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# Planning Cumbria

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Cumbria and Lake District Joint Structure Plan 2001 – 2016

## Technical Paper 8

### Sustainability Appraisal



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**Preface to Technical Paper 8  
Sustainability Appraisal of the (emerging)  
Cumbria and Lake District Joint Structure Plan 2001-2016**

- 1 The Government is committed to sustainable development, and has set out its approach in 'A better quality of life, a strategy for sustainable development in the UK' (1999). The strategy is based on four broad objectives:
  - Maintenance of high and stable levels of economic growth and employment;
  - Social progress which recognises the needs of everyone;
  - Effective protection of the environment; and
  - Prudent use of natural resources.
  
- 2 Planning Policy Guidance Note 12 stresses that the planning system, and development plans in particular, can make a major contribution to the achievement of the Government's objectives for sustainable development. Indeed the Development Plan Regulations require local authorities to have regard to environmental, social and economic considerations when preparing development plans. To demonstrate that this has taken place local authorities are expected to carry out a full appraisal of their development plan. 'Planning for Sustainable Development: Towards Better Practice' (DETR, 1998) encourages local authorities to cover all four sustainable development objectives as part of this process.
  
- 3 'Environmental Appraisal of Development Plans: A good practice guide' (DOE, 1993) states that the appraisal process should:
  - Apply to all types of plan;
  - Apply to all policies and proposals;
  - Be part of the plan preparation process; and
  - Be a process of identifying, quantifying (where appropriate), weighing up and reporting on effect of those policies and plans
  
- 4 Planning Policy Guidance Note 12 furthermore stresses that the appraisal process should be an important element of every stage of the development plan process. It should be systematic and iterative and test the intended performance of the plan or strategy against the agenda for sustainable development and thereby provide the basis for the plan's improvement.
  
- 5 To take this forward Cumbria County Council and the Lake District National Park Authority commissioned a Sustainability Appraisal of a draft set of policies being considered for inclusion in the Deposit Structure Plan. The Sustainability Team, within Cumbria County Council, undertook the Appraisal. Although part of the County Council this team is separate to, and independent of, the joint team responsible for preparing the Deposit Structure Plan. Their report is reproduced here in its entirety. The methodology, analysis and views contained in it are those of the authors and do not constitute Structure Plan policy.
  
- 6 The findings of the Sustainability Appraisal have been considered and where appropriate Structure Plan policies have been amended, refocused or given further clarification by way of supporting text. The Sustainability Appraisal has therefore informed the content of the Deposit version of the Structure Plan. To enable interested parties to assess the impact of the Sustainability Appraisal on the Deposit Structure Plan an extra column has been added to Appendix 1 of the Sustainability Appraisal report. This outlines the action taken as a result of the

Sustainability Appraisal. The comments contained within this column are those of officers preparing the Structure Plan and not the authors of the Sustainability Appraisal. A further column indicates new policy numbering to enable any comments to be linked to the version of policies now contained in the Deposit Structure Plan.

- 7 It is worth noting that the methodology applied to the process of Sustainability Appraisal inevitably focuses on individual policies. Structure Plan policies should, however, be read together and this is how they will be used in assessing development proposals. In the interests of conciseness or clarity it was not always considered necessary to amend policies as the result of the Sustainability Appraisal if the concerns raised by the Appraisal process were adequately covered by other policies contained in the Deposit Structure Plan.

# **Initial Appraisal of Cumbria Joint Structure Plan 2001 – 2016: Deposit**

**Sustainability Team, Cumbria County Council  
November 2002**

## **Contents**

- 1. Introduction**
- 2. Sustainable development and its Influence on Policy**
- 3. Sustainability Appraisal: a brief outline**
- 4. The Appraisal Process**
- 5. The Sustainability Criteria Used**
- 6. Summary of Appraisal Results: At a glance**
- 7. Summary of Appraisal Results: Commentary**
- 8. The Appraisal Results in Full**
- 9. Conclusions**

### **Appendices:**

- Appendix 1 – Policy by Policy Commentary on the draft Cumbria Joint Structure Plan (2001-2016):Deposit**
- Appendix 2 - Profile of Key Issues/Pressures Affecting Cumbria**
- Appendix 3 - List of Authorities which supplied appraisal documents as part of the best practice review**

# **1 Introduction**

## **The Joint Structure Plan**

- 1.1 The Cumbria and Lake District Joint Structure Plan covers the County of Cumbria and is produced jointly by Cumbria County Council and the Lake District National Park Authority. The Plan contains a number of policies designed to guide land use within the County. Taken together the Joint Structure Plan policies form a strategic development framework for the County, including the Lake District National Park area, over a 15-year period.
- 1.2 Other plans combine with the Joint Structure Plan to help guide development in Cumbria at the local level. These include the Minerals and Waste Local Plan, also produced by the County Council; and 7 Local Plans produced by the 6 District Councils and the Lake District National Park Authority. These local plans set more detailed policies for dealing with individual planning applications.
- 1.3 The existing Cumbria and Lake District Joint Structure Plan was published in 1995 and covers the period 1991 to 2006. Much of the policy review work underpinning the existing Joint Structure Plan was carried out in the early 1990's. In the intervening period many changes have taken place in both regional and national policy and also in local circumstances. As a consequence, the Lake District National Park Authority and the County Council are working together to produce an updated set of policies to guide development in Cumbria.

## **The Purpose of this report**

- 1.4 The County Council's Sustainability Team was asked to carry out an independent sustainability appraisal of the draft Joint Structure Plan policies as part of the plan development process. The appraisal took place during November 2002 using the draft policies which had evolved at that time.
- 1.5 Sustainability appraisal involves assessing the extent to which the proposed land use policies will contribute to sustainable development in Cumbria and making recommendations, where appropriate, to help those preparing the planning policies ensure that the policy outcomes will support sustainable development.
- 1.6 As part of the wider sustainability appraisal process, it was agreed that an assessment should also be made of the contribution that the draft joint structure plan policies would make to the National Park's purposes which are
  - to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park; and
  - to promote opportunities for the understanding and enjoyment of the special qualities of the National park by the public.
- 1.7 This report sets out the findings of that appraisal and contains a number of recommendations to modify policies which, if adopted, would increase the likelihood that the Joint Structure Plan will help deliver a more sustainable pattern of development in Cumbria and, where appropriate, would improve the degree to which individual policies matched and supported the National Park's purposes.
- 1.8 The report also looks at the emergence of sustainability appraisal, its growing use during policy and programme development and its relationship with national and regional policy. Also included in this report are details of the method used to conduct the appraisal and the approach taken to develop the appraisal framework.

- 1.9 **This report forms part of the public consultation process and will therefore be published as one of a number of technical papers available for inspection along with the Deposit draft Joint Structure Plan.**

## **2 Sustainable Development and its Influence on Policy**

- 2.1 The concept of sustainable development is not new but it is now exerting a major influence on policy in Britain and Europe. Sustainable development has been defined in many ways. In essence, it is about achieving social and economic progress for all in harmony with the natural environment.
- 2.2 Its prominence in current policy owes much to the United Nations' Conferences on Environment and Development. These 'earth summits' have had a major influence on European and British policy to the extent that both Britain and the European Union have their own sustainable development strategies.
- 2.3 The European strategy makes it clear that all policies should contribute to sustainable development and that putting sustainability at the heart of policy will be a major focus for policy review and new policy development.
- 2.4 In Britain, the current Sustainable Development Strategy was published in 1999. The Strategy defines sustainable development as 'ensuring a better quality of life for everyone, now and for generations to come'. To achieve this the Government has set out 4 key objectives:
  - social progress that recognises the needs of everyone;
  - effective protection of the environment;
  - prudent use of natural resources; and
  - maintenance of high and stable levels of economic growth and employment.
- 2.5 Closer to home, the North West Regional Assembly (NWRA) has published its own strategy 'Action for Sustainability'. It has followed this up with the publication of a draft Integrated Appraisal Toolkit. This is currently being piloted in the region and it is anticipated that after the results of the pilot have been assessed, the revised toolkit is likely to be launched around May 2003.
- 2.6 The aim of the Integrated Appraisal Toolkit is to generate action across the region that will help achieve the aims and objectives contained in the regional sustainability framework 'Action for Sustainability'.
- 2.7 Cumbria County Council has been promoting sustainable development in its policies and programmes since the early 1990's when it agreed to make sustainable development a central objective of policy making. This approach to promoting sustainable development continues with the recent decision to take action to integrate sustainability into the emerging local community strategies. The LDNPA adopted sustainable development as a central objective of its work in the context of the national park purposes.
- 2.8 To further complicate matters, the European Union adopted a Directive on Strategic Environmental Assessment (SEA) in 2001 (2001/42/EC) which will apply to certain plans and programmes (but not policies unless they are part of a plan) which will lead to development and also to assessments made under the Habitats Directive.
- 2.9 A new somewhat radical aspect is the need to consult the public on the environmental assessment before a decision is taken and publish the results of that consultation process showing how public concerns have been addressed.
- 2.10 Clearly there are strong links between sustainability appraisal and the forthcoming SEA. The Directive should come into force by July 2004 and the Government is

currently consulting on how this might be done. While it is difficult to predict how the SEA will be implemented in the UK, it appears that it will reinforce the need for sustainability appraisal inducing a shift from a voluntary approach to a mandatory one. It will also remove some of the discretion, which authorities have in terms of scoping the appraisal. The SEA is quite specific about what it means by environmental appraisal and it is likely to require any assessment to be made against a recent state of the environment report for an area. The SEA is also likely to impact significantly on the time taken for plan development.

- 2.11 It appears that the SEA will apply to development plans, minerals and waste plans, and other plans relating to transport and waste disposal. It is possible the Government will also make a connection with the emerging community strategies as a means of improving the environmental well-being of an area. It should result in environmental concerns being fully integrated into the planning process and therefore contribute enormously to moving towards sustainability.

### 3 Sustainability Appraisal: a brief outline

- 3.1 Sustainability appraisal in part derives from established policy development techniques in which an appraisal is carried out to test whether or not the aims of the policy are likely to be met. If the appraisal suggests the aims of the policy are unlikely to happen, then recommendations are made to allow the policy to be reviewed and modified to ensure that it will, in fact, deliver the required policy outcomes.
- 3.2 Sustainability appraisal measures the extent to which progress towards sustainable development is likely to be achieved following implementation of a plan or strategy. It does so by assessing the extent to which the policies in the plan will help bring about the Government's broad sustainability objectives by referring to more detailed, locally agreed sustainability criteria which make clear the desired policy direction.
- 3.3 Sustainability appraisal is therefore a method of testing and improving the extent to which strategies, plans or programmes contribute to sustainable development.
- 3.4 Sustainability appraisal also owes much to its predecessor: environmental appraisal. The European Union introduced a Directive on Environmental Impact Assessment in 1985 that subsequently led to a requirement in national planning policy guidance (PPG 12) for an environmental appraisal of development plans. The Government produced a good practice guide in 1993 that aimed to ensure that as part of the plan development process, an assessment was made of the local environment, that there was an evaluation of the impact that the policy proposals would have on the environment and that the final policies addressed the issues of concern.
- 3.5 One of the steps in an environmental appraisal process is the selection of criteria against which the policy can be assessed. It is usual to consider the likely impact on land and soil, landscape, air quality, and wildlife for example. It is also good practice to look at energy and traffic emissions and waste generated. Determining the number of environmental components and defining what each means is called 'scoping'.
- 3.6 The environmental criteria which emerge from the scoping process are then used to construct a matrix in which aspects of the policy are listed down the left-hand side and the scoping criteria are listed horizontally. This creates a series of boxes in which the initial response to the policy on aspects of the environment can be recorded i.e. a positive or negative outcome.

	<b>Air Quality</b>	<b>Water Quality</b>	<b>Landscape</b>	<b>Biodiversity</b>
<b>Policy 1</b>	✓✓	?	?	<b>xx</b>
<b>Policy 2</b>	<b>x</b>	<b>x</b>	✓	✓

- 3.7 The selection of criteria needs to be fairly comprehensive if the appraisal process is to be used reliably. Clearly there can be overlap between criteria and this needs to be considered, e.g. climate change, air quality, transport emissions and energy. Generally linked criteria are grouped together on the matrix under a number of headings.
- 3.8 Sustainability appraisal widens the scope of the criteria used to include social and economic criteria. The effect of this is to consider the impact of the policies on the environment, society and the economy and to reflect this in the matrix.
- 3.9 The sustainability criteria used in this exercise are set out on page 10 of this report. The criteria describe clearly the desired positive outcomes sought from policies in order to secure a pattern of sustainable development.

## **4 The Appraisal Process**

### **Developing the Appraisal Process**

- 4.1 A set of sustainability criteria was agreed for use in this appraisal exercise. These criteria in part built on previous criteria developed and used in-house for sustainability appraisal of policies and programmes by Cumbria County Council.
- 4.2 During 2000 Baker Associates carried out a sustainability appraisal of the provisional Local Transport Plan. They also provided a commentary on the adopted Cumbria and Lake District Joint Structure Plan 1991 – 2006 in order to assist the County Council and the National Park Authority in their work on the replacement Joint Structure Plan and advise on how a sustainability appraisal could be incorporated. Their report provided the authorities with:
- A commentary on the adopted structure plan generally, reflecting its strengths and weaknesses in terms of moving towards sustainable development;
  - Ideas on how the two authorities might approach the preparation of the revised structure plan; and
  - A suggested framework and set of criteria structured around national sustainability objectives that identified directions of change required to move towards sustainable development.
- 4.3 This led to a set of modified criteria being developed and agreed for use in this appraisal exercise by planners from the County Council and the Park Authority.
- 4.4 The County Council's Sustainability Team was asked to carry out an independent sustainability appraisal of the draft policies as part of the replacement Joint Structure Plan development process. The appraisal of the draft policies took place in November 2002 and the results reported to both authorities so that they could respond before the Draft JSP was placed on deposit.

### **The Approach Adopted**

- 4.5 The appraisal exercise was structured as follows:
- pre-appraisal review of Government and local policy on sustainable development in order to test the coverage of the sustainability criteria which had emerged;
  - a review of current practice on sustainability appraisal in England in order to ensure that the work carried out by the Sustainability Team matched best practice;
  - pre-appraisal desktop characterisation of the County (Appendix 2) to familiarise staff conducting the appraisal exercise with the key economic, social and environmental issues and pressures which the Joint Structure Plan could be expected to influence;
  - consideration would be given to the refinement of the proposed sustainability criteria that had been developed for use in future appraisals as a result of these exercises.
  - policy blocks would be reviewed as whole as well as individual policies and assessed in terms of their contribution to sustainability and for consistency.
  - in addition to the sustainability appraisal of policies the Sustainability Team was asked to look at those policies which would apply within the National Park and form a view on their compatibility with the National Park's purposes.
  - final writing up and publication of the report in support of the Joint Structure Plan review process.

## **Best Practice Review including the Integrated Appraisal Toolkit**

- 4.6 Around 20 councils were contacted to obtain copies of recent sustainability appraisals. The purpose of this was to see how the technique was being developed and applied elsewhere and to discover if there was anything to learn from these processes.
- 4.7 In addition to this the North West Regional Assembly (NWRA) had developed an Integrated Sustainability Toolkit and was consulting on its suitability. This seemed the ideal opportunity to examine the toolkit to decide whether it could inform the appraisal approach and method developed in Cumbria.
- 4.8 The Toolkit is aimed at those developing plans, projects, programmes and strategies. It has a two-tier level of appraisal comprising a simple checklist for routine use and a more detailed appraisal technique for major policies and programmes.
- 4.9 The Toolkit is intended to accelerate progress towards sustainability in the region by:
- enabling more informed and transparent decision-making;
  - identifying and minimising negative social, economic and environmental impacts;
  - adding value by testing the developing policies and asking how they can be improved; and by
  - providing an opportunity to engage stakeholders in the appraisal process.
- 4.10 From the review of other authorities' appraisals it became apparent that many had used external consultants to undertake the appraisals. One consultancy in particular appeared to have secured much of the available business. This reduced the diversity of approach to sustainability appraisals significantly.
- 4.11 Nonetheless the general approach taken and the methodology adopted was examined and compared to that proposed for the Cumbria and Lake District Joint Structure Plan appraisal. In this way the Sustainability Team was able to satisfy itself that the overall approach proposed matched current best practice.
- 4.12 A list of those authorities contacted is shown in Appendix 3.
- 4.13 In addition, an analysis was carried out comparing the criteria used in the draft Integrated Appraisal Toolkit to the criteria used in the appraisal of structure plans in Cheshire, Cambridgeshire and Lancashire and that proposed for the Cumbria Structure Plan appraisal. Also included in this exercise were criteria used by Baker Associates to carry out a sustainability appraisal of the North West Regional Planning Guidance and criteria contained in a sustainability checklist produced by the East Midlands Regional Assembly. The purpose of this exercise was to ensure that the sustainability criteria used in the Cumbria appraisal were comprehensive and to see what, if anything, might be gained by using the Toolkit.
- 4.14 The outcome of this exercise showed that with one or two exceptions the same sustainability themes were covered by each organisation although, inevitably, all had approached it in their own way, using their own language and highlighting particular concerns.
- 4.15 The Cumbria criteria demonstrated strong similarities to the criteria used elsewhere. In some cases there was a greater emphasis on certain aspects. For example, the Cumbria criterion on participation was much wider in scope than that contained in the integrated Toolkit. In other cases the desired outcome was implicit in the wording of the criteria.

4.16 Differences emerged between the Integrated Appraisal Toolkit and the Cumbria criteria on:

- alleviating poverty levels;
- ensuring risks to the community were fully considered;
- involving all stakeholders in the planning process;
- providing equal opportunities;
- reducing the need to travel;
- reducing the potential for environmental nuisance;
- maximising the use of energy from renewable sources;
- improving the performance of local business;
- improving the image of the region;
- regeneration of urban/rural areas;
- low input farming.

4.17 Most of these differences in criteria were not judged critical and the view was taken that the proposed Cumbria criteria were broadly comprehensive. For example, the Cumbria criteria went beyond involving stakeholders in the planning process and sought to involve people in all aspects of local government decision-making. Elsewhere equal opportunities were implied in the Cumbria criteria.

4.18 Perhaps the most striking omissions from the Cumbria criteria were reducing the need to travel and maximising energy from renewable resources. Scanning of the other criteria used also revealed that the Cumbria criteria did not test well for climate change adaptation or urban and rural regeneration.

4.19 The conclusion was reached that the IAT provides guidance and a framework on sustainability appraisal that was not previously available in parts of the North West region and that it will do much to improve the standard of sustainability appraisals carried out in the region. However it is aimed at plan-makers themselves and provides a simple but comprehensive checklist of issues that need to be taken into account during the plan making process. The outcome should be a more sustainable plan or strategy.

4.20 In Cumbria, it follows developments that have taken place locally in terms of sustainability toolkits and more detailed appraisal techniques. Some of the criteria contained in IAT are more suited to Districts rather than Counties.

4.21 Given the agreement that had been reached between the two Authorities it was decided to leave the criteria unchanged while recognising that the Cumbrian criteria would need to be amended for future use to include more sustainable criteria on energy and climate change, transport and regeneration.

4.22 As with all sustainability appraisal criteria, IAT will need to be reviewed in the light of the forthcoming SEA.

### **Conducting the Appraisal**

4.23 The draft policies set out in the Joint Structure Plan were analysed by 3 members of the Team. The first step was to look at the policy and reach agreement on what it meant and what its likely outcomes would be. Any uncertainty was clarified by asking the planning officers involved in drafting the policies.

4.24 Based on an agreed interpretation, each policy was tested against each of the sustainability criteria and the results recorded. A matrix was used for this exercise.

4.25 The matrix template is shown below:

<b>KEY</b>			
✓	Positive impact	?	Impact uncertain
X	Negative impact	-	No impact

<b>Policy XYZ</b>															
<b>Social Progress</b>						<b>Protection of the Environment</b>			<b>Prudent Use of Natural Resources</b>				<b>Economic Growth</b>		
SP1	SP2	SP3	SP4	SP5	SP6	EN1	EN2	EN3	NR1	NR2	NR3	NR4	EG1	EG2	EG3

4.26 The criteria are coded (SP 1, SP2, etc.) and grouped together under one of the 4 objectives identified by Government as equal corners of its Sustainability strategy. Each policy was tested against the criteria and scored.

4.27 The results of this exercise are summarised on pages 12-15 of this report and therefore it was not felt necessary to publish individual policy matrices as part of this report.

4.28 The sustainability criteria used are shown on page 10 of this report.

## 5. Sustainability Criteria used in the Sustainability Appraisal of the Joint Structure Plan (2001-2016)

REFERENCE	CRITERIA	CRITERIA DESCRIPTION
<b>Social progress which recognises the needs of everyone</b>		
SP1	Participation	Encourage and empower local people to become involved. Ensure all members of local communities are able to participate fully in decision making processes and understand the processes and decisions that impact on them.
SP2	Accessibility	Ensure and improve access and affordability for all to services, facilities and opportunities. Protect existing community facilities. Physical access to transport, buildings and areas of public open space must be suitable for those with a disability.
SP3	Housing	Ensure that local housing needs are met locally and that good quality, affordable housing is available to all.
SP4	Skills, Education and Training	Ensure that education and training is available to ensure that all people develop the values, knowledge and skills necessary to enable them to live, act and work in society. Retain and utilise local skills where possible.
SP5	Health	Ensure all members of society have access to the health care that they require. Ensure healthy and safe working and living environments and improve the quality of life for all.
SP6	Culture and Traditions	Encourage a sense of community identity, culture and cohesion. Ensure that local traditions and cultures are considered and, where possible, enhanced.
<b>Effective protection of the environment</b>		
EN1	Biodiversity	Ensure protection and conservation of rare, declining, threatened or indigenous species and habitats and, where possible, enhance conditions. Minimise adverse impacts on species and habitats through human activities. Sustain and extend tree cover, hedgerows, woodlands and sustainable forestry.
EN2	Landscape Character	Preserve the local landscape quality and character from unsympathetic development. Ensure that the remoteness and tranquility of landscapes are maintained.
EN3	Built Environment	Conserve features of historic and archaeological importance and maintain the character of the built environment. Ensure that new development is sympathetic to the character of the built environment. Minimise noise and light pollution.
<b>Prudent use of natural resources</b>		
NR1	Air quality and climate change	Ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary. Limit/reduce the emission of greenhouse gases.
NR2	Water	Maintain and, where possible, improve the quality and quantity of all water resources. Minimise water pollution from all sources.
NR3	Land and Soil	Minimise loss of greenfield sites or areas of open space and encourage development on brown field sites. Prevent any soil degradation or pollutant of soil and the use of peat products.
NR4	Minerals and Energy Sources	Reduce, reuse and recycle all forms of waste. Promote the use of energy recovered from waste. Minimise the use of primary minerals and encourage recycling of material where possible. Ensure that all new development maximises energy efficiency.
<b>Maintenance of high and stable levels of economic growth and employment</b>		
EG1	Employment	Ensure the number, variety and quality of employment opportunities is increased. Support local enterprises and skills and open new markets to local businesses.
EG2	Accessibility to Jobs	Increase the access to a variety of jobs for all through improved training, transport links and communication links. Ensure that new employment opportunities are located in areas of greatest need.
EG3	Wealth Creation	Attract new investment into the county and increase the environmental performance of local companies. Create opportunities to retain a skilled workforce and graduates in Cumbria. Encourage local innovation and diversification and provide associated financial assistance.

## **6 Summary of Appraisal Results: at a glance**

- 6.1 Pages 12-15 of this report show the sustainability appraisal matrix developed as part of the sustainability appraisal of the Joint Structure Plan (JSP). The matrix looks at the degree to which individual policies contribute to sustainable development as defined by a set of criteria developed by officers from both Authorities. The sustainability criteria used in the appraisal are shown on page 10 of this report. The matrix lists individual policies (S1, S2 etc.) and illustrates by means of single or double ticks a positive to strong positive effect on a particular criterion. Conversely single and double crosses indicate a negative or strong negative impact in terms of sustainability. No effect or a neutral association is shown by a dot.
- 6.2 Criteria are arranged along the horizontal axis under 4 distinct themes e.g. social progress, environmental protection criteria and so on. Each policy is given a score ranging from – 5 through 0 to + 5 against each criterion to indicate a negative or positive effect in terms of sustainability. The scores have been totalled and plotted to profile the sustainability of each policy. This profile is shown on page 16 of this report.
- 6.3 Clearly some policies are designed to make a significant contribution to sustainable development in Cumbria. Most policies do make a positive contribution. Only 7 policies work against sustainability. All of these have negative scores. These policies relate to major development proposals; new road building; car parking standards; development on the coast; biomass, energy from waste and anaerobic digestion; mineral extraction outside the Park and AONB's; and residual waste and landfill.
- 6.4 Within each policy block an average score is calculated allowing individual policies to be compared to the mean for that policy group. This helps to identify which policies should be re-worked to make the policy outcomes more sustainable.
- 6.5 A second set of scores has been calculated to assess the degree to which each individual criterion or component of sustainability is reflected throughout each of the policies in the JSP. Thus participation, wealth creation, biodiversity etc. are given a total score that reflects the extent to which they are supported by all of the policies.
- 6.6 The scoring system is the same (2 points for a positive effect, 5 points for a strong positive effect, zero points for no association and minus 2 and minus 5 for negative and strong negative effects).
- 6.7 The outcome of this exercise is a graph that shows the weight given to each of the sustainability criteria by the Joint Structure Plan draft policies as a whole. This graph can be seen on page 16 of this report. Unsurprisingly accessibility to services, facilities and opportunities (SP2), employment (EG1) and wealth creation (EG3) score highly, closely followed by health (SP5), housing (SP3) and the built environment (EN3).
- 6.8 The issues which consistently score less are water (NR2), air (NR1), minerals and energy sources (NR4), biodiversity (EN1), participation (SP1) and culture and traditions (SP6). This suggests that sustainable development is not yet fully integrated into the policy-making process.
- 6.9 The results of this analysis suggest that if the JSP is to deliver a pattern of sustainable development over the next 15 years then the policies identified in paragraph 6.3 above on transport, energy and waste etc. will need to be revisited and re-cast. This also applies to the policies which score below average for their policy block. Equally policy makers need to be more aware of what a sustainable society looks like and can then give greater consideration to the components of sustainability (the agreed criteria) and reflect how individual policies can support each of these.

# Sustainability Appraisal of the Joint Structure Plan

Impact	Score
✓✓	5
✓	2
.	0
?	0
×	-2
××	-5

Strong positive  
Positive  
No effect  
Uncertain impact  
Negative  
Strong Negative

Date: 19/11/2002

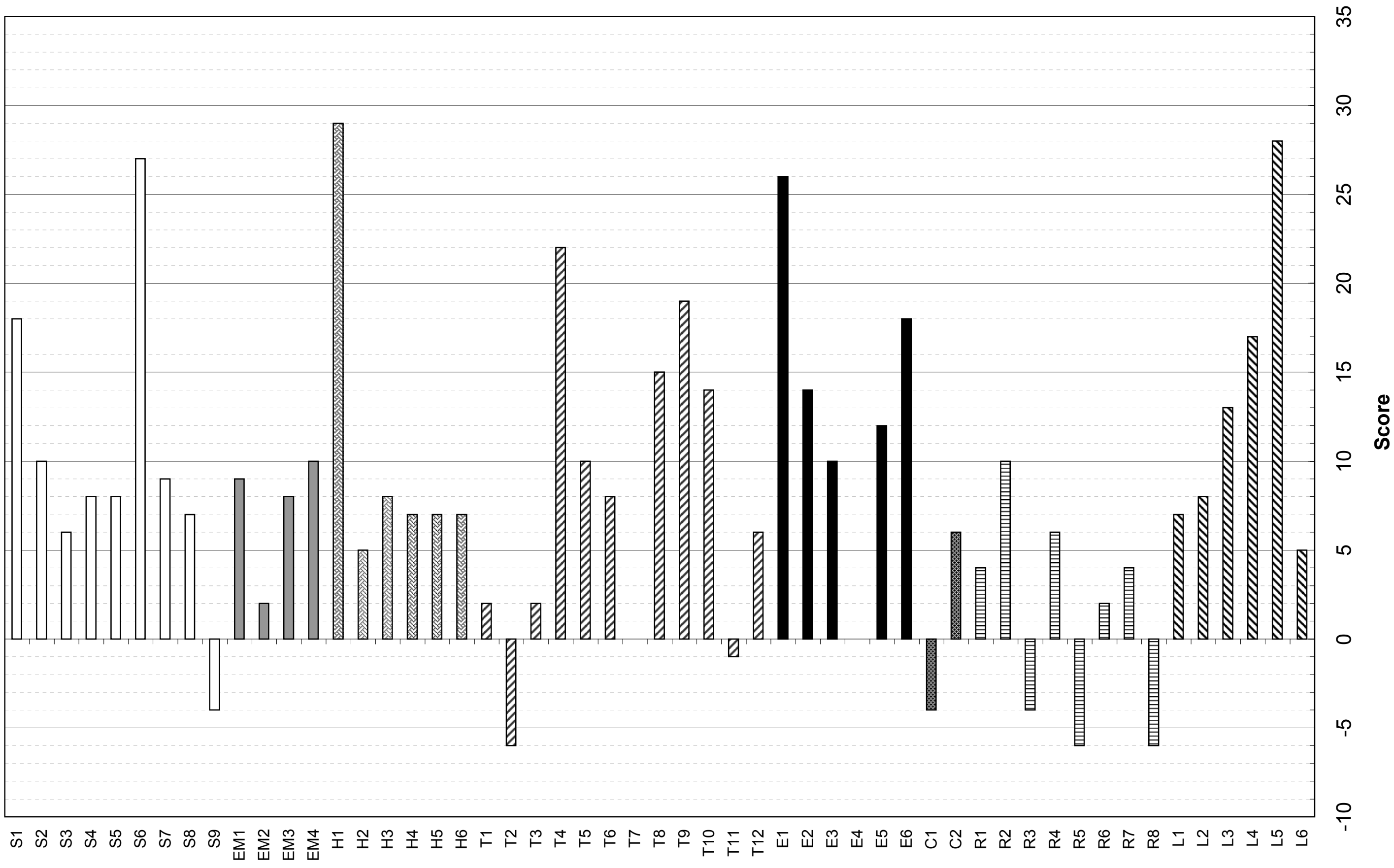
Policy Ref	Policy	Social Progress Criteria						Environmental Protection Criteria			Natural Resources Criteria				Economic Growth Criteria			Total	Ave.
		SP1 - Participation	SP2 - Accessibility	SP3 - Housing	SP4 - Education, Skills & Training	SP5 - Health	SP6 - Culture & Traditions	EN1 - Biodiversity	EN2 - Landscape Character	EN3 - Built Environment	NR1 - Air	NR2 - Water	NR3 - Land & Soil	NR4 - Minerals & Energy Sources	EG1 - Employment	EG2 - Accessibility to jobs	EG3 - Wealth Creation		
S1	Promoting a sustainable pattern of development	.	✓✓	.	.	.	✓	✓	✓	✓	.	.	.	✓✓	.	.	.	18	
S2	New development	.	✓	✓	.	.	.	.	.	.	.	.	.	.	✓	✓	✓	10	
S3	Development to sustain rural communities	.	✓	.	.	.	.	.	.	.	.	.	.	.	✓	✓	.	6	
S4	The City of Carlisle	.	✓	✓	.	.	.	×	.	.	×	.	.	✓	✓	✓	✓	8	
S5	Furness and West Cumbria	✓	✓	.	.	.	✓	×	×	.	×	.	?	✓	✓	✓	✓	8	
S6	Lake District National Park	.	✓	✓✓	.	✓	✓	✓✓	✓✓	✓	✓	?	.	.	✓	.	.	27	
S7	North Cumbria	.	.	?	.	.	.	.	.	✓	?	.	✓✓	.	✓	.	.	9	
S8	South and East Cumbria	.	?	✓✓	.	.	.	?	.	.	.	.	✓	?	.	.	.	7	
S9	Major development proposals	✓	.	.	.	×	.	×	×	×	?	?	?	?	✓✓	.	.	-4	10
EM1	Employment land provision	.	?	.	.	.	.	.	.	.	?	?	?	?	✓✓	✓	✓	9	
EM2	Development of employment land for other uses	.	?	?	.	✓	.	.	.	?	.	.	?	.	.	.	.	2	
EM3	Rural employment development	.	.	.	.	.	.	.	.	?	✓	.	.	.	✓	✓	✓	8	
EM4	Tourism development in Cumbria	.	✓	.	✓	✓	.	.	.	.	×	.	.	.	✓	✓	✓	10	7

Policy Ref	Policy	Social Progress Criteria						Environmental Protection Criteria			Natural Resources Criteria				Economic Growth Criteria			Total	Ave.
		SP1 - Participation	SP2 - Accessibility	SP3 - Housing	SP4 - Education, Skills & Training	SP5 - Health	SP6 - Culture & Traditions	EN1 - Biodiversity	EN2 - Landscape Character	EN3 - Built Environment	NR1 - Air	NR2 - Water	NR3 - Land & Soil	NR4 - Minerals & Energy Sources	EG1 - Employment	EG2 - Accessibility to jobs	EG3 - Wealth Creation		
H1	Housing renewal	.	.	✓✓	✓	✓	✓	✓	✓	✓	✓	.	✓	✓	✓	✓	✓	29	
H2	Scale of housing provision	?	?	✓✓	?	✓	.	.	?	.	×	.	×	×	✓	?	✓	5	
H3	Targets for the recycling of land and buildings	.	.	.	.	.	.	?	.	✓	✓	.	✓	✓	.	.	.	8	
H4	Affordable housing	.	.	✓✓	.	✓	.	.	.	.	.	.	?	?	.	.	.	7	
H5	Local and affordable housing in the Lake District National Park	.	✓	✓✓	.	✓	?	.	?	?	.	.	.	×	?	.	.	7	
H6	Allocation of exception sites within the Lake District National Park for affordable housing	.	✓	✓✓	.	✓	?	.	?	.	.	.	.	×	.	?	.	7	11
T1	The Strategic Transport Networks	.	✓	.	.	.	.	.	.	.	.	.	.	.	.	?	.	2	
T2	New road building	.	✓	.	.	?	.	?	?	?	×	×	×	×	.	.	?	-6	
T3	Ports and airports facilities	.	?	.	.	.	.	×	.	.	?	.	?	.	✓	?	✓	2	
T4	Public passenger transport	.	✓	.	✓	✓	.	✓	✓	✓	✓	?	✓	✓	✓	?	✓	22	
T5	Rail freight	.	.	.	.	✓	.	?	✓	.	✓	✓	?	.	?	?	✓	10	
T6	Safeguarding	.	✓	.	.	✓	.	?	?	?	?	.	✓	.	.	✓	.	8	
T7	Transport assessments	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	0	
T8	Travel plans	.	✓	.	.	✓	.	?	✓	✓✓	✓	.	.	.	.	.	✓	15	
T9	Access to town centres	.	✓	.	.	✓	.	.	✓	✓✓	✓	✓	.	.	.	✓	✓	19	
T10	Mobility within town centres	.	✓	.	.	✓	.	.	.	✓	✓	✓	.	.	.	✓	✓	14	
T11	Car parking standards	.	✓	.	.	.	.	×	×	×	×	.	.	×	.	✓	✓✓	-1	
T12	Telecommunications	.	✓	.	.	.	.	.	×	.	.	.	.	.	✓	✓	✓	6	8

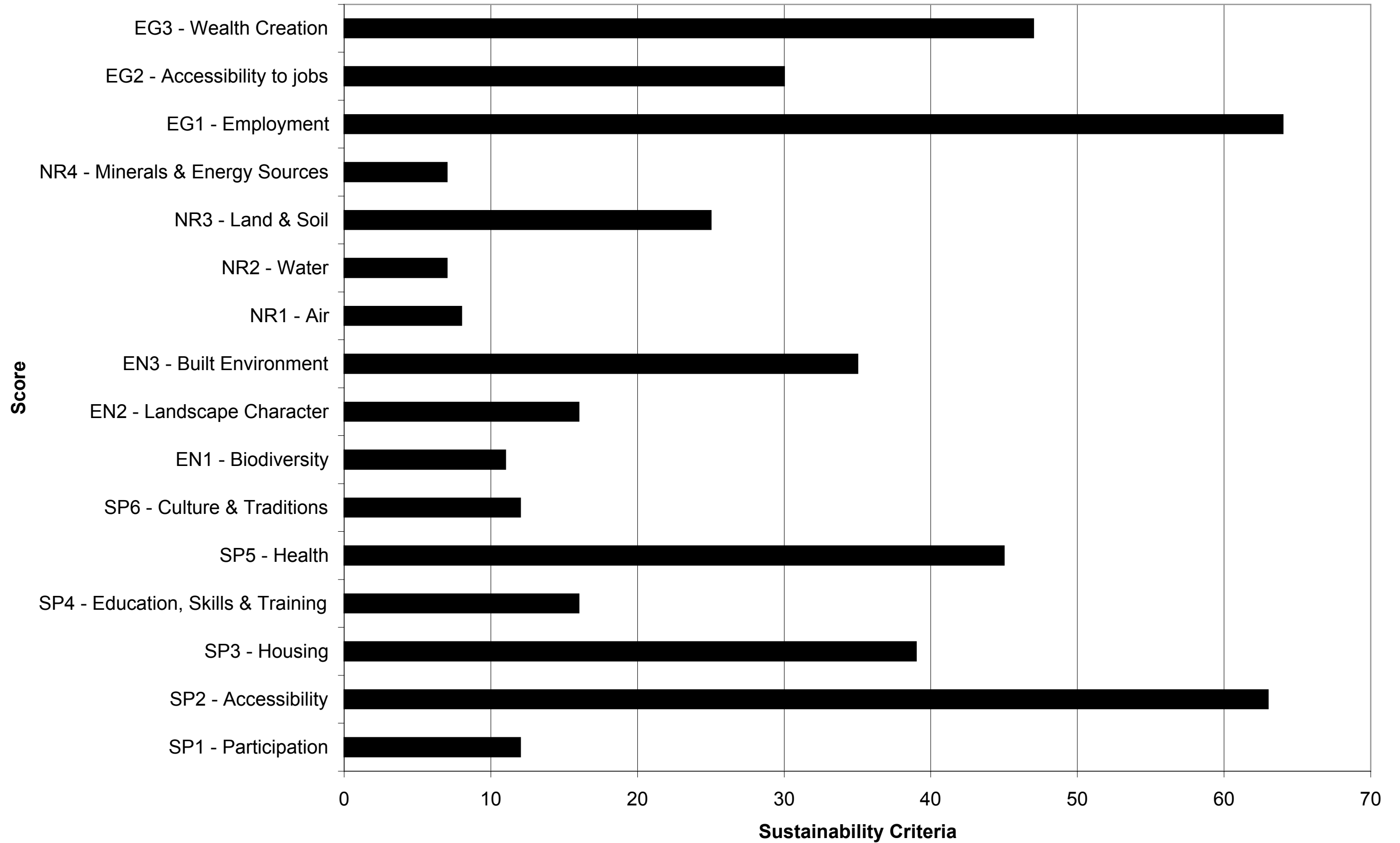
Policy Ref	Policy	Social Progress Criteria						Environmental Protection Criteria			Natural Resources Criteria				Economic Growth Criteria			Total	Ave.
		SP1 - Participation	SP2 - Accessibility	SP3 - Housing	SP4 - Education, Skills & Training	SP5 - Health	SP6 - Culture & Traditions	EN1 - Biodiversity	EN2 - Landscape Character	EN3 - Built Environment	NR1 - Air	NR2 - Water	NR3 - Land & Soil	NR4 - Minerals & Energy Sources	EG1 - Employment	EG2 - Accessibility to jobs	EG3 - Wealth Creation		
E1	Area and features of national and international conservation importance	.	?	.	.	✓	.	✓✓	✓✓	✓✓	.	✓✓	✓	.	✓	.	?	26	
E2	Sub-regional nature conservation interests	.	.	.	.	✓	.	✓	✓	✓	?	✓	✓	?	✓	?	.	14	
E3	Landscape character	✓	.	.	.	✓	?	✓	?	✓	.	?	✓	?	.	.	.	10	
E4	Historic environment	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	0	
E5	Woodlands	.	?	.	✓	✓	?	?	?	.	✓	?	?	✓	✓	.	✓	12	
E6	Environmental enhancement	✓	✓	.	✓	✓	?	✓	✓	?	?	.	✓	.	✓	✓	.	18	13
C1	Development on the coast	.	.	.	.	.	.	×	×	.	.	.	.	.	.	.	.	-4	
C2	Coastal defence	.	.	.	.	✓	.	✓	✓	.	.	.	.	.	.	.	.	6	1
R1	Areas of search for renewable energy	.	.	.	.	×	.	.	.	.	.	.	✓	.	✓	.	✓	4	
R2	Wind energy proposals	.	.	.	.	✓	.	.	×	.	✓	.	✓	✓	✓	.	✓	10	
R3	Biomass, energy from waste and anaerobic digestion	.	.	.	.	×	.	×	.	.	×	.	×	✓	.	✓	.	-4	
R4	Renewable energy in the National Park and AONB's	.	.	.	.	.	.	.	✓	.	.	.	✓	×	✓	.	✓	6	
R5	Mineral extraction outside the National Park and AONB's	.	.	.	✓	.	.	×	×	✓	×	×	×	×	✓	.	.	-6	
R6	Mineral extraction in the Lake District National Park and AONB's	.	.	.	✓	.	✓	×	.	✓	×	.	×	.	✓	.	.	2	
R7	Waste facilities in Cumbria	.	.	.	.	✓	.	.	.	.	.	.	×	.	✓	.	✓	4	
R8	Residual waste and landfill	.	.	.	.	✓	.	×	×	.	×	×	×	✓	.	.	.	-6	1

Policy Ref	Policy	Social Progress Criteria						Environmental Protection Criteria			Natural Resources Criteria				Economic Growth Criteria			Total	Ave.
		SP1 - Participation	SP2 - Accessibility	SP3 - Housing	SP4 - Education, Skills & Training	SP5 - Health	SP6 - Culture & Traditions	EN1 - Biodiversity	EN2 - Landscape Character	EN3 - Built Environment	NR1 - Air	NR2 - Water	NR3 - Land & Soil	NR4 - Minerals & Energy Sources	EG1 - Employment	EG2 - Accessibility to jobs	EG3 - Wealth Creation		
L1	Retail, leisure and office development in Cumbria	.	✓✓	.	.	.	.	.	.	X	.	.	.	✓	✓	.	.	7	
L2	Town centres	.	✓	.	.	✓	.	.	.	.	✓	.	✓	.	.	.	.	8	
L3	Local services and facilities	.	✓✓	.	.	✓	.	.	.	.	✓	.	✓	.	✓	.	.	13	
L4	Leisure and recreation spaces	✓	✓✓	.	.	✓	✓	✓	.	✓	.	.	✓	.	.	.	.	17	
L5	Regional Parks	✓	✓✓	.	✓	✓	.	✓✓	✓	✓	✓	.	✓	.	✓	✓	.	28	
L6	Views of strategic importance	.	.	.	.	.	.	.	✓✓	.	.	.	.	.	.	.	.	5	13
<b>TOTAL</b>		<b>12</b>	<b>63</b>	<b>39</b>	<b>16</b>	<b>45</b>	<b>12</b>	<b>11</b>	<b>16</b>	<b>35</b>	<b>8</b>	<b>7</b>	<b>25</b>	<b>7</b>	<b>64</b>	<b>30</b>	<b>47</b>		

# Sustainability Profile of Draft joint Structure Plan Policies



## Scores against each Sustainability Criteria



## **7. Summary of Appraisal Results: Commentary**

- 7.1 There are eight different blocks of policy, each dealing with a different theme. The commentary set out below summarises the findings of the appraisal for each different policy area. The full appraisal results are attached as appendix 1 of this report.

### **Promoting a Sustainable Pattern of Development (Policies S1 – S9)**

- 7.2 There are no major issues with this group of policies but the analysis picked up many points of detail that, if addressed, could significantly add to the Plan's aim of sustainable development. Key to this is the wording of framework policy S1 which in turn sets the tone for the rest of the policies on development and indeed the whole Joint Structure Plan. It was felt that the Policy S1 (and the whole JSP) would benefit from being set within a clear Explanatory Memorandum which set out the JSP's aims of sustainable development, related these goals to Cumbria and made clear the dominance and influence of S1 over other policies throughout the Plan.
- 7.3 Policies S1 and S2 were seen as contributing most to sustainability and Policy S9 the least. Policy S6 was also strong on sustainability within the Lake District National Park (LDNP).
- 7.4 Overall, the analysis questioned the adequacy of the proposed policies S1 – S9 in dealing with air quality and climate change, water resources generally and specifically the 16 major lakes and questioned the lack of a specific policy on nuclear waste.

### **Supporting the Economy (Policies EM 1 – EM 4)**

- 7.5 No comment is made on the quantity of land earmarked as employment land since there is no basis available to gauge whether it represents an oversupply or undersupply. It can be seen from the figures that the supply of development land is skewed towards areas in greatest need of regeneration. The key issue here in sustainability terms is location. Locations become more sustainable the closer they are to public transport routes, areas in which workers live and when no expansion is required to supporting infrastructure.
- 7.6 Overall the sustainability of these policies is reinforced by S1 with its emphasis on previously used land and buildings, proximity to public transport and/or access by foot or bicycle, resource minimisation etc.
- 7.7 EM 1's strengths were seen as employment, accessibility to jobs and wealth creation. The policy made no contribution to social progress and no assessment could be made on the environment or natural resources (these will be site specific) other than assumptions informed by S1. Of the 4 policies in this block, EM 2 was judged to make the least contribution to sustainability largely because its impact was seen as neutral.
- 7.8 Policy EM 4 again scored highly on the economic criteria and to some extent on social progress but had a negative impact on air quality and climate change. EM 4 and EM 3 could be made more sustainable if added protection was given to local biodiversity within the framework of S1, E1 and E2.
- 7.9 The policies were broadly seen as supportive of fostering the social and economic progress of communities within the National Park and it was judged that Policy S6 would ensure that this progress did not detract from the Park's wider purposes.

### **Providing New Housing (Policies H1 – H6)**

- 7.10 Overall the policies on housing were seen as neutral to positive in sustainability terms with few downsides identified. Policy H1 on Housing Renewal was considered the most sustainable policy while potentially Policy H2 on net new housing could be the least sustainable depending on the criteria used. Policy H2 could become more sustainable if some way was found within planning guidance of enabling it to promote energy efficiency in homes and relating new development to public transport, cycleways and footpaths.
- 7.11 Policy H3 was also seen as positive and combines well with Policies H1 and H2 to promote sustainability. The policies also make provision for affordable housing for current and future generations.
- 7.12 The policies generally support the Park's purposes but it was felt that H5 and H6 could relate more to the need to protect local biodiversity.

### **Improving Transport and Communications (Policies T1 – T12)**

- 7.13 It was felt that Policy T1 could contribute more to sustainability if it set the scene for the other 11 transport policies by stating that the long-term aim of the JSP was to bring about a modal shift across the Strategic Transport Network in terms of moving people and freight around.
- 7.14 Overall the block of transport policies support sustainability. Each contributes in some way while specific policies e.g. on public transport, access to town centres and travel plans are likely to induce a major shift towards sustainability in Cumbria. Some policies actively complement others and are expected to work well together e.g. T2, T4 and T8.
- 7.15 Adding a requirement for an Environmental Impact Assessment to accompany any new proposals for roads would strengthen policy T2. It was felt that Policy T11 contained some inconsistencies in parking provision, needed to be modified to include minimum cycle parking and disabled parking standards in new development and ought to make provision for a periodic review of minimum standards as other non car based modes of travel become more common.
- 7.16 By and large the transport policies did not detract from the LDNP's purposes and in many cases will help to foster social and economic progress. However Policy T11 on parking standards does not appear to address parking at the type of venues to be found within the Park e.g. B&B's, guest houses, small hotels and tourist attractions.

### **Caring for the Environment (Policies E1 to E6)**

- 7.17 Overall the policies were judged to protect the environment and encourage prudent use of natural resources. The only policy which was not assessed was E4 which deals with the historic environment. This was because the policy had no clearly stated aims. This made it difficult to interpret.
- 7.18 It was felt that Policies E1 and E2 could be strengthened to give more rigorous protection within planning legislation to Cumbria's unique environmental capital and in particular to UK and Cumbrian Biodiversity Action Plan sites/species. At present local BAP sites/species are not included.
- 7.19 Curiously Policy E5 on woodlands appeared to adopt a regulatory approach to new woodlands. The policy could be more sustainable if it actually encouraged new woodland planting.

- 7.20 Overall, the environment policy group was generally considered to support the LDNP's purposes.

### **Managing Cumbria's Coast (Policies C1 to C2)**

- 7.21 Current national planning guidance states that planning policies should not make provision for development on the coast, particularly in the undeveloped coast, adding that few developments actually require a coastal location. Draft Policy C1 could be made more sustainable by cross-referencing with Policies E1 (sites of national and international conservation importance) and E2 (Cumbrian nature conservation interests) and stressing the aim of the JSP to protect designated sites.
- 7.22 Policy C2 on coastal defence seems designed to support the direction of development away from the coast and as such indirectly supports natural coastal regeneration.
- 7.23 The current wording of Policy C1 may conflict with the LDNP's purposes but if it is amended to reflect current planning guidance, then neither policy will conflict with the Park's purposes. Policy C2 with its support for natural coastal rather than man-made coastal defences already fits well with the Park's purposes.

### **Utilising Resources (Policies R1 to R8)**

- 7.24 Renewable energy is one of the fundamental building blocks of a sustainable society and Policy R1 acknowledges this by identifying 'opportunities maps' for different types of renewables. This aims to steer renewable energy development towards designated areas of search to protect landscape and scenery. The policy would become more sustainable if it identified environmental constraints i.e. designated areas and reinforced the policy by invoking Policies E1 and E2 to give the highest level of protection to these areas.
- 7.25 Policy R2 (wind energy proposals) needs to be amended to provide a consistent degree of protection to environmental assets possibly by linking to E1 and E2 which should also include protection for local BAP sites/species.
- 7.26 Policy R3 tries to deal with too many issues and does none satisfactorily. It needs to be split into 3 separate policies covering biomass, energy from waste and anaerobic digestion. A separate policy is also being developed for landfill gas. Some thought needs to be given to the type of evaluation envisaged which would enable two different factors to be weighed against each other and the policy clarified accordingly.
- 7.27 While most of the policies on renewables either have no impact or limited impact on the Park, it is not clear how R1 and R2 would operate within the Park as they appear to conflict with each other.
- 7.28 Policy R5 needs to be qualified by excluding mineral extraction from within designated areas including Local BAP sites, marine environments, beaches and inland water courses.
- 7.29 R6 deals with mineral extraction within the Park and within Areas of Outstanding Beauty. It should require a full Environmental Impact Assessment. The constraint relating to landscape is too narrow and should be expanded to include local communities and biodiversity.
- 7.30 R7 sets the scene for an expansion of recycling facilities for household waste. The Explanatory Memorandum should outline Government policy and explain the waste hierarchy. The policy is weak on environmental and social impact minimisation,

particularly in relation to further landfill and energy from waste. Some test needs to be developed which prevents landfill and energy from waste being seen as alternatives to waste minimisation, re-use and recycling.

- 7.31 Overall the policies have little or no direct effect on the Park due to exclusion clauses or other provisos which minimise impact.

**Contributing to Quality of life (Policies L1 to L6)**

- 7.32 Policies L1 (retail, leisure and office development), L2 (town centres), L3 (local services and facilities), and L4 (recreation spaces) are seen as supporting sustainable communities although the criteria used to inform decisions on developing out of town locations need to be made more robust. L5 (regional parks) makes a positive contribution to sustainability.
- 7.33 Again the policies do not appear to contradict the National Park's purposes as most of the key service centres lie outside the Park and other policies would not apply within the Park. By way of an insurance policy, it may be useful to link S6 to L1 possibly through the Explanatory Memorandum.

## **8. The Appraisal Results in Full**

- 8.1 Each policy has been listed and a commentary of the appraisal findings written up under 4 headings:
- social progress;
  - effective protection of the environment;
  - prudent use of natural resources; and
  - maintenance of high and stable levels of economic growth.
- 8.2 The appraisal results are attached as Appendix 1 of this report.
- 8.3 Also included with the commentary of the appraisal findings are: general comments; an assessment of whether the appraisal meets the Lake District National Park's purposes; and recommendations to either make the policy more sustainable and/or to alter it in such a way that it will give greater support to the National Park's purposes.
- 8.4 The appraisal results reflect discussion around:
- what each policy was contributing to sustainability;
  - how each individual policy could be made more sustainable;
  - how individual policies related to their policy block in terms of sustainability – in other words did all the policies in that group support sustainability equally or did some policies act against sustainability and counter-act others;
  - how individual policies related to the plan as a whole and its aim to promote a sustainable pattern of development;
  - how each policy related to the Lake District National Park's purposes.

## **9 Conclusions**

- 9.1 The sustainability appraisal of the Cumbria Joint Structure Plan 2001-2016 Deposit Plan concludes that the majority of policies can be expected to contribute to sustainability. Some draft policies, e.g. S1 which deals with promoting a sustainable pattern of development, and policy S6, which relates to development within the Lake District National Park, are expected to contribute significantly more towards sustainability than many of the other policies. This can be seen at a glance from the Sustainability Profile of the Draft Joint Structure Plan Policies set out on page 8 of this report. Other above average sustainable policies like H1 on housing renewal and L5 on regional parks are also clearly visible.
- 9.2 Within each policy group or block there are a number of policies that consistently score less than the average score for that policy group as a whole. This suggests that these policies should be re-examined to see if any part of the policy could be improved and in so doing increase the policy's contribution to sustainability.
- 9.3 There are 7 policies that attract negative scores and are judged to work against sustainability. These are policies S9, T2, T11, C1, R3, R5, and R8. This is not really surprising since these policies relate to major development proposals, new road building, car parking standards and so on. The same principle applies to these policies. How can the policy as a whole or any part of it be improved to make the policy and the Joint Structure Plan that emerges more sustainable?
- 9.4 It is fairly clear that sustainable development has a long way to go before it is fully integrated into the planning policy process. Some evidence is provided for this view by

the graph which sets out the scores each sustainability criterion collected from all of the policies in the plan. This graph is shown on page 9 of this report. In theory this should show a balanced approach to social, economic and environmental issues. In practice the scores are skewed to economic criteria on wealth creation, employment and access to services, facilities and opportunities. Not far behind in terms of scores are health, housing and the built environment.

- 9.5 Biodiversity, air quality and water quality are at the other end of the scoring spectrum outdistanced by land and soil quality and landscape which scored relatively highly in comparison to the other criteria. This suggests that the policy framework proposed has some way to go before it can claim to equally support social, economic and environmental well-being in Cumbria.
- 9.6 There are many points of detail relating to individual policies set out in Appendix 1 which describes the appraisal results in full. It is not proposed to duplicate these here. If these points are picked up by the policy-makers and the existing draft policies are modified as suggested then the overall contribution of the Plan to sustainability in Cumbria will be significantly improved. Equally there are a number of suggestions for policy modification which would result in a closer integration of policies with the National Park's Purposes.
- 9.7 Finally there is a clear need to review the existing criteria to fully reflect issues like climate change adaptation.

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April 2003

**Appendix 1**



Sustainability Appraisal of the Joint Structure Plan

Date: 19/11/2002

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
S1	Promoting a sustainable pattern of development	Access should include physical access for the mobility challenged and also access to sustainable transport (i.e. public transport links).	Explain 'nature conservation features'. More clarity needed either in the policy wording itself or in the policy context. The policy should seek to avoid loss and damage and where possible seek to enhance important sites listed in E1 and E2. Air quality and water quality (quantity) deserve more emphasis within the S1 policy framework and possibly policies of their own.	Add 'reuse' to 'recycled materials'. Add 'renewable technologies' to complement 'energy efficient design'. Add conservation of water resources. Is the intention to reduce air quality a misprint?	The policy seems unduly silent on economic development and in order for the policy to fully contribute to economic development it should identify and relate more to, for example, employment land, tourism and rural diversification post F&M.	S1 could benefit from being wrapped in a policy context which clearly describes a sustainable society. Another option might be to restructure the policy under the four headings of sustainability and relocate the flood risk element elsewhere within the 'development' section. The reuse of previously used land needs to take account of colonisation and make provision for nature. Should the reuse of contaminated land be mentioned in this policy?	There is nothing within S1 which conflicts with the LDNP purposes and many elements of the policy promote the National Park purposes.	ST1	The Explanatory Memorandum provides the context and is specifically linked to ST1
S2	New development	'A high level of accessibility' is a little vague. Relate more to non-motorised access and physical access for the mobility impaired. 'A continuous supply of new housing' does not sound sustainable.	Within the framework of S1 all new development and site reclamation for development could consider provision for biodiversity, creation of habitats, open space and public access in the plans i.e. improve the environment rather than simply protect it.	Within the framework of policy S1 derelict or unused buildings should be developed before new sites are allocated. All new development should emphasise the reuse and/or recycling of materials. Sustainable construction should be encouraged including: water conservation design and sustainable drainage; renewable and energy efficient technologies steer developments to use local materials where possible.	'Broadband connection' – concern about proliferation of aerials and masts in rural areas and therefore this policy needs to be reinforced by T12. In managing the supply of land within these centres, the policy could perhaps emphasise the use of previously used land.	Clarify 'appropriate scale of development' are there guidelines that Local Planners would follow? Refer to these. Include sub-policy (from S1) on flood plain development here. Development in the flood plain really is not sustainable even with mitigation measures and there ought to be a presumption against new development in flood plain areas.	Given the existence of specific policies on housing within the National Park and the location of employment sites within 'key service centres' there appears to be no conflict between S2 and the National Park purposes.	ST2	Carlisle and Barrow in Furness are identified as key regional towns. The appropriate scale will be influenced by the housing and employment land allocation policies and take account of the local needs set out in the Local Plan
S3	Development to sustain rural communities	The policy could be more sustainable if public transport access is improved and rural communities are actively involved in decision making.	There is a question mark about 'exception to build in the open countryside' - within the framework of S1, is this robust enough?	No additional comments given the framework of S1.	This policy seems designed to support stable levels of economic growth and employment in rural areas.	No additional comments.	Policy S3 would help support the National Park purpose of 'fostering the economic and social well-being of local communities'.	ST3	Policy amended to make explicit that it applies everywhere outside key service centres. Clarification regarding the exception for new building to be located in the open countryside is provided in the EM.
S4	The City of Carlisle	The policy should seek to improve access by public transport, cyclists and pedestrians.	Airports clearly generate adverse environmental impacts and any expansion plans should be subject to a full EIA.	The emphasis within the policy of the refurbishment and redevelopment of existing housing stock together with S1's sub-policy on recycling will reduce demand for and pressure on primary natural resources.	The policy could benefit from making provision for the regeneration of existing run down sites or areas within the city.	'Opportunities will be taken to strengthen links to employment uses' requires clarification.	No direct connection.	ST4	Too detailed . The Policy enables all transport modes to be considered either through the Local Plan or through the Area Transport Plan
S5	Furness and West Cumbria	The policy contributes to local quality of life by seeking to improve community facilities, secure better access to the STN and to restore coastal heritage and link these to tourism and employment opportunities.	Any expansion or upgrading of the STN is likely to have a negative impact on biodiversity and landscape character.	Within the framework of S1 the policy should support recycling of building and building materials but may lead to a reduction in air quality and increased impact on climate change if the improvement to the STN is road based.	The policy is designed to rejuvenate and help sustain the local economy by focusing on employment, accessibility to jobs, broadening the economic base, improving communications and to some extent wealth creation.	The emphasis of this policy seems to be on social and economic regeneration and inevitably this will be at the expense of the environment. To help redress this, this policy needs to be firmly placed within the framework policy S1. 'Coastal renaissance' - suggest recast this phrase.	There is a possibility that the upgrading of the STN may conflict with the National Park's purposes in terms of conserving natural beauty and wildlife.	ST6	All development requires to address Policy ST1. Coastal Renaissance is the accepted NWDA phrase relating to the area

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
S6	Lake District National Park	This policy is environment led but makes provision for social progress in terms of affordable housing, social cohesion and well-being and improved transport opportunities.	The policy seeks to provide the 'highest level of protection' to biodiversity and landscape. It is not clear from the wording of the policy to what extent the built environment and the character of the built environment is covered by 'cultural heritage' and afforded the same level of protection.	The policy will help improve local air quality and contribute to a reduction in climate change impact by encouraging a shift from car use to other transport options. The existence of 16 lakes within the National Park boundary strongly suggests the need for a specific policy on protection of the water environment.	The policy provides some limited support for employment in the rural environment and promotes diversification of the local economy.	'Reducing the adverse impacts of car use' seems a task more suited for the motor manufacturer. Suggest this is reworded to reflect a reduction in the frequency of car use.	The opening paragraph of the policy restates the national Park's purposes. The policy appears not to contribute to the LDNP purpose to 'promote opportunities of understanding and enjoyment of the special qualities of the National Park by the public'. The remaining elements of the policy contribute to 'fostering the economic and social well being of local communities'.	ST8	<i>Policy amended to include protection of character of land identified on Section 3 Conservation Map, lakes and shores, quieter areas and other sensitive areas. Further clarification provided in Explanatory Memorandum. No change considered necessary to the phrase 'reducing the adverse impacts of car use' in the context it is used within the policy.</i>
S7	North Cumbria	In terms of social progress, this policy has minimal impact. The policy could be made more sustainable if it sought to improve local services and access to local services.	The policy does not address biodiversity or landscape issues directly but is, of course, governed by policy S1 which does. The main impact of the policy will focus on the built environment in small market towns in North Cumbria and again the policy fails to address issues relating to conservation and vernacular architecture. Does the framework provided by S1 adequately deal with these issues?	It is difficult to predict whether concentration of services within key service centres will improve or worsen air quality and therefore the impact on climate change is equally imprecise. The policy appears to support development on brownfield sites and the retention of green fields.	The policy will support employment and widen the range of employment opportunities within key service centres.	In broad terms the policy's contribution to sustainability could be improved if it met more of the social progress criteria, focused more on the built environment and widened its contribution to economic growth and employment. Given the small area covered by this policy it is felt the policy could be tailored more closely to the three market towns involved.	No direct connection.	ST5	<i>Policy unchanged.</i>
S8	South and East Cumbria	In terms of social progress, the policy's only contribution to sustainability is through affordable housing. The policy could be made more sustainable if it sought to improve rather than simply sustain the economic and service needs of rural areas.	Concentration of services in key service centres may lead to an increase in car transport with associated environmental disbenefits unless other, more sustainable, means of transport are provided.	It is difficult to predict whether concentration of services within key service centres will improve or worsen air quality and therefore the impact on climate change is equally imprecise. The policy appears to support development on brownfield sites and the retention of green fields.	The economic and service needs of rural areas will be sustained. The policy as currently drafted does not appear to contribute significantly to economic growth or employment.	The bulk of this policy relates to housing, particularly affordable housing, and has little to say in broader terms about South and East Cumbria.	In a limited way (affordable housing) this policy supports the economic and social well being of local communities within the National Park. The policy does not address conservation or public education issues.	ST7	<i>The policy addresses the key development issues within the area. No action required</i>
S9	Major development proposals	This policy makes little or no contribution to social progress, and indeed may work against it by limiting community participation to the post-planning decision stage. The policy also seems to accept in a matter of fact way that there will be quality of life disbenefits to local communities from major developments.	Because the nature of the development is unknown it is impossible to assess the impact on the environment. However, policy S9 assumes the environmental impact will be detrimental. All major development proposals should therefore be subject to EIA and full implementation of all mitigation measures.	Unable to predict given the universal application of the policy.	It is assumed that a major development will generate local jobs but it cannot be assumed that these will be located in areas of greatest need. The policy does not address accessibility to jobs or wealth creation.	The policy could be made more sustainable by setting some ground rules on calculating the true impact of the proposal by including the cost of environmental and social externalities. The 'definition' of a major development seems confusing and could stand clarification. Do we need a separate policy on nuclear waste?	The policy does not contribute to any of the National Park purposes.	ST9	<i>Definition revised. Criteria reworded to include total detrimental effects</i>

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EM1	<b>Employment land provision</b>	This policy has no direct impact on social progress as defined although the potential exists to assist with regeneration which will lead to a quality of life improvement.	The impact on the environment cannot be determined until site(s) are identified in the Local Plan and are subject to an EIA.	The impact on natural resources is location dependent. For example, if the site is located near or within existing settlements or on a public transport corridor then it will reduce travel distances and the number of trips with consequent benefits to air quality and reduced impact on climate change. Equally the location will be more sustainable if it fits within existing infrastructure rather than expanding the infrastructure network and consuming natural resources to do so. Location can also have critical impact on water resources particularly in Allerdale.	The provision of a steady supply of employment land to support diverse uses will help sustain and regenerate the local economy. Accessibility to jobs largely depends on site location and relationship to the STN. The closer the proximity the more sustainable the location. The policy should assist wealth creation by attracting inward investment. Site provision seems skewed towards the Carlisle and West Coast areas. In this sense development or employment land provision is being made in the areas of greatest need.	Provided this policy sits within the framework governed by S1 then it will contribute to sustainability through the reuse of existing buildings and previously used land. In sustainability terms the policy seems limited since it simply aims to provide land for employment purposes across the County. The policy could be made more sustainable by linking the proposed sites to the public transport network and to areas where potential workforces are resident.	It is assumed that the provision of local employment sites within the National Park area will help foster economic well being and that the wider aims of the National Park will be secured by policy S6 operating in tandem with this policy.	EM10	<i>All development is subject to Policy ST1. The employment land definitions include reference to key service centres and the public transport network, thus giving emphasis to accessibility.</i>
EM2	<b>Development of employment land for other uses</b>	This policy is only likely to contribute to social progress in a limited way possibly by freeing up sites for redevelopment which leads to an improvement in local quality of life.	The policy does not specifically address environmental issues.	The policy has the potential to promote sustainability through the development of brownfield sites. Sub-clauses iv and v suggest sustainable transport access but the wording falls short of expressing this clearly.	The likely impact of this policy on the economy and employment can only be assessed on a site specific basis.	No additional comments.	The policy does not conflict with the Park ancillary purpose of fostering the social and economic well being of local communities.	EM11	<i>The policy addresses a key development issue within the area and promotes the efficient and effective use of land. Minor wording changes have improved the clarity of the policy. No further action required.</i>
EM3	<b>Rural employment development</b>	This policy makes no contribution to social progress.	This policy has little or no direct impact on biodiversity and the policy contains sub-clauses which support landscape character and the built environment. The policy's contribution to sustainability could be reinforced by replacing sub-clause ii with the words 'where such developments contain proposals to reduce traffic impact'.	If sub-clause ii is rephrased, this would have a positive impact on air quality and climate change.	Overall the policy will help sustain and increase employment in rural areas, help locate jobs in areas of need and assist in economic diversification in the post F&M environment.	Overall the policy wording seems appropriate to small scale economic developments in rural areas and seems supportive of mixed use development in rural communities.	The policy is supportive of social and economic well being within the National Park area and the effect of the policy wording should help ensure that small scale rural development within the park contributes to the Park's conservation and enhancement purposes.	EM12	<i>The Explanatory Memorandum provides the context and is specifically linked to Policy ST1. To require every proposal for employment development in rural areas to incorporate measures to reduce the impact of traffic is considered unreasonable and inconsistent with Government Planning Policy Guidance. The Strategy of the Structure Plan encourages most employment development in the key service centres that should help to reduce the overall impact of traffic.</i>

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EM4	Tourism development in Cumbria	EM4 makes some contribution to social progress by having regard to the well being of local communities and advocating a raising of the visitor's understanding of Cumbria's unique assets.	The policy would contribute more to sustainability if the first paragraph read 'Cumbria's distinctive scenic, cultural, historic and natural assets'. The level of environmental protection afforded by the policy overall seems weak (particularly on biodiversity) and this could be improved significantly by rephrasing.	The policy needs to address air quality and climate change impacts generated by traffic. It is assumed that policy S1 will govern and influence scale and use of local materials etc.	The policy will support existing employment and lead to a wider range of employment opportunities and create opportunities for entrepreneurship and wealth creation.		The policy will help to contribute to the economic and social well being of local communities in the National Park and will help raise awareness among tourist of Cumbria's unique qualities. If the recommendation to include biodiversity is accepted this will help the policy meet the Park's principle aim of conservation and enhancement of wildlife etc.	EM13	<i>The Structure Plan gives protection to natural resources, biodiversity and air quality through the Strategy and environment policies. The policy for tourism development should not be read in isolation. Greater recognition has been given in the policy to the importance of designated areas such as the National Park.</i>
H1	Housing renewal	Policy would ensure that quality housing at an affordable price is available in areas with unlettable housing stock, and has the potential to provide construction skills and training to ease tight labour markets. The policy is also expected to improve the local environment and therefore make a positive contribution to quality of life. There are opportunities to involve local communities in discussions on the clearance and rebuild.	The policy of renewal is expected to reduce pressure on biodiversity and landscape character and within the framework of S1 contribute to the character and quality of local built environments.	The potential exists through design to reduce air emissions from housing stock and could further reduce climate change impact by positively linking non car transport to renewal schemes. The policy is also expected to reduce pressure on green fields and encourage reuse and recycling of materials, although this latter point is simply implied and perhaps needs more emphasis.	The policy has the potential to support local construction related businesses and increase the number and type of skilled and professional jobs. It should also ensure housing is relocated in areas of greatest need and has the potential to improve the environmental performance of local construction companies and encourage local innovation.	Overall this is a positive policy which should make a significant contribution to sustainable settlements in Cumbria. The policy could be made more sustainable by linking housing renewal to public transport, with provision for cyclists and pedestrians.	The policy does not conflict with the National Park's purposes and although it is expected to have limited large scale application within the Park, the policy's principal aims are well related to fostering the well being of local communities.	H20	<i>Policy unchanged. It should be read alongside other policies which promote reuse of buildings, energy efficient design and integration with public transport and provision for cycling and walking.</i>
H2	Scale of housing provision	As with all policies in the JSP, the plan making process is open to public participation in a limited way. The relationship of new housing development to existing services will however need to be addressed through local development frameworks and the policy could be strengthened to emphasise this. The link with policy H4 should ensure that a proportion of all new housing is affordable across the County now and in the future. Publication of the build rate requirements may also encourage investment in skills training.	Within the policy framework set by S1, major impacts on the environment and landscape should be avoided, and any new developments should fit well with the existing built environment.	Net new housing provision inevitably puts pressure on natural resources through: increased energy use, additional car journeys, increased demand for construction materials and pressure on previously undeveloped land and water resources. There is a need to emphasise the need for sustainable construction techniques and technologies as well as sustainable transport, perhaps by making the links with policy S1 (and its guiding principles) explicit in the policy context relating to H2.	Policy H2 has the potential to boost local employment opportunities and help develop and retain skilled workers while generating wealth creation opportunities for both local and external (to Cumbria) companies.	Net new housing provision and its related impacts has the potential to work against sustainable communities over the length of the JSP, however the provisions of policy S1 and H4 will go some way to mitigating these. The contribution of the policy to sustainability could be increased by making specific provision to tackle energy use in homes and to offset or reduce additional car trips likely to be generated. The policy could also be strengthened by giving priority to policy H1.	On the basis of the text supplied, it is assumed that the policy does not apply to the LDNP (this needs to be explored before finalising this statement).	H14	<i>Unchanged although slight amendment of numbers to reflect discussion with stakeholders. Link to Policy S1 (now ST1) not needed as sufficient emphasis given within Policy S1 that it applies to all new development. Cross reference in the Explanatory Memorandum to other policies within the strategy more relevant and link also made to affordable housing. A zero requirement has been set for the LDNPA to protect its environment .</i>
H3	Targets for the recycling of land and buildings	Policy H3 aims to meet national targets for the reuse of brownfield sites. As such it has no direct social impact although the accumulative redevelopment of brownfield sites should improve the urban landscape and therefore contribute to quality of life. There are opportunities to involve local communities in redevelopment proposals.	The policy may adversely impact on biodiversity depending on the degree to which individual sites have been reclaimed by nature. Landscape character is unlikely to be affected although the local built environment will benefit from regeneration.	The policy will result in reductions of greenhouse gas emissions by reducing the amount of energy used to extract and process minerals. The policy will also contribute to urban renewal and reduce green field land demand.	The policy will have no direct impact on employment or the economy.	The policy makes an important contribution to sustainability by reducing demand for land, minerals and energy and provides a focus for policies S1 and H1.	While the policy clearly applies to the LDNP, no specific target has been set for the Park as an administrative area. It is recommended that the way the policy will be applied to the Park is detailed in the policy context and commentary.	H15	<i>Policy unchanged, although targets amended to reflect changes in RPG. Targets not appropriate for the LDNPA as it has a zero housing requirement.</i>

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H4	Affordable housing	Policy H4 will ensure that a proportion of all new housing is affordable and as such makes an important contribution to equity, one of the keystones of a sustainable society.	The policy may lead to green field land development but given the dominance of policy S1 is not expected to significantly impact on biodiversity or landscape character.	The policy also makes a provision for future generations, an important aspect of sustainability.	No additional comments.		The policy will help to foster well being of local communities in the LDNP.	H16	<i>Retitling of policy makes it explicit that it does not apply to the LDNPA. The LDNPA is covered by Policies H5 and H6 (now Policies H17 to H19)</i>
H5	Local and affordable housing in the Lake District National Park	This policy aims to provide affordable housing for local people where there is need and as such can be expected to contribute to the quality of life to low income households. The policy could also promote social cohesion by allowing individuals to live and work in their local neighbourhood.	The policy is silent on biodiversity and weak on landscape and built environment. It may be that policy S1 and S6 provide adequate safeguards but it is felt that repetition or cross-referencing here would strengthen the policy in terms of environmental protection.	The policy is not designed to influence any of these factors directly but inevitably all new construction, including housing, has a varying impact on natural resources. Policy S1 should help mitigate this.	The policy may help maintain local employment levels indirectly but it is not thought likely to have any other bearing on economic growth and employment.	We feel the policy would benefit from a clarification of the wording of the first bullet point which tries to marry two different things and ends up dealing with neither satisfactorily. The issues to be addressed are scale and type and meeting local needs. The policy needs strengthening to tie in affordable social housing to occupation by local people in perpetuity.	The policy will contribute to the economic and social well being of local communities within the Park but it may not adequately contribute to the Park's environmental conservation and enhancement purposes.	H17	<i>Some policy rewording for improved clarity including more explicit link between local occupancy and social housing</i>
								H18 New Policy	<i>Deals explicitly with allocation of sites for social housing</i>
H6	Allocation of exception sites within the Lake District National Park for affordable housing	This policy aims to provide affordable housing for local people where there is need and as such can be expected to contribute to the quality of life to low income households. The policy could also promote social cohesion by allowing individuals to live and work in their local communities.	The policy is silent on biodiversity and weak on landscape and built environment. It may be that policy S1 and S6 provide adequate safeguards but it is felt that repetition or cross-referencing here would strengthen the policy in terms of environmental protection.	The policy is not designed to influence any of these factors directly but inevitably all new construction, including housing, has a varying impact on natural resources. Policy S1 should help mitigate this.	The policy may help maintain local employment levels indirectly but it is not thought likely to have any other bearing on economic growth and employment.	The need for two separate policies (H5 & H6) is not understood. Greater clarity would result if both policies were combined and specific reference made to National Park issues such as scale, setting and relationship to landscape.	Although the policy is designed to foster social well being of local communities, the policy does not specifically address the conservation purposes of the Park. Policies S1 and S6 may cover this but it is felt that conservation issues should be more fully addressed within the policy itself.	H19	<i>Some policy rewording for improved clarity but reference to allocation of sites removed into separate policy above.</i>
T1	The Strategic Transport Networks	The policy has the potential to <b>maintain</b> (but has not extended the network's contribution to sustainability) accessibility to services and maintain safe living environments.	The policy is judged to be environmentally neutral as currently worded with both the potential for adverse impacts in the future as well as mitigating these through the promotion of cycling and walking networks.	No immediate impact but with the potential to increase or decrease the impact depending on modal choices made.	No immediate impact.	The policy could make a greater contribution to sustainability if it were to set the scene for the rest of the transport policies by stating that the long term aim of the JSP is to encourage a modal shift across the STN from HGV to rail, from car to train/bus, bike or feet and that this will be done by locating jobs, premises and homes appropriately.	By and large the STN skirts the LDNP and therefore the policy will not detract from the park's purposes.	T21	<i>Unchanged as the policy is about the effectiveness of the Strategic Transport Network. Policy ST1 criteria 2, 8 and 10 address the issues of location and design of development.</i>
T2	New road building	This policy of restraint limiting new road building/upgrading through traffic/road safety situations has the potential to improve quality of life in certain localities.	The policy of restraint will not detract from biodiversity or landscape character and greater protection could be afforded to a number of environmental components by implementing EIA assessments <b>fully</b> rather than simply taking 'practical measures to mitigate the effects' of any new roads.	Extensive new road building would create adverse impacts on air quality, water resources and areas around road verges while increasing demand for other natural resources, for example, and aggregates.	By creating a living and working environment which is not dominated by traffic would help increase the marketability of the County.	If the JSP aims to reduce the frequency and length of motorised journeys then the policy proposal put forward for the LDNP could usefully be extended to cover Cumbria. There is real concern that the policy approach of measured restraint can be undermined by the loose wording 'can be justified within the overall approach to the future network'. This has all the hallmarks of a 'get out' clause.	Policy T2 with some minor changes would support the LDNP's purposes.	T22	<i>Policy remains unchanged although the explanation of criterion 3 has been amplified. The element of the policy covering the LDNP also applies to AONBs. Design aspects are covered by Policy ST1.</i>

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T3	Ports and airports facilities	No immediate impact on these criteria. Clearly the airport has the potential to generate adverse social impacts (noise, light pollution, fumes, transport etc.).	The policy may adversely affect biodiversity depending on the quality and degree of colonisation of individual sites. Port expansion and increased trafficking of bulk materials is likely to produce localised environmental gains by reducing road transport and its associated impacts. Airports clearly generate adverse environmental impacts and any expansion plans should be subject to a full EIA.	No immediate impact.	Potential for new employment exists through expansion of ports and airports with the added benefit of increased access to markets outside Cumbria and vice versa.		All existing ports and Carlisle airfield are outside the LDNP area and therefore the policy does not detract from the LDNP's purposes and may indeed help reduce through traffic on the A66/A591.	T23	No action required
T4	Public passenger transport	The policy should result in a range of social benefits in terms of access, skills retention and improved quality of life.	The policy should result in a range of environmental benefits by reducing pressure on biodiversity, landscape and the built environment with associated air quality gains and reduced climate change impact.	The policy should reduce demand for oil, aggregates and greenfield sites.	The policy is seen as being supportive of job retention, wealth generation and conducive to entrepreneurship.	The policy fits well with policy T2 and to achieve its aims needs to be consistently applied along with policy T2. It is difficult to see how the policy could be made more sustainable since reliability, frequency and affordability are not landuse issues.	The policy fully supports the LDNP purposes.	T24	No action required.
T5	Rail freight	The policy has the potential to improve quality of life in local areas by reducing HGV traffic.	The policy has the potential to reduce the visual impact of road traffic moving through the landscape.	Air quality and climate change gains are likely to result from this policy with possible benefits resulting from reduced HGV traffic on water resources and verges.	The policy may affect employment levels amongst local road haulage contractors but equally has the potential to increase the attractiveness of the area to outside investors by improving the efficiency of freight movement.		In broad terms, policy T5 is supportive and consistent with LDNP purposes.	T25	No action required. This policy is seen as being important in reducing freight movement by road, a key aspect of sustainability, and will be implemented through Transport Assessments
T6	Safeguarding	The policy has the potential to improve access and quality of life by contributing to a modal shift in the longer term. In the short term the policy could provide recreation, local amenity value and use as cycle networks, bridleways and footpaths.	Short term environmental gains in terms of biodiversity and landscape although reuse as a transport route may result in loss of biodiversity.	Mixed impacts but generally positive rather than negative.	Some addition to access links through use as cyclepaths and footpaths.	In terms of sustainability the policy is geared to retaining options for future public transport services. It is difficult to see how the policy could be made more sustainable other than temporary use as cycle routes.	Policy T5 fits well with the LDNP purposes but could benefit from a greater focus on recreational uses.	T26	No action required. The use of disused railway lines for footpath and cycle routes whether permanent or temporary would be in accord with this policy.
T7	Transport assessments	No immediate impact.	No immediate impact.	No immediate impact.	No immediate impact.	Traffic assessments themselves have no direct impact on sustainability but provide a range of baseline data on likely traffic flows generated by the development and as such are an essential. If limited, mechanism necessary for planning a sustainable society. The policy could be made more sustainable by widening or adding to the appraisal method to allow for a full consideration of the impact of the proposal in sustainability terms (NATA)	The policy broadly fits with the LDNP's purposes although the LDNP may wish to reconsider the relevant threshold sizes.	T27	Transport Assessments can assist with sustainability objectives. The scope of TAs will be subject to guidance in the near future and undoubtedly will reflect the emphasis on modal shift already contained within PPG 13
T8	Travel plans	Access and health benefits with cumulative quality of life benefits	Marginal benefits with more prominent benefits to be gained in the built environment.	Localised air quality benefits with reduced climate change input.	Reduced traffic flows generated by more regular public transport services and car sharing may help ease recruitment and retention difficulties experienced by local employers and help increase the attractiveness of the locality as a living and working environment.	T8 is a positive policy which should help steer Cumbria towards sustainability. Its contribution to sustainability could be increased if the development threshold to which traffic plans is applied is progressively reduced.	The policy does not detract from the National Park's purposes.	T28	No change. However the LTP places considerable emphasis on the development of travel plans as a key tool in reducing the inefficient use of the private car and encouraging the use of other modes.

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T9	Access to town centres	Access and health benefits with cumulative quality of life benefits	Marginal benefits with more prominent benefits to be gained in the built environment.	Localised air quality benefits with reduced climate change input. Reduced pollution to water resources from road transport.	Improved access to jobs and probable support for the local economy.	Taken with other transport policies, for example, T8 on travel plans and T4 on public passenger transport the transport policies overall are meshing and moving together towards sustainability.	The policy does not conflict with LDNP purposes and supports these positively in terms of well-being, quality of life, health and built environment.	now L49	<i>Policy changed. Now included as town centre policy to encourage an integrated approach</i>
T10	Mobility within town centres	Access, safety and health benefits with cumulative quality of life benefits as well as promoting inclusiveness.	Improved (non-motorised) mobility within the built environment should increase the attractiveness and usability of the built environment and may possibly reduce isolated 'islands'.	Localised air quality benefits with reduced climate change input. Reduced pollution to water resources from road transport.	Improved access to jobs and probable support for the local economy.	Policy could perhaps be made more sustainable by dropping its apparently neutral approach to car mobility and perhaps favouring pedestrianisation.	Again no conflict with LDNP purposes plus a range of quality of life and well-being benefits that will contribute positively to the Park's purposes.	now L49	<i>Policy integrated with the policy on access to town centres. The policy sets out a clear hierarchy with pedestrians at the top</i>
T11	Car parking standards	While the provision of parking spaces contributes to accessibility it does so in a way that conflicts with sustainability.	The encouragement of access by car would adversely affect the environment.	Air quality and climate change disbenefits associated with vehicle use. Long term maintenance impact on aggregates.	Access to goods and services is essential to maintain the sustainability of the local economy.	Any policy which makes provision for car parking is in conflict with sustainability. This policy could be made more sustainable by including a provision for a regular review and reduction of parking spaces as alternative means of access are developed. In the short term the policy can be made more sustainable by setting minimum standards for cycle parking and disabled parking in new developments.	This policy appears to conflict with the purposes of the National Park and does not address parking at the type of venues more likely to be found in the LDNP (e.g. B&B's, guest houses and tourist attractions).	T29	<i>No change. The provision of car parking of itself does not conflict with sustainability as it could enable social and economic benefits. The Explanatory Memorandum refers to minimum standards for cycling and disabled parking to be contained in the detailed guidance.</i>
T12	Telecommunications	The policy seeks to promote social inclusion through the provision of effective communications. However, the erection mast and/or pylons may have adverse health (unproven) and visual impacts locally.	Any new telecommunications infrastructure would have an adverse landscape impact.	No apparent effect.	Improved communications will have positive effect on the local economy and encourage entrepreneurship and skills retention in the County. Improved communications and faster internet connection speeds would increase the attractiveness of the area to future investors large and small.	In landscape terms the policy could be made more sustainable by extending its application to include the need for electricity pylons.	While the communication benefits support the LDNP purpose of 'fostering the economic and social well-being of local communities' the associated landscape impact of undisguised masts would detract from the Parks duty to enhance natural beauty.	T30	<i>No policy change as electricity pylons are not considered to be part of telecommunications. New lines of electricity pylons would be considered under Policy ST9.</i>
E1	Areas and features of national and international conservation importance	Few benefits other than broad quality of life benefits with public access to a range of environmental assets.	Significant benefits in terms of landscape, biodiversity, the historic built environment and geological and geomorphological sites.	Positive benefits in terms of the running and standing water environments. Policy will also have other benefits in terms of rare habitats, for example, peat bogs. Potential for air quality deterioration from large scale influx of visitors.	Some economic benefits in terms of the overall attractiveness of the area and scope for small-scale tourism initiatives and employment.	The wording of policy E1B is not clear. Overall the policy needs to be strengthened to protect the environmental capital that originally led to the designation by prohibiting anything other than small-scale sympathetic local development within these areas. The text 'over riding public interest' weakens the policy. The policy needs to be reworded to give rigorous protection to an exceptional area within current planning legislation.	The policy generally fits well with LDNP purposes and this fit could be improved if the policy was strengthened to reduce the proposed exceptions.	E31	<i>Policy amended to give greater clarity. Policy strengthened by amending criterion 1 of policy to restrict exceptional development to that where there is an over-riding need for development required to meet local infrastructure needs. Explanatory Memorandum gives further clarification.</i>

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E2	<b>Sub-regional nature conservation interests</b>	Few benefits other than broad quality of life benefits with public access to a range of environmental assets.	The policy affords some protection to biodiversity, habitats and landscape features.	The policy has the potential to produce a range of benefits across the range of natural resource components depending on how the policy is implemented.	Some economic benefits in terms of the overall attractiveness of the area and scope for small-scale tourism initiatives and employment.	The environment is one of Cumbria's key assets which in turn contributes a large proportion of UK designated sites. The importance of this does not seem to be recognised in the policy wording. UK BAP sites/species deserve a higher level of protection that this policy sets out to provide. The Cumbria BAP habitats/species should also be included as a bullet point. Local policy protection needs to be strengthened to make up for the lack of statutory protection. The policy needs to recognise the importance of wildlife corridors and routes for potential migration.	The policy appears to support many aspects of the LDNP's work. Whether the policy is strong enough to meet the park's purposes is doubtful.	E32	<i>Policy E31 covers nature conservation interests of international and national importance. This policy addresses sub-regional interests. The fourth criterion has been re-worded to broaden the scope for protection of species of conservation importance that occur in Cumbria. Policy does provide protection to landscape features of major importance for wild fauna and flora, which are essential for migration dispersal and genetic exchange.</i>
E3	<b>Landscape character</b>	Establishing ground rules on how development relates to its surroundings will enable the public to participate more fully in the planning process and will make the reason for decisions more transparent. The policy should also provide local quality of life improvement and support traditional styles of building.	The policy will result in positive local benefits in the built environment and lead to local biodiversity gains and conservation of local landscape quality and character	The policy should increase demand for local materials, may increase the uptake of brownfield sites by restricting open space development.	No apparent impact	The policy is a positive one which will help the local development framework contribute to sustainability by taking the 'jarring' out of the planning decision process and relate day to day planning more closely to landscape and biodiversity. The policy should define local infrastructure needs more clearly and relate these to transport policies.	The policy is fully supportive of National Park purposes on cultural heritage and special qualities of the Park.	E33	<i>Minor wording changes to amend ref to 'Landscape Map' and to include Cumbria Historic Landscape Characterisation Programme. Local infrastructure needs will vary and cannot be closely specified within a broad policy.</i>
E4	<b>Historic environment</b>	Not yet assessed	Not yet assessed	Not yet assessed	Not yet assessed	It was difficult to take any clear meaning from the wording of this policy. The policy needs to be rephrased to indicate precisely what the policy aims are, aims are in terms of protecting and conserving the historic environment.	Not yet assessed	E34	<i>Alternative policy wording developed to clarify and strengthen the aims of the policy.</i>
E5	<b>Woodlands</b>	New woodland planting with public access should provide quality of life benefits and may help preserve local woodcraft skills and traditions.	In broad terms biodiversity gains should be possible without distracting from existing landscape character. Large scale coniferous planting can increase the level of acidification in local rivers and tarns with adverse impacts on biodiversity.	Timber is a renewable resource which can be used to promote local economic activity. Large scale forestry can help reduce the volume of carbon dioxide released into the atmosphere.	New forest planting and subsequent management can help support forestry jobs and through various grant regimes can help improve the viability of local farms.	The policy could be more sustainable if it actually encouraged woodland planting rather than simply treating new woodlands as new development to be regulated. The reason for using the wording 'priority will be given to schemes that' is not clear. The choice of the word 'priority' seems an odd one.	There is nothing in the policy which appears to conflict with the National Park's purposes.	E36	<i>Policy amended to encourage planting as suggested.</i>
E6	<b>Environmental enhancement</b>	This policy touches on most of the themes relating to sustainability under the heading of social progress and should encourage public participation, help re-create community cohesion and a sense of community identity as well as providing benefits in terms of skills, training and employment.	The policy should provide biodiversity gains, in and around urban areas. Localised landscaping of urban areas which helps improve the setting of urban approaches and urban fringe areas.	The policy should encourage the temporary enhancement of redundant sites and contribute to an increase in urban green open space, with possible knock-on benefits for biodiversity.	The policy should enhance local training and employment opportunities and may help to support local businesses as well as increasing the overall attractiveness of the area to potential investors.	Taking this policy forward and implementing it lies outside the land-use planning arena but it is essential that this is delivered through partnership working if sustainability is to be achieved.	The policy fits well with the National Park's purposes although it is anticipated that the scale of enhancement work required will be less than in other parts of Cumbria.	E35	<i>Minor re-wording to include reference to restoration in addition to protecting and enhancing biodiversity, landscape and amenity value.</i>

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
C1	Development on the coast	The policy as currently worded has no impact on social progress and therefore does not contribute significantly to sustainable development or quality of life.	The policy has the potential to permit development which will have an impact on both biodiversity and landscape character. In order to minimise this all development on the undeveloped coast should be subject to EIA to guide decision making.	EIA will pick up any aspects relating to natural resources on a site by site basis.	It is impossible to assess the impact on the economy without site specific information.	In terms of the coastline, development needs to be more precisely defined than at present to distinguish between retirement housing, for example, and large scale industrial development. The policy fails to address issues relating to the local economy, for example, the regeneration of Victorian seaside resorts.	The policy is not strong enough to undermine the National Park's purposes relating to conservation, natural beauty and wildlife.	C37	<i>Intention of policy strengthened by reference to development requiring a coastal location. Explanatory Memorandum makes links with the need for regeneration of coastal communities.</i>
C2	Coastal defence	Generally the policy makes little or no contribution to social progress, although it has the potential to direct property away from dangerous environments.	The hub of the policy to direct development away from areas of risk would also produce significant benefits for biodiversity and landscape character.	The policy will have no direct impact on natural resource stocks.	No direct impact although the policy implies the freeing up of inland sites to compensate organisations forced to move.	The policy seems designed to direct development away from vulnerable coastline locations and as such has an important role to play in securing sustainable development in Cumbria.	Natural coastal regeneration as the basis for coastal defence fits well with the LDNP purposes of conservation.	C38	<i>Some rewording for improved clarity but content unaltered.</i>
R1	Areas of search for renewable energy	No major impacts on social progress other than health in terms of energy from waste plant buffer zones around populations.	The policy is not anticipated to have significant impacts on biodiversity, landscape character or the built environment. The policy could be improved by incorporating locally important biodiversity sites in the environmental protection criteria.	Mixed impact with air quality/climate change benefits arising from wind turbines and small scale hydro and climate change disbenefits arising from energy from waste. No major requirement for land take. Residual ash from energy from waste requires to be disposed of as special waste.	The policy has the potential to support employment and wealth creation by maintaining the viability of farming operations and contributing to the diversification of local businesses into support services.	The policy does not define constraints and it would be useful if this could be clarified and expanded to include protection for the environment and natural resources.	The bulk of the Areas of Search fall outside the National Park's boundaries with the exception of small scale wind developments. R1 appears to conflict with R4 by allowing favourable consideration to be given to small scale wind energy development within the Park area.	R39	<i>The criteria used for each technology to define Areas of Search are outlined in the Appendices to the Structure Plan. Local environmental factors, including biodiversity, are referred to in the policies specific to each technology .</i>
R2	Wind energy proposals	There will be some health benefits arising from substitution of low emission renewable energy for carbon based energy generation. Apart from this minor health benefit the policy does not contribute overall to social progress.	Wind energy proposals are not expected to have any significant impact on biodiversity. Clusters of wind turbines have the potential to visually jar and may detract from landscape quality. However, it is easier to reclaim and return to their former use sites used by wind turbines than sites used for large scale energy production. The environmental protection proposal put forward under policy R2 should be extended to include sites listed under policy E2.	Generation of energy from wind turbines can improve local air quality and can help to meet the UK Government's targets to reduce national contribution to climate change. Wind energy development generally minimises land take and can co-exist simultaneously with other land uses while end of site life reclamation is fairly minimal compared to other forms of energy generation.	Wind energy can play an important part in maintaining the viability of local upland farming operations and has the potential to stimulate entrepreneurship, wealth creation and employment locally.	The Government intends that 10% of UK electricity supply will be generated from renewable energy resources by 2010. Cumbria will be expected to contribute to these targets. The North West Renewable Energy Study (2001) suggests that Cumbria should provide 36% of the region's renewable energy capacity by 2010. Cumbria will be expected to provide 19.5% of the region's wind energy.	This policy has limited impact on the LDNP and, of course, wind farms are banned from the National Park under policy R4. Fringe areas around the National Park will be protected from wind energy development as part of the policy's proposal to ensure no detrimental impact on designated areas.	R40	<i>Policy E32 will need to be satisfied before development can take place. Unlike nationally designated landscapes, there is no acknowledged evidence to suggest wind turbine development would have an adverse effect on sub regional nature conservation interests.</i>

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
R3	<b>Biomass, energy from waste and anaerobic digestion</b>	Energy from waste will have adverse impacts on human health (more than energy from biomass and anaerobic digestion respectively) through emissions of dioxins and furins. Like the other two options, contributes little to social progress.	<p>Energy from waste is not expected to put any direct pressure on biodiversity or affect landscape character since the policy will direct plant to brownfield sites but the emissions have the potential to enter the food chain and adversely affect biodiversity in the surrounding area. It is considered unlikely that energy from waste plant will enhance the built environment.</p> <p>Energy from biomass is not expected to affect biodiversity or landscape character due to brownfield locations. However, extensive forestry plantations to sustain biomass plant may have adverse impacts on biodiversity and landscape. It is considered unlikely that energy from waste plant will enhance the built environment.</p> <p>Small scale anaerobic digestion would have the least impact in terms of biodiversity, landscape character and built environment of the three options.</p>	<p>Energy from waste has the potential to reduce local air quality and adversely affect climate change. This potential will increase with the age of the plant. Biomass and anaerobic digestion will both contribute fewer emissions than energy from waste but biomass will also make a contribution to climate change.</p> <p>None of the three options is expected to make any significant impact on water or land resources, and may lead to reduced volumes to landfill with associated environmental benefits.</p> <p>None of the three methods support the preferred options in the waste hierarchy (reduce, reuse, recycle). Energy from waste actually undermines this approach to waste management and discourages minimisation. Biomass and anaerobic digestion can both accept household kitchen waste and can add an additional dimension to kerbside recycling.</p>	All three options have the potential to boost local employment levels. Both biomass and anaerobic digestion have the potential to improve the viability of farming operations within the County through diversification.	The composite policy covering all three methods could be made clearer by separating out each method and the policy aims and objectives associated with each. The policy on landfill gas has not yet been provided for assessment. The EM should provide guidance on tried and tested techniques to be employed which would enable energy output to be weighed against environmental and social impacts.	Clarification required on whether the policy R3 (particularly biomass and energy from waste) refers to the National Park or not.	R41	<i>The policy now refers to Biomass and Energy from Waste (which includes anaerobic digestion). Both technology groupings are considered to have the same planning implications at a strategic level and have therefore not been separated. It will, however, be possible for each of the technologies to be separated in Local Plan policies and further context given. The Explanatory Memorandum to the Structure Plan does refer to the balance between Government targets and local interests.</i>
R4	<b>Renewable energy in the National Park and AONB's</b>	The policy does not promote social progress.	The policy focuses strongly on landscape and the use of sympathetic materials. It appears to overlook biodiversity.	Mixed impact with air quality/climate change benefits arising from wind turbines and small scale hydro and climate change disbenefits arising from energy from waste. No major requirement for land take. Residual ash from energy from waste requires to be disposed of as special waste.	The policy appears to provide some opportunity for diversification of existing farms and new business opportunities for other businesses, particularly waste related.	No additional comments.	The policy is not fully in tune with the LDNP's purposes as currently worded since it focuses on visual impact only. The policy could be strengthened to fit more closely with the Park's purposes and give specific protection to biodiversity and natural resources.	R42	<i>Policy amended to provide additional protection to local communities, nature conservation and historic interests.</i>
								<i>new policy R43</i>	<i>Safeguards mineral resources</i>
R5	<b>Mineral extraction outside the National Park and AONB's</b>	The policy makes little or no contribution to social progress other than the potential to retain and pass on traditional quarrying skills. The policy makes no concessions to minimising the environmental impact on local communities and this needs to be included.	In isolation the policy makes little concession to environmental protection in terms of biodiversity and landscape but does facilitate the use of local materials which can maintain the character of the local built environment. The policy could be made more sustainable by specifically excluding areas of National, International and sub-regional nature conservation interests from mineral working, and giving greater protection to the marine environment including beaches and inland water courses.	Large scale mineral extraction inevitably detracts from local air quality, puts pressure on water resources and greenfield land and involves the extraction of primary mineral resources. The policy could be made more sustainable by increasing the emphasis given to reuse and recycling and the relationship that this has with aggregate provision.	The policy has the potential to support rural employment and local construction related businesses and increase the number and type of skilled and professional jobs.	No additional comments.	No direct impact. The possibility exists for some environmental impact from sites on the fringe of the Park.	R44	<i>Revisions to the policy wording now give specific reference to the impact on communities and the local environment. Reference is made to the contribution from secondary aggregates/alternative sources in the policy and Explanatory Memorandum.</i>

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
R6	Mineral extraction in the Lake District National Park and AONB's	The policy is likely to result in minor benefits but is silent on adverse impacts on local communities.	The provision of an EIA to accompany each planning application will provide a basis for protecting land which, for the purposes of this assessment, goes beyond landscape to include biodiversity and the built environment.	The EIA provides a basis for protecting natural resources and mitigating the effects of mineral extraction. The analysis indicates that the policy will have a range of minor negative effects on natural resources.	The policy has the potential to support rural employment and local construction related businesses and increase the number and type of skilled and professional jobs.	Suggest that the phrasing of the first sentence is changed to 'Proposals for new mineral extraction or proposals to extend existing workings within the National Park and AONB's will only be <b>considered</b> if they are accompanied by a full EIA.	The policy will help foster the economic well being of local communities but will require amendment before it fully addresses the need to conserve and enhance natural beauty and wildlife of the Park.	R45	Minor rewording of policy to add clarity. The requirement for an EIA is prescribed in separate Regulations for specified types and scales of development.
R7	Waste facilities in Cumbria	No major impacts on social progress although in the long term the reduction in the amount of waste going to landfill could have positive quality of life impact. Any energy from waste plant is likely to have adverse health impacts.	The policy is weak on environmental protection measures perhaps it is assumed that this is covered in S1. Impacts on the environment will be site specific and development should be subject to an EIA.	Pressure may be put on water resources and green field land take for waste processing although the framework of policy S1 should limit this. The policy could be more sustainable by focusing on the waste hierarchy of waste minimisation, re-use and recycling. Waste recovery centres and recycling sites should be encouraged over the development of more landfill sites	The policy has the potential to create employment opportunities in waste recycling and associated local businesses dealing with waste management and there is a potential for entrepreneurship.	The location of recovery and treatment facilities in and around areas of population fits with the proximity principle and contributes to sustainability in terms of waste management. The policy wording should be tweaked to make it clear that further landfill and energy from waste are not easy options and that evidence will be sought before granting planning permission to show that a vigorous policy of minimisation, reuse and recycling has been overtaken by growth in waste.	Policies on energy and waste prevent the development of energy from waste and landfill sites within the National Park and therefore the policy has no direct impact on the Park's purposes.	R46	Policy amended to give emphasis to meeting the Government's targets for waste reuse and recycling. The Government's sustainable waste management principles are now applied consistently to municipal and industrial/commercial waste. EfW and landfill have more stringent tests applied to them so cannot be considered an "easy option".
R8	Residual waste and landfill	The policy is not making any significant contribution to social progress although it could be argued that in attempting to limit landfill to residual waste, landfill overall will decline leading to local quality of life improvements. To make the policy more sustainable any landfill proposals should be accompanied by a social impact study.	Landfill generates adverse environmental impacts and therefore all proposals should be accompanied by an EIA to assist decision making.	Landfill gas is a powerful contributor towards global warming and as such needs to be dealt with effectively and decisively. The policy needs to be changed so that landfill gas utilisation comes as a matter of routine in ordinary landfill operations. Other impacts on natural resources will be picked up by the EIA and appropriate conditions attached to any application approved as a result.	'End of pipe' waste operations are not labour intensive in contrast to urban programmes involving waste minimisation, reuse and recycling.	Sub-clause iv of the policy should read 'landfill gas to be recovered as a matter of routine'. Both waste policies have not been drafted to fully reflect the importance of the waste management hierarchy. In order to make the plan more sustainable this concept should be incorporated fully.	This policy prevents the development of landfill sites within the National Park and therefore the policy has no direct impact on the Park's purposes.	R47	The policy has been reworded to increase the requirement for landfill gas recovery. The waste management hierarchy and other sustainable waste management principles are referred to in the Explanatory Memorandum.

Ref	Policy Description	Social progress which recognises the needs of everyone	Effective protection of the environment	Prudent use of natural resources	Maintenance of high and stable levels of economic growth and employment	General Comments	National Park Purposes	New Ref	Action taken
L1	Retail, leisure and office development in Cumbria	The policy is not designed to promote social progress but will increase accessibility to services facilities and employment opportunities provided the policy succeeds in locating these in town centres or in other locations well served by public transport.	Environmental impact will depend on whether the policy succeeds in locating development in town centres or edge of centre locations. It is impossible to tell because the policy provides for both options. The policy should be clearly linked to policy T7 and T8 which require transport assessments and travel plans.	Air quality and climate change impact will suffer or gain depending on location. The policy could lead to brownfield site utilisation or loss of green field sites depending on decisions taken. Any new development will consume energy. At best, consumption can be made more efficient and less damaging to the environment.	New retail, leisure and possibly office development will generate new jobs in the longer term.	The sequential approach appears to be directing new development towards town centres and public transport nodes and as such supports sustainability. However, it retains the opportunity for out of town location with adverse impacts on the environment. The constraints set out in the policy do not appear to be sufficiently robust to restrain out of centre retail, leisure and office developments.	Policy S6 should ensure that development of this nature, if it succeeds in getting planning permission, is in keeping with the Park's purposes. The relationship between L1 and S6 could be made clearer in the EM.	L50	Policy amended to provide greater clarity. Explanatory Memorandum provides further guidance.
L2	Town centres	The policy may help improve accessibility to services and facilities within town centres and may help create a better environment thereby contributing to quality of life.	The policy is not adding to pressure on the environment by focusing on town centres and may actually be helping to protect the environment and natural resources by avoiding development which would generate traffic from adjacent towns.	The main benefit would be the reduction of pressure on green field sites with some air quality and climate change benefits through energy efficiency and the avoidance of additional car journeys.	New development is assumed to generate new jobs.	The assessment of this policy depends on the interpretation of the word 'measures' and perhaps this term could be explained more fully either in the policy or in the EM.	This policy applies to key service areas, all of which are located outside the National Park and therefore the policy has no impact on the Park's purposes.	L48	Some rewording for improved clarity.
L3	Local services and facilities	The policy is positively supporting social progress through maintaining and improving access to services and facilities. Depending on location and the nature of the individual proposal it may also contribute to quality of life and community cohesion.	The policy will not impact on biodiversity or landscape and depending on how it is implemented at local level may add or detract from the built environment.	The policy will help reduce air quality and climate change impacts while encouraging the reuse of existing sites and buildings.	All new developments and extensions to existing enterprises or facilities will generate additional local employment.	The policy appears designed to maintain and improve the viability of local services and facilities and therefore should help maintain the sustainability of small settlements.	The policy appears consistent with the Park's purpose of fostering the social and economic well being of local communities.	L51	Policy unchanged.
								new policy L52	Deals with health, education and training
L4	Leisure and recreation spaces	The policy is positively promoting social progress through improving access to leisure and recreation spaces, improving local quality of life and helping to generate a sense of community cohesion.	The policy has the potential to enhance biodiversity and may contribute to the built environment in settlements.	The policy is not designed to impact on natural resources and should help protect existing open spaces from development.	The policy is not expected to affect employment levels or the economy.	It is difficult to see how the retrospective provisions of the policy will operate.	The policy would seem to fit well with the National Park's policy of fostering the social well being of local communities and may help provide opportunities to further the understanding and enjoyment of the Park's qualities by the public.	L53	Policy unchanged. Agreed that implementation is not always easy.
L5	Regional Parks	The likelihood is that the policy will stimulate community participation through social companies and access to open space for residents in nearby towns coupled with job and skills training for those most in need.	The policy will generate positive gains for biodiversity and landscape and is expected to enhance urban fringe areas.	The policy should generate microclimate air quality improvements and help reduce the community's contribution to climate change. The policy will also help turn previously used land into open green spaces. There may also be some benefit to the local water environment.	The policy will provide opportunities for job creation and skills training in areas of greatest need.	No additional comments.	The policy will not apply within the National park area.	L54	Policy unchanged.
L6	Views of strategic importance	The policy does not contribute to social progress.	The policy is designed to preserve locally important i.e. 'strategic' scenes in the landscape and other important views in or from the townscape.	The policy will have no impact on natural resources.	The policy could either inhibit new development which could stimulate the local economy or help generate additional tourist revenue by retaining 'living postcards in Cumbria'.	The policy has little or no association with sustainability.	The policy closely fits with the Park's purpose of conservation of natural beauty.	Policy deleted	Policy deleted.

**Appendix 2**



## **A Profile of Key Issues/Pressures affecting Cumbria**

### **Social**

- ⌘ Housing demand resulting in inflated house prices (especially areas of South Lakeland, Eden and the Lake District National Park (LDNP));
- ⌘ Derelict and vacant properties (especially areas of Barrow and the West Coast);
- ⌘ Access to services and facilities problematic in rural communities;
- ⌘ Difficulty of providing suitable public transport services in rural areas;
- ⌘ Closure of rural services;
- ⌘ Fear of crime and disorder;
- ⌘ Out of town development affecting town centre services;
- ⌘ Traffic congestion at peak times (especially Carlisle and Kendal) also seasonal congestion in the National Park;
- ⌘ Limited facilities for cyclists within towns and cities;

### **Economic**

- ⌘ High levels of unemployment in Barrow, Allerdale and Copeland;
- ⌘ Economic vulnerability due to decline of manufacturing industry and the uncertain future of the nuclear industry (especially the West Coast & Barrow);
- ⌘ The effect of recent farming crises on the agricultural and tourism sectors;
- ⌘ Economic viability of upland farming;
- ⌘ Geographic issues – ICT and transport links to the West Coast and Barrow;
- ⌘ Effective use of port and harbours (West Coast and Barrow);
- ⌘ Legacy of nuclear, mining and manufacturing industries resulting in derelict and contaminated land (especially West Coast and Barrow).

### **Environmental**

- ⌘ Habitat fragmentation and destruction through unsympathetic development;
- ⌘ Deterioration in the quality of natural habitats and the number of species through pollution, coastal erosion and climate change;
- ⌘ Landscape character and quality at risk from unsympathetic development;
- ⌘ Historic features of the landscape (e.g. ancient field systems) at risk from farming practices;
- ⌘ Built heritage – historic character and archaeology at risk from alterations and developments not in keeping with the local character.
- ⌘ Air quality problems in urban areas;
- ⌘ Decrease in the water quality of rivers and an increase in eutrophication;
- ⌘ Loss of tranquillity and the impact of light pollution on dark skies.

## **Resources**

- ⌘ Unprecedented growth in municipal solid waste;
- ⌘ Pressure on existing landfill sites;
- ⌘ Recycling rates well below the national average;
- ⌘ Future requirements for renewable energy will lead to increasing pressure for development;
- ⌘ Problems associated with the disposal and storage of radioactive waste;
- ⌘ Pressure on water resources due to consumption;
- ⌘ Pressure on limited mineral resources.

**Appendix 3**



## **List of Authorities that supplied appraisal documents as part of the best practice review**

Bedfordshire and Luton Joint Structure Plan Sustainability Appraisal, Baker Associates, October 2002.

Cambridgeshire and Peterborough Structure Plan Sustainability Appraisal, Anne Gordon & Associates, the Metropolitan Transport Research Unit and SQW Ltd., March 2002.

Croydon's Unitary Development Plan Sustainability Appraisal, Summary document, Croydon Unitary Authority, October 2001.

Devon Structure Plan Sustainability Appraisal, Devon County Council, Plymouth City Council, Torbay Council and Dartmoor National Park Authority, July 2002.

Joint Lancashire Structure Plan Sustainability Appraisal, CAG Consultants, July 2002.

Leicestershire, Leicester and Rutland Structure Plan Sustainability Appraisal, Leicestershire County Council, Leicester City Council and Rutland County Council, June 2002.

Greater London Authority's Sustainability Appraisal of the draft London Plan, Entec UK, June 2002.

Highland Structure Plan Sustainability Appraisal, Summary Report, The Highland Council, December 1999.

North Yorkshire Joint Structure Plan, Baker Associates, September 2002.

Government Office North West, Sustainability Appraisal of the Proposed Changes to Draft Regional Planning Guidance for the North West, Baker Associates, June 2002.

An integrated appraisal toolkit: Guidance for the North West Version 1/2002, North West Regional Assembly and Partners.

North West Regional Assembly, Report on Sustainable Development Appraisal of 5<sup>th</sup> Working Draft, Baker Associates, May 2000.

Office of the Deputy Prime Minister, Proposals for a Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance, August 1999.

Office of the Deputy Prime Minister, Strategic Environmental Assessment Directive Draft Guidance, October 2002.

Surrey Structure Plan Sustainability Appraisal, Surrey County Council, November 2002.

West Sussex Structure Plan Sustainability Appraisal, Baker Associates, December 2001.

Worcestershire County Structure Plan Sustainability Appraisal, Worcestershire County Council, May 1999.