

**APPENDIX 4**

**Sustainability Appraisal of the Recommended Changes to  
Policies 1 and 14**

**CUMBRIA MINERALS AND WASTE DEVELOPMENT  
FRAMEWORK**

**SUBMISSION DRAFT CORE STRATEGY AND GENERIC  
DEVELOPMENT CONTROL POLICIES**

**RESPONSE TO THE INSPECTOR'S REQUEST FOR FURTHER  
INFORMATION**



# SUSTAINABILITY APPRAISAL OF REVISED CORE STRATEGY POLICIES

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## 1 Background and introduction

- 1.1 Cumbria County Council is preparing the Cumbria Minerals and Waste Development Framework (MWDF), which will replace the current Minerals and Waste Local Plan (1996-2006) and will guide minerals and waste development in Cumbria for the period up to 2020.
- 1.2 In preparing the Cumbria MWDF, Cumbria County Council is required by law (under the Planning and Compulsory Purchase Act<sup>1</sup> and Planning Policy Statement 12<sup>2</sup>) to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of components of the MWDF. This includes the Core Strategy and Generic Development Control Policy Development Plan Documents (DPDs). The Government recommends through guidance, that these two requirements can be met through one single appraisal process, which for the purposes of this and previous reporting, has been termed Sustainability Appraisal (SA).
- 1.3 The purpose of the SA is to inform the progression of the MWDF by identifying the key sustainability issues facing the County, and to predict what would be the likely effects of the Core Strategy and Generic Development Control Policies on these issues.

## 2 The Cumbria MWDF Sustainability Appraisal timeline

- 2.1 Government guidance suggests that SAs should be carried out using the following 5 stage template:
- A: Setting the context and objectives, establishing the baseline and deciding on the scope;
  - B: Developing and refining options and assessing effects;
  - C: Preparing the sustainability appraisal report;
  - D: Consultation on the preferred options of the SPD and the SA report;
  - E: Monitoring the significant effects of implementation of the SPD.
- 2.2 Stage A was undertaken by Cumbria County Council, including the Scoping Report, by the Council's Sustainability Team. Land Use Consultants (LUC) were appointed by the County Council in August 2006 to complete the SA of the MWDF.

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<sup>1</sup> Planning and Compulsory Purchase Act (2004)

<sup>2</sup> Planning Policy Statement 12: Local Spatial Planning (June, 2008)

- 2.3 The following sustainability appraisal reports have been prepared by LUC to date:  
Issues and Options (November 2006)  
Preferred Options (February 2007)  
Changes to Preferred Options Core Strategy (October 2007)

### 3 The requirement to reappraise policy changes

- 3.1 European<sup>3</sup> and UK legislation<sup>4</sup> on Sustainability Appraisal lacks specific detail on how changes to policy should be reappraised through the SA process, and when this is and is not required. Government guidance<sup>5</sup> has interpreted the legislation, and suggests that changes to policies need only be subject to further appraisal where it is deemed new, significant, negative effects on the environment are likely.

**The Guidance states that:**

***“The change may simply be a refinement of one of the Preferred Options to provide greater clarity about how it will be delivered, including for example, detailed policy wording. In this case further SA would not be needed, but an annex to the SA Report would explain the position”.***

***“On the other hand the DPD may contain strategy which was not included in the Preferred Options to the extent that it has significant impacts which have not hitherto been appraised. In this case these effects must be appraised and the SA Report may need more extensive supplementation or even rewriting”.***

- 3.2 In the case of the Cumbria MWDF, the changes made to Core Strategy Policies 1 and 14 are not regarded as materially substantial enough as to bring about new, significant, negative effects on the environment on top of those effects that have already been assessed by LUC through the SA process and report.
- 3.3 Despite that, the changes to the policies will be reviewed within this short report to provide clarity, adhere to best practice approaches in SA and complete the SA in fullness, ahead of the Hearing in Public and consultation phase – in effect, this report will provide the annex to the main SA Report to which the guidance refers.

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<sup>3</sup> Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the effects of certain plans and programmes on the environment

<sup>4</sup> Statutory Instrument 2004 No 1633, The Environmental Assessment of Plans and Programmes Regulations 2004

<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents – Guidance for Regional Planning Bodies and Local Planning Authorities, ODPM (November 2005)

## **4 Cumbria MWDF - Changes to Core Strategy Policies**

### **4.1 Background**

- 4.1.1 A number of policies contained within the Core Strategy have been revised as a result of the ongoing process of refining the final draft to be submitted to the Secretary of State.
- 4.1.2 During June to September 2006, the County Council consulted upon the issues and options for the Minerals and Waste Development Framework. The feedback and comments helped to identify Preferred Options. The Preferred Options were published in March 2007 and provided the first draft of the plan. Further changes were then made, along with repeat consultations, in November/December 2007, which led to the 'Proposed Changes to the Preferred Options Core Strategy'.
- 4.1.3 The results of the consultation were again taken into account in preparing a final draft version of the Core Strategy. Further minor amendments are continuing to be made, reflecting local circumstances and changes in national and regional guidance and policy. The final draft will be submitted to the Secretary of State.
- 4.1.4 Sites will be identified in the Proposed Changes to the Preferred Options Site Allocations Policies and associated maps. Consultations on these documents are programmed for late 2008/ early 2009. There are ongoing revisions to these documents, as some sites are no longer available and alternative or additional sites are needed.
- 4.1.5 Core Strategy Policies 1 and 14 have been identified for reappraisal. Changes to the policies are set out in Table 1 (see pages 6 to 10).

### **4.2 Changes to Core Strategy Policy 1 – SUSTAINABLE LOCATION AND DESIGN**

- 4.2.1 A fundamental change to Core Strategy Policy 1: Sustainable Location and Design, has been recommended. At the time this policy was originally drafted, national and regional policies appeared to be working towards a requirement for developments, above a specified floor space, to meet a proportion of their energy needs from on-site renewables or from a decentralised renewable or low-carbon source. National policy is now less specific, as are the Proposed Changes to the Regional Spatial Strategy. In light of these modifications, it is deemed more appropriate to require carbon reduction measures rather than the narrower criterion of energy supplies. Changes to Policy 1 have been made accordingly. This would also involve a change to the text in the Generic Development Control Policies document, at paragraph 2.9.

### **4.3 Changes to Core Strategy Policy 14 – MINERALS SAFEGUARDING**

- 4.3.1 A change is proposed to Core Strategy policy 14: Minerals Safeguarding. This relates to the provision for safeguarding coal resources. There is a requirement for this change to be publicised, with a consultation period of six weeks, as it is not an option that has been put forward as part of the earlier stages of preparing the Framework. The matter is programmed to be discussed at the Hearing in Public to be held in November 2008.

- 4.3.2 The background is that the local planning authorities used to consult the Coal Authority about planning applications for buildings and pipelines, within the area of the West Cumbria Coalfield, that had been notified by the Coal Authority for this purpose. This was in accordance with the 1995 General Development Procedure Order and earlier legislation. However, in 2004, the Coal Authority advised that it no longer wished to be consulted.
- 4.3.3 With the present national focus on energy supply, the Coal Authority is now adopting a more pro-active engagement with the planning system, having set up a new planning department in April 2008. In its representations in connection with the submitted Development Plan Documents, the Coal Authority has provided a map, which shows the extent of the deep and shallow coal resources within the county. The Coal Authority is requesting that the Development Framework incorporates a Mineral Consultation Area for the shallow coal resources. A mining company has also submitted similar representations about the need to safeguard these and the associated fireclays.
- 4.3.4 The County Council is not likely to have any fundamental objections to identifying a Mineral Consultation Area for shallow coal in Core Strategy Policy 14. Whilst coal is not the cleanest energy source, it is part of the Government's energy mix. The policy would seek to safeguard those coal resources, which would have to be worked by opencast mining, from being sterilised by other developments. It would not involve a commitment to accepting that any should be worked.

## **5 Reappraisal Methodology**

- 5.1 The majority of changes made to the Core Strategy Policies have been minor textual changes that do not require further appraisal. For the purposes of this exercise in reappraising policy changes, Core Policies 1 and 14 have been identified for further examination. As outlined above, the changes do not go far enough to warrant detailed reappraisal, but instead, this report provides a full and complete explanation of the changes and their potential implications for the wider sustainability appraisal of the Cumbria MWDF.
- 5.2 The approach to reappraising Core Policies 1 and 14 is a simple one. A direct comparison is made between the two policy versions in terms of both the omissions and the additions. The changes are then considered against the Sustainability Framework (**Appendix 1**). Where there are considered to be implications against a particular sustainability objective, this is noted.

### **Developing the Sustainability Appraisal Framework**

- 5.3 The County Council's Sustainability Team developed the sustainability appraisal framework, which has been tried and tested in the sustainability appraisal of land use plans and community strategies for a number of years. Land Use Consultants used the framework as the basis for assessing policy in the main sustainability appraisal report.
- 5.4 A sustainability group, made up of the district councils, the LDNPA, Natural England, English Heritage, the Environment Agency and the County Council, have all signed up to the appraisal framework as the preferred method of assessment in Cumbria.

- 5.5 Each objective is accompanied by a series of questions, which were designed to guide the appraisal process and allow the appraiser to test whether or not the plan was likely to contribute to a particular objective. These have been modified and refined over the life of the framework, to reflect changes in policy and best practice in sustainability appraisal.
- 5.6 In developing the revised framework, care was taken to ensure that the SEA Directive's environmental objectives were also comprehensively included.
- 5.7 This consultation process has led to the adoption by the Cumbrian local authorities and the Lake District National Park, of a robust sustainability appraisal framework, which has the approval of the three statutory consultees, and is based on a tried and tested methodology.
- 5.8 The sustainability appraisal framework is strengthened each time an appraisal is carried out using it. Comments from the appraisal group are used to refine the framework, so that it is a constantly evolving appraisal tool that develops to reflect the international, national, regional and Cumbrian sustainability priorities. The framework is shown in **Appendix 1**.

**Table 1: Policy Changes, comparison and possible implications for the Sustainability Appraisal**

Original Policy version - Submission Draft Core Strategy (March 2008)	Revised Draft Policy Version	Comments/Implications for the Sustainability Appraisal
<p><b>Core Strategy Policy 1 SUSTAINABLE LOCATION AND DESIGN</b></p> <p>Proposals for minerals and waste management developments should demonstrate that:-</p> <ul style="list-style-type: none"> <li>energy management, environmental performance and carbon reduction have been determining design factors.</li> <li>their location will minimise, as far as is practicable, the "minerals or waste road miles" involved in supplying the minerals or managing the wastes unless other environmental/sustainability and, for minerals, geological considerations override this aim.</li> <li><b>all proposed waste management developments with gross floor space of over 1000 square metres gain at least 10% of energy supply, annually or over the design life of the development, from on-site or decentralised renewable or low carbon energy supplies. Any exceptions to this should demonstrate that this would not be</b></li> </ul>	<p><b>Core Strategy Policy 1 SUSTAINABLE LOCATION AND DESIGN</b></p> <p>Proposals for minerals and waste management developments should demonstrate that:-</p> <ul style="list-style-type: none"> <li>energy management, environmental performance and carbon reduction have been determining design factors.</li> <li>their location will minimise, as far as is practicable, the "minerals or waste road miles" involved in supplying the minerals or managing the wastes unless other environmental/sustainability and, for minerals, geological considerations override this aim.</li> <li><b>carbon reduction measures are proposed. These may include on-site or decentralised renewable or low carbon energy supplies and the role of restoration proposals in helping to combat climate change.</b> Any exceptions to this should demonstrate that <b>carbon reduction</b> would not be viable for the specific development and that the development would form part</li> </ul>	<p>Core Strategy Policy 1 has been revised to reflect changes to local circumstances and national and regional guidance and policy. The implications for the sustainability appraisal are assessed below, against the 16 sustainability objectives from the Cumbria SA Framework.</p> <p><b>SA Objective SP1 – To increase the level of participation in democratic processes.</b> There is no direct relationship between the changes to Policy 1 and sustainability objective SP1 – No new implications for the SA.</p> <p><b>SA Objective SP2 – To improve access to services, facilities, the countryside and opens spaces.</b> There is no direct relationship between the changes to Policy 1 and sustainability objective SP2 – No new implications for the SA.</p> <p><b>SA Objective SP3 – To provide everyone with a decent home.</b> There is no direct relationship between the changes to Policy 1 and sustainability objective SP3 – No new implications for the SA.</p> <p><b>SA Objective SP4 – To improve the levels of skills, education and training.</b> There is no direct relationship between the changes to Policy 1 and sustainability objective SP4 – No implications for the SA.</p> <p><b>SA Objective SP5 – To improve the levels of health and sense of well-being of people.</b> There is little or no direct relationship between the changes to Policy 1 and sustainability objective SP5 – No major new implications for the SA. There may be some broad parallels drawn between tackling climate change and improving people’s quality of life. Reducing the impacts of climate change from new developments could bring about health protection benefits to people living close to the sites.</p> <p><b>SA Objective SP6 – To create vibrant, active, inclusive and open-minded communities with a strong sense of local history.</b> There is no direct relationship between the changes to Policy 1 and sustainability objective SP6 – No new implications for the SA.</p> <p><b>SA Objective EN1 – To protect and enhance biodiversity.</b> There is little or no direct relationship between the changes to Policy 1 and sustainability objective EN1 – No major new implications for the SA. Changing the restoration techniques around site remediation, in order to mitigate and take account of the effects of climate change, may present some opportunities for ecological protection and enhancement – the impacts of climate change on biodiversity could be taken into account at the same time.</p>

**Table 1: Policy Changes, comparison and possible implications for the Sustainability Appraisal**

<p>viable for the specific development and that the development would form part of an integrated process for reducing greenhouse gas emissions or <b>for</b> carbon-offsetting measures.</p> <ul style="list-style-type: none"> <li>• mineral working proposals should demonstrate a life cycle ("cradle to grave") analysis of product and process emissions.</li> <li>• construction of buildings minimises waste production and use of primary aggregates and makes best use of products made from recycled/re-used materials.</li> </ul> <p>Work will be undertaken, in conjunction with stakeholders, to develop life cycle analysis criteria that are relevant for minerals developments.</p>	<p>of an integrated process for reducing greenhouse gas emissions or <b>that</b> carbon-offsetting measures <b>are proposed</b>.</p> <ul style="list-style-type: none"> <li>• mineral working proposals should demonstrate a life cycle ("cradle to grave") analysis of product and process <b>carbon</b> emissions.</li> <li>• construction of buildings minimises waste production and use of primary aggregates and makes best use of products made from recycled/re-used materials.</li> </ul> <p>Work will be undertaken, in conjunction with stakeholders, to develop life cycle analysis criteria that are relevant for minerals developments.</p>	<p><b>SA Objective EN2 – To preserve, enhance and manage landscape quality and character for future generations.</b>          There is little or no direct relationship between the changes to Policy 1 and sustainability objective EN2 – No major implications for the SA. Whilst there are unlikely to be any major implications for the landscape as a result of the policy changes, other than minor potential improvements to landscape as a result of changes to site remediation techniques.</p> <p><b>SA Objective EN3 – To improve the quality of the built environment</b>          There is no direct relationship between the changes to Policy 1 and sustainability objective EN3 – No new implications for the SA.</p> <p><b>SA Objective NR1 – To reduce greenhouse gas emissions and improve local air quality</b>          The changes to Core Policy 1 have the greatest influence on and relationship with SA objective NR1. The wording change is crucial in better supporting the intended outcomes of NR1 – namely to cut greenhouse gas emissions and design policy in such a way as to mitigate against, and adapt to, the likely impacts of climate change - mitigation in the form of cutting emissions and carbon offset measures and adaptation through appropriate site remediation work. The original wording set a criteria-based requirement for renewable energy generation. The revised wording, whilst not setting any direct targets, aims to ensure new development is 'low carbon' – this opens up opportunities for other aspects, other than renewables, to be explored in order to reduce carbon emissions.</p> <p><b>SA Objective NR2 – To Protect and improve water quality and water resources</b>          There is little or no direct relationship between the changes to Policy 1 and sustainability objective NR2 – No major new implications for the SA, other than through changes in terms of possible impacts on the water environment as a result of new techniques in site remediation techniques – this is unlikely to bring about significant change and would be managed through established best practice in Environmental Impact Assessment techniques.</p> <p><b>SA Objective NR3 – To restore and protect land and soil</b>          There is little or no direct relationship between the changes to Policy 1 and sustainability objective NR3 – No major new implications for the SA. The changes to Core Policy 1 have focused the policy on delivering site remediation that takes account of climate change – this may have implications for the way sites are restored, but it should not bring about major changes with regard to the protection of land and soil, as best practice approaches in this area are already well established.</p> <p><b>SA Objective NR4 – To manage mineral resources sustainably and minimise waste</b>          Core Policy 1 already accorded with and supported the intended outcomes of SA objective NR4 before the changes in wording. There are no new major implications for the SA as a result of the wording change, other than a stronger focus on carbon reduction through site identification, site remediation and the life cycle approach to mineral working proposals.</p>
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**Table 1: Policy Changes, comparison and possible implications for the Sustainability Appraisal**

		<p><b>SA Objective EC1 – To retain existing jobs and create new employment opportunities</b> There is no direct relationship between the changes to Policy 1 and sustainability objective EC1 – No new implications for the SA.</p> <p><b>SA Objective EC2 – To improve access to jobs</b> There is no direct relationship between the changes to Policy 1 and sustainability objective EC2 – No new implications for the SA.</p> <p><b>SA Objective EC3 – To diversify and strengthen the local economy</b> There is no direct relationship between the changes to Policy 1 and sustainability objective EC3 – No new implications for the SA.</p>
<p><b>Core Strategy Policy 14 MINERALS SAFEGUARDING</b></p> <p>Mineral resources will be safeguarded by identifying:-</p> <ul style="list-style-type: none"> <li>• Preferred Areas and/or Areas of Search to enable a landbank of at least seven years sales at the Regional Spatial Strategy's apportionment level for sand and gravel to be maintained throughout the plan period;</li> <li>• A Preferred Area or Area of Search for extending Ghyll Scaur quarry for very high specification roadstone;</li> <li>• An Area of Search for extending High Greenscoe quarry for brickmaking mudstones;</li> <li>• A Preferred Area and/or Area of Search for working additional gypsum and a Mineral Safeguarding Area for the remaining gypsum resources;</li> </ul>	<p><b>Core Strategy Policy 14 MINERALS SAFEGUARDING</b></p> <p>Mineral resources will be safeguarded by identifying:-</p> <ul style="list-style-type: none"> <li>• Preferred Areas and/or Areas of Search to enable a landbank of at least seven years sales at the Regional Spatial Strategy's apportionment level for sand and gravel to be maintained throughout the plan period;</li> <li>• A Preferred Area or Area of Search for extending Ghyll Scaur quarry for <b>nationally important</b> very high specification roadstone;</li> <li>• An Area of Search for extending High Greenscoe quarry for brickmaking mudstones;</li> <li>• A Preferred Area and/or Area of Search for working additional gypsum and a Mineral Safeguarding Area for the remaining gypsum resources;</li> </ul>	<p>Core Strategy Policy 14 has been revised to reflect changes to local circumstances and national and regional guidance and policy. The implications for the sustainability appraisal are assessed below, against the 16 sustainability objectives from the Cumbria SA Framework. It should be noted that due to the minor changes to the text of this policy, there are relatively few new direct implications for the sustainability appraisal. For the sake of clarity, each of the 16 SA objectives are reviewed below.</p> <p><b>SA Objective SP1 – To increase the level of participation in democratic processes.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP1 – No new implications for the SA.</p> <p><b>SA Objective SP2 – To improve access to services, facilities, the countryside and opens spaces.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP2 – No new implications for the SA.</p> <p><b>SA Objective SP3 – To provide everyone with a decent home.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP3 – No new implications for the SA.</p> <p><b>SA Objective SP4 – To improve the levels of skills, education and training.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP4 – No implications for the SA.</p> <p><b>SA Objective SP5 – To improve the levels of health and sense of well-being of people.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP5 – No new implications for the SA.</p> <p><b>SA Objective SP6 – To create vibrant, active, inclusive and open-minded communities with a strong sense of local history.</b> There is no direct relationship between the changes to Policy 14 and sustainability objective SP6 – No new implications for the SA.</p>

**Table 1: Policy Changes, comparison and possible implications for the Sustainability Appraisal**

<ul style="list-style-type: none"> <li>• Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources identified by the British Geological Survey;</li> <li>• Mineral Safeguarding Areas for resources of local building stones;</li> <li>• Mineral Consultation Areas, which will include buffer zones around the Preferred Areas, Areas of Search and Mineral Safeguarding Areas.</li> </ul> <p>The need to safeguard other mineral resources, secondary aggregate resources and potential railheads and wharves, will be considered in the Site Allocations Development Plan Document.</p>	<ul style="list-style-type: none"> <li>• Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources identified by the British Geological Survey;</li> <li>• Mineral Safeguarding Areas for resources of local building stones;</li> <li>• Mineral Consultation Areas, which will include buffer zones around the Preferred Areas, Areas of Search and Mineral Safeguarding Areas <b>and shallow coal resources.</b></li> </ul> <p>The need to safeguard other mineral resources, secondary aggregate resources and potential railheads and wharves, will be considered in the Site Allocations Development Plan Document.</p>	<p><b>SA Objective EN1 – To protect and enhance biodiversity.</b>          There is little or no direct relationship between the changes to Policy 14 and sustainability objective EN1 – No major new implications for the SA, although there may be some impacts as a result of new coal extraction sites - identifying and managing any impacts would be picked through the planning and Environmental Impact Assessment (EIA) processes.</p> <p><b>SA Objective EN2 – To preserve, enhance and manage landscape quality and character for future generations.</b>          There is little or no direct relationship between the changes to Policy 14 and sustainability objective EN2 – No major implications for the SA, although there may be some impacts as a result of new coal extraction sites - identifying and managing any impacts would be picked through the planning and landscape assessment processes.</p> <p><b>SA Objective EN3 – To improve the quality of the built environment</b>          There is no direct relationship between the changes to Policy 41 and sustainability objective EN3 – No new implications for the SA.</p> <p><b>SA Objective NR1 – To reduce greenhouse gas emissions and improve local air quality</b>          Whilst Core Policy 14 is not directly encouraging the extraction of coal as fuel source, following the wording change, the MWDF does now include coal resources within its Mineral Consultation Areas. It is recognised that coal forms part of the Government’s proposed energy mix for the future, but in terms of meeting SA objective NR1, the inclusion of coal resources could be said to work against the low carbon aim of the MWDF as a whole.</p> <p><b>SA Objective NR2 – To Protect and improve water quality and water resources</b>          There is little or no direct relationship between the changes to Policy 14 and sustainability objective NR2 – No major new implications for the SA.</p> <p><b>SA Objective NR3 – To restore and protect land and soil</b>          There is little or no direct relationship between the changes to Policy 14 and sustainability objective NR3 – No major new implications for the SA, other than the potential impacts that would be brought about should new coal extraction sites be identified and opened up, although well established site remediation techniques would mitigate much of this.</p> <p><b>SA Objective NR4 – To manage mineral resources sustainably and minimise waste</b>          There is no direct relationship between the changes to Policy 14 and sustainability objective NR4 – No new implications for the SA, although using fossil high carbon fuels goes against the intended outcomes of SA objective NR4 – identifying and safeguarding new coal resources could be said to be facilitating extraction and coal use <b>though it is noted that safeguarding an area does not provide a commitment that the area should be worked.</b></p>
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**Table 1: Policy Changes, comparison and possible implications for the Sustainability Appraisal**

		<p><b>SA Objective EC1 – To retain existing jobs and create new employment opportunities</b>          There is no direct relationship between the changes to Policy 14 and sustainability objective EC1 – No new implications for the SA.</p> <p><b>SA Objective EC2 – To improve access to jobs</b>          There is no direct relationship between the changes to Policy 14 and sustainability objective EC2 – No new implications for the SA.</p> <p><b>SA Objective EC3 – To diversify and strengthen the local economy</b>          There is no direct relationship between the changes to Policy 14 and sustainability objective EC3 – No new implications for the SA.</p>
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## **6 Summary and Conclusions**

- 6.1 The Cumbria MWDF Core Policies have been revised following the publication of the Submission Draft Core Strategy in March 2008. The vast majority of changes to policy wording are regarded as minor textual changes and, therefore, reappraisal of their effects against the sustainability framework is not necessary.
- 6.2 Core Policies 1 and 14 were highlighted as containing more significant changes that should be revisited by the sustainability appraisal. The amendments are still not regarded as being significant enough as to have 'significant environmental affects' and, therefore, according to Government guidance, the new policy wording does not require formal reappraisal in order to meet the requirements on Sustainability Appraisal and Strategic Environmental Assessment.
- 6.3 Despite there being no formal requirement to carry out further assessment, by way of best practice and for completeness, this brief review of revised Core Policies 1 and 14 has been carried out and will form an annex (as suggested in Government guidance) to the main Sustainability Appraisal report carried out by Land Use Consultants in February 2008.

### **Core Strategy Policy 1 – SUSTAINABLE LOCATION AND DESIGN**

- 6.4 The review of reworded Policy 1 against the 16 sustainability objectives, found that there were no new significant implications for the sustainability appraisal, and that any effects would largely be positive. The main links were with SA objective NR1, relating to the reduction of greenhouse gas emissions. The revised wording, whilst not setting any direct targets, aims to ensure that new development is 'low carbon' – this opens up opportunities for other aspects, other than renewables, to be explored, in order to reduce carbon emissions. Broadly, the new wording strengthens the policy and better aligns it with the intended outcomes of SA objective NR1, in tackling climate change through reducing carbon emissions.
- 6.5 Taking account of the future impacts of climate change on site remediation also accords with SA objective NR3 on restoring and protecting land and soil.

### **Core Strategy Policy 14 – MINERALS SAFEGUARDING**

- 6.6 The review of reworded Policy 14 against the 16 sustainability objectives, also found that there were no new significant implications for the sustainability appraisal. The main links were again with SA objective NR1, due to the inclusion of new coal resources to form part of Mineral Consultation Areas. This essentially works against the intended outcomes of SA objective NR1, which is to reduce climate change gases and the impacts of climate change, though it is acknowledged that the MWDF is not advocating coal as a fuel source, but accepts it as part of the Government's mix of fuels for energy generation.
- 6.7 There are links with SA objective NR3 on restoring and protecting land and soil – there are potential impacts that would be brought about should new coal extraction sites be identified and opened up, though it is accepted that existing and well established restoration techniques would mitigate these impacts as well as any Environmental Impact Assessment.

- 6.8 Links were also made with SA objective NR4, sustainable management of mineral and waste resources - identifying and safeguarding new coal resources could be said to be facilitating extraction and coal use, but it is noted that inclusion of coal resources within a minerals safeguarded area does not provide a commitment for future extraction, but merely prevents the land being 'sterilised' by other development.

Reference	Sustainability Objectives	Sustainability Framework: guidance on making progress towards each objective
<b>Social progress which recognises the needs of everyone</b>		
SP1	To increase the level of participation in democratic processes	Does the plan encourage and empower local people to become involved? Are all members of society able to participate fully in decision making processes based on an understanding of these processes and how decisions impact on them? Does the plan identify and set out how hard to reach groups, including rural and physically isolated communities, will be involved? Do plan policies respect the needs of all communities and future generations?
SP2	To improve access to services, facilities, the countryside and open spaces	Does the plan improve access and affordability for everyone to all services, essential goods, facilities, and education and employment opportunities (where possible within local communities using sustainable transport choices)? Does it help retain essential local facilities and ensure that physical access to transport, facilities, buildings and public spaces are suitable for those with a disability? Does the plan support broadband access to services across Cumbria? Does the plan address public transport service gaps and encourage community transport and lift sharing schemes? Does the plan promote and facilitate access to, and opportunities to enjoy and understand the countryside, green space and historic sites? Does the plan take into account the risks posed to the transport network by extreme weather events?
SP3	To provide everyone with a decent home	Will the plan help meet local housing need by ensuring that good quality, resource efficient, affordable housing with reduced environmental impact is available to all? Do policies address fuel poverty and promote sustainable construction and low carbon design? Do policies seek to improve energy efficiency in existing housing stock? Do plan policies tackle Cumbrian housing market failures and distortions in both urban and rural areas and help regenerate local communities? Does the plan provide a mixed range of adaptable housing for rent and purchase?
SP4	To improve the level of skills, education and training	Will the plan deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? Does the plan recognise the need for people to adapt to economic change and retrain where necessary? Does the plan enable people to live sustainable, low carbon lifestyles?
SP5	To improve the health and sense of well-being of people	Do plan policies ensure all members of society have access to the health care that they require? Do they reduce health inequalities within society associated with income, lifestyle and diet? Does the plan help create a healthy and safe working and living environment with low rates of crime and disorder? Does the plan help improve quality of life for all and mental health and well-being within communities? Does the plan anticipate and plan for the potential impacts of climate change on health?
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Does the plan promote a sense of community identity? Does it encourage social cohesion and help continue valued local traditions? Is recreational and cultural activity embracing the arts, heritage, the environment, dialect and sport promoted along with multicultural understanding, respect for all and equality of opportunity? Does the plan identify and tackle issues around social exclusion? Do policies try to stem outward migration?
<b>Effective protection of the environment</b>		
EN1	To protect and enhance biodiversity	Does the plan protect and conserve habitats and species especially where these may be rare, declining, threatened or indigenous. Will the plan ensure biodiversity sustainability by enhancing conditions wherever necessary to retain viability of the resource? Do policies minimise adverse impacts on species and habitats through human activities and development? Do policies ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species? Are the impacts of climate change on biodiversity taken into account?
EN2	To preserve, enhance and manage landscape quality and character for future generations	Is local landscape quality, distinctiveness and character protected from unsympathetic development and adverse changes in land management? Is the remoteness and tranquility of landscapes maintained? Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected? Are areas of high archaeological and historic landscape sensitivity protected? Do policies encourage low input organic farming with environmental stewardship styles of land management? Do they sustain and extend tree cover, hedgerows, woodlands and sustainable forestry? Do policies factor in anticipated impacts of extreme weather events on landscape character and other valued assets?

EN3	To improve the quality of the built environment	Does the plan conserve features of historic and architectural importance? Will policies ensure that new development is of high quality, sympathetic to the character of the built environment, strengthens local distinctiveness, enhances the public realm and helps create a sense of place? Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, energy efficiency, the use of locally sourced materials and low impact operation? Will policies guide inappropriate development away from areas currently at risk from flooding and those adversely affected by climate change? Where development is, exceptionally, necessary in flood risk areas, do policies ensure that development is safe without increasing flood risk elsewhere and where possible, reduce flood risk overall? Will the plan reduce noise levels, light pollution, fly tipping, the spread of litter and graffiti
<b>Sustainable use and management of natural resources</b>		
NR1	To reduce greenhouse gas emissions and improve local air quality	Will policies limit or reduce the emission of greenhouse gases and other air pollutants? Will the use of clean, low carbon energy efficient technologies be encouraged? Will policies maximise the production of renewable energy? Will they reduce the need to travel especially by car, and switch goods, minerals and waste from roads onto the rail network? Do policies encourage people to live and work in close proximity? Will the plan introduce strategies to adapt to and mitigate other climate change impacts? Will the plan ensure that local air quality is not adversely affected by pollution and seek to improve it where necessary?
NR2	To protect and improve water quality and water resources	Will the plan protect and, where possible, improve the quality and quantity of all water resources, including marine and coastal waters? Will policies promote sustainable drainage systems to help alleviate flooding and flood contamination of water resources from foul and surface water drainage and wastewater? Will policies lead to the effective management of demand for water, avoiding wastage and retain water within the catchment and flood plain, preventing stress on the still and running water environment? Will policies help water users adapt to the impacts of climate change?
NR3	To restore and protect land and soil	Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site? Will it minimise the loss of greenfield sites or areas of open space? Will policies restore and create new green space? Will policies prevent soil degradation, pollution of soil and the use of peat? Does the plan consider the impacts of climate change on agriculture and forestry?
NR4	To manage mineral resources sustainably and minimise waste	Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material? Will the plan minimise the amounts of industrial, commercial and household waste generated and increase re-use, recovery and recycling? Will policies improve energy efficiency of operations? Will it promote the use of energy recovered from waste and substitute on site renewable generation for fossil fuels? Will policies reduce water use and the need for energy intensive wastewater treatment? Will policies protect, maintain and seek to regenerate peat bogs? Will site location criteria minimise the need for transport?
<b>Building a sustainable economy in which all can prosper</b>		
EC1	To retain existing jobs and create new employment opportunities	Will the plan increase the number, variety and quality of employment opportunities including those offered by tourism, digital commerce, cultural and creative industries, local produce and social enterprise? Will the plan support local companies, help build local supply chains and help local businesses develop export markets? Will it stimulate the use of local companies, local products and services including opportunities inherent in outdoor activity? Will the plan help retain a skilled workforce, graduates and companies in Cumbria that are able to prosper in a low carbon economy? Will the plan attract higher paying jobs?
EC2	To improve access to jobs	Will plan policies increase access for all to a range of jobs through improved training in both basic and specialised skills, sustainable transport and communication links? Are work place travel schemes promoted? Will the plan lead to the location of new employment opportunities in areas of greatest need? Do plan policies recognise the role of ICT in reducing journeys to work through homeworking and increasing access to training and employment opportunities?

<p><b>EC3</b></p>	<p>To diversify and strengthen the local economy</p>	<p>Will the plan help create the right conditions including sites, premises and infrastructure to encourage private sector investment? Will it encourage indigenous growth? Will it help increase the environmental performance of local companies and their products/services? Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas? Does the plan provide financial assistance? Will it help improve the competitiveness and productivity of the local economy? Do policies support research and development into environmental and other new technologies including opportunities to recycle and re-use waste products, the growth of renewable energy crops, specialised manufacturing of renewable technologies and renewable energy generation? Does the plan factor in likely impacts of climate change on the economy, particularly on tourism and agriculture and the risks imposed on business continuity by extreme weather related events?</p>
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