

South Lakeland Sustainability Appraisal Scoping Report **Schedule of Comments and SLDC Responses**

(Approved by Planning Portfolio Holder Advisory Group on 27 April 2006)

Introduction

This schedule details the consultation responses to the Draft Sustainability Appraisal Scoping Report (September 2005) and the proposed changes to the Scoping Report.

In addition, the Scoping Report - Final Draft (April 2006) also contains changes resulting from: -

- Publication of final guidance on Sustainability Appraisal by the Office of Deputy Prime Minister (ODPM) in November 2005
- Advice from Government Office North West that a Sustainability Scoping Report must be prepared and consulted upon for each Development Plan Document and Supplementary Planning Document.
- New requirements arising from the EU Directive 'Conservation of Natural Habitats and of Wild Flora and Fauna Habitats' (92/43/EEC)
- On going work on Sustainability Appraisal indicators by the Cumbria Sustainability Appraisal Officers Group – indicators may be modified later as a result of the future work of this Group
- The views of a panel convened to consider the Scoping Report in October 2005 and also undertake a preliminary appraisal of the emerging Core Strategy Issues and Options Report – a record of this meeting and proposed changes to both documents are listed at Appendix 9 to the Scoping Report (Final Draft, April 2006).

The main **additional changes** resulting from the above are:

- The Sustainability Appraisal Scoping Report (April 2006) has been amended to apply only to the emerging Core Strategy Development Plan Document. Separate Scoping Reports, based closely on the one prepared for the Core Strategy will be prepared and consulted on for each subsequent Development Plan Document and Supplementary Planning Document.
- A table has been added to section 1 setting out the timetable and stages for preparing the Core Strategy DPD and the associated stages for the sustainability appraisal of the emerging document.
- Section 1 now also outlines the new requirement for the 'Appropriate Assessment' of the impact of the Core Strategy – Issues and Options Report on Natura 2000 sites, under the EU Habitats Directive 92/43/EEC. Natura 2000 sites are those nature conservation sites of European or international significance. Government guidance on this new requirement will be published in June 2006. We propose to consult English Nature on the likely implications of the Appropriate Assessment for the Core Strategy Issues and Options report.
- The Sustainability Appraisal indicators have been modified to take account of on-going work of the Cumbria Sustainability Appraisal Officers Group, and any newly available information – in particular the Quality of Life indicators recently available on the Audit Commission website.
- Appendix 9 of the Scoping Report (April 2006) records the views of a preliminary sustainability appraisal panel meeting to consider the draft Scoping Report and early draft Core Strategy Issues and Options report. The appendix also lists the proposed changes made to both documents.
- The method for appraising, recording and scoring the Core Strategy has been simplified and clarified – see section 2 and Appendix 5.

Next Steps

We propose to seek the views of English Nature and the Government Office North West on 'Appropriate Assessment' on whether the Scoping Report meets the statutory requirements for this, as well as of Sustainability Appraisal and Strategic Environmental Assessment.

The revised Scoping Report will now form the basis for convening a panel to undertake the Sustainability Appraisal of the Core Strategy Issues and Options report, in accordance with the methodology set out in the report. The resulting Sustainability Appraisal report will inform the preparation of the subsequent Core Strategy – Preferred Options report, both of which will be the subject of consultation under Regulation 26 in summer 2006.

Organisation	Comment	SLDC Response	Proposed change(s)
<p>Relevant Plans and Programmes (Paragraph 2.4, Table 1 and Appendix 1) Question1 - Are there other documents relevant to the LDF that we should take into account? Have we adequately taken account of those listed?</p>			
Cumbria Regionally Important Geological/Geomorphological Sites Group (RIGS)/Cumbria Wildlife Trust (CWT)	Can't think of any that have been missed	Noted	No change.
English Heritage	<p>International/European <u>The European Landscape Convention (Florence Convention – adopted July 2002)</u> This Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. Landscapes are defined as 'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'. The Convention applies this definition to all parts of a country's territory, urban as well as rural areas, to both outstanding and ordinary landscapes, to degraded as well as well-preserved places. Although the UK is not yet a signatory, the</p>	Noted	Include documents in Appendix 1.

	<p>Convention's definition of landscape and its emphasis on action/interaction, human factors and cultural perspectives is well reflected in the UK's national programme of Historic Landscape Characterisation.</p> <p>[http://conventions.coe.int/Treaty/EN/Summaries/Html/176.htm]</p> <p><u>Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention).</u></p> <p>The Convention contains provisions for the identification and protection of archaeological heritage, its integrated conservation, the control of excavations, the use of metal detectors and the prevention of illicit circulation of archaeological objects, and the dissemination of information. It was ratified by the UK in September 2000, and provides for a broad definition of 'archaeological heritage' that includes 'structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water.</p> <p>[http://convention.coe.int/Treaty/EN/Treaties/Html/143.htm]</p> <p><u>Convention for the protection of Architectural Heritage of Europe (Granada 3rd October 1985)</u></p> <p><u>European Spatial Development Perspective.</u></p> <p>Paragraph (17) defines balanced spatial development as 'reconciling the social and economic claims for spatial development with the area's ecological and cultural functions and, hence, contributing to a sustainable, and at a larger scale, balanced territorial development'. The 'conservation of natural resources and cultural heritage' is identified as a fundamental goal of European policy (18). This translates into three policy guidelines for spatial development (19) of which 'sustainable development, prudent management and protection of nature and cultural heritage' is the key environmental</p>		
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	<p>objective for promoting sustainable development. This is set in the context of the recognition that 'Natural and cultural heritage in the EU is endangered by economic and social modernisation processes. European cultural landscapes, cities and towns, as well as a variety of natural and historic monuments are part of the European heritage. Its fostering should be an important task for modern architecture, urban and landscape planning in all regions of the EU'.</p> <p>National</p> <ul style="list-style-type: none"> • <u>Ancient Monuments and Archaeological Areas Act 1979</u> • <u>The UK Government Sustainable Development Strategy March 2005</u> • <u>The Government statement <i>The Historic Environment: a Force for Our Future</i> (DCMS 2001)</u> <p>Regional <u>Streets for All North West</u> – a regional English Heritage guide to the management of streets and public open spaces</p> <p>County <u>Cumbria Historic Landscape Characterisation project (incomplete)</u></p> <p>Local Conservation Area Appraisals and Management Plans</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Add Conservation Area Appraisals to Appendix 1. Work on the Management Plans for these areas will commence in 2008/09.</p>	<p>Include documents in Appendix 1 (Sustainable Development Strategy 2005 already included)</p> <p>Include documents in Appendix 1</p> <p>Include in Appendix 1</p> <p>Add Conservation Area Appraisal documents to Appendix 1 - these are currently in draft and will be going to Council for adoption in Spring/Summer 2006.</p>
Dr George Steele	<p>Comments apply only to rural housing: The University of York Centre for Housing has many reports and current research relevant to rural housing. "State of the countryside" versions 2002/03/04 are relevant. Has it reported in 2005? Government Office North West (GONW) due to issue preliminary draft of Regional Spatial Strategy (RSS) in January 2006. South Lakeland Local Development Framework (SLLDF) should be aware.</p>	<p>Noted</p> <p>We will research reports available and take account in providing baseline data for indicators</p> <p>Noted.</p> <p>Agree on need to update reference to Regional Spatial Strategy</p>	<p>Update reference to Regional Spatial Strategy at 1.6</p>

The National Trust	<p>Welcome the use of Action for Sustainability, an important and underused document. Concerned about the relative importance that will be attached to some documents, e.g. such as Lake District Economic Futures (LDEF) study which has not been the subject of any formal consultation/review process.</p> <p>The documents listed do not include any relating to landscape quality or the built environment (e.g. Heritage Counts and the Regional Cultural Strategy) although they are listed in App 1.</p> <p>National documents should include DEFRA's Soil Strategy and relevant Mineral Planning Guidance Notes (certainly MPGs 1, 6 and 7). Regional documents should include the Regional Forestry Strategy (RFS)</p>	<p>The NWDA Board has approved the LDEF and have urged Local Planning Authorities to take this into account in preparing their LDFs. The LDEF study is reflected in the Regional Economic Strategy.</p> <p>The documents listed at the top of Table 1 contain strategic and regional policy for landscape and built heritage, including it's importance to the community</p> <p>Agree that there is merit in including DEFRA's Soil Strategy and RFS in App. 1 but consider that Minerals are adequately covered by Cumbria Minerals and Waste Local Plan</p>	<p>No change</p> <p>No change</p> <p>Include DEFRA's Soil Strategy 'The First Soil Action Plan for England 2004-06' and the Regional Forestry Strategy in Appendix 1.</p>
<p>District 'baseline' Profile and Key Sustainability Issues (Section 3)</p> <p>Question 2 - Can you suggest (or provide) any other relevant information? Have we identified the main sustainability issues?</p>			
Cumbria RIGS Group/CWT	Should contain more than just flora and fauna. It appears that geological /geomorphological sustainability and limestone pavements have been omitted from the list of environmental indicators. Geological and geomorphological sustainability is a key part of the new PPS9 and limestone pavements are identified in CROW Act and the Wildlife and Countryside Act as well as the current County Structure and SLDC local plans as being a habitat in need of specific protection.	Agree	Amend 3.16 to note importance of South Lakeland for geological and geomorphological sites, particularly limestone pavements.
Dr George Steele	SLDC's Chief Executive Mike Jones in Issue 1 South Lakeland News (October 2005, page 4) refers to 400 affordable homes and more use of brownfield sites. Could LDF be more specific?	<u>Affordable Housing:</u> Agree	Amend Section 3 (Housing) to provide latest information on Housing Needs Survey and Interim Planning Approach to

		<p><u>Brownfield:</u> Para. 3.24 and the following table refer to brownfield land Further LDF documents will address brownfield land and affordable housing issues in more detail</p>	<p>Housing Development.</p> <p>No change</p>
Morecambe Bay Primary Care Trust	<p>Page 18 states that there are no acute services in SL. Not sure this is correct, as there is a casualty dept at Westmorland General Hospital (WGH). I suggest you contact, Mr Ian Cumming at WGH.</p>	<p>We contacted Mr Cumming who's colleague confirmed: "WGH is a 250 bed hospital providing elective surgical services and minor injury services and a midwifery led maternity unit in addition to acute medical care and access to coronary care facilities". WGH provides Category C services, whilst Barrow and Lancaster provide Category A. Category C covers broken limbs etc but not 'major trauma'. There will be a review re: provision of acute services in March (2006).</p>	<p>Amend 3.12 as stated to clarify position on acute services in light of statement from Mr Cumming's colleague.</p>
Ramblers Association	<p>Include the footpath and bridleways network in the document by making specific reference to it.</p>	<p>Agree It would be useful to include reference to the extent and importance of the network under the Leisure and Recreation section</p>	<p>Amend 3.13 to refer to the extent and importance of the footpath and bridleways network in South Lakeland</p>
South Lakeland Friends of the Earth (FoE)	<p>Please see FoE's policy on Sustainable Development. This appears to differ from Section 3 in the following ways: the precautionary approach and the polluter pays and proximity principles. The vision for South Lakeland as identified by the Community Strategy makes it especially important that the environment receives as much protection as possible, our social, and economic future depend on this. Business development must encourage</p>	<p>Noted The statutory process of SA requires that we set out a framework to assess the environmental, social and economic impacts of proposals and how these can be mitigated</p>	<p>No change</p>

	sustainable developments that will use energy efficiency schemes.		
The Countryside Agency (CA), North West Region	<p>The information and indicators that are available in relation to our environmental interests include:</p> <ul style="list-style-type: none"> * Protected Landscapes - boundaries of National Parks, Areas of Outstanding National Beauty (AONBs) and the location of Heritage Coasts; *State of the Countryside; and * Countryside Quality Counts, including the boundaries of character areas. <p>PROTECTED LANDSCAPES:</p> <p>As you will know, there are various information sources for protected landscapes and links can be found from our website at www.countryside.gov.uk. Another useful source is www.magic.org.uk, which is a web-based interactive map; bring together geographic information on key environmental schemes and designations in one place. In addition, of course, the AONB Management Plans identify the special qualities of an AONB, the importance of specific landscape features and those that are vulnerable to change.</p> <p>STATE OF THE COUNTRYSIDE:</p> <p>We publish National and Regional State of the Countryside Reports and these are available on-line at www.countryside.gov.uk. The latest State of the Countryside Report for England 2005 is supported by regional data sets for 2005 that can be accessed via the website.</p> <p>The State of the Countryside Reports provide facts and trends about the social, economic and environmental issues encountered in England's countryside. They present evidence against 20 key indicator themes, which include a number on environment and recreation:</p> <ul style="list-style-type: none"> • The state of natural resources - air quality, river quality; • Biodiversity - wild birds, SSSI condition, Biodiversity Action Plans (BAPS); • Sustainable land management - areas of woodland under sustainable management, 	<p>Noted.</p> <p>We will review data sources to inform the baseline assessment and sustainability indicators.</p>	<p>In investigating these information sources further, it has become apparent that a significant proportion of the data available currently only goes down to national or regional level. We have made further contact with the relevant organisations and providers of such data raising this issue and will continue to review sources to enable us to include data for the district if/when it becomes available at local authority level.</p>

	<p>woodland areas by species, countryside stewardship schemes, organic farmers, farm income trends;</p> <ul style="list-style-type: none"> • How people use the countryside - day visitors' activity, visitors to National Parks, visitors' social characteristics, residents of the countryside, travel and transport use, trip expenditure, domestic tourism, tourism trip expenditure, tourism activities. <p>COUNTRYSIDE QUALITY COUNTS (CQC). The CQC project has developed an indicator of change in countryside quality based on landscape character, in response to the 2000 Rural White Paper call for monitoring of changes in the countryside. Information on CQC is available via www.countryside-quality-counts.org.uk.</p> <p>Within the CQC project a set of Character Area Profiles for the Character Areas of England have been constructed which set out the key elements that give each area its sense of local distinctiveness, the threats and opportunities facing those areas.</p> <p>The Character Area Profiles will be updates and extended to ensure that the information about the Character Areas, the threats and opportunities that exist in relation to sustaining their qualities, continue to be relevant to policy customers at national, regional and local scales.</p> <p>These may provide useful data sources or comparative information in relation to SA Objective SP2 and EN2.</p>		
The National Trust	<p>3.15: Ignores Historic Parks and Gardens and their settings.</p> <p>3.16: no consideration is given to woodlands, including ancient woodlands.</p> <p>3.18: should contain a broad analysis of the District's landscape character.</p>	<p>Agree.</p> <p>Noted</p> <p>Purpose of baseline assessment is to set out key information and draw out key issues for sustainability. Para. 3.18 could cross refer to</p>	<p>Add reference to historic parks and gardens in district at 3.15</p> <p>No change - woodlands referred to in para 3.17</p> <p>Add reference to Structure Plan Landscape Character Technical Paper 5, which outlines landscape character of district.</p>

	<p>Environmental Sustainability Issues: largely unambitious, looking mainly at 'protection', rather than the opportunities to 'enhance'. Nothing on landscape character, AONBs or the coast.</p> <p>3.24: is devoid of explicit consideration of soil quality/characteristics despite the heading.</p> <p>3.20-3.28: nothing on soils, or adaptation to the impacts of climate change.</p> <p>3.33: does not note that the actual requirement will be dependent upon take up of land.</p> <p>3.36: not clear why specific projects are referred to here but not in the other sections, this appears to be inappropriate as these are not committed schemes, could be controversial and indeed contrary to some of the aims of sustainable development.</p> <p>Economic Development: not convinced that</p>	<p>Structure Plan Landscape Character Technical Paper 5</p> <p>3.19 issues table refers to landscape character and <i>enhancement</i> as well as protection. It is intended that 'coasts' are included under references to 'landscape' and 'habitats'</p> <p>Agree. Should be some direct reference to soils. Illustrative information on soil types in South Lakeland has been obtained at www.magic.gov.uk.</p> <p>See above re soil. Adaptation to climate change relates inter alia to taking account of flood risk, which is covered in 3.23.</p> <p>The requirements are set out in the Cumbria and the Lake District Joint Structure Plan. Provision in the LDF will take account of the amount already built within the plan period and existing allocations and commitments.</p> <p>3.36 does not imply that these schemes are committed. While the schemes may be relevant to other sections they also provide evidence of regeneration potential, and are thus relevant to section 3.36. Feasible projects may form an important part of the implementation of the LDF.</p> <p>It is recognised that providing</p>	<p>Amend 3.19 table of issues to refer to AONB</p> <p>Amend 3.24 to provide summary of soil types for South Lakeland and continue to seek numeric data on this.</p> <p>No change</p> <p>No change</p> <p>No change.</p> <p>Add summary of Employment</p>
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	provision of land/sites is the main answer to many of the issues; the potential for live/work units and to utilise heritage buildings should not be forgotten. It is not clear from the evidence base presented that there is 'an acute shortage of quality Strategic and Local Employment Sites'	land is not the sole answer to issues. However, providing sufficient land to meet needs is a requirement of regional and national policy. The new Employment Land Study (December 2005) confirms an acute shortage of land in the District to meet future economic needs.	Land Study to 3.33 (The study can be viewed on the Council's website)
The Theatres Trust	The Trust is surprised that Tourism and the Arts are not listed as Key Issues. Would have thought that Arts, Culture and Tourism would be principal subjects to take into account.	Tourism is referred to at para. 3.31, but agree this could be expanded. Arts and culture are reflected in the SA objectives and appraisal questions in Appendix 2 - at SP6, SP6.3, EC1 and EC1.1	Add reference to tourism in issues table relating to 'Building a Sustainable Economy' in para. 3.36 Add reference to Arts and Culture in the Social Progress section para. 3.14
United Utilities	Support the items on conserving water and energy within the Natural Resources section.	Support Noted	
Sustainability Objectives and Appraisal Questions (Paragraph 2.4 and Appendix 2) Question 3 – Do you agree with those we have identified through joint working with local authorities in Cumbria and the four statutory agencies?			
Cumbria RIGS Group/CWT	Modify objective EN1 to read "To protect and enhance biodiversity AND GEODIVERSITY". EN1.1 should be altered to include "...or restore and enhance habitats, species, GEOLOGICAL/ GEOMORPHOLOGICAL sites especially where...." This is in light of PPS9 "Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests" (PPS9 key principle ii)	Agree. Agree.	Alter wording of objective EN1 as suggested Alter wording of appraisal question EN1.1 as suggested

<p>English Heritage</p>	<p>English Heritage will look to see how the objective of SEA “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with view to promoting sustainable development” is integrated into the SA process with particular reference to our area of concern “cultural heritage, including architectural and archaeological heritage, landscape.”</p> <p><u>Sustainability Appraisal Objectives</u> The following are suggested:</p> <ul style="list-style-type: none"> • Preserve, enhance and manage the cultural heritage resource of SLDC • Protect, enhance and manage the character and appearance of the landscape, townscape and local environmental quality maintaining and strengthening local distinctiveness and sense of place. • To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality. <p><u>Appraisal Questions</u> Table 17 in <i>Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents</i> provides a useful starting point.</p> <p>□ <u>Social questions</u> for SA of RSS/ LDFs:</p> <ul style="list-style-type: none"> • Which settlements offer poor quality living surroundings? • Which neighbourhoods are particularly associated with poor quality and neglected surroundings? <p>□ <u>Environmental questions</u> for SA of RSS/LDFs;</p> <ul style="list-style-type: none"> • Which parts of the region are rich in cultural heritage and are they at risk of damage or neglect? • Where are features of cultural heritage importance (e.g. listed buildings, scheduled 	<p>It is considered that the Scoping Report adequately reflects this objective of SEA</p> <p>We will refine the appraisal questions of SA Objective EN3 to incorporate these proposals. However, we consider that these points are covered specifically in the SA questions for objective EN3</p> <p>We consider these questions relate to the baseline assessment and identification of sustainability issues in Sect. 2:</p> <p>See para 3.7-3.8 and table</p> <p>See para 3.15-3.19 and table</p>	<p>No change</p> <p>EN3.1 ‘Heritage’ added to refer to this specifically</p> <p>No change.</p> <p>No change</p> <p>No change</p>
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	<p>ancient monuments, conservation areas, historic parks and gardens, views and vistas etc) and what state are they in?</p> <ul style="list-style-type: none"> • Which areas have been designated because of their landscape quality (National Parks, AONBs)? • Has the landscape/townscape character of the plan area been defined and which are those locations that should be conserved, restored or enhanced? • Where are there concentrations of derelict, degraded or underused land and properties? <p>Where are the derelict, degraded or underused land and sites?</p> <p>Figure 22 of Appendix 9 (page 113) of ODPM guidance <i>Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents</i> provides one overarching decision-making criterion that relates to the historic environment.</p> <p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>For detailed interpretation and for the purposes of clarification, English Heritage recommends the following questions –</p> <p>Will it make the best use of existing buildings and physical infrastructure</p> <ul style="list-style-type: none"> • Will it improve the quality of the built and historic environment • Will it protect and/or enhance the local landscape character <p>Will it protect and/or enhance the region's environmental assets (natural, built and historic)</p> <p>Will it increase the social and/or economic benefit derived from the region's historic environment</p>	<p>Noted</p> <p>We consider that SA objective EN3 as amplified by appraisal questions EN3.1-EN3.2 largely covers the issues raised.</p> <p>See EN3.3</p> <p>See EN3.1/EN3.3</p> <p>See EN2.1</p> <p>See SA appraisal questions re SA objectives EN1, EN2, EN3, NR1, NR2, NR3 and NR4</p> <p>Covered separately by social, economic and environmental questions, but there is potential to add references</p>	<p>No change</p> <p>Add references to benefits to economy and social aspects from local history, culture and heritage to EC3.2 and SP6.1</p>
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	<ul style="list-style-type: none"> • Will it protect and/or enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens, and their settings? • Will it protect and/or enhance the character and appearance of the region's townscape and countryside maintaining and strengthening local distinctiveness and sense of place • Will it ensure that restoration and repair and maintenance is sympathetic towards the local environment • Will it support the repair and reuse of existing buildings • Will it preserve or enhance the character or appearance of conservation areas • Will it preserve listed buildings and structures • Will it conserve locally important buildings and townscapes • Will it protect archaeology • Will it respect and improve the distinctive character of the locality • Will it promote high quality urban design • Will it conserve distinctive historic landscapes • Will it improve the satisfaction of people with their neighbourhoods as places to live • Will it provide for increased access to, and understanding of, the historic environment • Will it protect and/or enhance the character, appearance or setting of the World Heritage Site? • Will it protect and/or enhance the character, appearance or setting of a Registered Battlefield or prejudice the potential for their interpretation? 	<p>See EN2 and EN3</p> <p>See EN2 and EN3</p> <p>Add reference to maintenance and repair at EN3</p> <p>See EN3.3</p> <p>See EN3.1</p> <p>See EN3.1</p> <p>See EN3.1</p> <p>See EN2.1/3.2</p> <p>See EN3.2/3.3 See EN2.3</p> <p>Add question relating to residential and neighbourhood amenity in EN3 Add reference to historic environment at SP2.4</p> <p>To consider adding if LDNP achieve World Heritage Site status</p> <p>Not applicable to South Lakeland</p>	<p>Add reference to maintenance and repair to EN3.3</p> <p>Question relating to neighbourhood amenity added to EN3 Reference to historic environment added at SP2.4</p> <p>No change in light of current position but will consider if status is gained</p> <p>No change</p>
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	<p>The following list provides examples of the environmental problems, which we would expect authorities to take into account in the SEA/SA process.</p> <ul style="list-style-type: none"> • Areas of significantly degraded landscape/townscape or areas where, on current trends, there is likely to be further significant loss of landscape/townscape character or quality. • Areas where development has had or likely to have significant impact upon the historic environment or people's enjoyment of it • Areas where landscape character or quality is being eroded because of changing farming or other lands management practices • Traffic congestion, air quality, noise pollution and other problems effecting the historic environment • Areas where quality of life including economic and social well being is significantly effected by above environmental problems 	<p>We consider that these issues are covered adequately in the Protection of the Environment issues table.</p> <p>We consider that these issues are covered by the 3rd row of the Protection of the Environment issues table. Agree to including reference to farming and land management.</p> <p>We consider that these issues are adequately addressed in the Natural Resources issues table.</p> <p>Quality of life relates collectively to all the social, economic and environmental objectives, but is also specifically covered by appraisal question SP5.4</p>	<p>No change</p> <p>Add reference to farming and land management to Protection of the Environment issues table</p> <p>No change</p> <p>No change</p>
Dr George Steele	Too vague to comment.	Noted	No change
Mrs Zoë Davison	<p>We believe that the Objectives are clear and relevant.</p> <p>We understand that the Appraisal Questions are meant to be helpful, but many of them contain multiple aspects and so can be answered in several different ways. For example, SP3.1 refers to housing for all, which is good, of appropriate quality and affordable. Who decides what is good, appropriate or affordable? Everyone will have different values.</p>	<p>Noted.</p> <p>Most questions have a central theme, sometimes with several specific aspects to be taken into account and assessed together as part of the appraisal process; it would be difficult to have questions covering every detailed aspect. An overview must be taken in the appraisal exercise.</p>	No change

		<p>Agree that the word 'good' adds to subjectivity.</p> <p>Levels of affordability are calculated after surveying those in housing need who are unable to afford open market prices to assess what would be affordable to them based on their incomes and capital in comparison with local house prices and rents.</p> <p>There are set standards for quality and needs surveys and design standards will help judge what is 'appropriate' by establishing the type and size of home that families in need require and also by assessing what kind of building design will complement the area in which development will take place.</p>	Amend appraisal question SP3.1 to remove reference to 'good' quality.
Mr Mark Harris, SLDC	<p>EN1 seems to cover only the 'sexy' bits of land, those designated as SSSI's etc and don't seem to include other green space types.</p> <p>SP2 'to improve access to services and facilities, the countryside and open spaces' there is no mention of access for people with disability, a key issue.</p>	<p>EN2 refers to other green space in general and SP2 refers to open space and the wider countryside</p> <p>SP2.3 specifically deals with the issue of access for people with disabilities</p>	<p>No change</p> <p>No change</p>
South Lakeland Friends of the Earth	EN3/NR1 pleased to see 'energy efficiency' 'renewable energy' 'reduce need to travel'.	Noted.	

<p>The Countryside Agency, North West Region</p>	<p>The following list provides some examples of environmental problems that we would expect authorities to take into account in the SA/SEA process:</p> <ul style="list-style-type: none"> • Areas of significantly degraded landscape or areas where, on current trends, there is likely to be a further significant loss of landscape character or quality; • Areas where development has had or is likely to have a significant impact on the landscape or people's enjoyment of it • Part of an AONB where landscape character or quality is being eroded because of changing farming or other land management practices; • Problems affecting National Trails or other long distance recreation routes and major countryside recreation site or rural tourism locations; • Traffic congestion, air quality, landscape erosion and other problems in and around sites in the countryside under significant visitor pressure; and • Where quality of life, including economic and social well being, is significantly affected by the environmental problems set out above. <p>We participated in the group that produced the countywide SA framework for Cumbria. We support the Objectives SP2/EN2.</p>	<p>We consider that landscape impacts are reflected in SA appraisal questions for objective EN2. See above</p> <p>See above – we will add reference to AONB in the NE2 appraisal questions</p> <p>We propose adding a question to EN2 to cover this point</p> <p>We consider these points are covered by appraisal question NR1.1, NR1.4, and those for objective EN2</p> <p>Quality of life relates collectively to all the social, economic and environmental objectives, but is also specifically covered by appraisal question SP5.4</p> <p>Noted</p>	<p>Add further appraisal question at EN2 to cover issues raised here.</p>
<p>The National Trust</p>	<p>Climatic factors should include the promotion of energy efficiency (this sits awkwardly under the heading of 'cultural heritage') and an objective relating to adaptation to the impacts of climate change (question NR1.8 is helpful but too vague). A specific energy efficiency (EE) question should be added to section NR1.</p>	<p>Agree. Support suggestion to move reference energy efficiency to NR1.</p> <p>It is considered that the objectives of NR1 do relate to adaptation to the impacts of</p>	<p>Move 'promoting energy efficiency' from objective EN3 to NR1.</p> <p>Amend appraisal question NR1.8 to read: 'Will it introduce and encourage methods of</p>

	<p>NR2 has no overt questions relating to flooding.</p> <p>Agree comments at 2.5 and 2.6, but need better questions rather than none at all.</p> <p>EC3.1: 'climate' is an inappropriate word in the context of the rest of the document and it would be better to refer to the improvement of 'quality of life'.</p> <p>EC3.4: suggest 'where (environmentally and socially) appropriate' rather than 'partially'.</p> <p>EC3.5: not clear as to the relevance of this question to the Sustainability Appraisal of a LDF document.</p>	<p>climate change – for example, question NR1.3 specifically refers to energy efficiency. However further clarification may assist.</p> <p>Flooding questions are included in NR1 and EN3</p> <p>Agree - revise NR2.5 and NR2.6</p> <p>Agree</p> <p>'Partially' is an error and should read 'particularly'. The SA framework as a whole seeks to balance environmental, social and economic factors.</p> <p>Planning policies can help deliver financial benefits. Text could be clarified by replacing 'provide' with 'facilitate the provision of'.</p>	<p>adapting to and mitigating climatic impacts and changes?'</p> <p>No change</p> <p>Revise NR2.5 to read: 'Will it help reduce pressure on watercourses/water bodies from diffuse pollution such as agricultural waste, fertilizer and run off from drains and concrete surfaces?' Revise NR2.6 to read: 'Will it encourage water usage habits to take account of the pressures on water resources?'</p> <p>Alter EC3.1 to read 'Will it help create the right <u>economic conditions etc</u> '</p> <p>Amend error to read '<u>particularly</u> in rural areas'.</p> <p>Alter wording of EC3.5 to read 'Will it help <u>facilitate the provision of</u> financial assistance to local businesses".</p>
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Sustainability Indicators (Paragraph 2.11 and Appendix 3)

Question 4: We welcome comments (or extra information) on our initial ideas and suggestions for others.

Cumbria RIGS Group/CWT	County Wildlife Site status should be an indicator added to EN1. County Wildlife Sites are not protected by law; however, they have status in planning under PPS9 and LPs. Wildlife Sites are a secondary tier of ecological designation in the County and form a huge biodiversity resource e.g. corridors and buffers. They are a good measure of the state of the environment as they indicate how much damage is done outside of the statutorily protected sites such as SSSIs, Special Areas of Conservation (SACs) etc. Please contact CWT for more information.	Agree. Development of indicators for biodiversity to be discussed and agreed with CWT and CCC ecologist in conjunction with other Local Planning Authorities (LPAs) in Cumbria who are developing indicators for the same purpose.	To be added, when agreed.
Dr George Steele	Helpful if relevant to aging population. 3 times the national average in communities e.g. Grange Arnside could be identified.	We recognise the demographic makeup of the area and consider that the great majority of indicators are relevant to residents of all ages. Several may be particularly relevant to older residents such as those relating to objective SP5 regarding health and sense of wellbeing. It is however, important to recognise the needs of all age groups.	No change
Kirkby Lonsdale Civic Society (KLCS)	<p>EN2 - Agree with the indicators, but what about wind farms, new roads and other major developments? These could degrade landscape quality and character in a major way. Needs to be an indicator that recognises major visual intrusions of that type.</p> <p>EN3 - Broadly agree with the indicators. What about an extra one to measure the number of enforcement notices issues or enforced?</p>	<p>Agree. Additional indicators to measure impact of new development in open countryside to be sought in discussion with other LPAs in Cumbria.</p> <p>Noted. This indicator will be considered with other LPAs in Cumbria and SLDC Enforcement Officers.</p>	<p>To be added later.</p> <p>To be decided.</p>

Mrs Zoë Davison	Indicators don't relate directly to the objectives. E.g. indicator 1 SP1 may be the response of a single person and does not reflect public opinion.	We have sought to relate indicators to objectives as far as possible and will seek to improve this relationship further, taking account of advice from statutory bodies and other planning authorities in Cumbria who are working on similar exercises. We consider that measuring the level of community organisations responding to LDF documents is one way of assessing the level of democratic participation in LDF preparation. The significance to be attached to responses is a separate matter.	Consider relationship between objectives and indicators by discussing indicators with statutory bodies, other LPAs and County Council (CC).
Ramblers Association	Cumbria County Council (CCC) will have a record of the ease of use of their footpaths as a % each year. It would be helpful to distinguish between those inside/outside the NP.	Agree. Investigate the availability of data with CCC.	Data is available at County level only and cannot be readily broken down to district level. No change, but will consider if the data becomes available at district level in the future.
South Lakeland Friends of the Earth (SLFoE)	<p>SP3 Add number of houses with adequate insulation</p> <p>SP4 GCSEs may not be an adequate measure of skills.</p> <p>SP6 In this community, the number of racial incidents is not a good measure of 'inclusive' 'open-minded'</p>	<p>Noted. We have not yet identified suitable data sources, but will explore further with other Cumbrian LPAs and the CC.</p> <p>Audit Commission data for this indicator refers to 5 GCSEs 'or equivalent' (eg NVQs), which we consider covers other skills adequately.</p> <p>Agree. Propose retaining indicator in case incidences increase due to growing numbers of in-migrants. But we also propose an extra indicator as set out across.</p>	<p>To be decided</p> <p>No change</p> <p>Add indicator: 'Percentage of residents who think for their local area over the past 3 years that race relations has got better or stayed the same'</p>

	<p>EN3 'Energy efficiency' does not appear to have an indicator capable of measuring it. Excess winter deaths have traditionally been used for home energy efficiency. The number of businesses with energy efficient schemes could be added.</p> <p>NR1: Measuring emissions do not indicate how much renewable energy has been promoted. Electricity in MW generated from Renewable Sources should be used.</p> <p>NR2 Number of homes and businesses with water saving measures.</p> <p>NR4 Amount of industrial waste as % of waste recycled. Amount of household waste...</p>	<p>Broadly agree. Energy efficiency will be moved to NR1 and we will seek relevant indicators, including an indicator on number of businesses gaining energy efficiency standard awards. We will also add an indicator on the number of businesses working towards environmental awards. If introduced, the proposed Sustainable Homes Code may provide data on voluntary take up of additional energy efficiency measures.</p> <p>We are not convinced winter deaths are a good reflection of changes in energy efficiency. It may reflect other factors more, such as weather, changes in energy prices, government help for winter fuel costs and local age structure.</p> <p>Propose use of indicator, which measures renewable energy capacity installed by type (MW); although information is only available for wind at present.</p> <p>Agree. However we have not yet found suitable data source. The proposed Code for Sustainable Homes may provide data.</p> <p>SLDC Waste Management suggest accurate data is not available as industrial and</p>	<p>Move reference to energy efficiency in EN3 to NR1. Add indicators: 'Number of businesses gaining energy efficiency standard awards' Business Environment Network indicator "Number of businesses working towards bronze, silver or gold Environmental Awards Scheme awards. Explore additional indicators, including proposed Code for Sustainable Homes.</p> <p>No change</p> <p>Add indicator for NR1: 'Renewable energy installed by type (MW)'.</p> <p>Add indicator and continue to search for suitable data: 'Number and percentage of homes (and/or) businesses with water saving measures'.</p> <p>No change.</p>
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	<p>EC1 Add especially sustainable businesses</p> <p>Climate change will have an impact on all the appraisal objectives and this should be included. Measuring Quality of Life in Cumbria measures Annual Rainfall. The number of houses flooded should be included as a measure of climate change</p>	<p>household waste is collected together, and other companies collect some of the district's industrial/commercial waste.</p> <p>Cannot connect individual objectives or criteria with other specific measures, as this will skew results.</p> <p>Climate change issues are considered under objectives NR1 and NR2 relate to some aspects of climate change. We will seek views of Environment Agency on these proposals.</p>	<p>No change.</p> <p>We have sought the views of the Environment Agency, who do not feel that the indicators suggested are suitable indicators. Although flooding is related to climate change, there is not sufficient evidence to indicate an established link between rainfall and climate change. Flooding can be affected by surcharging water drainage systems/groundwater as opposed to river/sea levels. The presence of flood defences would reduce the likelihood of flooding in areas that would otherwise have flooded and hence the reduction in flooding is not due to climate change.</p>
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<p>The National Trust</p>	<p>SP2 indicator 3-measuring access to facilities for rural dwellers by car is not inclusive, and indeed ignores those for whom the convenience of access is arguably most important.</p> <p>SP6 indicators do not pick up the reference to 'local history' no consideration has been given to cultural activities or local identity/distinctiveness.</p> <p>EN1 no measures relating to woodlands, nor to continuity of habitats.</p> <p>EN2 number of Tree Preservation Orders (TPOs) is unlikely to be a major factor; issues such as creation and loss of woodland are more relevant. Also nothing on landscape quality.</p> <p>EN3 Conservation Area Appraisals are a better measure than 'reviews'.</p> <p>Indicators confirm that this is not the place to deal with energy efficiency – move to NR1 and add appropriate indicator.</p> <p>There are some significant gaps in the environmental section, e.g. indicators to assess impacts upon environmental assets such as AONBs, the coast and archaeological sites.</p>	<p>Agree, but cannot expand the indicator to include those without a car as the data available is specifically for this indicator as it is worded here.</p> <p>We will research possible indicators suitable to take account of these aspects.</p> <p>This may be covered when Biodiversity Action Reporting System (BARS) becomes operational. To discuss with CWT and other Cumbrian LPAs.</p> <p>The TPO indicator has some merit and data is readily available. See comments on woodlands above and to Kirkby Lonsdale Civic Society.</p> <p>Agree</p> <p>Agree Seek energy efficiency indicator Agree to move energy efficiency to NR1 and consider appropriate indicator (See response to SLFoE above) Other suggestions welcome.</p> <p>We will continue to seek other indicators through joint working with other Cumbrian LPAs and 4 statutory bodies. We would also welcome any suggestions for indicators to measure those</p>	<p>Research other data available and discuss the possibilities with other LPAs/CC.</p> <p>Add indicators reflecting these aspects where appropriate. Not yet found source of data to measure 'sense of local history', will continue to seek. Explore with CWT/LPAs whether woodland (habitats) are covered by BARS.</p> <p>Discuss the merits of this indicator with other LPAs. And explore additional or replacement indicator opportunities.</p> <p>Alter wording to refer to Conservation Area Appraisals.</p> <p>Move reference to energy efficiency in EN3 to NR1. Indicator on homes with adequate insulation added, but no data as yet. Will continue to research.</p> <p>No change currently.</p>
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	<p>NR3/NR4 indicators are poor to assess this objective.</p> <p>EC1 job retention often has little to do with land availability. Poor measures.</p> <p>EC3 not convinced that GVA is a measure of 'diversity and strength', does not promote 'sustainable consumption and production' in accord with latest UK Sustainable Development Strategy.</p>	<p>aspects mentioned.</p> <p>The main mechanism by which SLDC can affect land and soil is to maximise brownfield development and consider appropriate increases in development density (particularly on greenfield sites)</p> <p>SLDC's capacity as LPA to influence this relates mainly to the provision of adequate land for employment and prevention of loss of current employment sites, both of which are covered by the indicators identified.</p> <p>GVA is widely used by Cumbrian authorities as a measure of strength of the economy. We recognise the importance of sustainable consumption and production, although are not aware of any specific data in order to measure this. This does however link to the indicator added to NR1 on businesses receiving or working towards environmental awards.</p>	<p>No change</p> <p>No change</p> <p>No change.</p>
United Utilities (UU)	NR2 Daily Domestic Water Use refers to the Audit Commission (AC) Area Profiles as the source of data. The AC website gives water use of 148l/hd-day, which is the figure for 2002/3! Our reported value for 2003/4 was 150l/hd-day (as your report states).	AC Area Profiles was proposed as a source of this data. UU will be contacted for data confirmation and cited as the source.	Change source stated to United Utilities and input data from UU (latest figures available). Trend data has been requested, but this is not available.

Methodology

(Section 2, Paragraph 2.5 and Appendix. 5)

Question 5 - Do you think the appraisal methodology is clear and workable?

Cumbria RIGS Group/CWT	Appraisal score wheel needs some explanation, at the moment there is none. Worked examples would be useful.	Explanation is provided at 2.15-2.18.	Add cross-reference in Appendix 5 to 2.15-2.18. (Also see response to South Lakeland Friends of the Earth)
Dr George Steele	Yes, but gaps need plugging to be credible.	Ongoing work to seek additional indicators will assist with this.	
South Lakeland Friends of the Earth	Not entirely clear. 2.16 and 2.17 are reasonably clear. The appraisal recording of scoring chart is not clear, especially how the overall score is arrived at.	Noted. We will review the appraisal recording and scoring chart and add clearer explanation	Review appraisal and scoring table at Appendix 5 and add clearer explanation, both in the appendix and 2.17 and 2.18.
The National Trust	Methodology is sector based, rather than seeking to bring together in an integrated manner all the strands of sustainable development. This is especially so in terms of having three separate panels to look at these matters individually; it is also unclear how/who would pick up natural resources issues. The scoring system proposed gives equal weight to all indicators; this raises questions about balance, e.g. the number of indicators relating to each area; and weighting, is it right that all the indicators are of the same importance?	We propose one combined panel comprised of representatives covering all four sectors. In terms of natural resources, the Environment Agency can take a lead on water; also assist SLDC Environmental Protection Team on air quality. These bodies, together with County Sustainability Manager, can advise on climatic issues. In terms of soils we will approach DEFRA. Other suggestions are welcome. Each objective will be given equal weight. Indicators will inform the collective assessment of proposals against each appraisal question. We consider that weighting indicators is unnecessary as the SA scoring is based on the appraisal questions not the indicators. We acknowledge that the SA	Approach DEFRA to advise on soils (inter alia) on SA appraisal panel.

		panel's collective scoring are essentially subjective decisions, but informed by available information from baseline information and indicators.	
	'Wheel' diagram preferable to the 'bar chart'.	Agree.	Delete reference to bar chart.
United Utilities	Support the methodology put forward in the report.	Noted.	No change.
Proposed Determination of Significant Environmental Effects under SEA regulations (Para. 1.8)			
Cumbria RIGS Group/CWT	This seems like a sensible approach.	Noted.	No change
Dr George Steele	Too easy to frustrate sustainable development of rural communities	Comment noted.	No change
The National Trust	It is agreed that there are likely to be significant environmental effects in respect of all four DPDs and that formal determinations should be made accordingly.	Noted	No change
Other General Comments			
Cumbria RIGS Group/CWT	Response is on behalf of Cumbria Wildlife Trust and also on behalf of Cumbria RIGS group. Please take this into account when listing organisations that have responded.	Noted	This consultation response table and LDF database will be amended to record comments as those of both Cumbria Wildlife Trust and Cumbria RIGS Group.
English Heritage	<u>Information Sources</u> <ul style="list-style-type: none"> • General information, national and regional, on the annual state of the historic environment is given in <i>Heritage Counts</i> (see www.heritagecounts.org.uk) • National Monuments Record Centre, Swindon (www.pastscapes.org) • HELM (www.helm.org.uk) • English Heritage annual Buildings at Risk register (Grade I and II* listed buildings only) and structural Scheduled Monuments) [NB 	Information sources will be taken into account, particularly in relation to indicators.	No change

	<p>the National Register does not cover Grade II listed buildings, the vast majority of listed buildings]</p> <ul style="list-style-type: none"> • County Historic Environment Record/Sites and Monuments Record • County Historic Landscape Characterisation • Extensive and Intensive Urban Surveys (urban characterisation) – refer to SMR; • Urban Archaeological Databases • Local Authority: BAR for grade II listed buildings and buildings of local historic/architectural interest; Conservation Area appraisals; other characterisation initiatives; local lists (buildings, parks and gardens) • Resident satisfaction surveys • Quality of Life Counts <p><i>Countryside Quality Counts</i> (www.cqc.org.uk)</p>		
Cumbria Tourist Board	<p>Quite a heavy weight and complex document. Not really one for general consumption by the public! It looks very thorough. CTB would be willing to get involved in a sustainability panel at the appropriate time.</p>	<p>Noted. We are only required to consult the 4 statutory bodies on SA Scoping Reports but also intend to inform all other consultees that they may comment if they so wish.</p>	No change
Dr George Steele	<p>The value of South Lakeland’s rural communities has not been appreciated and their needs under-resourced by Government Office North West, Cumbria County Council and South Lakeland District Council. Comment relevant to 2.10 page 10, to facilitate SP3 Guide 3.28 and affordable housing.</p> <p>My understanding is that ODPM policy still requires that sites on agricultural holdings do not qualify as brown-field sites. Moreover SLD planning has embraced this policy with vigour for reasons that could be explored at public enquiry. Notwithstanding that in South Lakeland there are 70 rural parishes. In rural areas there are many opportunities for small-scale developments to meet special rural housing needs.</p>	<p>It is considered that the SA Scoping Report takes account of the needs of all communities. The majority of SA objectives apply equally to rural communities.</p> <p>These issues relate more to Government policy rather than sustainability appraisal and can properly be addressed in forthcoming Development Plan Documents. ODPM’s definition of brownfield land excludes land and buildings actively or previously</p>	<p>No change.</p> <p>No change</p>

	<p>If brown-field site status was changed or erased the proportion of brown-field site developments could be increased, opportunity to enhance the landscape-value of suitable sites, increase the housing stock in rural communities, sustainable development of rural communities and possibility of diversification in SLD farming economy.</p>	<p>used for agriculture or forestry. The definition remains unchanged in draft Planning Policy Statement (PPS) 3. The issue should therefore be addressed to ODPM. SLDC has sought to implement national policy in PPG3 by aiming to build at least 50% of new houses on brownfield land. Draft PPS3 raises the prospect of additional measures to help identify sites to meet the need for affordable housing in rural areas. The District Council places a high priority on housing to meet local needs in accordance with Structure Plan policy.</p>	
Furness Greenways Partnership	<p>Feel the scoping document is thorough and the scoring criteria quite rigorous. Certainly fit for purpose.</p>	<p>Noted</p>	<p>No change</p>
Kendal Civic Society	<p>A well thought out and comprehensive document, with one criticism: it is difficult to read, full of office jargon ('synergistic', for example) and many phrases which have to be read and unscrambled before making sense. Please use plain English as it is spoken! On behalf of the Society, may we put in a plea for less (or ideally no) interference from alien planning inspectors. Local people think local planners should decide what they want in their locality.</p>	<p>We have added a Glossary and will review the extent of use of acronyms. Many of the terms are taken from published Government guidance and it is often difficult (or even misleading) to find simpler alternatives. It would be very difficult to produce an accurate document that met the various requirements without using the related terminology.</p> <p>We are only required to consult the 4 statutory bodies on Sustainability Appraisal Scoping Reports – in essence they set out a technical methodology. But we have informed others should they have the interest to</p>	<p>Review extent of use of acronyms.</p>

		comment. The final Sustainability Appraisal report for each planning document will be available to everyone for comment and will hopefully be in plain English!	
Morecambe Bay Primary Care Trust	Cumbria CC has done some work on accessibility mapping. A report is available showing wards with access problems. The contact for this is allan.mcnicoll@cumbriacc.gov.uk	We have this information and will seek to use it in relation to indicators.	No change
Mrs Zoë Davison	Baseline data is virtually non-existent. We further believe that SP1 is the most important objective, which can only be met if SLDC encourage public participation in decision-making. Why not have a simple Sustainability Appraisal Checklist for public use?	<p>We are working towards a final set of indicators and associated baseline data for the revised Scoping Report. We will continue to work with planning authorities in Cumbria and statutory bodies to refine these in the medium term.</p> <p>The proposed framework considers that all objectives are equally important. The Council's Statement of Community Involvement sets out the various ways by which we are actively encouraging public participation in decision making through consultation.</p> <p>We welcome the public's comments on the methodology for sustainability appraisal, and propose to carry out appraisals by means of an expert panel. The public will have opportunity to comment on the Sustainability Appraisal report for each planning document at the Preferred Options stage (Reg 26). We therefore do not feel a SA checklist is required</p>	<p>On-going improvements to indicators and baseline data.</p> <p>No change</p>

	<p>comments.</p> <p>I would like to suggest that after a determined period (say two years) from implementation that an independent review of how the LDF is performing be undertaken and also to ask parish councils and the public to give their inputs at this review.</p> <p>There have been occasions when development in our parish seems detrimental to sustainability, so during the initial period of implementation it might be a good time for SLDC to indicate on their decisions/documents how they have been influenced by the LDF. This may enable a better input from the parish council into any future reviews/comments on sustainability and the LDF.</p>	<p>Development Framework. The methodology on sustainability appraisal will not be applied to the consideration of individual planning applications; which will be determined to a large extent by LDF policies (which will hopefully be more sustainable as a result of having undergone the sustainability appraisal process.)</p> <p>The LDF will comprise various documents to be prepared and adopted over the next 2 or 3 years in accordance with the timetable in our Local Development Scheme. We are required to prepare an Annual Monitoring Report (AMR) to indicate how the LDF policy is being implemented and is performing. The AMR is available on the website and an Executive Summary has been sent to all Parish Councils. Much of the terminology is used in order to be consistent with that used in government guidance. It would be difficult to produce an accurate document that met the various requirements without using the related terminology. The glossary should help in this respect.</p>	
EA	In this instance we have no comments to add.	Noted	
Lancashire County Council	Does not have any observations. Wants to be consulted at future stages of LDF preparation.	Noted	