p>	

			<p>on the edge of the settlement. The site performs largely neutral overall against the objectives of the SA. The site benefits from planning permission for 15 dwellings under application number 12/0856.</p>	
<b>Houghton</b>	<p>R10 – Land at Hadrian’s Camp  HO01 – Land to the north east of Houghton  HO02 – Land West of Houghton Road  HO03 – Hadrian’s Camp, Houghton Road, Houghton</p>	<p><b>R10 – Land at Hadrian’s Camp</b> - This is a large brownfield site on the edge of Houghton. It is well connected with good links into Carlisle. Planning application 14/0930 is granted with authority to issue subject to a section 106 agreement being signed. A habitats regulations assessment submitted with the application did not identify any harm associated with the development of the site on the designated County Wildlife Site which is located within the site. The site performs positive/neutral overall. Where uncertainties or potential negative outcomes exist, mitigation measures are identified and further information has been provided.</p>	<p>HO01 – Land to the north east of Houghton- Houghton has expanded significantly in recent years. In addition, planning permission has recently been granted for the development of 99 houses on brownfield land adjoin the southern edge of Houghton. This represents a 20% increase in houses in the village. It is therefore considered that a further allocation of this site would be a significant addition out of scale with the rest of the village. There are also primary school capacity issues. This site performs largely positive/neutral overall against the objectives of the SA.</p> <p>HO02 – Land West of Houghton Road - This is a large greenfield</p>	

			<p>site to the north west of Houghton. It is not particularly well related to the built form of Houghton in this location. It lies visibly and physically outside the settlement and does not benefit from any landscape or topographical features which would help to integrate the site with the village. Houghton has expanded significantly in recent years. In addition, planning permission has recently been granted for the development of 99 houses on brownfield land adjoining the southern edge of Houghton. It is therefore considered that a further allocation of this site would be a significant addition out of scale with the rest of the village. There are also primary school capacity issues. This site performs largely positive/neutral overall against the objectives of the SA.</p> <p>HO03 – Hadrian’s Camp, Houghton Road, Houghton - This is a large brownfield site on the</p>
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			<p>edge of Houghton, partly currently used by the Police Authority. Houghton has expanded significantly in recent years, with permission recently granted for the development of 99 houses on land adjoining this site. This represents a 20% increase in houses in the village. It is therefore considered that a further allocation of this large site would be a significant addition out of scale with the rest of the village. There are also primary school capacity issues. This site covers a large part of a County Wildlife Site. Whilst there may be some scope for the development of part of this site, the size and scale of the land identified would potentially have a negative effect on the residual wildlife site and uncertainty has also been identified with regards to the potential impact on Hadrian's Wall World Heritage Site Buffer Zone. The site performs largely neutral overall. Where uncertainties or potential negative</p>
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				outcomes exist, mitigation measures are identified.
	<b>Linstock</b>	R13 – Linstock North OC31 – Land to the west of Linstock OC32 – Land to the east of Linstock	<b>R13 – Linstock North</b> - site is centrally located, relates well, and is of an appropriate scale for the village. Whilst there are limited local services in Linstock, its proximity to Carlisle increases its sustainability as a location for development. There is a designated off road footpath and cycleway from The Beeches (which lies west of the M6), to Rickerby Park, and from then on easy access into Carlisle. The site performs positive/neutral overall. Where uncertainties or potential negative outcomes exist, mitigation measures are identified and further information has been provided.	OC31 – Land to the west of Linstock - This is a greenfield site on the edge of the village which has limited services but good links to Carlisle. The village has developed over time in a nucleated manner, including the redevelopment of a former horticultural nursery in the centre of the village. The village form is broken up by fields between the houses. This site to the north west of the village would represent a large extension out of scale with the rest of the village. The site does not integrate well with the village form either visibly or physically, and is not contained by and landscape or topographical features which would help it to relate to the edge of the village. The SA highlights uncertainties relating to the potential impact of development on the landscape due to its prominence. The site performs largely positive/neutral overall



			<p>against the objectives of the sustainability appraisal.</p> <p>OC32 – Land to the east of Linstock - This is a greenfield site on the edge of the village which has limited services but good links to Carlisle. The village has developed over time in a nucleated manner, including the redevelopment of a former horticultural nursery in the centre of the village. The village form is broken up by fields between the houses. This site to the north west of the village would represent a large extension out of scale with the rest of the village. The site does not integrate well with the village form either visibly or physically, and is not contained by and landscape or topographical features which would help it to relate to the edge of the village. The SA highlights uncertainties relating to the potential impact of development on the landscape due to its prominence. The site performs</p>
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				<p>largely positive/neutral overall against the objectives of the sustainability appraisal</p> <p>An additional 10 houses over the next 10-15 years is considered to be an appropriate scale of development for the village and as such R13 is considered to be the most appropriate location for development.</p>
	<b>Rickerby</b>	R14 – Land at Tower Farm	<p><b>R14 – Land at Tower Farm –</b> Existing farm site in close proximity to Carlisle with good links to the city centre via existing off road green infrastructure routes. There are existing attractive barns within the site which reflect the local vernacular style in this location. Their conversion would retain these heritage assets within the Rickerby Conservation Area. The SA highlights uncertainties relating to the potential impact of the development of this site on biodiversity and the landscape however it is considered that other Policies within the Plan</p>	

			would help to ensure that any impact would not be negative. This site therefore performs largely neutral overall against the objectives of the SA.	
	<b>Scotby</b>	R16 – Land at Broomfallen Road R15 – Land north of Hill Head SC09 – Land off Holme Close	<b>R16 – Land at Broomfallen Road-</b> This is a greenfield site which is sustainably located close to Carlisle and within a village with good service provision. It is not a prominent site however it will encroach into open countryside and as such will incur some landscape impact. This site therefore performs largely neutral overall against the objectives of the SA. This site benefits from planning permission for 28 houses under application number 12/0790. <b>R15 – Land north of Hill Head -</b> This is a greenfield site which is well screened by existing development. It is sustainably located close to Carlisle and within a village with good service provision. This site therefore	SC09 – Land off Holme Close - This is a greenfield site which is backland development and as such may have an impact on the townscape and the properties along Holme Close. The site performs largely neutral overall against the objectives of the SA.

			performs largely neutral overall against the objectives of the SA.	
	<b>Warwick Bridge</b>	R17 – Warwick Bridge/Little Corby North R18 – Land to the south of Corby Hill/Heads Nook Road	<b>R17 – Warwick Bridge/Little Corby North</b> - This is a greenfield site on the edge of the village which relates well and will have a minimal impact on the landscape. Development here has the capacity to support village services, which include a primary school, doctors' surgery, post office and Cooperative store, together with the Warwick Mill business village. There is good access to the wider transport network. The SA highlights uncertainties relating to the potential impact of development of this site on the Grade II Listed Little Corby Hall which lies adjacent to this site. It is however considered that other Policies within the Plan would ensure that development here would not have a negative impact. The site scores largely neutral overall. This site performs largely neutral against the objectives of the SA. Where uncertainties or potential	

			<p>negative outcomes exist, mitigation measures are in place and further information has been provided.</p> <p><b>R18 – Land to the south of Corby Hill/Heads Nook Road –</b>  This is a greenfield site on the edge of the settlement. The SA highlights uncertainties relating to the potential impact of development here due to landscape prominence and flood risk issues however it is considered that other Policies within the Plan would help to mitigate these effects. However, there is good accessibility to the doctors' surgery, cooperative store, post office, primary school and business park. The site scores largely positive/neutral overall against the objectives of the SA.</p>	
	<b>Wetheral</b>	R19 - Wetheral South R20 – Land west of Steele's Bank WE08 – Land to the north of Wetheral, west of Plains Road	<b>R19 - Wetheral South</b> – This is a greenfield site which relates well to the village, bordered on two sides by housing, and whilst the landscape is flat and fairly enclosed, there is potential to	WE08 – Land to the north of Wetheral, west of Plains Road - This is a large greenfield site on the edge of the village. The SA highlights uncertainties relating to the landscape impact of the site

		<p>WE03 – Land adjacent Hallmoor Court</p>	<p>integrate any new development with the existing built form of the village, and through good design establish an attractive edge to the village. Wetheral has a good range of services and facilities making it a sustainable location for development. The site is immediately adjacent to the new community centre, and the village playing fields. The site scores largely positive/neutral overall against the objectives of the SA.</p> <p><b>R20 – Land west of Steele’s Bank</b>– This is a greenfield site which relates well to the village, bordered on two sides by housing, and whilst the landscape is flat and open, there is potential to integrate any new development with the existing built form of the village, and through good design establish an attractive edge to the village. Wetheral has a good range of services and facilities making it a sustainable location for development. The site is immediately opposite the new community centre, and the village</p>	<p>as it projects north into open countryside, as such there may only be potential for the development of a proportion of this site. The site in its current form is out of scale with the village in this location. Plains Road is a tree lined road which is characterised by large detached properties. Most of the road lies within the Wetheral Conservation Area designation. The most northerly part of the road is at a much lower density, with large houses in large plots, with open fields to the rear. The development of this site would unacceptably alter the character of this area. The site scores largely neutral overall against the objectives of the SA, whilst uncertainty relates to the landscape impact of development here.</p> <p>WE03 – Land adjacent Hallmoor Court - This is a large greenfield site which relates well to the existing built up extent of the</p>
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			<p>playing fields. The site scores largely positive/neutral overall against the objectives of the SA.</p>	<p>village. It is subject to a current planning application (12/0880), and the delay in making a decision on this application has been largely due to UU concerns over drainage. However, these concerns have been addressed and the site is likely to gain permission in March 2015. The site scores largely positive/neutral overall against the objectives of the sustainability appraisal.</p>
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<p><b>Rural West</b></p>	<p><b>Dalston</b></p>	<p>OC07 – Land at Buckabank DA01 – Land to the South of Dalston</p>		<p>OC07 – Land at Buckabank – This is a greenfield site in the rural area with limited access to bus service provision. However it is only a short distance from Dalston which has a range of services. There is concern that development of the whole of this site would have an impact on the landscape. The site performs largely neutral overall against the objectives of the SA, with uncertainty identified in relation to landscape impact.</p> <p>DA01 – Land at Nook Lane, to the South of Dalston - This is a large greenfield site which lies immediately adjacent to an established housing area within a village with a good range of services, facilities and employment opportunities. This site is located on the periphery of the village, and development of the whole site could have some unacceptable landscape impact. However, the northern and western boundaries of the site</p>
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				<p>abut existing housing areas, and there is potential for some of the site to be developed. UU have indicated that the waste water treatment works are at capacity, and can not support any further development in the village. Site scores largely neutral overall against the objectives of the SA, whilst uncertainty remains around the potential landscape impact of development in this location.</p>
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	<p><b>Burgh Sands</b></p>	<p><b>by</b></p> <p>R6 – Land west of Amberfield          BU01 – Land to the west of, and including, Highfield</p>	<p><b>R6 – Land west of Amberfield -</b>          This is a greenfield site, well related to the village. It has the potential to be developed with minimal landscape impact, and is well located in terms of providing safe access in relation to the village primary school. It lies outside the boundaries of the Solway Coast AONB, Burgh by Sands Conservation Area, and the Hadrian’s Wall Military Zone World Heritage Site. The Rural Masterplanning exercise resulted in support for some additional housing in this area, particularly as there is some fairly recent housing in this area already. The site performs largely positive/neutral overall against the objectives of the SA.</p>	<p>BU01 – Land to the west of and including Highfield - This is a small greenfield site which would involve the demolition of an existing dwelling. The site is also located within the AONB and so any development would have to be of the highest quality of design. Overall the site performs largely neutral against SA objectives, however uncertainties have been identified relating to potential surface water flood risk and landscape impact.</p>
	<p><b>Cummersdale</b></p>	<p>R7 – Land east of Cummersdale Road          CUD03 – Land off Caldew Road</p>	<p><b>R7 – Land east of Cummersdale Road -</b> This is a small greenfield site on the edge of the settlement, which represents a logical extension to the village. Some community and parish council support for the proposal. Cummersdale has a</p>	<p>CUD03 – Land off Caldew Road - This is a greenfield site on the edge of the settlement. Cummersdale has a number of local services and is also within close proximity to Carlisle. As such it is considered to be a sustainable location for</p>

			<p>number of local services and is also within close proximity to the urban area. It is close to two large employers, Pirellis and the Stead McAlpin Mill. As such it is considered to be a sustainable location for development. Site performs largely positive/neutral overall against the objectives of the SA.</p>	<p>development. However, the perception of the site in terms of its relationship to the village is that it is physically and visibly outside the edge of Cummersdale. The northern part of the site consists of part of a large open, flat, green field, separated from the village by a mature hedge and an area of public open space, with some more recent roadside planting. The grass verge widens at a point beyond the site, towards the village, and is maintained in an attractive manner, as part of the village amenity greenspace. This reinforces the perception that the village edge is at this point. The lower portion of the site is not particularly visible from the main approach road from Carlisle, but can be seen from the end of Gilbert Road, and the public bridleway beyond. The scale of the site is too large for the size of the village, and would be an unacceptable intrusion into open countryside. Site performs</p>
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				largely neutral overall against the objectives of the SA, however there is some uncertainty surrounding access to the site.
	<b>Moorhouse</b>	R12 – Land east of Monkhill Road MR03 – Land to the West of Moorhouse MR02 – Land to the North of Low Moorhouse Farm	<b>R12 – Land east of Monkhill Road</b> - This is a small, centrally located greenfield site in a village with limited service provision however development could support nearby services. The village is part of a cluster of villages including Thurstonfield, Monkhill, Great Orton, Burgh by Sands and Kirkbampton. There are primary schools and village halls at the latter three villages. The site performs largely neutral overall against the objectives of the SA.	MR03 – Land to the West of Moorhouse The site lies in flat open countryside which is visually prominent when approaching from both the B5307 and the unclassified road from Burgh by Sands. The site is physically and visibly separate from the form of the village, and with the exception of a roadside and field boundary hedge, could not be said to be well contained within existing landscape features. The site performs largely neutral against the objectives of the SA, however a negative impact has been identified relating to the potential landscape impact of development. MR02 – Land to the North of Low Moorhouse Farm - This is a small greenfield site located on the edge of a village. The site lies in flat open countryside which is

				<p>visually prominent. The site is physically and visibly separate from the form of the village, and with the exception of a roadside and field boundary hedge, could not be said to be well contained within existing landscape features. This adds to the perception that the site does not integrate with the edge of the village in this location. The site performs largely neutral overall, with uncertainty surrounding the potential landscape impact of development.</p> <p>Both these sites are located on the edge of a village with limited service provision but could support nearby services such as schools by villages working in clusters (working with Burgh by Sands etc).</p> <p>A preferable site to both these sites is available within the centre of Moorhouse.</p>
	<b>Wreay</b>	R21 – Land to the west of Wreay School, Wreay	<b>R21 – Land to the west of Wreay School, Wreay – Wreay</b>	

			<p>has not seen any development of this scale in recent years and as such development will help to support its existing services in order to improve the overall sustainability of the settlement. Whilst the SA highlights uncertainties relating to the impact of development on the significant historic environment of Wreay, it is considered that other Policies within the Plan would help to safeguard against any potential negative impacts on heritage assets. The site is subject to current planning application 14/0875 for the development of five houses. The site scores largely neutral overall with uncertainties relating to the potential landscape impact of development.</p>	
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## **Approach to Appraising and Selecting Gypsy and Traveller Allocations**

**4.66** 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 is available now and lies adjacent to a popular and well managed Gypsy and Traveller site. There are no major constraints to the site and it scores neutrally overall against the objectives of the SA. Please see Table 13 below.

**Table 13 – Summary of Gypsy Traveller Site Selection**

Development sites have been submitted in the following housing market areas	Development is considered appropriate in the following locations	The Following Sites were submitted for each location	The following sites have been taken forward for the following reasons -	The following sites have not been taken forward for the following reasons -
Rural East	Harker	Land adjacent to Low Harker Dene	<p><b>Land adjacent to Low Harker Dene</b> - This is a large greenfield site, located between the M6 and an existing Gypsy and Traveller site, Low Harker Dene. Development here would help to meet an identified need for pitch provision and as such scores positively against SA Objective 13 - to ensure opportunities for all for living in decent and affordable homes. The site lies within 1.5 km of junction 44 of the M6, and the western bypass, giving quick and easy access to Carlisle and beyond. The site is therefore considered to present an opportunity for the sustainable development of a Gypsy and Traveller site in a location that is proven to work well with the community given the success of the adjacent site. The site performs generally positively/neutral against the SA objectives.</p>	N/A



## Approach to Appraising and Selecting Employment Allocations

**4.67** Employment sites were identified through the following means:

- sites allocated within the existing Carlisle District Local Plan 2001-2016 which have not been developed; and
- sites identified in the Employment Land Review (2010).

**4.68** 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. This study identifies that at face value there is a quantitative surplus of employment land in the District, which is spatially concentrated to the north of the City Centre. It recommends that targeted growth to existing sites is a realistic spatial option for Carlisle going forward. This therefore demonstrates that a sustainable approach to employment land development is to grow existing sites (Brunthill) and to direct development to the south of the City to rebalance the current concentration (Morton). Both sites score positive/neutral against the objectives of the SA. See Table 14 below.

**Table 14 – Summary of Employment Site Selection**

Development sites have been submitted in the following locations	Development is considered appropriate in the following locations	The Following Sites were submitted for each location	The following sites have been taken forward for the following reasons -	The following sites have not been taken forward for the following reasons -
Carlisle	Carlisle	Kingmoor Park/Brunthill (37 Ha) for the development of B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution); and	<p><b>Kingmoor Park/Brunthill (37 Ha)</b></p> <p>This is a major greenfield employment site that is accessible and likely to have significant economic benefits and attract investment. Negative SA outcomes are reflective of the greenfield nature of this site whilst uncertainty relates to the potential impact on biodiversity. It is however considered that other Policies within the Plan would help to mitigate against any potential adverse impact of such development. The site benefits from a series of planning permissions which are either outline in nature or full consents which are yet to be implemented. Accordingly the allocation of the site is considered both appropriate and necessary to safeguard it for employment purposes across a longer horizon. Site scores generally positive/neutral overall against the objectives of the SA, whilst one uncertainty is identified relating to the biodiversity impact of new development, however mitigation in the form of other</p>	N/A

		<p>Land to the South West of Morton (8 Ha) for the development of a business park (B1 use)</p>	<p>policies within the Local Plan would offer protection.</p> <p><b>Land to the South West of Morton</b></p> <p>This is a major greenfield employment site that is accessible and likely to have significant economic benefits and attract investment. Negative outcomes are reflective of the greenfield nature of this site whilst uncertainty relates to the potential impact on biodiversity. It is however considered that other Policies within the Plan would help to mitigate against any potential adverse impact of such development. Whilst the full extent of the allocation currently benefits from outline planning permission for B1 purposes, the allocation of the site is considered both appropriate and necessary to safeguard it for employment purposes across a longer horizon. Site scores fairly positive/neutral overall against the objectives of the SA, whilst one uncertainty is identified relating to the biodiversity impact of new development, however mitigation in the form of other policies within the Local Plan would offer protection.</p> <p>The Carlisle Employment Sites Study (2010) identified that whilst there was sufficient land for employment in Carlisle there were qualitative issues with the sites which were available to fulfil this need. A key element of the Plan’s economic strategy is to support investment in existing sites to facilitate their modernisation and reconfiguration, as well as</p>	
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			ensuring the potential of residual capacity within these sites is realised. This approach is therefore complemented by the allocation of an additional 45 Hectares of land for employment related purposes.	
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## **Conclusion – main impacts of the Site Allocations**

### **Positive impacts**

**4.69** Allocating sites is part of a more strategic approach to development to avoid development whereby sites come forward organically. This approach provides a number of benefits in ensuring that the most sustainable sites are proposed, the most appropriate scale of development is achieved and allows for more effective planning of infrastructure to support growth.

**4.70** 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.

### **Uncertain impacts**

**4.71** 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.

### **Negative impacts and mitigation**

**4.72** Whilst redevelopment/development that involves intensification may have an impact on several of the objectives, for example climate change, resource use and pressure on open space, these impacts are generally not specific to the site and thus have been covered within the SA of policies which considers the impact of the general policy approach and strategic distribution. Additionally, the majority of sites score negatively against the SA Objective that relates to encouraging the sustainable use of previously developed land as the Council considers that it has maximised its opportunities for developing brownfield land, and as such the number of brownfield sites subject to assessment is therefore limited. Where brownfield sites have been identified as having potential for residential development, these have been supported as a priority for redevelopment; however, it would not be possible for the Council to only allocate brownfield land and still be able to meet development needs identified by the evidence base, this would be unsustainable. Additionally, the Plan is supported by robust

evidence supporting viability of sites for development which generally concluded that remaining Brownfield sites are likely to face viability challenges.

**4.73** The principal negative impacts which have been identified on a site specific basis relate to acting to mitigate the causes and impacts of climate change including minimising the risk of flooding, and protecting and enhancing the quality and distinctiveness of landscapes, townscapes and locally designated wildlife sites and priority habitats. Where it is considered that there is a risk of flooding to a particular site or that there may be a landscape impact as a result of development, which cannot be appropriately mitigated against, such sites have not been considered favourably.

## **Task B4 – Mitigating Potential Adverse Effects and Maximising Beneficial Effects**

**4.74** Task B3 of the Sustainability Appraisal process requires that any likely effects of the Local Plan are evaluated and Task B4 requires measures to be considered to mitigate adverse effects and maximise beneficial effects. The purpose of this is to identify both the positive and negative effects of the identified policy approaches and potential site allocations in the plan in social, environmental and economic terms. The Local Plan will deliver an improvement on the current situation and evaluating the Local Plan Objectives against the SA Objectives shows that in the majority of cases where the Local Plan has an impact, this is considered to be positive (see Appendix 9). A number of Local Plan Objectives were recommended to be amended as a result of the assessment to ensure that positive effects were maximised and these are set out at the start of this section, in Task B1 (full assessment contained within Appendix 4). Amendments to the wording of policies has also been recommended in a number of cases as a result of the SA assessment and the assessment has also informed the selection of sites to be taken forward (Appendices 7 & 8).

**4.75** 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.

**4.76** 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.

## **Any proposed mitigation measures**

**4.77** 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. Task B5 addresses monitoring arrangements to ensure this position is however kept under review.

## **Task B5 Proposed Measures to Monitor the Significant Effects of Implementing the Local Plan**

**4.78** The SA process is an iterative one, so its success and effectiveness will be monitored by the continued collection of data according to identified indicators in the sustainability framework. Whilst each policy and site have been appraised for their sustainability effects, in practice the appropriateness of development proposals will require consideration of how the relevant policies interact with each other, and mitigation is likely to take the form of a combination of mitigating measures, both to minimise disbenefits and maximise benefits of development proposals.

**4.79** The likely significant effects of the Local Plan policies 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 Annual Monitoring Report (AMR). Alignment between indicators used for monitoring the Local Plan with Sustainability Framework indicators has been ensured as far as possible so as not to overburden any monitoring regime.

**4.80** Chapter 11 and associated Appendix 2 of the Proposed Submission Draft Local Plan outlines the indicators that will be used for monitoring both the Local Plan Policies and SA objectives. In addition, the SA baseline itself (Appendix 2) will also be subject to regular review.

**4.81** 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 or further interventions.

## **5. CONCLUSION & NEXT STEPS**

**5.1** Overall it is considered that the SA supports the proposed submission draft of the Local Plan in that the most sustainable options can be seen to have been taken forward and that opportunities to maximise the overall sustainability of the Plan can be seen to have been taken.

**5.2** This SA Report is now being made available alongside the Carlisle District Local Plan (2015 - 2030) Proposed Submission Draft for a minimum six week period of consultation. Once the period for public representations on the Proposed Submission Draft Plan 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.

**5.3** At Examination the Inspector will consider representations (and findings presented in this SA Report) before then reporting back on the Plan"s soundness. Providing the Plan is found to be „sound“, or capable of being made sound through modifications, the Plan can then be formally adopted by the Council.



## 6. Appendices

6.1 Due to their substantial volume the appendices have been prepared as a separate document which is available alongside, and which should be read in conjunction with, this report.