

# APPENDIX II: Issues and options appraisal

## Appraisal Recording and Scoring

Sustainability Appraisal of Development Management Policies DPD					
<u>Key</u>					
<b>Impact</b>		<b>Timeframe</b>		<b>Geographic Scale</b>	
Major Positive	+4	Short Term	S	Local	L
Positive	+2	Medium Term	M	District Wide	D
No Impact	0	Long Term	L	Urban	U
Negative	-2			Rural	R
Major Negative	-4				
Uncertain	?				
Neutral	N				

## ADVERTISEMENTS & SIGNS OPTION 1 Maintain current policy position

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D (but some elements are area-specific)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights/NPPF
Impact Score	N

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

#### Comments

Maintaining the current policy position results in status-quo. Limited bearing on these objectives, although some potential relevance to SP2 (good signage could aid access), SP5 (poor/prolific signage could contribute to lowered quality of life) and SP6 (wider role of advertising and signage within communities), although effectiveness of current policy has not been assessed. The current policy is not contrary to the NPPF but is out of date and there is a lack of clarity as to the geographical areas covered.

#### Mitigation

A new policy would improve the contribution to SP objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements.

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

### **EFFECTIVE PROTECTION OF THE ENVIRONMENT**

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D (but some policy elements are area-specific and impacts may be more significant in rural areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights/NPPF
Impact Score	N

#### Comments

Maintaining the current policy position results in status-quo. Some bearing on these objectives, including EN3 in particular (poor / prolific signage could harm the built environment and vice versa) although effectiveness of current policy has not been assessed. The current policy is not contrary to the NPPF but is out of date and there is a lack of clarity as to the geographical areas covered.

#### Mitigation

A new policy would improve the contribution to EN objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements and gearing them towards sensitive and sympathetic design, materials and location. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies and policies in the AONB DPD. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D (but some elements are area-specific)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	N

### Comments

Maintaining the current policy position results in status-quo. Limited bearing on these objectives. The current policy is not contrary to the NPPF but is out of date and there is a lack of clarity as to the geographical areas covered.

### Mitigation

It is unlikely that a new policy would provide a significant contribution to NR objectives. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies, and will include matters relating to natural resources. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D (but some policy elements are area-specific and impacts may be more significant in urban areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights/NPPF
Impact Score	N

### Comments

Maintaining the current policy position results in status-quo. Some bearing on these objectives, as good signage and advertising is important for businesses but poor/prolific/ signage could detract from the attractiveness of the area to tourists and as a place to invest. Effectiveness of current policy has not been assessed. The current policy is not contrary to the NPPF but is out of date and there is a lack of clarity as to the geographical areas covered.

### Mitigation

A new policy would improve the contribution to EC objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements and gearing them towards supporting the economy.

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

## ADVERTISEMENTS & SIGNS OPTION 2

### New Policy with updated/amended requirements

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D (but some elements are area-specific)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	+2

#### Comments

A new policy would improve the contribution to SP objectives, potentially including SP2 (supporting accessibility) and SP5 and SP6 (in relation to living environment and community vitality) through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

#### Mitigation

Ensure that effectiveness of the existing policies feeds into the preparation of a new policy, including clarity over the area to which they are being applied. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D (but some policy elements are area-specific and impacts may be more significant in rural areas/historic areas of towns and villages)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	+2

### Comments

A new policy would improve the contribution to EN objectives, potentially including EN2 (protecting the landscape and local character from inappropriate / prolific signage e.g. on rural roads and around attractions or businesses or cross-roads) and EN3 (protecting the built environment from inappropriate / prolific signage) through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts

### Mitigation

Ensure that effectiveness of the existing policies feeds into the preparation of a new policy, including clarity over the area to which they are being applied. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, landscape and historic environment policies and policies in the AONB DPD. Highways Authority input may be required.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D (but some policy elements are area-specific and impacts may be more significant in rural areas/historic areas of towns and villages)
Cumulative Impact	Limited
Impact Score	N

### Comments

A new policy could improve the contribution to NR objectives, but there is limited bearing on these objectives. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts.

### Mitigation

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, landscape and historic environment policies and will cover matters relating to natural resources.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D (but some policy elements are area-specific and impacts may be more significant in rural areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	N/+2

### Comments

A new policy would improve the contribution to EC objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements. This could include helping to ensure that signage is fit for purpose, sympathetic in design and materials and appropriately located so that a balance is struck between supporting businesses (allowing necessary, appropriate signage) whilst preventing harm (unattractive, poor, inappropriately designed or prolific signage) to an area's attractiveness as a place to shop, visit or do business. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts.

### Mitigation

Ensure that effectiveness of the existing policies feeds into the preparation of a new policy, including clarity over the area to which they are being applied. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment and retail policies.

## ADVERTISEMENTS & SIGNS OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	?
Geographic Scale	D (but potentially greater risk of negative impacts in certain areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	-2

#### Comments

The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control. This option would remove the opportunity to set out a locally specific approach, meaning, for example, that areas requiring special protection might be less well protected. There would be less control over adverts and signs than there is currently and interpretation of the NPPF could result in inconsistent decisions. This can be a contentious issue and not having a local policy limits ability to act and increase the risk of challenge to decisions. There is a risk of changes to NPPF and therefore CS currency.

#### Mitigation

A new policy would improve the contribution to SP objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements.

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	?
Geographic Scale	D (but potentially greater risk of negative impacts in certain areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	-2

### Comments

The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control. This option would remove the opportunity to set out a locally specific approach, meaning, for example, that areas requiring special protection might be less well protected and thus harm to local landscape or built environment could result. There would be less control over adverts and signs than there is currently and interpretation of the NPPF could result in inconsistent decisions. This can be a contentious issue and not having a local policy limits ability to act and increase the risk of challenge to decisions. There is a risk of changes to NPPF and therefore CS currency.

### Mitigation

A new policy would improve the contribution to EN objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements.

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment and landscape policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	?
Geographic Scale	D
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	N

### Comments

This option would remove the opportunity to set out a locally specific approach, and there would be less control over adverts and signs. Interpretation of the NPPF could result in inconsistent decisions. This can be a contentious issue and not having a local policy limits ability to act and increases the risk of challenge to decisions. There is a risk of changes to NPPF and therefore CS currency. However, there is limited bearing on these objectives.

### Mitigation

Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, landscape and historic environment policies and will cover matters relating to natural resources. The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control – it includes a requirement to consider cumulative impacts.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	?
Geographic Scale	D (but potentially greater risk of negative impacts in certain areas)
Cumulative Impact	With other policies such as those relating to design, historic environment, retail, etc and PD rights / NPPF
Impact Score	N/+2

### Comments

The NPPF sets out general principles for this policy topic and restricts circumstances in which LPA can exert control. This option would remove the opportunity to set out a locally specific approach, meaning, for example, that areas requiring special protection might be less well protected. There would be less control over adverts and signs than there is currently and interpretation of the NPPF could result in inconsistent decisions. This can be a contentious issue and not having a local policy limits ability to act and increase the risk of challenge to decisions. There is a risk of changes to NPPF and therefore CS currency. These factors could make it more difficult to ensure that a balance is struck between supporting businesses (allowing necessary, appropriate signage) whilst preventing harm (unattractive, poor, inappropriately designed or prolific signage) to an area's attractiveness as a place to shop, visit or do business.

### Mitigation

A new policy could improve the contribution to EC objectives through bringing it up-to-date, revising the areas covered if appropriate and ensuring clarity over the area to which each policy element applies, as well as strengthening the requirements. Other policies will/could cover some of the impacts relating to adverts and signage e.g. general requirements and design policies, historic environment policies.

## **CARAVANS, CHALETS & LOG CABINS OPTION 1**

### **Maintain current policy position**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies, e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N - neutral

#### Comments

Maintaining the current policy position results in status-quo. Limited bearing on these objectives. No longer a requirement to have a 6-week closed season (conditions now used to control occupancy) – people staying in caravans longer may have impacts on services and facilities in terms of both strain and helping them remain viable, thus impacting SP2

#### Mitigation

Careful thought required when applying conditions regarding e.g. open season lengths in relation to amounts and location of caravans and impacts (positive and negative) on local communities, services and facilities. A new policy may be required to ensure these issues and SP objectives are fully addressed. A new policy may be required to include additional criteria such as seeking enhancements / benefits. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that SP objectives are supported by development.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / ?

### Comments

Maintaining the current policy position results in status-quo, assuming this policy is working effectively. Particular links with EN1, EN2 and EN4 There are some concentrations of such accommodation. A strong policy needs to be in place – further information may be needed to determine success of current policy.

A positive approach is nevertheless required through CS and NPPF. Consider in context of existing and new AONB policy for caravans.

### Mitigation

A new policy may be required to include additional criteria such as requirement for Landscape and Visual Impact Assessment (LVIA) and seeking enhancements / benefits as well as just managing impacts. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that EN objectives are supported by development.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / ?

### Comments

Maintaining the current policy position results in status-quo. No longer a requirement to have a 6-week closed season (conditions now used to control occupancy) – people staying in caravans all year round may have impacts on traffic, journeys, water demand, effluent, waste and noise impacts, hence impacting NR1, NR2 and NR4

### Mitigation

Careful thought required when applying conditions regarding e.g. open season lengths in relation to amounts and location of caravans and impacts (positive and negative) on aspects such as traffic, journeys, water demand, effluent, waste and noise. A new policy may be required to ensure these issues and NR objectives are fully addressed. Ensure other relevant policies are applied to caravan (and similar) development to ensure that NR objectives are supported by development.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / ?

### Comments

Maintaining the current policy position results in status-quo. No longer a requirement to have a 6-week closed season (conditions now used to control occupancy) – people staying in caravans longer may have impacts on services and facilities in terms of both strain and helping them remain viable. Also means that jobs/income will be year round. Benefits to EC1 in particular. Newer types of camping-type accommodation such as pods, yurts etc are not accounted for in current policy.

### Mitigation

Careful thought required when applying conditions regarding e.g. open season lengths in relation to amounts and location of caravans and impacts (positive and negative). A new policy may be required to ensure these issues and EC objectives are fully addressed and for example to ensure that newer types of camping-type accommodation such as pods, yurts etc are accounted for. Ensure other relevant policies are applied to caravan (and similar) development to ensure that EC objectives are supported by development.

## CARAVANS, CHALETS & LOG CABINS OPTION 2

### New policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	?

#### Comments

Many criteria can be covered elsewhere through other policies such as general requirements. Unclear exactly which elements may need to be included in a new policy – score/impact depends on what the policy would include.  
 Lancaster seeks improved facilities.

#### Mitigation

New policy could guide application of conditions regarding e.g. open season lengths in relation to amounts and location of caravans and impacts (positive and negative) on local communities, services and facilities.

Opportunity to include additional criteria such as seeking enhancements / benefits – this could include better supporting existing community facilities rather than campsites having an onsite shop or providing facilities onsite that can be used by local community where these are currently lacking to help support SP objectives. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that SP objectives are supported by development.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	?

### Comments

Many criteria can be covered elsewhere through other policies such as general requirements. Unclear exactly which elements may need to be included in a new policy – score/impact depends on what the policy would include. Consider in context of existing and new AONB policy for caravans.

### Mitigation

Opportunity to include additional criteria (as Lancaster policy) such as seeking environmental enhancements / benefits – this could include biodiversity enhancements, plugging gaps in green networks, landscaping to help support EN objectives, although this should be covered by other policies. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that EN objectives are supported by development.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	?

### Comments

Many criteria can be covered elsewhere through other policies such as general requirements. Unclear exactly which elements may need to be included in a new policy – score/impact depends on what the policy would include.

### Mitigation

Opportunity to include additional criteria (as Lancaster policy) such as seeking environmental enhancements / benefits – this could include energy or water efficiency measures to help support NR objectives, although this should be covered by other policies. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that NR objectives are supported by development.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D-R
Cumulative Impact	With other policies e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	?

### Comments

Many criteria can be covered elsewhere through other policies such as general requirements. Unclear exactly which elements may need to be included in a new policy – score/impact depends on what the policy would include. Lancaster seeks improved facilities.

### Mitigation

New policy could guide application of conditions regarding e.g. open season lengths in relation to amounts and location of caravans and impacts (positive and negative) on local communities, local economy, services and facilities.

Opportunity to include additional criteria such as seeking enhancements / benefits – this could include better supporting existing community facilities rather than campsites having an onsite shop or providing facilities onsite that can be used by local community where these are currently lacking to help support SP objectives. Policy needs to be strong and up-to-date, fit for purpose for current trends. Ensure other relevant policies are applied to caravan (and similar) development to ensure that EC objectives are supported by development.

## CARAVANS, CHALETs & LOG CABINS OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R
Cumulative Impact	Potentially with any new policies introduced e.g. including, General Requirements, Design, Heritage, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / -2

#### Comments

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency  
 Lose any opportunity to improve on existing position and bring policy up-to-date including to reflect newer forms of camping accommodation, to account for new open season rules, to seek enhancements or to take a locally specific approach in an area that is popular with tourists using this form of accommodation.

#### Mitigation

Ensure other relevant policies are applied to caravan (and similar) development to ensure that SP objectives are supported by development.  
 Many aspects to consider are already covered in the basic principles of CS and NPPF policies and could be further managed through other new policies such as General Requirements.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R
Cumulative Impact	Potentially with any new policies introduced e.g. including General Requirements, car parking, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / -2

### Comments

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency  
Lose any opportunity to improve on existing position and bring policy up-to-date including to reflect newer forms of camping accommodation, to account for new open season rules, to seek enhancements or to take a locally specific approach in an area that is popular with tourists using this form of accommodation. Consider in context of existing and new AONB policy for caravans.

### Mitigation

Ensure other relevant policies are applied to caravan (and similar) development to ensure that EN objectives are supported by development. In particular, a need for LVIAs to be submitted for certain locations/scales/types of this type of development.

Many aspects to consider are already covered in the basic principles of CS and NPPF policies and could be further managed through other new policies such as General Requirements.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R
Cumulative Impact	Potentially with any new policies introduced e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / -2

### Comments

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency  
Lose any opportunity to improve on existing position and bring policy up-to-date including to reflect newer forms of camping accommodation, to account for new open season rules, to seek enhancements or to take a locally specific approach in an area that is popular with tourists using this form of accommodation.

### Mitigation

Ensure other relevant policies are applied to caravan (and similar) development to ensure that NR objectives are supported by development. Many aspects to consider are already covered in the basic principles of CS and NPPF policies and could be further managed through other new policies such as General Requirements.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R
Cumulative Impact	Potentially with any new policies introduced e.g. including General Requirements, Design, Trees and Landscaping and Pollution (external light). Also Core Strategy Policies – Development and flood risk, Transport Impact, Biodiversity and geo-biodiversity, Protection of enhancement of landscape and settlement character and Coast.
Impact Score	N / -2

### Comments

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency  
Lose any opportunity to improve on existing position and bring policy up-to-date including to reflect newer forms of camping accommodation, to account for new open season rules, to seek enhancements or to take a locally specific approach in an area that is popular with tourists using this form of accommodation.

### Mitigation

Ensure other relevant policies are applied to caravan (and similar) development to ensure that NR objectives are supported by development. Many aspects to consider are already covered in the basic principles of CS and NPPF policies and could be further managed through other new policies such as General Requirements.

## COASTS & WATERCOURSES OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium to Long
Geographic Scale	District (with focus on coastal areas and watercourses)
Cumulative Impact	Cumulative impact with other local planning policies including those relating to flooding, drainage and the environment.
Impact Score	N

#### Comments

Maintaining the current policy position in relation to coasts and watercourses would maintain the status quo and not therefore result in any different impacts than at present. This policy area has limited direct relevance to social progress objectives, although links could be defined between objective SP2 (improving access to services and facilities, the countryside and open spaces) and SP5 (improving people's health and sense of wellbeing).

#### Mitigation

A new policy would enable the NPPF to be fully taken into account and for positive impacts to be maximised.



### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local planning policies including those relating to flooding, drainage and the environment.
Impact Score	N

#### Comments

Maintaining the current policy position in relation to coasts and watercourses would maintain the status quo and not therefore result in any different impacts than at present. This approach would however potentially result in missed opportunities to address some of the issues covered in the National Planning Policy Framework.

#### Mitigation

A new policy would enable the NPPF to be fully taken into account and for positive impacts to be maximised.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local planning policies including those relating to flooding, drainage and the environment.
Impact Score	N

### Comments

Maintaining the current policy position in relation to coasts and watercourses would maintain the status quo and not therefore result in any different impacts than at present. This approach would however potentially result in missed opportunities to address some of the issues covered in the National Planning Policy Framework.

### Mitigation

A new policy would enable the NPPF to be fully taken into account and for positive impacts to be maximised.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local planning policies including those relating to flooding, drainage and the environment.
Impact Score	N

### Comments

Maintaining the current policy position in relation to coasts and watercourses would maintain the status quo and not therefore result in any different impacts than at present. This approach would however potentially result in missed opportunities to address some of the issues covered in the National Planning Policy Framework.

### Mitigation

A new policy would enable the NPPF to be fully taken into account and for positive impacts to be maximised.

## COASTS & WATERCOURSES OPTION 2

### New Policy (combining existing and adding new criteria)

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	+2

#### Comments

A new policy would help create a clear policy framework which could help communities better understand how decisions are taken (SP1.3). Out of date and unnecessary elements could be removed and the NPPF could be fully taken into account. A new policy could offer support for proposals that would appropriately enhance access to the coastal areas.

#### Mitigation

The policy would need to provide sufficient clarity to enable it to be effectively used to mitigate any potential negative impacts on coasts and watercourses.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	N / +2

### Comments

The environmental impacts of a new policy relating to coasts and watercourses would depend on its specific content. Such a policy would have the opportunity to maximise potential positive effects on environmental objectives if it goes above and beyond the existing provisions of Core Strategy policies.

### Mitigation

Potential benefits could be maximised by ensuring any new policy tackles specific issues and provides sufficient clarity on environmental issues.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	N / +2

### Comments

A new updated policy would have the opportunity to impact positively on natural resources objectives, particularly in relation to NR2 which concerns water quality.

### Mitigation

Clear requirements in a new policy would hap maximise potential positive impacts.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	N

### Comments

This option would have some effects in terms of enabling the local economy to be more resilient to the impacts of flood risk and therefore help strengthen it – ensuring current local plan policies are retained. However, this would still be the case if NPPF and Core Strategy policies were applied

### Mitigation

Ensure NPPF and CS policy continues to be fully applied.

## COASTS & WATERCOURSES OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	-2

#### Comments

This option would not result in a clear local decision making framework to help people understand the process, and would therefore negatively impact on objective SP1.

#### Mitigation

This negative impact could be mitigated by having a local policy on coasts and watercourse to present a clear decision making framework.

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	-2

#### Comments

This option would miss opportunities to have a local policy that fully reflects the requirements of the NPPF. Some desirable elements of saved local plan policies would be lost, for example references to culverting leading to potential risks of negative effects on the water and wider environment.

#### Mitigation

A local policy containing clear requirements and covering all relevant elements relating to coastal areas and watercourses would help mitigate potential negative impacts, and maximise opportunities for positive benefits. Other local planning policies relating to the environment would also help mitigate potential effects.

### SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	-2

#### Comments

This option would miss opportunities to have a local policy that fully reflects the requirements of the NPPF. Some desirable elements of saved local plan policies would be lost, for example references to culverting leading to potential risks of negative effects on natural resources objective for example those relating to water quality and resources.

#### Mitigation

A local policy containing clear requirements and covering all relevant elements relating to coastal areas and watercourses would help mitigate potential negative impacts, and maximise opportunities for positive benefits. Other local planning policies relating to the sustainable use and management of natural resources would also help mitigate potential effects.



## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium to Long
Geographic Scale	District
Cumulative Impact	Cumulative impact with other relevant policies, plans and programmes.
Impact Score	0

### Comments

This policy area has limited bearing to economic objectives therefore no impacts of this approach are predicted.

### Mitigation

No applicable as policy area does not relate to economic objectives.

## COMMUNITY FACILITIES OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	N

#### Comments

Current policies seek to protect facilities unless certain criteria have been met. This has benefits for most SP objectives, which would continue as the status quo. There is a possible negative impact for SP3 in that the current policy restricts conversion of facilities to homes, although again this would remain as status quo if the current policy was retained. The policy does not protect from conversion to non-residential uses which leaves facilities at risk of loss in this way.

#### Mitigation

Introduce a new policy that applies to conversions of community facilities to any type of use and which has tighter criteria regarding the circumstances in which a loss would be permitted. For example, it may be that conversion of a less suitable building for a particular facility could enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc – the development of a new policy should include exploration of this opportunity.

Other policies may help to meet SP objectives through conversions but only where permission is required.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	N

### Comments

Current policies seek to protect facilities unless certain criteria have been met. Any existing impacts would continue as the status quo. The policy does not protect from conversion to non-residential uses which leaves facilities at risk of loss in this way and PD rights allow some conversions anyway. Harm to biodiversity (e.g. bats roosting and swifts nesting in older buildings) may result even where permission of required. Policy currently allows for e.g. underused facilities to be converted in certain circumstances, meaning that conversions may result in improvements to the built environment and settlement character. Equally however, buildings may deliberately be allowed to fall into disrepair in order to help meet the criteria for conversion or the conversion may not be sympathetic.

### Mitigation

Introduce a new policy that applies to conversions of community facilities to any type of use and which has tighter criteria regarding the circumstances in which a loss would be permitted. For example, it may be that conversion of a less suitable building for a particular facility could enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc – the development of a new policy should include exploration of this opportunity.

Other policies, such as design policies may help to meet EN objectives through conversions but only where permission is required. This should include design requirements for conversions to take biodiversity value of existing buildings into account in terms of e.g. bats and swifts and make provision for them as part of the conversion and to reflect and enhance settlement character/built environment.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	N

### Comments

Current policies seek to protect facilities unless certain criteria have been met. This has benefits such as helping to retain facilities in rural areas resulting, in theory, in a reduced need to travel (NR1), which would continue as the status quo. Where facilities are not retained, conversions to create new homes are likely to be more resource efficient than new builds in terms of re-using the existing fabric but also in terms of land and making older buildings more energy efficient. The policy does not protect from conversion to non-residential uses which leaves facilities at risk of loss in this way.

### Mitigation

Introduce a new policy that applies to conversions of community facilities to any type of use and which has tighter criteria regarding the circumstances in which a loss would be permitted. For example, it may be that conversions of buildings housing a facility could be encouraged to result in co-use rather than full conversion allowing the facility to remain viable and available whilst delivering a new home/employment unit – the development of a new policy should include exploration of this opportunity.

Other policies may help to meet NR objectives through conversions but only where permission is required.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	N

### Comments

Current policies seek to protect facilities unless certain criteria have been met. This has benefits for most EC objectives that continue as the status quo – this includes retaining jobs and economic diversity especially in rural areas. The policy does not protect from conversion to non-residential uses which leaves facilities at risk of loss in this way.

### Mitigation

Introduce a new policy that applies to conversions of community facilities to any type of use and which has tighter criteria regarding the circumstances in which a loss would be permitted. For example, it may be that conversion of a less suitable building for a particular facility could enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc. Alternatively, dual uses could be delivered through partial conversions to help facilities remain viable – the development of a new policy should include exploration of these opportunities.

Other policies may help to meet EC objectives through conversions but only where permission is required.

## COMMUNITY FACILITIES OPTION 2

### New Policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	+2

#### Comments

A new policy would continue to protect facilities unless certain criteria have been met, but the criteria would be likely to be stronger and/or more up to date and more reflective of the current context. This has benefits for most SP objectives. A new policy should also protect from conversion to non-residential uses. There is a possible negative impact for SP3 in that the policy would still restrict conversion of facilities to homes but delivery of homes specifically through conversion of facilities is minimal and also have to be balanced against the wider benefits of retaining the facilities, especially in rural areas that might otherwise have none.

#### Mitigation

Ensure new policy applies to conversions of community facilities to any type of use and includes more robust and up-to-date criteria regarding the circumstances in which a loss would be permitted, including robustness of marketing and viability demonstration. Provisions should be sought to support (as a priority over loss) conversion of a less suitable building for a particular facility to enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc and to enable co-location of facilities or a facility and another use, such as an employment unit or home.

Other policies should also be applied to conversions to help to meet SP objectives where permission is required.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	+2

### Comments

A new policy would continue to protect facilities unless certain criteria have been met, but the criteria would be likely to be stronger and/or more up to date and more reflective of the current context. This could have benefits for some EN objectives, although some benefits would be delivered through other policies e.g. relating to biodiversity and design, avoiding harm to wildlife and supporting improvements to the built environment and settlement character. Criteria could seek to refuse conversions where there is evidence that buildings have been deliberately be allowed to fall into disrepair. A new policy should also protect from conversion to non-residential uses.

### Mitigation

Ensure new policy applies to conversions of community facilities to any type of use and includes more robust and up-to-date criteria regarding the circumstances in which a loss would be permitted, including robustness of marketing and viability demonstration.

Other policies, such as design policies should be applied to help to meet EN objectives through conversions where permission is required. This should include design requirements for conversions to take biodiversity value of existing buildings into account in terms of e.g. bats and swifts and make provision for them as part of the conversion and to reflect and enhance settlement character/built environment.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	+2

### Comments

A new policy would continue to protect facilities unless certain criteria have been met, but the criteria would be likely to be stronger and/or more up to date and more reflective of the current context. A new policy should also protect from conversion to non-residential uses. This will have benefits such as helping to retain facilities in rural areas resulting, in theory, in a reduced need to travel (NR1). Where facilities are not retained, conversions to create new homes are likely to be more resource efficient than new builds in terms of re-using the existing fabric but also in terms of land and making older buildings more energy efficient.

### Mitigation

Ensure new policy applies to conversions of community facilities to any type of use and includes more robust and up-to-date criteria regarding the circumstances in which a loss would be permitted, including robustness of marketing and viability demonstration.

Other policies, such as design policies should be applied to help to meet EN objectives through conversions where permission is required. Provisions should be sought to support (as a priority over loss) conversion of a less suitable building for a particular facility to enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc and to enable co-location of facilities or a facility and another use, such as an employment unit or home.



## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	0

### Comments

A new policy would continue to protect facilities unless certain criteria have been met, but the criteria would be likely to be stronger and/or more up to date and more reflective of the current context. A new policy should also protect from conversion to non-residential uses. This has benefits for most EC objectives that continue as the status quo – this includes retaining jobs and economic diversity especially in rural areas. However, it could also restrict conversion to employment uses – this could have negative impacts or benefits depending on the type of employment/number of jobs etc that are lost, gained or retained.

### Mitigation

It is important that a new policy that applies to conversions of community facilities to any type of use and has more robust criteria regarding the circumstances in which a loss would be permitted. However, provision should be made for weight to be given to the type of conversion and the benefits to or impacts on the specific locality so that the balance of losses, gains or retention of employment/economic diversity can be taken into account.

Economic benefits could also be gained through encouraging (as a priority over loss) conversion of a less suitable building for a particular facility to enable/deliver/fund the use of a more appropriate building allowing the facility to remain available whilst delivering a new home/employment unit etc. Alternatively, dual uses could be delivered through partial conversions to help facilities remain viable, retaining them whilst also delivering an employment unit or home – the development of a new policy should include exploration of these opportunities.

Other policies may help to meet EC objectives through conversions but only where permission is required.

## COMMUNITY FACILITIES OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S-M
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	-2

#### Comments

Removing all local level policy could result in increased loss of local services and facilities, particularly in rural areas where these are already limited. Core Strategy policy seeks to retain vitality of communities but there would be reduced ability to seek retention of specific facilities without criteria. Similarly, the opportunity to make other improvements to the existing position, such as encouraging dual uses or using conversions to otherwise aid retention and viability would be lost.

#### Mitigation

Introduce a new local policy with improvements as set out under option 2.

Other policies, such as those relating to design and access to services should be applied to help to meet SP objectives through conversions where permission is required.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S-M
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	N but potentially +1

### Comments

Whilst the loss of a local policy could have negative impacts for other objectives, provided other policies, including Design and General Requirements policies, take relevant issues into account and are properly and fully applied to conversions, and provided that NPPF and existing CS policies are interpreted strongly, EN objectives should be largely met.

Conversions can cause harm to biodiversity (e.g. bats roosting and swifts nesting in older buildings). Conversions may result in improvements to the built environment and settlement character but equally, buildings may deliberately be allowed to fall into disrepair in order that the conversion becomes favourable.

### Mitigation

A new policy would provide a more robust basis on which to judge applications for the conversion and potential loss of community facilities.

Other policies, such as design policies should be applied to help to meet EN objectives through conversions where permission is required. This should include design requirements for conversions to take biodiversity value of existing buildings into account in terms of e.g. bats and swifts and make provision for them as part of the conversion and to reflect and enhance settlement character/built environment.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S-M
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	0/N

### Comments

Removing all local level policy could result in increased loss of local services and facilities, particularly in rural areas where these are already limited. This could have pros and cons depending on circumstances in each locality and case. For instance, the loss of a facility might mean rural people need to travel more but the new building might be more energy efficient, might mean a local family can now live nearer their school/work or might create a new business unit. Losing the local policy would result in less control and less opportunity to take a balanced view based on local circumstances. Core Strategy policy seeks to retain vitality of communities but there would be reduced ability to seek retention of specific facilities without criteria. Similarly, the opportunity to make other improvements to the existing position, such as encouraging dual uses or using conversions to otherwise aid retention and viability would be lost. However, other policies could cover some of these issues.

### Mitigation

A new policy would provide a more robust basis on which to judge applications for the conversion and potential loss of community facilities.

Other policies, such as those relating to design and access to services should be applied to help to meet NR objectives through conversions where permission is required.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S-M
Geographic Scale	D R
Cumulative Impact	With other policies e.g. Design, General Requirements, plus PD Rights
Impact Score	-2

### Comments

A loss of local control could mean increased conversions to residential which could result in increased loss of local facilities and businesses, rural economic diversity and, whilst potentially small in numbers, important rural jobs. Some conversions could be to other employment/job-providing uses. No local policy on this matter would weaken the position and ability to make balanced judgements about net gains and losses depending on different circumstances in each case e.g. depending on the type of facility being lost, other facilities available and what is going to replace it and the local benefits of that etc. These issues are particularly relevant to the rural economy and rural areas, which have fewer facilities to begin with and thus the impacts and benefits will be more acutely felt.

### Mitigation

Introduce a new local policy with improvements as set out under option 2.

Other policies, such as those relating to design and access to services should be applied to help to meet EC objectives through conversions where permission is required.

# CONVERSION OF BUILDINGS TO RESIDENTIAL USE OPTION 1

## Maintain current policy position

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	D
Cumulative Impact	? (cumulative impact with new Permitted Development rights)
Impact Score	0

#### Comments

Maintaining the current policy position would maintain the status quo therefore this option would not result in any different impacts on social progress objectives than at present. This policy area has links with objective SP3 to provide everyone with a decent home. It also has relevance in relation to SP2 which concerns ensuring people have access to facilities and services, which is of relevance due to this policy area covering housing proposals in rural areas. Cumulative impacts with the policy approach towards loss of community facilities would also need to be considered as the existing saved local plan policy H13 seeks to protect against the loss of community facilities to residential use.

#### Mitigation

Criteria in the existing policy seek to mitigate impacts regarding the increased need to travel as a result of rural development, as proposed locations must not be isolated or poorly linked to transport infrastructure. Further clarity and strict application of these requirements could help further mitigate impacts.

Other local policies are applied to proposals for conversion to residential use such as design and heritage policies, and these can be applied to mitigate negative effects or maximise potential positive impacts in relation to this policy area.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	D
Cumulative Impact	? (cumulative impact with new Permitted Development rights)
Impact Score	0

### Comments

Maintaining the current policy position would maintain the status quo therefore this option would not result in any different impacts on environmental objectives than at present. This policy area has links with objectives relating to landscape (EN2), built environment character, the historic environment (EN3) and nature conservation (EN1), given that a significant proportion of proposals it will deal with are disused traditional buildings in rural areas.

### Mitigation

The existing saved Local Plan policies include criteria to mitigate possible environmental impacts from the conversion of buildings to residential use. Other environmental local planning policies can also be applied to such proposals to mitigate effects. Positive effects could be maximised through perhaps additional guidance relating to design.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	D
Cumulative Impact	? (cumulative impact with new Permitted Development rights)
Impact Score	0

### Comments

Maintaining the current policy position would maintain the status quo therefore this option would not result in any different impacts on natural resources objectives than at present. This policy area has links with objectives relating to reducing the need to travel and increasing energy efficiency (NR1) and encouraging development on brownfield sites (NR3.1) given that it is a policy area concerned with re-using existing buildings.

### Mitigation

Criteria of the existing saved local plan policy H12 and other local planning policies will be applied for example sustainable development policies to ensure that negative natural resource impacts are minimised, through for example ensuring conversions do not take place in isolated locations.



## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	D
Cumulative Impact	? (cumulative impact with new Permitted Development rights)
Impact Score	0

### Comments

Maintaining the current policy position would maintain the status quo therefore this option would not result in any different impacts on economic objectives than at present. This policy area has links with objectives relating to creating new employment opportunities (EC1) and diversifying and strengthening the local economy (EC3). The existing saved local plan policy H12 in relation to converting buildings outside development boundaries prioritises employment uses over residential uses, requiring it to be demonstrated that the building is not in demand for rural employment in the local area before it is allowed to be considered for housing use. This criteria of the existing policy is therefore important in its focus on promoting the rural economy.

### Mitigation

Maintaining the current policy position would continue to ensure that priority is given to employment uses when consideration is given to the conversion of rural buildings. However the expansion of permitted development rights offer far more scope for the conversion of employment and rural buildings to residential use, thus limiting the planning authority's scope to exercise control over this issue.

## CONVERSION OF BUILDINGS TO RESIDENTIAL USE OPTION

### 2

#### New policy with amended/updated criteria

##### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long - if carried into Single Local Plan
Geographic Scale	District (balance between rural and urban depends on content and approach)
Cumulative Impact	? (in combination with new permitted development rights, proposed general requirements policy and other local planning policies)
Impact Score	0 / +2

##### Comments

The impacts of a new policy would be dependent upon its specific content. It has the potential to impact positively on the objective to provide everyone with a decent home (SP3) if it enables more appropriate conversions to residential use. Careful consideration would need to be given to continuing to ensure the location of conversions is managed so as not to impact negatively on objectives to ensure that people have satisfactory access to goods and services (SP2), given the focus of the existing policy on rural areas. If any new policy includes existing criteria and provides largely the same policy direction then the impact would be neutral, however a new policy offers opportunities to seek more positive impacts.

A new updated policy would help provide a clear framework for local decision making and could help people more easily understand the decision making process, positively contributing to objective SP1.

##### Mitigation

The proposed general requirements policy and other existing and new policies must contain the most appropriate criteria and be enforced properly to ensure any loss of criteria currently in place in relation to the conversion of buildings to residential use does not have a negative impact.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long - if carried into Single Local Plan
Geographic Scale	District (balance between rural and urban depends on content and approach)
Cumulative Impact	? (in combination with new permitted development rights, proposed general requirements policy and other local planning policies)
Impact Score	0 / +2

### Comments

The impacts of a new policy would be dependent upon its specific content and whether it represents a more permissive or restrictive approach to conversions of buildings to residential use. It has the potential to impact positively on environmental objectives through for example requiring high quality sympathetic design to respect the character of the building (EN3.2) and encouraging the re-use of buildings (EN3.3). It could also impact positively on biodiversity objectives (EN1) by including criteria to ensure that habitats and species associated with disused buildings are protected, and on landscape objectives (EN2) by ensuring that building conversions are only permitted where they would respect the rural character of the countryside. The existing saved Local Plan policy already generally achieves these objectives and the impacts of a new/updated policy may therefore be limited, however it offers the opportunity to consider whether any elements of the policy could be strengthened or whether new elements could be added.

### Mitigation

The proposed general requirements policy and other existing and new policies must contain the most appropriate criteria and be enforced properly to ensure any loss of criteria currently in place in relation to the conversion of buildings to residential use does not have a negative impact. A large proportion of proposals for conversion to residential use now benefit from permitted development rights, removing a large degree of control from local authorities. This increases the risk of negative environmental effects but there is no scope for mitigating these impacts.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long – if carried into Single Local Plan
Geographic Scale	District (balance between rural and urban depends on content and approach)
Cumulative Impact	? (in combination with new permitted development rights, proposed general requirements policy and other local planning policies)
Impact Score	0 / +2

### Comments

The impacts of a new policy would be dependent upon its specific content and whether it represents a more permissive or restrictive approach to conversions of buildings to residential use. It has the potential to impact positively on natural resources objectives through for example encouraging development on brownfield sites (NR3.1).

### Mitigation

The proposed general requirements policy and other existing and new policies must contain the most appropriate criteria and be enforced properly to ensure any loss of criteria currently in place in relation to the conversion of buildings to residential use does not have a negative impact. Many buildings proposed for conversion are in rural areas and therefore less sustainable locations, leading to potential negative natural resources impacts given the increased need to travel. A new policy will need to provide a structured framework for permitting conversions in rural areas to ensure that only buildings in relatively sustainable locations are permitted to minimise the potential for cumulative negative natural resources impacts.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long – if carried into Single Local Plan
Geographic Scale	District (balance between rural and urban depends on content and approach)
Cumulative Impact	? (in combination with new permitted development rights, proposed general requirements policy and other local planning policies)
Impact Score	0 / +2

### Comments

The impacts of a new policy would be dependent upon its specific content and whether it represents a more permissive or restrictive approach to conversions of buildings to residential use. This policy area has links with objectives relating to creating new employment opportunities (EC1) and diversifying and strengthening the local economy (EC3). The existing saved local plan policy H12 in relation to converting buildings outside development boundaries prioritises employment uses over residential uses, requiring it to be demonstrated that the building is not in demand for rural employment in the local area before it is allowed to be considered for housing use. This criteria of the existing policy is therefore important in its focus on promoting the rural economy. Impacts on the economy of a new updated policy would therefore depend upon whether the preference for employment uses is rolled forward into a new policy.

### Mitigation

The proposed general requirements policy and other existing and new policies must contain the most appropriate criteria and be enforced properly to ensure any loss of criteria currently in place in relation to the conversion of buildings to residential use does not have a negative impact.

## CONVERSION OF BUILDINGS TO RESIDENTIAL USE OPTION

### 3

#### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Depends on longevity of National Policy relied upon or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	District
Cumulative Impact	In combination with new permitted development rights, proposed general requirements policy and other local planning policies.
Impact Score	-2

#### Comments

This option would involve relying only on national policy and the Core Strategy, with existing saved Local Plan policies H11 and H12 becoming redundant. This would introduce more uncertainty and not provide as clear a decision making framework than at present, which would not help people understand the process (SP1.3). Losing the current local plan policies would weaken the Council's policy position in relation to conversions – for example it would lose the criteria requiring such proposals not to be in isolated locations. This could result in more conversions in unsustainable locations which would not align well with social objectives of improving people's access to services and facilities.

#### Mitigation

Other existing policies, for example in relation to sustainable development principles and transport and accessibility could still be applied to try and control the location of conversions to mitigate potential negative effects. A clear specific policy on conversions to residential use would help provide a clearer policy framework and help people understand how decisions on proposals for building conversions would be determined.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Depends on longevity of National Policy relied upon or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	District
Cumulative Impact	In combination with new permitted development rights, proposed general requirements policy and other local planning policies.
Impact Score	-2

### Comments

Losing a number of specific criteria in the saved Local Plan policies risks a number of negative environmental effects, as there is little policy detail in the NPPF or Core Strategy in relation to conversion of buildings to residential use. For example the existing saved policies requires that the conversion proposal does create additional demands for new buildings – i.e. the building must be redundant. This helps to minimise landscape impacts by reducing the need for new buildings in the countryside. Losing this specific element of the policy would therefore risk negative landscape impacts (EN2).

### Mitigation

Some mitigation of environmental impacts could be achieved through the application of other local policies but a number of specific elements of the existing conversions policy are not covered adequately by other policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Depends on longevity of National Policy relied upon or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	District
Cumulative Impact	In combination with new permitted development rights, proposed general requirements policy and other local planning policies.
Impact Score	-2

### Comments

Losing a number of specific criteria in the saved Local Plan policies risks a number of negative natural resources effects, as there is little policy detail in the NPPF or Core Strategy in relation to conversion of buildings to residential use. As an example the current policy H12 requires that proposals are not isolated or poorly linked to existing transport infrastructure. Without this criteria there is a risk that the location of proposals will not be able to be as tightly controlled, risking more conversions in more remote areas thus increasing the need to travel and resultant greenhouse gas emissions (NR1).

### Mitigation

Some mitigation of natural resources impacts could be achieved through other local planning policies for example relating to sustainable development and transport and accessibility.



## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Depends on longevity of National Policy relied upon or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	District
Cumulative Impact	In combination with new permitted development rights, proposed general requirements policy and other local planning policies.
Impact Score	-2

### Comments

Losing a number of specific criteria in the saved Local Plan policies risks a number of negative impacts on economic objectives, as there is little policy detail in the NPPF or Core Strategy in relation to conversion of buildings to residential use. As an example the current policy H12 requires it to be demonstrated that a building is not in demand for rural employment in the local area before it can be considered for conversion. Without a specific policy the Council risks losing this promotion of rural employment opportunities which does not align well with economic objectives (e.g. EC1 and EC3).

### Mitigation

Whilst existing employment sites are offered protection from change of use by other local planning policies, the specific issue of effectively protecting the 'potential' of buildings for employment uses would not be covered in other policies. The only way of mitigating this impact would therefore be to retain this policy element in the Development Management policies DPD.

## EQUESTRIAN DEVELOPMENT OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS and NPPF
Impact Score	N

#### Comments

Maintaining the current policy position results in status-quo.

Some bearing on SP2, SP5 and SP6

Policy L9 not being strictly applied (e.g. criterion a)) and some elements in need of improvement/updating.

#### Mitigation

Consider new policy to improve and update – this could help achieve SP objectives more fully.

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS and NPPF
Impact Score	N

#### Comments

Links to all EN objectives, however, maintaining current policy position results in status-quo

#### Mitigation

Consider new policy to improve and update – this could help achieve EN objectives more fully.

### SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Limited
Impact Score	N

#### Comments

Limited links to NR objectives. Maintaining current policy position results in status-quo.

#### Mitigation

Consider new policy to improve and update – this could potentially help achieve NR objectives more fully.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS and NPPF
Impact Score	N

### Comments

Some links with EC1 and EC3. Impact will vary depending on type of horse-related use e.g. single horse in field with shelter for private use will have different impact to a large riding stables offering lessons or rides out.

Maintaining current policy position results in status-quo.

### Mitigation

Consider new policy to improve and update – however, impacts will remain dependent on types of horse-relates use applied for and approved – a new policy could encourage certain types.

## EQUESTRIAN DEVELOPMENT OPTION 2

### New Policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS, NPPF other new policies, including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	? (scope for + depending on exact criteria set out)

#### Comments

Main links are with SP2, SP5 and SP6. Potential for improvements on current position but nature and extent will depend on exact criteria.

#### Mitigation

Criteria to be carefully chosen to ensure support for SP objectives.

Policy should be more positively worded than at present and need not be so restrictive in terms of requiring relationship to existing buildings in all circumstances i.e. Policy L9 not currently being strictly applied (criterion a))

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS, NPPF other new policies; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	? (scope for + depending on exact criteria set out)

### Comments

Main links are with SP2, SP5 and SP6. Potential for improvements on current position but nature and extent will depend on exact criteria.

Dependence on other policies to fully achieve these objectives.

### Mitigation

Criteria to be carefully chosen to ensure support for EN objectives.

Policy should include specific control over the cumulative and incremental impacts of this type of development. Potential for a new General Requirements Policy that could include control over cumulative and incremental impacts.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Limited
Impact Score	0

### Comments

Few links with NR objectives. Other policies are likely to cover most NR issues.

Horse-related development has the potential to encourage more cars journeys in the countryside – this issue needs to be carefully managed.

### Mitigation

Criteria to be carefully chosen to ensure support for NR objectives where possible, in particular ensuring that car journeys in particular, but also and energy and water supplies are fully considered and properly managed in line with NR1 and NR2.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D R (rural emphasis)
Cumulative Impact	In combination effects with CS, NPPF other new policies; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	? (scope for + depending on exact criteria set out)

### Comments

Contribution to EC SA objectives is dependent on exact criteria and approach set out in new policy to the locations that would be considered acceptable for the various types of horse-related development.

### Mitigation

Criteria to be carefully chosen to ensure support for EN objectives.

New policy will need to be more flexible, to take account of the different types of horse-related development and their differing impacts.



## EQUESTRIAN DEVELOPMENT OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Potentially with any new policies introduced; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	N / -2

#### Comments

Principles set out in existing policy L9 are largely (although not wholly) covered by NPPF and CS. Control over location of horse-related developments would be lost.

Opportunity to include other local slants on managing this type of development and the need to consider bridleway congestion and highway impacts would be lost.

No opportunity to enhance contribution to meeting SP2, SP5 and SP6.

In a rural district, horse-related development is a particular issue and needs local interpretation of national and strategic policies in order to manage the impacts appropriately.

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency.

#### Mitigation

Consider new policy to improve and update to ensure support for SP objectives and to cover those aspects that are still considered to be required but would be otherwise lost.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Potentially with any new policies introduced; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	N / -2

### Comments

Principles set out in existing policy L9 are largely (although not wholly) covered by NPPF and CS. Control over location of horse-related developments would be lost.

Opportunity to include other local slants on managing this type of development and the need to consider bridleway congestion and highway impacts would be lost.

Opportunity to employ controls on cumulative and incremental impacts would be lost, although could be covered by a cumulative impacts reference in another policy (e.g. General Requirements).

No opportunity to enhance contribution to meeting EN objectives.

In a rural district, horse-related development is a particular issue and needs local interpretation of national and strategic policies in order to manage the impacts appropriately.

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency

### Mitigation

Consider new policy to improve and update to ensure support for EN objectives and to cover those aspects that are still considered to be required but would be otherwise lost.

Policy should include specific control over the cumulative and incremental impacts of this type of development – could cover incremental and cumulative impacts in a new general requirements local policy.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Potentially with any new policies introduced; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	N

### Comments

Limited links to NR objectives.

### Mitigation

Consider new policy to improve and update – this could potentially help achieve NR objectives more fully, especially NR1.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D R (rural emphasis)
Cumulative Impact	Potentially with any new policies introduced; including General Requirements, Design, Trees and Landscaping, Pollution (external lighting), Heritage and Parking.
Impact Score	N / ?

### Comments

Any new policy is unlikely to seek a greater or lesser quantum of horse-related development and so overall effects of Option 3 for EC objectives may not be significantly different from current position. However, this option removes the opportunity to employ controls over location and to be more locally specific in terms of the need to manage different types and scales of horse-related development, which may also influence economic impacts.

There is a risk of changes to the NPPF that could result in a loss of controls/affect CS currency

### Mitigation

Consider new policy to improve and update and to help support EN objectives – in particular, by including appropriate controls over location and different types and scales of horse-related development.

# ESSENTIAL DWELLINGS FOR WORKERS IN THE COUNTRYSIDE OPTION 1

## Maintain current policy position

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

#### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. The policy area has links with some social progress objectives, particularly the objective to provide people with decent homes (SP3) and the objective to improve people's access to facilities and services as it affects where people can live in relation to their workplace. It also affects how much development can take place in rural areas so has links with objectives of supporting local facilities and rural communities (SP6).

#### Mitigation

Given the limited links and impacts of this approach on social progress objectives there is limited scope for mitigation to maximise positive impacts.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. This policy area has links with a number of environmental objectives as its purpose is to manage new housing development in rural areas. It therefore links with EN2.1 relating to landscape quality and EN2.2 relating to maintaining the tranquillity of rural landscapes

### Mitigation

Any potential negative impacts of new housing in the countryside are mitigated through other local plan policies relating to landscape, design etc. There is scope to maximise potential positive effects through a new/amended policy that contains more/stricter requirements in relation to environmental objectives.

### **SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES**

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

#### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. This policy area has links with natural resource objectives. It deals with development in rural areas which raises issues such as accessing services and facilities and the need to travel by car (NR1.4). It specifically deals with essential dwellings for workers in the countryside to enable people to live close to their place of work (but not necessarily other facilities and services).

#### Mitigation

Other local plan policies seek to mitigate impacts relating to this policy area, for example policies relating to sustainable development and the environment. Clear and firm requirements in a new/updated policy could help ensure that only new dwellings for which there is an essential requirement are permitted in rural areas, helping minimise potential negative impacts such as increased car travel.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. The policy area has some limited links with economic objectives, as a policy concerned with allowing people to build homes in the countryside where it is essential to the operation of a rural business. It therefore links with objectives relating to rural diversification (EC3.4) and supporting local companies (EC1.2).

### Mitigation

Economic benefits could perhaps be maximised by a new/amended policy approach that would be more permissive of new dwellings to support rural benefits. However this would need to be balanced with the negative environmental and natural resources impacts that would arise from a more permissive approach to development in rural areas.



## ESSENTIAL DWELLINGS FOR WORKERS IN THE COUNTRYSIDE OPTION 2

New policy with updated criteria

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

#### Comments

The impacts on social progress objectives will clearly be dependent upon the specific content of a new policy. An issue under consideration at the Issues and Options stage however was whether it would be more appropriate for new businesses to be served by a temporary (rather than permanent) dwelling until the business is fully established. The permitting of temporary as opposed to permanent dwellings would not align well with social objectives relating to providing everyone with a decent home (SP3) and to improve people's sense of health and wellbeing (SP5) as generally temporary accommodation is likely to be of a lesser quality and standard than permanent dwellings.

#### Mitigation

The potential negative effects of this policy could be mitigated by placing a time limit on the temporary accommodation to ensure it is removed after a specified time period, or replaced with a permanent home if the business with which it is associated becomes fully established and justifies a permanent dwelling.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

### Comments

The impacts on environmental protection objectives will clearly be dependent upon the specific content of a new policy. An issue under consideration at the Issues and Options stage however was whether it would be more appropriate for new businesses to be served by a temporary (rather than permanent) dwelling until the business is fully established. The permitting of temporary as opposed to permanent dwellings would not align well with some environmental protection objectives for example relating to landscape character (EN2) and high quality sympathetic design (EN3.2) as there is the risk that temporary accommodation (e.g. caravans) would be of a lesser quality than well designed permanent dwellings. However given their temporary nature, such impacts would be time limited and reversible, compared to the provision of a permanent dwelling for a business which subsequently ceases to operate.

### Mitigation

Other local planning policies (e.g. relating to landscape impact) would still work to mitigate any negative impacts of temporary accommodation and influence its siting and location. Also imposing a time limit/requirement for temporary dwellings to be removed or replaced with permanent dwellings would ensure any effects are time limited and reversible.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

### Comments

The impacts on natural resources objectives will clearly be dependent upon the specific content of a new policy. If a new policy requires temporary as opposed to permanent dwellings for rural businesses that aren't fully established it could have impacts on a number of objectives. The use of temporary dwellings would ensure that new permanent dwellings are only built to support rural businesses where there is the strongest justification and need. This will help minimise the amount of new permanent development in the countryside, promoting sustainable patterns of development and reducing the need to travel by car (NR1).

### Mitigation

Other policies concerning sustainable development and the environment would be applied to help ensure the highest quality outcome for natural resources objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N / +2

### Comments

The impacts on economic objectives will clearly be dependent upon the specific content of a new policy. If a new policy requires temporary as opposed to permanent dwellings for rural businesses that aren't fully established it could have impacts on a number of objectives. This could help support rural diversification (EC3) by promoting a more flexible approach for businesses that are not fully established.

### Mitigation

The Council would need to have clear requirements and a definition as to what is considered a 'fully established' business. Requiring temporary rather than permanent dwellings could in some cases present an extra barrier or hurdle to rural businesses and potentially discourage investment in the area, so this would need to be carefully managed.

## **ESSENTIAL DWELLINGS FOR WORKERS IN THE COUNTRYSIDE OPTION 3**

**No Policy – rely on National and Core Strategy Policies**

### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

#### Comments

Deleting the existing saved Local Plan policies and not replacing them with a new Local Plan policy would mean decisions on new dwellings for essential workers in the countryside would need to be based just on relevant Core Strategy policies, other new Development Management policies and national policy in the NPPF. This would not create a clear local decision making framework that would enable people to fully understand the decision making process and would therefore impact negatively on objective SP1.3. Not having a locally specific policy for South Lakeland would not address housing needs in the most appropriate way (SP3). The absence of a clear local policy may result in more development in the countryside which would not positively impact on SP2 in relation to improving people's access to facilities and services.

#### Mitigation

A local policy with clear criteria to address and manage this particular type of housing need would mitigate negative impacts of this policy approach.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

### Comments

The absence of a specific local policy would create a more uncertain decision making framework for essential dwellings for workers in the countryside. This would likely mean that the Council would not be able to effectively manage such proposals for development. As a result this could lead to more development in the countryside with resultant potential negative impacts on landscape, local character etc. (EN2.1, EN2.2).

### Mitigation

Other local and national policies would still be applied to mitigate potential negative impacts of this approach, however impacts could most effectively be managed by having a clear local policy on dwellings for essential workers in the countryside.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

### Comments

The absence of a specific local policy would create a more uncertain decision making framework for essential dwellings for workers in the countryside. This would likely mean that the Council would not be able to effectively manage such proposals for development. As a result this could lead to more development in the countryside with resultant potential negative impacts on natural resources objectives such as in relation to reducing the need to travel (NR1) and minimising development on greenfield sites and productive land (NR3.3).

### Mitigation

Other local and national policies would still be applied to mitigate potential negative impacts of this approach, however impacts could most effectively be managed by having a clear local policy on dwellings for essential workers in the countryside to set out clear principles for this type of development.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	? / -2

### Comments

This option would offer less certainty for decision making and less clarity for potential applicants. This could impact upon business confidence and future investment decisions if people cannot be given initial certainty on whether a dwelling to support their business would be appropriate. This could therefore have negative impacts (EC1.2, EC3.4).

### Mitigation

A clear local policy setting out the circumstances in which dwellings for workers in the countryside will be allowed would help mitigate potential negative impacts by increasing clarity and certainty for rural businesses.



# **GYPSIES' AND TRAVELLERS' SITES OPTION 1**

## **Update GTAA and use to inform policy approach and site provision**

### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes  
SP2 - To improve access to services and facilities, the countryside and open spaces  
SP3 - To provide everyone with a decent home  
SP4 - To improve the level of skills, education and training  
SP5 - To improve people's health and sense of wellbeing  
SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	N

#### Comments

Further updating of evidence on Traveller accommodation needs and taking results into account in a separate Development Plan Document or the single Local Plan review, may result in better, more up to date evidence which takes account of latest government policy and guidance. However it may also delay putting in place updated policy and making site provision based on current evidence of need.  
Based on current evidence of need, there is a need for a small transit site in the Furness peninsula, south of Ulverston. This may have some potential to impact on aspects of health and well-being and traditional life styles of travellers and could result in more unauthorised encampments.

#### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	-2

### Comments

Taking time to update evidence may risk more unauthorised encampments in the short term. This could have some negative impacts for the protection of the environment - including for landscape, biodiversity and possibly built environment - although in practice these are likely to be very localised and limited both in scale and duration.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	0

### Comments

Taking time to update evidence may risk more unauthorised encampments in the short term. This could have some negative impacts for natural resources (land, soil) although again these are likely to be very localised and limited both in scale and probably in duration.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	0

### Comments

Taking time to update evidence and any delay in providing a transit site may have some impact in terms of the travelling community accessing some forms of employment but the level of impact is considered likely to be modest or minimal.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## **GYPSIES' AND TRAVELLERS' SITES OPTION 2**

### **Use current evidence to inform policy and site provision**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	N

#### Comments

Updating policy and making site provision based on current evidence would have the advantage of earlier delivery. A disadvantage however of waiting for more up to date evidence, is to the risk of making provision based on evidence which is less up to date. Arguably the opportunity for short term benefits as opposed to longer better outcomes over the longer term balance each other.

Based on current evidence of need, there is a need for a small transit site in the Furness peninsula, south of Ulverston. Until provision is made, this may have potential for some impact on aspects of health and wellbeing and traditional life styles of travellers and could result in more unauthorised encampments.

#### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	+2

### Comments

Updating policy and making site provision based on current evidence would have the advantage of earlier delivery. A disadvantage however of waiting for more up to date evidence, is to the risk of making provision based on evidence which is less up to date. As noted above, arguably the opportunity for short term benefits as opposed to longer better outcomes over the longer term, balance each other.

The benefits of earlier site provision include reduced risks of unauthorised encampments which could avoid some negative impacts for the protection of the environment - including for landscape, biodiversity and possibly built environment - although in practice would be relatively limited.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	+2

### Comments

Updating policy and making site provision based on current evidence would have the advantage of earlier delivery. A disadvantage however of waiting for more up to date evidence, is to the risk of making provision based on evidence which is less up to date. As noted above, arguably the opportunity for short term benefits as opposed to longer better outcomes over the longer term, balance each other.

The benefits of earlier site provision include reduced risks of unauthorised encampments which could avoid some potentially harmful implications for natural resources (land, soil) although these are likely to be limited and localised.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M/L - until review of Local Plan or separate Development Plan Document
Geographic Scale	Potentially district wide
Cumulative Impact	With other policies relating to development in rural areas
Impact Score	N

### Comments

As noted above, updating policy and making site provision based on current evidence would have the advantage of earlier delivery. A disadvantage however of waiting for more up to date evidence, is to the risk of making provision based on evidence which is less up to date. As noted earlier, the opportunity for short term benefits as opposed to longer better outcomes over the longer term, arguably balance each other. In this context any advantages and disadvantages relating to the economy and opportunities for the travelling community seem modest and finely balanced.

### Mitigation

Expedite progress, either using latest evidence or by progressing a review of evidence, also taking account of latest Government policy and guidance.

## GENERAL REQUIREMENTS OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
-----------	--

Geographic Scale	District
------------------	----------

Cumulative Impact	Cumulative impact with other local and national planning policies.
-------------------	--

Impact Score	N
--------------	---

#### Comments

This policy approach would not result in any different impacts than at present as it would maintain the status quo whereby 'standard' requirements for new development are contained across a range of different policies. The impacts of this approach however would be largely dependent on the content of other new development management policies and whether elements that could be covered in a 'general requirements' policy are adequately covered in other policies.

#### Mitigation

There could be scope for potential positive impacts if a new general requirements policy is introduced to create a clear overarching development management policy, and if elements are included that improve the outcomes compared to the existing suite of policies. It would provide scope to take account of NPPF elements that may not currently be reflected in local policy.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local and national planning policies.
Impact Score	N

### Comments

This policy approach would not result in any different impacts than at present as it would maintain the status quo whereby 'standard' requirements for new development are contained across a range of different policies. The impacts of this approach however would be largely dependent on the content of other new development management policies and whether elements that could be covered in a 'general requirements' policy are adequately covered in other policies.

### Mitigation

There could be scope for potential positive impacts if a new general requirements policy is introduced to create a clear overarching development management policy, and if elements are included that improve the outcomes compared to the existing suite of policies. It would provide scope to take account of NPPF elements that may not currently be reflected in local policy.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local and national planning policies.
Impact Score	N

### Comments

This policy approach would not result in any different impacts than at present as it would maintain the status quo whereby 'standard' requirements for new development are contained across a range of different policies. The impacts of this approach however would be largely dependent on the content of other new development management policies and whether elements that could be covered in a 'general requirements' policy are adequately covered in other policies.

### Mitigation

There could be scope for potential positive impacts if a new general requirements policy is introduced to create a clear overarching development management policy, and if elements are included that improve the outcomes compared to the existing suite of policies. It would provide scope to take account of NPPF elements that may not currently be reflected in local policy.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	Cumulative impact with other local and national planning policies.
Impact Score	N

### Comments

This policy approach would not result in any different impacts than at present as it would maintain the status quo whereby 'standard' requirements for new development are contained across a range of different policies. The impacts of this approach however would be largely dependent on the content of other new development management policies and whether elements that could be covered in a 'general requirements' policy are adequately covered in other policies.

### Mitigation

There could be scope for potential positive impacts if a new general requirements policy is introduced to create a clear overarching development management policy, and if elements are included that improve the outcomes compared to the existing suite of policies. It would provide scope to take account of NPPF elements that may not currently be reflected in local policy.

## GENERAL REQUIREMENTS OPTION 2

### New General Requirements Policy

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	+2

#### Comments

A new single 'general requirements' policy would provide an opportunity to streamline and update existing policies. It would allow for all the general elements of different policies (e.g. relating to design, amenity, highways impact etc) to be brought together into one policy that would apply to all types of development and be the starting point for development management decisions. It is considered that this could provide a clearer decision making framework and help people better understand the process and how decisions will be made. This would therefore have positive impacts for objective SP1.3 which relates to helping people understand the decision making process. This approach could also assist with the consistency of decision making as it would be applied to all development proposals.

The introduction of a new general policy would provide more scope to cover additional elements not already covered in other policies to better address current issues and meet sustainability objectives.

#### Mitigation

There is a risk that having a general overarching policy that needs to apply to all types of development may risk some specific elements relating to specific types of development being overlooked or 'watered' down to make them more generally applicable. This could be mitigated by ensuring that specific or more specialised issues are still retained in more detailed policies. It could be that general overarching requirements are contained in a general requirements policy and then more specific and detailed requirements could be included in other supporting policies.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	+2

### Comments

A new single 'general requirements' policy would provide an opportunity to streamline and update existing policies. It would allow for all the general elements of different policies (e.g. relating to design, amenity, highways impact etc) to be brought together into one policy that would apply to all types of development and be the starting point for development management decisions. A 'general requirements' policy would have the scope to cover a range of environmental issues such as landscape, nature conservation and design and it would therefore have the potential to positively contribute to those objectives. However depending on the content of the policy it may just be presenting existing policy requirements in a different way rather than presenting a new stronger policy position.

### Mitigation

There is a risk that having a general overarching policy that needs to apply to all types of development may risk some specific elements relating to specific types of development being overlooked or 'watered' down to make them more generally applicable. This could be mitigated by ensuring that specific or more specialised issues are still retained in more detailed policies. It could be that general overarching requirements are contained in a general requirements policy and then more specific and detailed requirements could be included in other supporting policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	+2

### Comments

A new single 'general requirements' policy would provide an opportunity to streamline and update existing policies. It would allow for all the general elements of different policies (e.g. relating to design, amenity, highways impact etc) to be brought together into one policy that would apply to all types of development and be the starting point for development management decisions. A 'general requirements' policy would have the scope to cover a range of natural resources issues such as sustainable design and it would therefore have the potential to positively contribute to those objectives. However depending on the content of the policy it may just be presenting existing policy requirements in a different way rather than presenting a new stronger policy position.

### Mitigation

There is a risk that having a general overarching policy that needs to apply to all types of development may risk some specific elements relating to specific types of development being overlooked or 'watered' down to make them more generally applicable. This could be mitigated by ensuring that specific or more specialised issues are still retained in more detailed policies. It could be that general overarching requirements are contained in a general requirements policy and then more specific and detailed requirements could be included in other supporting policies.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	+2

### Comments

A new single 'general requirements' policy would provide an opportunity to streamline and update existing policies. It would allow for all the general elements of different policies (e.g. relating to design, amenity, highways impact etc) to be brought together into one policy that would apply to all types of development and be the starting point for development management decisions. It would be of limited relevance to economic sustainability objectives, however it would be seeking to set a high quality standard for all new development which will have positive impacts for the district generally and help create a high quality environment in which people and businesses can prosper.

### Mitigation

There is a risk that having a general overarching policy that needs to apply to all types of development may risk some specific elements relating to specific types of development being overlooked or 'watered' down to make them more generally applicable. This could be mitigated by ensuring that specific or more specialised issues are still retained in more detailed policies. It could be that general overarching requirements are contained in a general requirements policy and then more specific and detailed requirements could be included in other supporting policies.

## GENERAL REQUIREMENTS OPTION 3

### No General Requirements Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium – position could be reviewed at Local Plan Review, but effects of development permitted under this approach would be long term.
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	?

#### Comments

This option would comprise of not including a general requirements policy in the Development Management policies DPD and instead relying on existing Core Strategy and national policies. This option would result in general criteria in other saved local policies becoming redundant. The impacts of this approach would be dependent upon whether elements of existing policies that are deleted are already covered by national and Core Strategy policies and whether they are still required. If there is no real difference in policy coverage as a result of this approach then its impacts would be neutral. However there is a risk that certain elements may be lost and not adequately covered in local policy. Under this approach there is less scope to introduce new more positive elements and some opportunities for positive effects may be missed. This option also creates uncertainty as it would be more vulnerable to national policy changes and does not create a clear decision making framework at a local level. This option would not help communities understand the decision making process and would not therefore contribute to objective SP1.2.

#### Mitigation

The introduction of a local general requirements policy would enable a clear local framework that can take opportunities to update and supplement the existing policy framework.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium – position could be reviewed at Local Plan Review, but effects of development permitted under this approach would be long term.
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	?

### Comments

The impacts of this approach would be dependent upon whether elements of existing policies that are deleted are already covered by national and Core Strategy policies and whether they are still required. If there is no real difference in policy coverage as a result of this approach then its impacts would be neutral. However there is a risk that certain elements may be lost and not adequately covered in local policy. Under this approach there is less scope to introduce new more positive elements and some opportunities for positive effects may be missed. This option also creates uncertainty as it would be more vulnerable to national policy changes.

### Mitigation

The introduction of a local general requirements policy would enable a clear local framework that can take opportunities to update and supplement the existing policy framework.

Additionally specific environmental policies, e.g. in relation to landscape, historic environment, nature conservation etc would still be included in the Local Plan offering detailed policy guidance – it would only be the broad overarching principles that are not carried forward – and many of these are already contained within the Core Strategy.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium – position could be reviewed at Local Plan Review, but effects of development permitted under this approach would be long term.
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	?

### Comments

The impacts of this approach would be dependent upon whether elements of existing policies that are deleted are already covered by national and Core Strategy policies and whether they are still required. If there is no real difference in policy coverage as a result of this approach then its impacts would be neutral. However there is a risk that certain elements may be lost and not adequately covered in local policy. Under this approach there is less scope to introduce new more positive elements and some opportunities for positive effects may be missed. This option also creates uncertainty as it would be more vulnerable to national policy changes

### Mitigation

The introduction of a local general requirements policy would enable a clear local framework that can take opportunities to update and supplement the existing policy framework.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium – position could be reviewed at Local Plan Review, but effects of development permitted under this approach would be long term.
Geographic Scale	District
Cumulative Impact	With other local and national planning policies.
Impact Score	?

### Comments

The impacts of this approach would be dependent upon whether elements of existing policies that are deleted are already covered by national and Core Strategy policies and whether they are still required. If there is no real difference in policy coverage as a result of this approach then its impacts would be neutral. However there is a risk that certain elements may be lost and not adequately covered in local policy. This policy area has limited relevance to the economic sustainability objectives. This option also creates uncertainty as it would be more vulnerable to national policy changes.

### Mitigation

The introduction of a local general requirements policy would enable a clear local framework that can take opportunities to update and supplement the existing policy framework.

## GREEN INFRASTRUCTURE & OPEN SPACE OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	In combination with NPPF and other potential new policies e.g. design; sustainable travel (recreation routes); pollution; SUDs etc
Impact Score	N

#### Comments

Clear links with social progress objectives, particularly SP2, SP5 & SP6. Strongly protects existing designations from international to local level, and provides policy framework for specific elements of green infrastructure – e.g. golf courses, disused railway lines, Lancaster Canal.

However, gaps in policy remain including:

- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision is lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm, other small-scale non-designated open spaces / green infrastructure.

#### Mitigation

- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as addressing mechanisms for its long term management;
- Policy provision to recognise the contribution of urban greening / public realm – in particular, to support SP5 and SP6 objectives;
- Other topic areas will potentially provide policy that contributes significantly / crosses over GI & OS policy area.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	In combination with NPPF and other potential new policies e.g. design; sustainable travel (recreation routes); pollution; SUDs etc
Impact Score	N

### Comments

Links with all EN objectives – policy could do more to fulfil EN3 – e.g. aspects of urban greening / public realm.

Existing policy gaps include:

- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision is lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm or other small-scale non-designated open spaces / green infrastructure.

### Mitigation

- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening all EN objectives in association with other proposed policies / supplementary guidance – e.g. design, sustainable travel etc;
- Policy provision to recognise the contribution of urban greening / public realm – in particular, to strengthen EN3 and EN4 objectives;
- Other topic areas that will potentially provide policy that contributes significantly / crosses over GI & OS policy area.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S - M
Geographic Scale	D; U (in respect of air quality)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. SUDS, sustainable travel etc as well as other Council initiatives including Air Quality Management Plans and Action Plans.
Impact Score	N

### Comments

In association with other policy topic areas (SUDS, sustainable travel, pollution etc) existing policy position supports NR objectives, particularly NR1, 2 & 3 (e.g. NR3.3 regarding minimising loss of green infrastructure assets and open spaces) – Core Strategy policy CS8.1 recognises role of green infrastructure as an integral part of creating sustainable communities and as a means of mitigating the negative impacts of development; also recognises need to protect and enhance watercourses and wetlands and the important contributions these make to sustainability objectives (NR2).

Gaps remain including:

- recognition of the cumulative contribution that urban greening / public realm could make particularly with reference to NR1;
- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision is lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green (or blue) infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm or other small scale non-designated open spaces / green infrastructure.

### Mitigation

- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening all NR objectives in association with other proposed policies / supplementary guidance – e.g. design, sustainable travel etc;

- Policy provision to recognise the potential cumulative contribution of urban greening / public realm – in particular, to strengthen NR1 (air quality) objectives especially in parts of the district where air quality issues are identified;
- Other topic areas that will potentially provide policy that contributes significantly / crosses over GI & OS policy area.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S – M
Geographic Scale	D
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. design and general requirements policies.
Impact Score	N

### Comments

Tenuous links with EC objectives – although arguably green infrastructure & open space policies contribute to enhancing the quality of the environment and sustainability of development, in turn retaining existing employment (including tourism and service sector) and attracting inward investment. In combination with other new policy areas, significant potential to contribute cumulatively to achieving EC objectives.

Currently no green infrastructure / open space guidance (in terms of quality, quantity, management) in the context of new employment development. In addition, existing policy does not address potential contribution of urban greening / public realm in respect of building a sustainable economy.

### Mitigation

- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments (including employment development) in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening EC objectives in association with other proposed policies / supplementary guidance – e.g. general requirements, design, sustainable travel etc;
- Policy provision to recognise the potential cumulative contribution of urban greening / public realm – e.g. in creating the right environment to attract and retain employment opportunities, particularly in town centres (potential to strengthen EC1 & EC3 objectives, as well as EC2 in conjunction with other new policies, such as sustainable travel, pollution etc);
- Other new policy areas (e.g. sustainable travel, design, pollution) will potentially enhance the impact of any new green infrastructure / open space policies and the role these play in securing EC objectives.



## GREEN INFRASTRUCTURE & OPEN SPACE OPTION 2

### New Policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M – L
Geographic Scale	D
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other new policies across topic areas.
Impact Score	+2

### Comments

Clear links with social progress objectives, particularly SP2, SP5 & SP6. Strongly protects existing designations from international to local level, and provides policy framework for specific elements of green infrastructure – e.g. golf courses, disused railway lines, Lancaster Canal.

Having new policy provides opportunity to address gaps including:

- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision that is currently lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm or other small-scale non-designated open spaces / green infrastructure.

There is also an opportunity for policy provision to recognise the contribution of urban greening / public realm – in particular, to support SP5 and SP6 objectives.

### Mitigation

Crucial to ensure that linked / supporting policies across other topic areas support green infrastructure / open space policy in securing SP objectives; for example, policies addressing sustainable travel, pollution, design can help secure objectives in conjunction with green infrastructure / open space policies.

Could include Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as addressing mechanisms for its long term management.

Recognise that other topic areas will potentially provide policy that contributes significantly / crosses over GI & IS policy area.

### **EFFECTIVE PROTECTION OF THE ENVIRONMENT**

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M – L
Geographic Scale	D
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other new policies across topic areas.
Impact Score	+2

## **Comments and Mitigation**

### Comments

Links with all EN objectives – policy could do more to fulfil EN3 – e.g. aspects of urban greening.

Existing policy gaps include:

- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision is lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm or other small-scale non-designated open spaces / green infrastructure.

Opportunity for policy provision to recognise the contribution of urban greening / public realm – in particular, to strengthen EN3 and EN4 objectives.

### Mitigation

- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening all EN objectives in association with other proposed policies / supplementary guidance – e.g. design, sustainable travel etc;
- other topic areas that will potentially provide policy that contributes significantly / crosses over GI & OS policy area.
- Ensure that linked / supporting policies across other topic areas support green infrastructure / open space policy in securing EN objectives; for example, policies addressing sustainable travel, pollution, design can help secure objectives in conjunction with green infrastructure / open space policies. Aspects of 'blue infrastructure' can be further strengthened by other linked policies including those addressing SUDS and coasts & watercourses, thereby contributing to EN objectives 1.4, 2.6, 3.4 & 3.5.

## **SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES**

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M – L
Geographic Scale	D; U (air quality)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. SUDS, sustainable travel, pollution etc as well as other Council initiatives including Air Quality Management Plans and Action Plans.
Impact Score	+2

### Comments

In association with other policy topic areas (SUDS, sustainable travel, pollution etc) existing policy position supports NR objectives, particularly NR1, 2 & 3 (e.g. NR3.3 regarding minimising loss of green infrastructure assets and open spaces) – Core Strategy policy CS8.1 recognises need to protect and enhance watercourses and wetlands and the important contributions these make to sustainability objectives (NR2).

Gaps remain including:

- Qualification for quantity (financial / physical) of open space / green infrastructure in new developments; up-to-date baseline data regarding existing open space provision and guidance on need, quality and function of new provision is lacking;
- Existing policies address specific elements of green infrastructure and existing protected / designated areas, but doesn't address non-designated green (or blue) infrastructure or recognise its cumulative multifaceted benefits – e.g. does not address contribution of urban greening, public realm or other small scale non-designated open spaces / green infrastructure.
- Policy provision to recognise the potential cumulative contribution of urban greening / public realm – in particular, to strengthen NR1 (air quality) objectives especially in parts of the district where air quality issues are identified;

### Mitigation

- Ensure that linked / supporting policies across other topic areas support green infrastructure / open space policy in securing NR objectives; for example, policies addressing sustainable travel, pollution, design, SUDS can also help secure NR objectives in conjunction with green infrastructure / open space policies.
- Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening all NR objectives in association with other proposed policies / supplementary guidance – e.g. design, sustainable travel etc;
- other topic areas that will potentially provide policy that contributes significantly / crosses over GI & OS policy area.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M - L
Geographic Scale	D
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. design and general requirements policies.
Impact Score	+2

### Comments

Tenuous links with EC objectives – although arguably green infrastructure & open space policies contribute to enhancing the quality of the environment and sustainability of development, in turn retaining existing employment (including tourism and service sector) and attracting inward investment. In combination with other new policy areas, significant potential to contribute cumulatively to achieving EC objectives.

Option offers opportunity to include green infrastructure / open space guidance (in terms of quality, quantity, management) in the context of new employment development.

Opportunity to include policy provision to recognise the potential cumulative contribution of urban greening / public realm – e.g. in creating the right environment to attract and retain employment opportunities, particularly in town centres (potential to strengthen EC1 & EC3 objectives, as well as EC2 in conjunction with other new policies, such as sustainable travel, pollution etc);

### Mitigation

Ensure that linked / supporting policies across other topic areas support green infrastructure / open space policy in securing EC objectives; for example, policies addressing sustainable travel, pollution and design have a bearing on green infrastructure and open space and together can help secure EC objectives.

Possible Supplementary Planning Guidance to guide and promote the way in which green infrastructure / open space can be designed into new developments (including employment development) in terms of its quantity, quality and multiple functions it can perform, as well as how it can be managed in the long term – could contribute to strengthening EC objectives in association with other proposed policies / supplementary guidance – e.g. general requirements, design, sustainable travel etc;

## GREEN INFRASTRUCTURE & OPEN SPACE OPTION 3

### No Policy – rely on National, Core Strategy and Land Allocations Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S / ?
Geographic Scale	D
Cumulative Impact	Other policies - e.g. recreation routes, SUDS etc
Impact Score	0 / -2

#### Comments

Strong links with SP objectives, particularly SP2, SP5 & SP6; however, Core Strategy and Land Allocation DPD policies lack clarity regarding quantity of open space for new development and does not recognise potential contribution of urban greening / public realm or cumulative impact of small-scale non-designated open space / green infrastructure.

Loses opportunity to introduce new measures – i.e. by providing up to date baseline information and adding clarity regarding quantity of open space required; also loses opportunity to link with other policy areas (e.g. air quality / recreation routes) which together could contribute to satisfying SP2 & SP5 objectives.

Also risk of uncertainty due to NPPF scope to change.

#### Mitigation

Core Strategy policy CS8.1 and Land Allocations DPD policy 1.10 would have to be rigorously applied.

Other high level policies / other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Recreational Routes policy.

New policy / supplementary planning guidance to cover quantity (physical and financial) of open space / green infrastructure provision in new developments.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S / ?
Geographic Scale	D
Cumulative Impact	Other policy topic areas – e.g. Recreational Routes, SUDS, trees & landscaping etc
Impact Score	0 / -2

### Comments and Mitigation

#### Comments

Strong links with all EN objectives.

Core Strategy and Land Allocation DPD policies lack clarity regarding quantity of open space for new development and does not recognise potential contribution of urban greening / public realm or cumulative impact of small-scale non-designated open space / green infrastructure.

Loses opportunity to introduce new measures – i.e. by providing up to date baseline information and adding clarity regarding quantity of open space required; also loses opportunity to link with other policy areas (e.g. air quality / recreation routes) which together could contribute to satisfying EN objectives.

Also risk of uncertainty due to NPPF scope to change.

#### Mitigation

Core Strategy policies and Land Allocations DPD policy 1.10 would have to be rigorously applied.

Other high level policies / other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Recreational Routes policy, Trees and Landscaping etc.

New policy / supplementary planning guidance to cover quantity (physical and financial) of open space / green infrastructure provision in new developments.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S / ?
Geographic Scale	D; U (in respect of air quality)
Cumulative Impact	In association with other new policies – e.g. SUDS, sustainable travel etc as well as other Council initiatives including Air Quality Management Plans and Action Plans
Impact Score	0 / -2

### Comments and Mitigation

#### Comments

In association with other policy topic areas (SUDS, sustainable travel, pollution etc) existing policy position supports NR objectives, particularly NR1, 2 & 3 (e.g. NR3.3 regarding minimising loss of green infrastructure assets and open spaces) – CS8.1 recognises role of green infrastructure as an integral part of creating sustainable communities and as a means of mitigating the negative impacts of development; also recognises need to protect and enhance watercourses and wetlands and the important contributions these make to sustainability objectives (NR2).

Core Strategy and Land Allocation DPD policies lack clarity regarding quantity of open space for new development and does not recognise potential contribution of urban greening / public realm or cumulative impact of small-scale non-designated open space / green infrastructure.

Loses opportunity to introduce new measures – i.e. by providing up to date baseline information and adding clarity regarding quantity of open space required; also loses opportunity to link with other policy areas (e.g. air quality / recreation routes) which together could contribute to satisfying EN objectives.

Also risk of uncertainty due to NPPF scope to change.

#### Mitigation

Core Strategy policies and Land Allocations DPD policy 1.10 would have to be rigorously applied.

Other high level policies / other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. sustainable travel, SUDS, Trees and Landscaping etc.

New policy / supplementary planning guidance to cover quantity (physical and financial) of open space / green infrastructure provision in new developments.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S / ?
Geographic Scale	D
Cumulative Impact	Other potential new policies – e.g. design, sustainable travel and general requirements policies etc
Impact Score	N / -2

### Comments and Mitigation

#### Comments

Tenuous links with EC objectives – although arguably green infrastructure & open space policies contribute to enhancing quality of the environment and sustainability of development, in turn retaining existing employment (including tourism and service sector) and attracting inward investment.

Loses opportunity to provide policy framework / guidance for green infrastructure / open space (quantity, quality, management) in the context of new employment development. In addition, existing policy does not address potential contribution of urban greening / public realm in respect of building a sustainable economy.

Also risk of uncertainty due to NPPF scope to change.

#### Mitigation

Core Strategy policies and Land Allocations DPD policy 1.10 would have to be rigorously applied.

Other high level policies / other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. sustainable travel, SUDS, Trees and Landscaping etc.

New policy / supplementary planning guidance to cover quantity (physical and financial) of open space / green infrastructure provision in new developments.

## **HISTORIC ENVIRONMENT OPTION 1**

### **Maintain current policy position**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	N/A
-----------	-----

Geographic Scale	N/A
------------------	-----

Cumulative Impact	N/A
-------------------	-----

Impact Score	N/A
--------------	-----

#### Comments

Concluded that this is not a reasonable alternative – maintaining current policy position would result in non-compliance with NPPF

#### Mitigation

N/A

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	N/A
Geographic Scale	N/A
Cumulative Impact	N/A
Impact Score	N/A

#### Comments

Concluded that this is not a reasonable alternative – maintaining current policy position would result in non-compliance with NPPF

#### Mitigation

None identified.

### SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	N/A
Geographic Scale	N/A
Cumulative Impact	N/A
Impact Score	N/A

#### Comments

Concluded that this is not a reasonable alternative – maintaining current policy position would result in non-compliance with NPPF

#### Mitigation

None identified.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	N/A
Geographic Scale	N/A
Cumulative Impact	N/A
Impact Score	N/A

### Comments

Concluded that this is not a reasonable alternative – maintaining current policy position would result in non-compliance with NPPF

### Mitigation

None identified.

## **HISTORIC ENVIRONMENT OPTION 2**

### **New Policy with updated/amended criteria**

## **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. design, general requirements, CS Policy etc plus legislation
Impact Score	+1

### Comments

Precise impacts are unknown as they depend on the exact content of the policy. However, a new policy will explicitly seek an improvement on the current position and so any impacts are highly likely to be positive. A new policy would set out a clearer and simpler decision-making framework, aiding SP1. Public benefits of heritage are likely to be given greater weight, and a strong policy will support a sense of place and belonging, awareness of local history and distinctiveness of communities.

### Mitigation

Other policies, such as Design and General Requirements may also deliver some SP SA objectives through development affecting the historic environment and should be applied to relevant development proposals.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
 EN2 - To conserve and enhance landscape quality and character for future generations  
 EN3 - To improve the quality of the built environment  
 EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. Green Infrastructure, general requirements, CS Policy
Impact Score	+1

### Comments and Mitigation

#### Comments

Precise impacts are unknown as they depend on the exact content of the policy. However, a new policy will explicitly seek an improvement on the current position and so any impacts are highly likely to be positive. A strong policy will support the protection and enhancement of the built environment (EN3) in particular.

#### Mitigation

Other policies, such as Green Infrastructure, Design and General Requirements, may also deliver some EN SA objectives through development affecting the historic environment, for example, those relating to trees and other elements of biodiversity (bats in older buildings etc), and should be applied to relevant development proposals.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
 NR2 - To improve and manage water quality and water resources and services  
 NR3 - To restore and protect land and soil  
 NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	D
Cumulative Impact	Limited – possibly with other policies such as Design and General Requirements, Core Strategy, Building Regulations
Impact Score	?

### Comments and Mitigation

#### Comments

This option is unlikely to have more than limited impacts on NR objectives as the primary purpose of a historic environment policy is to protect heritage assets.

#### Mitigation

Other policies, such as Design and General Requirements, may also deliver some NR SA objectives through development affecting the historic environment, for example, where there are redevelopments, refurbishments or new developments affecting heritage assets/conservation areas, and should be applied to relevant development proposals.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. GI, design, general requirements, CS Policy etc plus legislation
Impact Score	+1

### Comments and Mitigation

#### Comments

Precise impacts are unknown as they depend on the exact content of the policy. However, a new policy will explicitly seek an improvement on the current position and so any impacts are highly likely to be positive. A strong policy will support the protection and enhancement of the built environment and thus, should have a positive impact on the general attractiveness of the area in terms of tourism and investment.

#### Mitigation

Other policies, such as Green Infrastructure, Design and General Requirements may support the delivery of EN SA objectives through development affecting the historic environment and should be applied to relevant development proposals.



## HISTORIC ENVIRONMENT OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. design, general requirements, CS Policy etc plus legislation
Impact Score	-1

#### Comments

Potentially not a reasonable alternative – relying solely on Core Strategy and National Policy could be considered non-compliance with NPPF in same way as option 1. It would result in gaps in fulfilment of the requirements set out in the NPPF relating to what Local Plans should cover regarding the historic environment. It would not proactively conserve local heritage. Non-designated heritage assets would have no protection and no details would be provided on the weight to be given to significance of heritage assets. No local interpretation of the NPPF or locally specific approach to heritage would be provided beyond the strategic CS policy.

#### Mitigation

If introduced, other policies, such as Design and General Requirements may support the delivery of SP SA objectives through development affecting the historic environment and should be applied to relevant development proposals.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. GI, design, general requirements, CS Policy etc plus legislation
Impact Score	-1

### Comments

Potentially not a reasonable alternative – relying solely on Core Strategy and National Policy could be considered non-compliance with NPPF in same way as option 1. It would result in gaps in fulfilment of the requirements set out in the NPPF relating to what Local Plans should cover regarding the historic environment. It would not proactively conserve local heritage. Non-designated heritage assets would have no protection and no details would be provided on the weight to be given to significance of heritage assets. No local interpretation of the NPPF or locally specific approach to heritage would be provided beyond the strategic CS policy.

### Mitigation

Other policies such as Green Infrastructure, Design and General Requirements may support the delivery of EN SA objectives through development affecting the historic environment and should be applied to relevant development proposals.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	D
Cumulative Impact	Limited – possibly with other policies such as Design and General Requirements, Core Strategy, Building Regulations
Impact Score	0

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

### Comments

Potentially not a reasonable alternative – relying solely on Core Strategy and National Policy could be considered non-compliance with NPPF in same way as option 1. It would result in gaps in fulfilment of the requirements set out in the NPPF relating to what Local Plans should cover regarding the historic environment. It would not proactively conserve local heritage. Non-designated heritage assets would have no protection and no details would be provided on the weight to be given to significance of heritage assets. No local interpretation of the NPPF or locally specific approach to heritage would be provided beyond the strategic CS policy.

However, the potential impacts of this option on NR objectives are less apparent than on other objectives.

### Mitigation

Other policies, such as Design and General Requirements, may also deliver some NR SA objectives through development affecting the historic environment, for example, where there are redevelopments, refurbishments or new developments affecting heritage assets/conservation areas, and should be applied to relevant development proposals.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	D
Cumulative Impact	Other policies e.g. GI, design, general requirements, CS Policy etc plus legislation
Impact Score	-1

### Comments

Potentially not a reasonable alternative – relying solely on Core Strategy and National Policy could be considered non-compliance with NPPF in same way as option 1. It would result in gaps in fulfilment of the requirements set out in the NPPF relating to what Local Plans should cover regarding the historic environment. It would not proactively conserve local heritage. Non-designated heritage assets would have no protection and no details would be provided on the weight to be given to significance of heritage assets. No local interpretation of the NPPF or locally specific approach to heritage would be provided beyond the strategic CS policy.

### Mitigation

Other policies such as Green Infrastructure, Design and General Requirements may support the delivery of EC SA objectives through development affecting the historic environment and should be applied to relevant development proposals.

## **HOT FOOD TAKEAWAYS OPTION 1**

### **Maintain current policy position**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S-M
-----------	-----

Geographic Scale	D U
------------------	-----

Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, adverts and signs
-------------------	--

Impact Score	N
--------------	---

#### Comments

This option offers the status quo. However, it potentially loses the opportunity to address the health issues relating to (a proliferation of) hot food takeaways (SP5). Amenity, health and town centre vibrancy and vitality are the main connections with SP objectives (SP5, SP6). There are some links to SP3 as the controls of this policy will support homes being 'decent' in that they will reduce potentially negative impacts (smells, noise, additional traffic) on the quiet enjoyment of homes near such outlets.

#### Mitigation

A new policy would offer the opportunity to add controls relating to the health impacts of (a proliferation of) hot food takeaways. Alternatively, General requirements or other Council schemes could be used to achieve this.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

- EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
EN2 - To conserve and enhance landscape quality and character for future generations  
EN3 - To improve the quality of the built environment  
EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S-M
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement
Impact Score	N

### Comments

This option offers the status quo. There are some links to EN3 as the controls of this policy will help to ensure that there are no negative impacts to the built environment/neighbourhoods as places to live (EN3.6 and EN3.7) in terms of noise, smells, litter.

### Mitigation

Some elements (over and above the policy) could be/are managed through General Requirements or other Council schemes/Environmental Protection enforcement to achieve further controls. This could include ensuring high quality frontages of these outlets.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

- NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
NR2 - To improve and manage water quality and water resources and services  
NR3 - To restore and protect land and soil  
NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S-M
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements and PD rights, Environmental protection enforcement, Pollution
Impact Score	N

### Comments

This option offers the status quo. However, there are limited direct impacts on NR objectives. In Kendal town centre in particular, there could be some limited links in terms of air quality impacts of cars left running outside such outlets.

### Mitigation

Some elements (over and above the policy) could be/are managed through General Requirements or other Council schemes/Environmental Protection enforcement to achieve further controls. There are connections to these objectives that are potentially outside the remit of the planning system, for example waste products such as takeaway packaging and cooking oil will need to be dealt with in an appropriate way to avoid negative impacts on the environment.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S-M
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	N

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

### Comments

This option offers the status quo. The role of these establishments in town centre vibrancy, variety and vitality and job creation, alongside the controls to ensure they deliver these benefits in an appropriate way, is important. The policy does not actively promote their provision, but rather seeks to manage it.

### Mitigation

General requirements or other Council schemes could be used to support the implementation of the policy to best support EC objectives.

## HOT FOOD TAKEAWAYS OPTION 2

### New Hot Food Takeaways Policy

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	0 / +2

#### Comments

This option presents an opportunity to address the health issues relating to (a proliferation of) hot food takeaways (SP5). Amenity, health and town centre vibrancy and vitality are the main connections with SP objectives (SP5, SP6). The impacts on SP6 will depend on the specific measures included in the policy – more flexibility could be allowed which could have positive or negative impacts. There are some links to SP3 as the controls of this policy will support homes being 'decent' in that they will reduce potentially negative impacts (smells, noise, and additional traffic) on the quiet enjoyment of homes near such outlets. Some provisions of the existing policy would be managed through General Requirements policy.

#### Mitigation

To gain the most for SP objectives from a new policy, it should include controls relating to the health impacts of (a proliferation of) hot food takeaways; the existing controls should be retained (whether through the new policy or through other measures, such as the General Requirements policy) where, on balance, they offer net gains for town centre amenity, vitality, vibrancy and variety whilst maintaining the area as an attractive place to live as well as visit. Consideration should be given to including a policy that covers all food and drink outlets.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	0 / +1

### Comments

A new policy could offer some positive elements for EN objectives but these are less tangible than in relation to SP objectives (so potential minor positive). Some provisions of the existing policy would be managed through General Requirements policy. In relation to EN3 in particular, in that the quality of the frontage of such outlets is important in managing their impact.

### Mitigation

Existing controls should be retained (whether through the new policy or through other measures, such as the General Requirements policy) where, on balance, they offer net gains for the environment. Specific provisions in the new policy or in an appropriate other policy (Design, Adverts and Signs) should ensure the frontages of such outlets are of a high quality. Consideration should be given to including a policy that covers all food and drink outlets.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements and PD rights, Environmental protection enforcement, Pollution
Impact Score	N

### Comments

There are limited direct impacts on NR objectives. Some provisions of the existing policy would be managed through General Requirements policy. There could be some limited links in terms of air quality impacts of cars left running outside such outlets or pollution and waste through the disposal of takeaway packaging and substances such as cooking oil.

### Mitigation

Existing controls should be retained (whether through the new policy or through other measures, such as the General Requirements policy). There are connections to these objectives that are potentially outside the remit of the planning system, for example waste products such as takeaway packaging and cooking oil will need to be dealt with in an appropriate way to avoid negative impacts on the environment. Consideration should be given to including a policy that covers all food and drink outlets.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	N

### Comments

The role of these establishments in town centre vibrancy, variety and vitality and job creation, alongside the controls to ensure they deliver these benefits in an appropriate way, is important. A new policy would not actively promote their provision, but rather seeks to manage it.

### Mitigation

Existing controls should be retained (whether through the new policy or through other measures, such as the General Requirements policy) where, on balance, they offer net gains for town centre amenity, vitality, vibrancy and variety whilst maintaining the area as an attractive place to live as well as visit.

General requirements or other Council schemes could be used to support the implementation of the policy to best support EC objectives. Consideration should be given to including a policy that covers all food and drink outlets.

## HOT FOOD TAKEAWAYS OPTION 3

### No Policy – rely on National, Core Strategy and Land Allocations Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	?
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	? – depends on content

#### Comments

The impacts of this option are heavily dependent on the specific content of other policies such as Design, General Requirements, Town Centres, Historic Environment, Adverts and Signs as well as the controls implemented through PD rights and Environmental protection enforcement. This option would result in the loss of specific controls (although many of the principles would remain covered through NPPF/CS) and this could have positive and negative impacts for SP objectives. For example, through variety/vitality in the town centres and through potential proliferation/domination of this use type (impacts on SP5 and SP6 in particular) depending on their interpretation. This option would also mean the loss of the opportunity to address the health issues relating to (a proliferation of) hot food takeaways (SP5)

#### Mitigation

Existing controls should be retained through other means, such as the new General Requirements, Design or Town centres policies where, on balance, they offer net gains for town centre amenity, vitality, vibrancy and variety whilst maintaining the area as an attractive place to live as well as visit. General requirements or other Council schemes could be used to support the implementation of the policy to best support SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	?
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	? – depends on content

### Comments

The impacts of this option are heavily dependent on the specific content of other policies such as Design, General Requirements, Town Centres, Historic Environment, Adverts and Signs as well as the controls implemented through PD rights and Environmental protection enforcement. This option would result in the loss of specific controls (although many of the principles would remain covered through NPPF/CS) and this could have positive and negative impacts for EN objectives.

### Mitigation

Existing controls should be retained through other means, such as the new General Requirements, Design or Town centres policies where, on balance, they offer net gains for the environment. Specific provisions in appropriate other policies (Design, Adverts and Signs, Historic Environment) should ensure the frontages of such outlets are of a high quality.

General requirements or other Council schemes could be used to support the implementation of the policy to best support EN objectives.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	?
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs, Pollution
Impact Score	N/?

### Comments

The impacts of this option are heavily dependent on the specific content of other policies such as Design, General Requirements, Town Centres, Historic Environment, Adverts and Signs, Pollution as well as the controls implemented through PD rights and Environmental protection enforcement. This option would result in the loss of specific controls (although many of the principles would remain covered through NPPF/CS) although there may be limited bearing on NR objectives. There could be some limited links in terms of air quality impacts of cars left running outside such outlets or pollution and waste through the disposal of takeaway packaging and substances such as cooking oil.

### Mitigation

Existing controls should be retained through other means, such as the new General Requirements, Design or Town centres policies where, on balance, they offer net gains for town centre amenity, vitality, vibrancy and variety whilst maintaining the area as an attractive place to live as well as visit. There are connections to these objectives that are potentially outside the remit of the planning system, for example waste products such as takeaway packaging and cooking oil will need to be dealt with in an appropriate way to avoid negative impacts on the environment.

General requirements or other Council schemes could be used to support the implementation of the policy to best support NR objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	?
Geographic Scale	D U
Cumulative Impact	With other policies: Design, General Requirements, Town Centres, Historic Environment and PD rights, Environmental protection enforcement, adverts and signs
Impact Score	? – depends on content

### Comments

The impacts of this option are heavily dependent on the specific content of other policies such as Design, General Requirements, Town Centres, Historic Environment, Adverts and Signs as well as the controls implemented through PD rights and Environmental protection enforcement. This option would result in the loss of specific controls (although many of the principles would remain covered through NPPF/CS) and this could have positive and negative impacts for EC objectives. For example, through variety/vitality in the town centres and through potential proliferation/domination of this use type depending on their interpretation. Negative impacts could harm the town centre economy in particular, whilst fewer controls may enable greater flexibility resulting in variety and new ventures.

### Mitigation

Existing controls should be retained through other means, such as the new General Requirements, Design or Town centres policies where, on balance, they offer net gains for town centre amenity, vitality, vibrancy and variety whilst maintaining the area as an attractive place to live as well as visit. General requirements or other Council schemes could be used to support the implementation of the policy to best support SP objectives.

# HOUSING OPTIONS TECHNICAL STANDARDS OPTION 1

## Maintain current policy position (implement none of the optional standards)

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M (until Local Plan review when policy position could be reviewed, although long term for the houses built in the period until the review)
Geographic Scale	District
Cumulative Impact	0 Links with Building Regulations
Impact Score	-2

#### Comments

The national technical standards review has resulted in the withdrawal of the Code for Sustainable Homes and Lifetime Homes standard, the introduction of optional space standards, optional accessibility and adaptability standards and water efficiency standards, and the inability of local authorities to require standards in new homes in excess of building regulations. Maintaining the current policy position would mean not adopting any of the new optional standards. Whilst this option would not result in any different social impacts as at present, as it would be a continuation of the status quo, it would represent significant missed opportunities. Whilst the policy position would be the same, the recent national changes mean that the Council can no longer apply the Code for Sustainable Homes and Lifetime Homes elements of its Core Strategy policy. Not adopting the new optional standards, and losing the existing Code and Lifetime Homes standards scores poorly against the social objectives of providing everyone with a decent home (SP3) and improving people's sense of health and wellbeing (SP5).

#### Mitigation

The Core Strategy cannot be fully applied due to the withdrawal of the Code for Sustainable Homes and the Lifetime Homes standards. The negative effects of this change could be mitigated by introducing some or all of the new optional standards through a new development management policy.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium (until Local Plan review when policy position could be reviewed, although long term for the houses built in the period until the review)
Geographic Scale	District
Cumulative Impact	0 Links with Building Regulations
Impact Score	0

### Comments

Maintaining the current policy position would mean not introducing the optional standards and therefore a continuation of the status quo. This option would not therefore result in any different impacts than at present. Not introducing the standards could potentially provide some benefits for the quality of the built environment as new schemes would not be constrained by rigid standards that could result in more standardised and hard engineered solutions (e.g. in relation to creating accessible environments) rather than more creative and bespoke designs. Not introducing the standards (particularly the minimum space standards) could also result in better outcomes for green infrastructure on new sites, as introducing the standards would increase house sizes which could encourage developers to try and provide less green space to compensate for the extra development area required. Introducing standards could also impact upon viability which could risk adverse impacts on green infrastructure provision and quality design (e.g. perhaps through cheaper materials choice).

### Mitigation

This policy approach has limited links with environmental objectives, however a better outcome for environmental objectives could be achieved by introducing some of the optional standards as these could help improve people's satisfaction with their neighbourhoods as places to live (EN3.7) through improving the quality of housing on offer.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium (until Local Plan review when policy position could be reviewed, although long term for the houses built in the period until the review)
Geographic Scale	District
Cumulative Impact	0 Links with Building Regulations
Impact Score	0

### Comments

Maintaining the current policy position would mean not introducing the optional standards and therefore a continuation of the status quo. This option would not therefore result in any different impacts than at present. It would however represent missed opportunities in terms of securing the best outcomes for natural resources objectives, for example by not introducing the water standard it would not be encouraging prudent water usage (NR2.4).

### Mitigation

The Government has committed to reviewing the energy efficiency of new homes through the Building regulations system, and this will be the only way in which the positive impacts for natural resources can be maximised, as local Councils can no longer set standards above building regulations in relation to energy efficiency.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium (until Local Plan review when policy position could be reviewed, although long term for the houses built in the period until the review)
Geographic Scale	District
Cumulative Impact	0 Links with Building Regulations
Impact Score	0

### Comments

Maintaining the current policy position would mean not introducing the optional standards and therefore a continuation of the status quo. This option would not therefore result in any different impacts than at present.

### Mitigation

This policy area has very limited links with economic objectives so there is limited scope to maximise potential positive impacts.



## HOUSING OPTIONS TECHNICAL STANDARDS OPTION 2

### New policy to implement one or more of the optional standards

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District
Cumulative Impact	Links with other local planning policies and building regulations.
Impact Score	+2

#### Comments

Introducing some or all of the optional standards (space standards, accessibility standards, water standards) would result in a wide range of positive outcomes for the social progress objectives. All of the standards would positively contribute to the objective of providing people with decent homes (SP3) and improving people's quality of life and sense of health and wellbeing (SP5).

The introduction of the different standards would have effects in the following areas:

Accessibility and adaptability standards:

- Would help people with disabilities have better access to their homes and surrounding environment (SP2.3)
- Would help create better quality houses that will improve the quality of life and health and wellbeing of their occupants (SP5.4)
- Would help create mixed and inclusive communities by providing housing that is suitable for a wider range of people with different needs, and mean people would be more likely to be able to stay in their houses and communities if their needs change over time (SP6.2)
- 

Minimum space standards:

- Would provide housing of an appropriate quality but perhaps have negative impacts on affordability as the sizes, and therefore sales values would increase (SP3.1).
- Would help improve the quality of life for people living in new homes which are more practical and functional for modern life (SP5.4).

Water efficiency standards:

- Would provide housing that is resource efficient and has a reduced environmental impact (SP3.2).
- Would help people live more sustainable lifestyles (SP4.3) through reduced water usage in their homes.
- Would increase the affordability of people's access to water services through reduced water bills (SP2.1).

#### Mitigation

The benefits could be maximised by applying as many of the standards as possible, to as many new homes as possible.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District
Cumulative Impact	Links with other local planning policies and building regulations.
Impact Score	N

### Comments

The introduction of the different standards would have effects in the following areas:

Accessibility and adaptability standards:

- Would improve people's satisfaction with their neighbourhoods as places to live (EN3.7) if their houses and surrounding areas are easily accessible for a wide range of different people.
- Could potentially lead to challenges in design terms if new development is expected to adhere to rigid standards which could lead to standardised solutions rather than creative and bespoke design. (EN3.2)
- 

Minimum space standards:

- The increase in house sizes could lead to a squeeze on green infrastructure provision in new development (EN4.4).

Water efficiency standards:

- Would promote sustainable design and construction and low impact operation (EN3.3).

### Mitigation

Other policies (e.g. design policies) would be applied to ensure any potential negative effects on design and the built environment would be minimised.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District
Cumulative Impact	Links with other local planning policies and building regulations.
Impact Score	N

### Comments

The introduction of the different standards would have effects in the following areas:

Accessibility and adaptability standards:

- Limited relevance to natural resource objectives, however improved accessibility to waste and recycling storage areas in developments would enable people to recycle more easily (NR4.5).

Minimum space standards:

- Could potentially increase the use of land for development as larger house sizes could require more land for the same quantity of houses (NR3).

Water efficiency standards:

- Would encourage prudent water usage in new development (NR2.4).

### Mitigation

Limited links with natural resources objectives, benefits could be maximised by applying all the standards to as many new homes as possible. Potential negative effects on the amount of land required for larger house sizes could be mitigated through existing design policies.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District
Cumulative Impact	Links with other local planning policies and building regulations.
Impact Score	N

### Comments

Limited relationship to economic objectives.

### Mitigation

Limited relationship to economic objectives therefore limited scope for maximising positive impacts.

## RURAL HOUSING INFILL & ROUNDING OFF OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium (Until Local Plan review when policy position can be reviewed)
Geographic Scale	District (Rural emphasis – villages and hamlets)
Cumulative Impact	With other policies relating to development in rural areas e.g. rural exception policy.
Impact Score	N

#### Comments

Maintaining the current policy position in relation to rounding off and infill (Policy CS1.2 of the Core Strategy) would maintain the status quo and not therefore result in any different impacts than at present. The current policy position has small social benefits in terms of enabling small scale development in existing rural communities, which helps provide housing to meet local needs (SP3) and provide additional demand and support for rural facilities and services (SP2). The current policy position can help promote a sense of community by enabling small scale appropriate new housing within rural communities. (SP6)

#### Mitigation

The existing small positive social benefits that arise from the current policy position could be maximised through an amended policy approach that allows for increased scope for rounding off and infill development and that provides more clarity on the form of development that will be permitted.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium (until Local Plan review when policy position can be reviewed)
Geographic Scale	District (rural emphasis – villages and hamlets)
Cumulative Impact	With other policies relating to development in rural areas e.g. rural exception policy.
Impact Score	N

### Comments

Maintaining the existing Core Strategy policy position in relation to rounding off and infill would maintain the status quo and not therefore lead to any different environmental impacts. The current policy position minimises environmental impacts, particularly on landscape and the built environment by adopting a relatively strict approach to controlling new development in villages and hamlets.

### Mitigation

Environmental impacts of the current policy position are mitigated through existing planning policies that are applied to proposals for development in villages and hamlets.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium (until Local Plan Review when policy position can be reviewed)
Geographic Scale	District (rural emphasis – villages and hamlets)
Cumulative Impact	With other policies relating to development in rural areas e.g. rural exception policy.
Impact Score	N

### Comments

Maintaining the existing Core Strategy policy position in relation to rounding off and infill would maintain the status quo and not therefore lead to any different environmental impacts. The current policy position minimises environmental impacts, particularly on landscape and the built environment by adopting a relatively strict approach to controlling new development in villages and hamlets.

### Mitigation

Impacts on natural resources of the current policy position are mitigated through existing planning policies that are applied to proposals for development in villages and hamlets, and through the overall development strategy for the district that promotes a sustainable pattern of development.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium (Until Local Plan review when policy position can be reviewed)
Geographic Scale	District (rural – villages and hamlets)
Cumulative Impact	With other policies relating to development in rural areas e.g. rural exception policy.
Impact Score	N

### Comments and Mitigation

#### Comments

Maintaining the existing Core Strategy policy position in relation to rounding off and infill would maintain the status quo and not therefore lead to any different impacts on the economy. The small scale housing developments that are permitted through the current policy approach to rounding off and infill have modest benefits for the rural economy through both construction and then occupation in terms of the extra demand and support for rural facilities and services. The existing position perhaps places greater pressure on redeveloping existing employment land in rural areas for housing given the overall strict approach.

#### Mitigation

The economic benefits of new infill and rounding off housing in villages and hamlets could perhaps be maximised through a slightly more permissive approach to enable slightly more housing growth in existing rural communities.

## RURAL HOUSING INFILL & ROUNDING OFF OPTION 2

### New Policy or Planning Guidance

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium to Long (depending on Local Plan review)
Geographic Scale	District (rural)
Cumulative Impact	With other planning policies relating to development in the rural areas.
Impact Score	+2

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

#### Comments

A new or amended policy approach in relation to rounding off and infill could have a number of positive social impacts. A slightly more permissive approach could help strengthen existing communities (SP6) by allowing more people to meet their housing needs locally (SP3). An amended position could help provide clarity to the existing policy approach. Depending on the content and direction of an amended policy approach however, negative social impacts could arise if certain villages or hamlets have a more restrictive position in future. This would depend on the content of the policy and how it is applied, and impacts may well be different in different settlements. For example an amended policy position could perhaps be more permissive/restrictive in different size or location of settlements. A more restrictive approach would not help support rural communities and local services and facilities, whereas a more permissive approach would have potentially positive impacts in this regard. The overall scoring assumes a more permissive approach.

#### Mitigation

In order to mitigate any potential negative social impacts, any amended policy position would need to carefully consider the definition of rounding off and infill and ensure that it does not preclude development from coming forward in rural settlements where it would be appropriate.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium to Long
Geographic Scale	District (rural)
Cumulative Impact	With other planning policies relating to development in the rural areas.
Impact Score	-2

### Comments

The environmental impacts of an amended policy approach would depend on whether the new policy is more permissive or restrictive towards new development in villages and hamlets. In some instances sites that are not 'rounding off/infill', for example well related but adjacent, may be more suitable in environmental terms for a village's development, and the policy must ensure that it promotes the most suitable development in villages/hamlets in environmental terms. Impacts will be different for different villages/hamlets depending on their individual contexts and environmental surroundings. The overall scoring assumes a more permissive approach.

### Mitigation

A range of other local planning policies would still be applied to proposals for development in villages and hamlets – just because a proposal may be considered 'rounding off/infill' this would not be an automatic 'green light' to development. Policies relating to landscape and built environment, design etc would still be applied. The criteria within a new policy on rounding off/infill would be important in mitigating potential environmental impacts by being clear about what form of development would be acceptable in principle.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium to Long
Geographic Scale	District (rural)
Cumulative Impact	With other planning policies relating to development in the rural areas.
Impact Score	-2

### Comments

A more permissive approach to development in villages and hamlets could result in more development in rural areas which would lead to an increased need to travel in the district to access facilities and services in the larger settlements. Most sites enabled by a new policy approach would be greenfield given their rural nature therefore a more permissive policy could have adverse impacts with regards promoting the efficient use of land and prioritising brownfield land (NR3). The overall scoring assumes a more permissive approach.

### Mitigation

If a new policy approach requires consideration to be given to the level of service provision in villages and hamlets it could help mitigate potential negative impacts on greenhouse gas emissions by offering more support for development in more sustainable locations in villages with more services.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium to Long
Geographic Scale	District (rural)
Cumulative Impact	With other planning policies relating to development in the rural areas.
Impact Score	+2

### Comments

If a new policy approach offered a more permissive position to development in villages and hamlets it could offer economic benefits for the rural economy (EC3) in terms of more sustainable communities and support for local businesses, services and facilities. On the other hand a more restrictive approach in some villages could result in negative impacts for the local economy if communities are not enabled to sustain themselves with limited growth. The overall scoring assumes a more permissive approach.

### Mitigation

None identified.

## KENDAL TOWN CENTRE & CANAL HEAD OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M to L
Geographic Scale	L (and urban)
Cumulative Impact	With other policies (core strategy & depends on whether retain 2006 Local Plan Town Centre Policies).
Impact Score	0

#### Comments

Existing Local Plan Policy R1 has only limited impact in terms of meeting social progress SA (SP) objectives. R1 in a limited way helps meet health and wellbeing objective (SP5). Local Plan Policy R1 may have a limited effect/impact on SA objective SP2 – improve access to services and facilities, the countryside and open spaces. Existing Local Plan Policy R1 mentions access for disabled people and car parking. Policy R1 also has some (limited) impact on the SA objective SP6.1, as existing Policy R1 mentions conservation areas. There is no Local plan policy covering Kendal Canal Head which leaves the council in an exposed position.

#### Mitigation

Any update and review of existing Local Plan Policy R1 will need to seek to ensure that SA objectives SP1 to SP6 are met as fully as possible.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
 EN2 - To conserve and enhance landscape quality and character for future generations  
 EN3 - To improve the quality of the built environment  
 EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M to L
Geographic Scale	L (and urban)
Cumulative Impact	Yes, depends on the retention of 2006 Policy R1, along with application of other new development management policies and the application of relevant core strategy policies.
Impact Score	0/-1 (score will be dependent on the interplay with other policies, could be negative, -1, if not done well)

### Comments and Mitigation

#### Comments

Existing Local Plan Policy R1 may have some impact in terms of SA objectives; EN 2.4, EN 2.3, EN 2.1 and EN 2.6 (enhancing elements of green infrastructure). Also, objectives EN 3.2, EN 3.1, EN 3.3 and EN 3.7 also may have some effect, but the effect is limited and general.

#### Mitigation

There may be scope to improve/review policy, to add criteria. This will be dependent on whether other new development management policies cover the issues and/or core strategy policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
 NR2 - To improve and manage water quality and water resources and services  
 NR3 - To restore and protect land and soil  
 NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, depends on the retention of 2006 Local Plan Policy R1, along with the application of other new development management policies and the application of relevant core strategy policies.
Impact Score	0

#### Comments

Existing Local Plan Policy R1 not really having any effect on SA objective NR1 etc. (all of the NR objectives).

#### Mitigation

There may be scope to improve/review policy, to add criteria. Will be dependent on whether other new development management policies cover the issues and/or core strategy policies.

### **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, depends on the retention of 2006 Policy R1, along with application of other new development management policies and the application of relevant core strategy policies.
Impact Score	0

#### Comments

Existing Local Plan Policy R1 seeks to ensure the viability and vitality of Kendal town centre, and so Policy R1 does have some affect in terms of SA objectives, but Policy R1 does not reiterate existing core strategy policy. Local Plan Policy R1 only relates to retail and not employment in the wider sense, (SA objective EC1).

#### Mitigation

There may be scope to improve/review policy, to add criteria, so as to better meet SA sustainable economy (EC) objectives; could help to strengthen the economy and maintain a viable town centre.

## KENDAL TOWN CENTRE & CANAL HEAD OPTION 2

### New Policy (taking into account outcome of Kendal Town Centre Masterplan)

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, with other new development management policies and core strategy policies.
Impact Score	+2 (positive, dependent on new policy scope/criteria and the score potentially, dependent on the interplay with other policies).

#### Comments

SA objective SP1 – Opportunity for the introduction of a new policy which, potentially, could provide clarity/certainty for the town centre and canal head e.g. concerning land uses that are appropriate, (this will depend on the scope). There are also policy linkages with increasing a sense of place (SP6) and promoting more recreational and cultural activity.

#### Mitigation

There may be scope to have a new policy, potentially a policy could provide clarity and certainty for Kendal town centre and Kendal Canal Head, in terms of uses that are appropriate. A new policy could potentially improve accessibility and the green infrastructure network and set out where support new housing (SP3). A new policy could also mean SA social progress objectives are more fully. Similarly, concerning SA objective SP5, a new policy could also help address air quality issues, (but, potentially could have a new development management policy relating to pollution, including air quality).

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	+ 2 positive (positive - dependent on new policy scope/criteria and potentially, dependent on interplay with other policies)

### Comments

Depending on policy scope, a new development management policy potentially could help to protect and enhance green spaces and habitats, helping to meet SA objective (EN1). A new policy could say about enhancing biodiversity value (EN1) and EN2 – in helping to protect landscape quality and character from unsympathetic development. A new policy could potentially also have an impact on helping to protect historic parts of the town and canal head (EN3), including design and appearance and enhancing elements of green infrastructure (EN4).

### Mitigation

The introduction of a new policy would be an opportunity to better meet EN SA objectives; could help meet SA objectives; EN3.1 (design and appearance and quality of the built environment), provide satisfactory places to live (EN3.7), and (EN4.3) multifunctional nature of green infrastructure assets.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	+ 2 positive (positive - dependent on new policy scope/criteria potentially, dependent on interplay with other policies)

### Comments and Mitigation

#### Comments

Depending on the scope of any new policy - SA objective NR1 (NR1.1) new policy could potentially include criterion, so that air quality is not adversely affected; set out measures/requirements to address air quality. SA objective NR 1.4 - could include in a new policy; traffic management and reducing the need to travel. SA objective NR2 - improving and managing water quality could have less impact. SA objective (NR3.3) refers to loss of green space. SA objective NR4 - mineral resources and waste will not be applicable to a new policy.

#### Mitigation

New policy would be an opportunity to better meet NR SA objectives.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M to L
Geographic Scale	L (and urban).
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	+ 2 positive (positive - dependent on new policy scope/criteria potentially, dependent on interplay with other policies)

### Comments

Option 2 scores positively (Impact +2). Depending on the scope of any new policy - SA objective EC1 – A new policy could identify new employment opportunities / access to jobs (EC2) and to retain existing jobs and tourism and to diversify and strengthen the local economy (EC3).

### Mitigation

The introduction of a new development management policy, with improvements, relating to Kendal town centre and canal head, would be an opportunity to help better meet economic (EC) SA objectives.

Other policies should be applied, e.g. relevant core strategy policies.

## KENDAL TOWN CENTRE & CANAL HEAD OPTION OPTION 3

### No General Requirements Policy – rely on National, Core Strategy and Land Allocations Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M
Geographic Scale	D
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	- 1

#### Comments

Option 3 is likely to have some negative impact - (score -1 negative) at a site specific level. Policy option 3 is unlikely to fulfil all potential for mitigating fully the negative impacts on development, but, could go some way to having some impact. This, however, depends on other new development management policies. Option 3 - policy vacuum – no policy giving local direction or that is site specific. Other new development management policies (general requirements) etc. could help to meet general policy objectives, but will not be specific to the town centre and canal head.

#### Mitigation

A new development management policy for Kendal Town Centre and Kendal Canal Head could help more fully meet SA Social Progress (SP) objectives. Opportunity to Introduce a new development management general requirements policy.

Other policies should be applied, e.g. relevant core strategy policies.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M
Geographic Scale	D
Cumulative Impact	Yes, with other new development management and core strategy polices.
Impact Score	- 1

### Comments

Option 3 is likely to have some negative impact -1 negative. The degree of impact will depend on the scope and content of other new development management policies, including a new general requirements policy. New policies could cover such matters as landscaping and protecting, enhancing and maintaining green infrastructure. Depending on its content, a new historic environment policy could include matters such as design, conservation areas etc. – albeit in a more general sense.

Relying on non-locally specific polices, potentially, could not meet SA environmental objectives in full. Removing all local level policy, would not allow for a more specific local policy direction, e.g. the opportunity for an area policy with the inclusion of specific criterion/criteria relating to the town centre and canal head, for example, about the quality of the built environment and any green infrastructure within the area.

### Mitigation

Introduce a new development management policy, with improvements, which is locally specific, as set out under Option 2. A new development management policy would provide a more robust basis in which to assess planning applications and could help more fully meet SA environmental (EN) objectives.

Other polices should be applied e.g. those relating to development general requirements, heritage, design, quality of development, landscaping/green infrastructure and biodiversity.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M
Geographic Scale	D
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	- 1

### Comments

Option 3, is likely to have some negative impact (score -1 negative) at local area/specific level – potentially this option would mean relying on existing core strategy policies that relate to matters, including, recycling and reducing the need to travel etc, together with relevant guidance in the National Planning Policy Framework (NPPF).

The degree of impact will depend on the content and scope of other new development management policies relating to natural resources.

### Mitigation

The opportunity to introduce a new development management policy, with improvements, which is locally specific. A new development management policy could help more fully meet SA environmental (NR) objectives. Also, the introduction of other new development management policies (including a general requirements policy relating to all development), may also help to meet natural resources (NR) objectives more fully.

Other policies should be applied e.g. relevant core strategy policies that relate to the sustainable use and management of natural resources.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M
Geographic Scale	D
Cumulative Impact	Yes, with other new development management and core strategy policies.
Impact Score	- 1

### Comments

Option 3, is likely to have some negative impact (score -1 negative) at site specific level – potentially would mean the loss of local, area specific policy and relying on existing core strategy policies together with relevant guidance in the National Planning Policy Framework (NPPF).

The degree of impact will depend on the content and scope of other new development management policies, together with robustly applying relevant core strategy policies, for example, those that relate to the locally economy (CS7.5) and the spatial strategy for Kendal (CS 2). Land Allocations policy LA1.2 - Town Centre Boundaries also would apply.

### Mitigation

The opportunity to introduce a new development management policy, with improvements, which is locally specific. A new local policy relating to the area could help to retain jobs by providing certainty and clarity in terms of policy direction; what land uses will be acceptable in the town centre and the canal head area. As such, (depending on policy content), a new policy could potentially help to diversify and strengthen the economy in these areas; with the intention of increasing the vitality and viability of these areas.

Other policies should be applied e.g. relevant core strategy and land allocation policies.

## **LOSS OF EMPLOYMENT SITES AND PREMISES OPTION 1**

### **Maintain current policy position**

**(Resulting in the retention of Policy E6 in its present state in conjunction with the application of Land Allocations DPD Policy LA1.5)**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

#### Comments

Possibly not a reasonable alternative. This option offers the status quo. It gives a high level of protection to existing identified employment sites by retaining current policy; Local Plan Policy E6 and Land Allocations DPD Policy LA1.5. Whilst some sites, such as small businesses within mainly residential areas have been lost this had often been because they have met the 'unneighbourly' criteria and have often been relocations rather than outright losses. There are relatively tenuous links to or impacts on SP objectives. Policy (and NPPF paragraph 22 – which specifically refers to allocated employment sites) is a little unclear about whether the areas/sites identified as 'existing employment areas' are covered as well as allocated employment sites. The policy (Local plan Policy E6) is not favourably/positively worded and doesn't take some elements of the NPPF into account, including flexibility.

#### Mitigation

A new policy could provide clarity required over whether sites allocated for employment development are covered by this policy (and NPPF); could allow greater flexibility and be more positively worded. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

### Comments

Possibly not a reasonable alternative. This option offers the status quo. Employment uses may be harmful to amenity and other environmental factors but policy would allow their change of use. Unused sites sat empty might not meet the criteria for change of use if existing Local Plan Policy E6 is strictly applied, thus preventing potential environmental and other enhancement (EN2, EN3). Policy (and NPPF – paragraph 22– which specifically refers to allocated employment sites), is a little unclear about whether the areas/sites identified as 'existing employment areas' are covered as well as allocated employment sites. The policy is not favourably/positively worded and doesn't take some elements of the NPPF into account, including flexibility.

### Mitigation

A new policy could provide clarity required over whether sites allocated for employment development are covered by this policy (and NPPF); could allow greater flexibility and be more positively worded. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

### Comments

Possibly not a reasonable alternative. This option offers the status quo. There are relatively tenuous links to or impacts on NR objectives. However, unused sites sat empty might not meet the criteria for change of use if Local Plan Policy E6 is strictly applied, thus preventing potential use (and potentially forcing the use of greenfield land when there is brownfield available) (NR3). Policy (and NPPF – paragraph 22 – which specifically refers to allocated employment sites), is a little unclear about whether the areas/sites identified as 'existing employment areas' are covered as well as allocated employment sites. The policy is not favourably/positively worded and doesn't take some elements of the NPPF into account, including flexibility.

### Mitigation

A new policy could provide clarity required over whether sites allocated for employment development are covered by this policy (and NPPF); could be more positively worded. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

### Comments

Possibly not a reasonable alternative. This option offers the status quo. It gives a high level of protection to existing identified employment sites. Whilst some sites, such as small businesses within mainly residential areas have been lost this had often been because they have met the 'unneighbourly' criteria and have often been relocations rather than outright losses. There are clear links to EC objectives. Policy (and NPPF – paragraph 22 – which specifically refers to allocated employment sites), is a little unclear about whether the areas/sites identified as 'existing employment areas' are covered as well as allocated employment sites. The policy is not favourably/positively worded and doesn't take some elements of the NPPF into account, including flexibility. It is positive for retention of employment on the whole but could also be stifling development.

### Mitigation

A new policy could provide clarity required over whether sites allocated for employment development are covered by this policy (and NPPF); could allow greater flexibility and be more positively worded. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

**LOSS OF EMPLOYMENT SITES AND PREMISES OPTION 2**  
**No longer apply Policy E6 – rely on National and Core Strategy Policies**  
**and a new Development Management General Requirements policy, if**  
**this is progressed.**

**SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-?
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

Comments

There are relatively tenuous links to or impacts on Social Progress objectives. Relying on the NPPF would potentially allow greater flexibility; the NPPF (Paragraph 22) is more favourable towards the loss of employment sites to alternative uses, it specifically refers to sites allocated for employment use. Sites not included in the Land Allocations Policy LA1.5 list would be at particular risk of loss, as the NPPF is a little unclear about whether sites/premises identified as 'existing employment areas' are covered, as well as the sites allocated for employment development. Both Core Strategy and Land Allocations policies could be interpreted to allow scope for flexibility. Permitted Development rights affecting the change of use of employment uses (land use classes B1 (a) to C3 – office to dwellings), are now permanent and takes some elements out of local policy control anyway.

Mitigation

A new development management policy could provide clarity required over exactly which sites are covered by the NPPF; it could also provide clarity over the degree of flexibility allowed. The introduction of viability (the need to demonstrate that an allocated employment site is unviable) in new policy or an employment site is underused, before loss to alternative uses; e.g. there has been a lack of recent development activity to improve the commercial or industrial site, as factors, could allow a more flexible approach and possibly support remediation/enhancements.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-?
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	0

### Comments

There are links to or impacts on EC objectives. Relying on the NPPF would potentially allow greater flexibility; the NPPF (paragraph 22) is more favourable towards the loss of employment sites to alternative uses. It specifically refers to allocated employment sites. Sites not on the LA1.5 list (Land Allocations) would be at particular risk of loss as the NPPF (paragraph 22) is a little unclear about whether sites areas identified as 'existing employment areas' are covered as well as sites allocated for employment development. This could be positive or negative in environmental terms depending on the previous and new use of the site and other factors such as design. Both Core Strategy and Land Allocations policies could be interpreted to allow scope for flexibility. This could allow uses with negative impacts to be redeveloped in a way that had a more positive impact, but the reverse could equally apply, depending on the nature of use and other factors, such as design. Assumption that the reference to 'suitable' in the Land Allocations policy relates to the issues covered by Local Plan policy E6a. Permitted Development rights affecting employment uses (land use class B1 (a) office to a dwelling) are now permanent and takes some elements out of local policy control anyway.

### Mitigation

A new policy could provide clarity required over exactly which sites are covered by the NPPF; it could also provide clarity over the degree of flexibility allowed. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-?
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	+2

### Comments

There are links to or impacts on NR objectives. Relying on the NPPF would potentially allow greater flexibility, which could mean more efficient and effective use of land. Sites not on the LA1.5 Policy list (Land Allocations) would be at particular risk of loss as the NPPF is a little unclear about whether sites areas identified as 'existing employment areas' are covered, as well as sites allocated for employment development. NPPF Paragraph 22 specifically refers to allocated employment sites. Both Core Strategy and Land Allocations policies could be interpreted to allow scope for flexibility. Permitted Development rights affecting employment uses (land use class B1 (a) office to a dwelling) are now permanent and takes some elements out of local policy control anyway.

### Mitigation

A new policy could provide clarity required over exactly which sites are covered by the NPPF; it could also provide clarity over the degree of flexibility allowed. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-?
Geographic Scale	D (wherever such sites are present)
Cumulative Impact	With other policies and Permitted Development rights
Impact Score	-2

### Comments

There are links to or impacts on EC objectives. Relying on the NPPF would potentially allow greater flexibility, which could mean the approach being more responsive to the economy but could also mean more scope for loss of sites. Sites not on the LA1.5 list (Land Allocations) would be at particular risk of loss as the NPPF is a little unclear whether sites areas identified as 'existing employment areas' are covered, as well as sites allocated for employment development. NPPF Paragraph 22 specifically refers to allocated employment sites. Both Core Strategy and Land Allocations policies could be interpreted to allow scope for flexibility. Permitted Development rights affecting employment uses (land use class B1 (a) office to a dwelling) are now permanent and takes some elements out of local policy control anyway.

### Mitigation

A new policy could provide clarity required over exactly which sites are covered by the NPPF; it could also provide clarity over the degree of flexibility allowed. Introduction of viability of existing use as a factor could allow a more flexible approach and support remediation/enhancements.

## PARKING PROVISION OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	0

#### Comments

Retaining current policy is unlikely to impact significantly on social objectives, particularly as parking guidance provided by the County Council has not been modified, although we understand a review is underway.

#### Mitigation

Parking policy could be more effective through combining the several current policies into a single clear policy. As parking is a factor in most forms of development consideration could also be given to inclusion of parking within the proposed General Requirements policy. Parking policy could also be improved in ways which address social objectives – for example, ensuring car parks are accessible by disabled people; ensuring car parks facilitate transfer to other forms of sustainable, health-promoting travel such as walking, cycling and also public transport.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	0

### Comments

Retaining current policy would not result in any change in terms of impact on environmental objectives, particularly as parking guidance provided by the County Council has not been modified, although we understand a review is underway.

### Mitigation

In terms of mitigation, it is considered that environmental issues are addressed primarily through clear, robust generic policies relating (mainly) to general requirements, design, green infrastructure and open space. As the relationship of these emerging policies to car parking may be less obvious than for other forms of development, an appropriate cross reference may be considered in the policy or supporting text.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	0

### Comments

Retaining current policy will maintain the status quo and hence have little or no change of impact on objectives relating to natural resources, particularly as parking guidance provided by the County Council has not been modified, although we understand a review is underway.

### Mitigation

Areas of mitigation to consider in future policy include:

- Promoting the role of car parks in providing facilities which encourage journey transfer to other more sustainable, forms of transport, with a smaller carbon footprint such as cycling and public transport.
- Promoting location of electric charging points for hybrid or electric vehicles
- The extent to which the size and location of car parking encourages or discourages travel by means other than the car. For larger developments, car parking provision should form part of a travel planning approach.
- Suitably located car parks with public access also offer opportunity for recycling facilities.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	0

### Comments

Retaining current policy will maintain the status quo and hence have little or no change of impact on objectives relating to building a sustainable economy.

### Mitigation

Current policy Tr5 sets out a series of criteria as to how car parking requirements will be assessed for development proposals in town centres. Current parking guidance from the County Council sets out standards for car parking associated with new employment generating development.

Local plan policy on parking could signal the importance of car park provision for the effective operation of many businesses, large and small, including those in town centre locations. For businesses, operational efficiency considerations need to be taken fully into account, alongside measures which encourage travel by means other than the car – ideally in the context of a travel planning approach.

## PARKING PROVISION OPTION 2

### New Policy combining existing policies and adding new criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	+2

#### Comments

This option would combine existing policies and remove criteria relating to proposed generic policies including General Requirements. It is unclear which additional criteria may be added, but this could include application of a more flexible or different approach to the car parking standards currently in Cumbria County Council guidance.

#### Mitigation

Overall modified, improved policy has potential to improve access to services and facilities, including homes and jobs. As noted for option 1, parking policy could also be improved to increase access for the disabled and facilitate journey transfer to other forms of sustainable, health-promoting travel such as walking, cycling and public transport. The level of car parking provision in residential areas could also be modified to reflect increased car ownership, reduce congestion arising from on-street parking and thereby contribute to increased safety and sense of well-being in local communities.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	+1

### Comments

As noted for option 1 most aspects of environmental protection for all forms of development will be addressed by other generic policies including those dealing with general requirements, design, green infrastructure and open space. They are also addressed in Core Strategy policy and national planning policy. A new policy is therefore unlikely in itself to impact significantly on environmental protection objectives, although it may have some potential to have a positive impact by addressing factors specific to car parking, not covered in other policies.

### Mitigation

Overall modified, improved policy may have some potential to improve effective protection of the environment including by:

- Effective cross reference to ensure application of other relevant policies
- Including some considerations specific to car parking – for example, depending on size and location, these might include use of natural rather than hard surfacing; encouraging permeable surfaces which reduce surface water run-off; design and materials which complement historic environments; landscaping or other elements which encourage increased biodiversity.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	+2

### Comments

While option 2 presents no specific policy directions, a combined, modified policy on car parking provides opportunity to improve the sustainable use and management of natural resources, albeit that many aspects will be addressed by other generic policies.

### Mitigation

Over and above other generic policies, a modified policy may have some potential to improve the use and management of natural resources by (as noted for option 1) promoting the role of car parks in providing facilities which encourage journey transfer to other more sustainable, forms of transport, with a smaller carbon footprint such as cycling and public transport. Other opportunities include:

- Promoting car parks as a location for electric charging points for hybrid or electric vehicles
- Encouraging the location and size of car parks to form part of a wider travel plan.
- Encouraging car parks with public access as locations for recycling facilities.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	+2

### Comments

While again option 2 presents no specific policy directions, a combined, modified policy on car parking may provide opportunity for effective car parking to contribute to a successful, growing local economy.

### Mitigation

As noted for option 1, modified policy on car parking could signal the importance of car parking provision for the effective operation of local businesses. It could help ensure car parking provision contributes to the operational efficiency of businesses as well as encouraging travel by means other than the car in the context of a travel planning approach.

## PARKING PROVISION OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	-2

#### Comments

Removing existing local policy would weaken policy in relation to social progress objectives. In particular policy Tr6a encourages full regard to the needs of the mobility impaired in car parking provision. Also policy S10 provides for the District Council to apply some flexibility in the application of the County Council's published guidelines, which may have mean there is less scope for locally appropriate car parking provision.

#### Mitigation

Mitigation of these impacts could be achieved by retaining and improving existing policies. As noted for Options 1 and 2, improved policy has potential to improve access to services and facilities, including homes and jobs. Parking policy could be improved to increase access for the disabled and facilitate journey transfer to other forms of sustainable, health-promoting travel such as walking, cycling and public transport. The level of car parking provision in residential areas could also be modified to reflect increased car ownership, reduce congestion arising from on-street parking and thereby contribute to increased safety and sense of well-being in local communities.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	-1

### Comments

Removing existing local policy may weaken policy to some extent in relation to environmental protection objectives. In practice however existing policy has limited reference to this issue, although the removal of policy S10 which provides for the District Council to apply some flexibility in the application of the County Council's published guidelines, may have some impact. The complete removal of policy would however remove the potential to consider and introduce appropriate improvements.

### Mitigation

Mitigation of these impacts could be achieved by retaining and improving existing policies. As noted for option 2, improved local policy has potential to improve effective protection of the environment including by:

- Effective cross reference to ensure application of other relevant policies
- Including some considerations specific to car parking – for example, depending on size and location, these might include use of natural rather than hard surfacing; encouraging permeable surfaces which reduce surface water run-off; design and materials which complement historic environments; landscaping or other elements which encourage increased biodiversity.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	-1

### Comments

Removing existing local policy may weaken policy to some extent in relation to the sustainable use and management of natural resources, although this is probably marginal as current policy has limited relevant references. However, more significantly, the complete removal of local policy also removes the potential to consider and introduce appropriate improvements relevant to natural resources.

### Mitigation

Mitigation of these impacts could be achieved by retaining and improving existing policies. As noted for Option 2, a modified policy has potential to improve the use and management of natural resources by promoting the role of car parks in providing facilities which encourage journey transfer to other more sustainable, forms of transport, with a smaller carbon footprint such as cycling and public transport. Other opportunities include:

- Promoting car parks as a location for electric charging points for hybrid or electric vehicles
- Encouraging the location and size of car parks to form part of a wider travel plan.
- Encouraging car parks with public access as locations for recycling facilities.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium/Long (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District
Cumulative Impact	Cumulative impacts with other policies which impact on development
Impact Score	-2

### Comments

Removing existing local policy will weaken policy in regard to economic objectives. In particular the removal of policy Tr5 in regard to car parking for town centre development would leave a gap in relevant policy and guidance. However, more significantly (as for other topics), the complete removal of local policy also removes the potential to consider and introduce appropriate improvements relevant to economic opportunities.

### Mitigation

Mitigation of these impacts could be achieved by retaining and improving existing policies. As noted for option 2, modified policy on car parking could signal the importance of car parking provision for the effective operation of local businesses. It could help ensure car parking provision contributes to the operational efficiency of businesses as well as encouraging travel by means other than the car in the context of a travel planning approach.

## POLLUTION OPTION 1

### New policy with more detailed requirements

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. design
Impact Score	+2 (dependent on interplay with other policies – could be +4 if done well or poorer if done badly)

#### Comments

Impacts depend on whether measures seek an actual reduction in types of pollution or just a minimised increase. Opportunity to provide clarity of approach, supporting SP1. Opportunity for methods of managing pollution advocated through the policy to have a wide range of knock-on benefits such as; green infrastructure and sustainable travel (supporting SP2 and objectives from other Sustainability topic areas); enjoyment of green infrastructure, countryside, historic environment through reduced pollution (SP2.4); reducing environmental impact of housing means increasing how 'decent' homes are (SP3); benefits for the living environment, health and wellbeing and quality of life (SP5) and promoting recreational and cultural activity (SP6.3) as well as pollution management benefits.

#### Mitigation

Further aspects of details will be covered by other policies e.g. lighting impact could be covered through a design policy. Ensure that the policy supports 'soft' pollution management measures so as to secure wider benefits. Ensure that the policy recognises all types of pollution.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. green infrastructure
Impact Score	+2 (dependent on interplay with other policies – could be +4 if done well or poorer if done badly)

### Comments

Impacts depend on whether measures seek an actual reduction in types of pollution (EN3.6) or just a minimised increase. Opportunity for the methods of managing pollution advocated through the policy to have a wide range of knock-on benefits such as; green infrastructure/corridors (EN4), biodiversity benefits (EN1), landscape enhancement (EN2), public realm (EN3) as well as pollution management benefits. However, if measures employed are 'hard' solutions, benefits could be negative/opportunities for net environmental gains could be lost.

### Mitigation

Further aspects of details will be covered by other policies e.g. lighting impact could be covered through a design policy. Ensure that the policy supports 'soft' pollution management measures so as to secure wider benefits. Ensure that the policy recognises all types of pollution



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies (including 'non-planning' measures such as AQMA action plan, noise legislation)
Impact Score	+2 (dependent on interplay with other policies – could be +4 if done well or poorer if done badly)

### Comments

Impacts depend on whether the measures seek an actual reduction in types of pollution (NR1) or just a minimised increase. There are some circumstances, such as redevelopment of an existing site or where the introduction of a measure has wider then immediate benefits (e.g. a noise barrier), where a reduction can be made, but these may be few. Opportunity for the methods of managing pollution advocated through the policy to have a wide range of knock-on benefits such as reducing the need to travel by private car (NR1).

### Mitigation

Further aspects of details will be covered by other policies e.g. lighting impact could be covered through a design policy. Ensure that the policy supports 'soft' pollution management measures so as to secure wider benefits.

There will be an issue around monitoring and attributing increases of decreases in air pollution especially to particular developments/measures.

Ensure that the policy recognises all types of pollution

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies
Impact Score	0 (possibly minor +)

### Comments

Links to EC3.7 – policy may see environmental performance of new employment development increase. Could also mean a pleasanter, more attractive environment in which businesses want to invest. However, these possible benefits will depend on the content of the policy and the measures employed.

### Mitigation

Ensure that the policy recognises all types of pollution and measures relevant to employment development.

## POLLUTION OPTION 2

### No Policy – rely on National Policies and guidance

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D
Cumulative Impact	Potentially with any new policies introduced such as Design, General requirements, pollution specific legislation
Impact Score	N

#### Comments

The need to provide clarity of approach on this topic would not be addressed (SP1). In relation to other SP objectives such as SP5, the opportunity to introduce locally specific measures and maximise benefits would be lost. Risk of changes to NPPF and CS currency.  
 C5 would be lost relating to lighting leaving a specific policy gap. There would be nothing to specify what's expected of developers in order to address issues such as AQMA in Kendal (SP5)

#### Mitigation

Many aspects could potentially be covered by other policies e.g. General Requirements and Design. If these other policies are relied upon, there is a need to ensure that measures are included that are applicable to all types of pollution and that the full range of impacts and benefits are taken into account. Other policies, such as on GI will also support.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D
Cumulative Impact	Potentially with any new policies introduced such as Design, General requirements, pollution specific legislation
Impact Score	N / -2

### Comments

In relation to all EN objectives, the opportunity to introduce locally specific measures (that apply to all types of pollution) and maximise benefits would be lost. Risk of changes to NPPF and CS currency. C5 would be lost relating to lighting leaving a specific policy gap. There would be nothing to specify what's expected of developers in order to address issues such as AQMA in Kendal.

### Mitigation

Many aspects could potentially be covered by other policies e.g. General Requirements and Design. If these other policies are relied upon, there is a need to ensure that measures are included that are applicable to all types of pollution and that the full range of impacts and benefits are taken into account. Other policies, such as on GI will also support.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D
Cumulative Impact	Potentially with any new policies introduced such as Design, General requirements, pollution specific legislation
Impact Score	N / -2

### Comments

In relation to all NR objectives, the opportunity to introduce locally specific measures (that apply to all types of pollution) and maximise benefits would be lost. Risk of changes to NPPF and CS currency. C5 would be lost relating to lighting leaving a specific policy gap. There would be nothing to specify what's expected of developers in order to address issues such as AQMA in Kendal, on which the CS requires support.

### Mitigation

Many aspects could potentially be covered by other policies e.g. General Requirements and Design. If these other policies are relied upon, there is a need to ensure that measures are included that are applicable to all types of pollution and that the full range of impacts and benefits are taken into account. Other policies, such as on GI will also support.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S/? (NPPF could be altered, CS to be revised into single Local Plan by 2021)
Geographic Scale	D
Cumulative Impact	Potentially with any new policies introduced such as Design, General requirements, pollution specific legislation
Impact Score	N

### Comments

Impacts on EC objectives are potentially more limited than other Sustainability Objectives, however, without a policy, there could be a risk of pollutions issues of all types not being properly addressed. C5 would be lost relating to lighting leaving a specific policy gap for instances and other types of pollution would not be covered by any locally specific measures. Reduced air quality and a generally poorer, more polluted environment could reduce the likelihood of existing firms wanting to stay here and new firms wanting to invest.

### Mitigation

Many aspects could potentially be covered by other policies e.g. General Requirements and Design. If these other policies are relied upon, there is a need to ensure that measures are included that are applicable to all types of pollution and that the full range of impacts and benefits are taken into account. Other policies, such as on GI will also support.

## QUALITY DESIGN OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M - L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, housing standards, pollution, landscaping and trees
Impact Score	N

#### Comments

Current policies seek to ensure development proposals take proper account of a specific South Lakeland Design Code. Other policies seek to ensure proposals in their design and layout create a safe environment and ensure lighting schemes cause limited harmful impacts for the environment. Other policies place controls around external security measures in town centres, and seek to ensure shop fronts are designed in an appropriate manner through use of supplementary guidance.

These have some benefits for most SP objectives, particularly SP3, SP5 and SP6, which would continue as the status quo. However, applying current policy and guidance may not enable SP objectives to be met to their fullest, especially if it is considered these need to be updated to take further account of local / site specific circumstances, new initiatives or guidelines, or change in emphasis.

#### Mitigation

Introduce a new or updated policy or set of policies and guidance incorporating principles and criteria as appropriate in line with local / site specific circumstances, new initiatives or guidelines, or change in emphasis. This should include the consideration of production of new supplementary planning guidance that should be used to help consider different types of development in different locations. Any new policy and guidance should consider the role of design in contributing to the improvement of health and sense of well-being – thinking not just about the appearance of buildings and spaces, but also their function, response to local identity and creation of sense of place as well as how people access and move through new development. This will ensure SP objectives are realised to their fullest. Other policies may help to complement such a policy especially any relating to sustainable transport movements, housing standards and general requirements.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping
Impact Score	N

### Comments

Current policies seek to ensure development proposals take proper account of a specific South Lakeland Design Code. Other policies seek to ensure proposals in their design and layout create a safe environment and ensure lighting schemes cause limited harmful impacts for the environment. Other policies place controls around external security measures in town centres, and seek to ensure shop fronts are designed in an appropriate manner through use of supplementary guidance.

These have specific benefits for all EN objectives, particularly EN3 which would continue as the status quo. However, applying current policy and guidance may not enable EN objectives to be met to their fullest, especially if it is considered these need to be updated to take further account of local / site specific circumstances, new initiatives or guidelines, or change in emphasis. Current policies and guidance need to consider the role of design in shaping the environment as a whole and be threaded into any other policies that seek to enhance the built and natural environment. The current policy and guidance doesn't include reference to the role of design in helping to enhance habitats and create a greener environment for instance.

### Mitigation

Introduce a new or updated policy or set of policies and relevant guidance incorporating principles and criteria as appropriate in line with local / site specific circumstances, new initiatives or guidelines, or change in emphasis. This should include the consideration of production of new supplementary planning guidance that should be used to help consider different types of development in different locations. Any new policy and guidance should consider the role of design in helping to enhance all types of environment, thinking about particular sensitivities associated with particular localities. It should consider how through design improvements to the environment should wherever possible be realized, and how local features and characteristics should be taken into account to help shape design and layout. It should consider the role of design in helping to protect, enhance habitats, biodiversity and geodiversity – for example ensuring lighting schemes minimise impact on wildlife and a greener environment as a whole, and encourage measures that support urban greening and habitat creation. Other policies may help to complement such a policy especially historic environment, landscaping and general requirements.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	N

### Comments

Current policies seek to ensure development proposals take proper account of a specific South Lakeland Design Code. Other policies seek to ensure proposals in their design and layout create a safe environment and ensure lighting schemes cause limited harmful impacts for the environment. Other policies place controls around external security measures in town centres, and seek to ensure shop fronts are designed in an appropriate manner through use of supplementary guidance.

These have some limited benefits for some NR objectives, more so NR1, but less so other objectives which would continue as the status quo. However, applying current policy and guidance may not enable NR objectives to be met to their fullest, especially if it is considered these need to be updated to take further account of local / site specific circumstances, new initiatives or guidelines, or change in emphasis. Current policies and guidance don't for instance refer to the role of design in helping to improve air quality and reduce greenhouse gas emissions, or make direct links with how it can reduce the need to travel.

### Mitigation

Introduce a new or updated policy or set of policies and relevant guidance incorporating principles and criteria as appropriate in line with local / site specific circumstances, new initiatives or guidelines, or change in emphasis. This should include the consideration of production of new supplementary planning guidance that should be used to help consider different types of development in different locations. Any new policy and guidance should consider the role of design in helping to ensure sustainable use and management of natural resources. It should consider how through design, improvements to the environment should wherever possible be realized, and how local features and characteristics should be taken into account to help shape design and layout. Any updated policy or guidance should consider how design can help improve air quality, reduce greenhouse emissions and promote renewable energy as well as reduce need to travel. Consideration of access / provision of bin storage may help to ensure policy/guidance meets objective NR4 more fully.

Other policies may help to complement such a policy especially historic environment, landscaping, general requirements and pollution.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	N

### Comments

Current policies seek to ensure development proposals take proper account of a specific South Lakeland Design Code. Other policies seek to ensure proposals in their design and layout create a safe environment and ensure lighting schemes cause limited harmful impacts for the environment. Other policies place controls around external security measures in town centres, and seek to ensure shop fronts are designed in an appropriate manner through use of supplementary guidance.

These have some limited benefits for some EC objectives, more so EC3, but less so other objectives as it doesn't specifically promote the creation of new jobs, which would continue as the status quo. However, applying current policy and guidance may not enable EC objectives to be met to their fullest, especially if it is considered these need to be updated to take further account of local / site specific circumstances, new initiatives or guidelines, or change in emphasis.

### Mitigation

Introduce a new or updated policy or set of policies and relevant guidance incorporating principles and criteria as appropriate in line with local / site specific circumstances, new initiatives or guidelines, or change in emphasis. This should include the consideration of production of new supplementary planning guidance that should be used to help consider different types of development in different locations. Any new policy and guidance should consider the role of design in helping to enhance the environment so it appeals to economic investment. Any updated policy or guidance relating to shop fronts should consider the needs of all businesses in this respect. Any update of existing policy should consider how through design, improvements to the environment should wherever possible be realized, and how local features and characteristics should be taken into account to help shape design and layout.

Other policies may help to complement such a policy especially historic environment, landscaping, general requirements and pollution.

## QUALITY DESIGN OPTION 2

### New Policy setting out list of design principles

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D guidance likely to be applied differently depending on locality
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, housing standards, pollution, landscaping and trees
Impact Score	+2

#### Comments

A new policy would continue to ensure development proposals are considered against a set of criteria or principles that promote high quality design, minimise effects of lighting schemes, control external security measures in town centres, promote a safe environment in their design and layout and ensure shop fronts are designed in an appropriate manner. It would likely result in a strengthening of policy so it meets the full range of social objectives particularly in respect to improving health and sense of wellbeing, placing emphasis on the need to create a strong sense of local history and depending on content include reference to the role of design in helping to improve access to services and facilities, countryside and open spaces. The updating of guidance and introduction of Design SPD provides an opportunity to adopt specific guidelines and standards in order to take account of particular locational characteristics that need to be considered when assessing the impact of different types of development. This may result in positive impacts for objectives relating to the creation of social identity, social inclusiveness, quality of housing and embracing culture.

#### Mitigation

Ensure new policy and guidance includes consideration of meeting SP objectives to its fullest especially the role of how design can contribute to the creation of social identity, inclusiveness, improved housing conditions, healthy environments and improved access to services and natural environment. Any new general guidance in the form of a Design SPD should not just consider appearance of new development, but also its relationship with the surrounding environment, its function, accessibility and overall attractiveness. Other policies notably any general requirements policy, sustainable transport related policies, historic environment, town centre and landscaping and trees should complement such a policy and guidance in helping to meet SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D guidance likely to be applied differently depending on locality
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping
Impact Score	+2 but potentially +3

### Comments

A new policy would continue to ensure development proposals are considered against a set of criteria or principles that promote high quality design, minimise effects of lighting schemes, control external security measures in town centres, promote a safe environment in their design and layout and ensure shop fronts are designed in an appropriate manner. It would likely result in a strengthening of policy so it meets the full range of environment objectives particularly in respect to improving the quality of the built environment but also enhancing and maintaining habitats if it include specific reference to introduction of measures that would support this for example urban greening.

The updating of guidance and introduction of Design SPD provides an opportunity to adopt specific guidelines and standards in order to take account of particular locational characteristics that need to be considered when assessing the impact of different types of development. This may result in positive impacts for objectives relating to the different aspects of the district's environment – rural and urban, edge of settlement, residential, employment, town centres etc. The updating of guidance regarding shop fronts could have a beneficial impact for town centre built environments in particular.

### Mitigation

Ensure new policy and guidance includes consideration of meeting EN objectives to its fullest especially the role of how design can contribute to the creation of a quality built environment, create opportunities for new habitats and biodiversity features as well as enhancing landscape quality. Any new Design SPD guidance should not just consider appearance of new development, but also its relationship with the surrounding environment, its function, accessibility, greening effect and overall attractiveness. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees should complement such a policy and guidance in helping to meet EN objectives.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D, guidance likely to be applied differently depending on locality
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	+1 potentially +2

### Comments

A new policy would continue to ensure development proposals are considered against a set of criteria or principles that promote high quality design, minimise effects of lighting schemes, control external security measures in town centres, promote a safe environment in their design and layout and ensure shop fronts are designed in an appropriate manner. It would likely result in a strengthening of policy that creates a positive impact for meeting NR objectives particularly in respect to improving air quality, reducing greenhouse gas emissions, promoting renewable energy and efficiency and reducing need to travel depending on content. This could include reference to specific measures that ensure delivery of such objectives.

The updating of guidance and introduction of Design SPD provides an opportunity to adopt specific guidelines and standards in order to take account of particular locational characteristics that need to be considered when assessing the impact of different types of development. This may result in positive impacts for objectives relating to the above.

### Mitigation

Ensure new policy and guidance includes consideration of meeting EN objectives to its fullest especially the role of how design can contribute to improving air quality through measures such as urban greening and any other energy efficiency measures. Any new Design SPD guidance should not just consider appearance of new development, but also its relationship with the surrounding environment, its function, accessibility, greening effect and overall attractiveness. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet EN objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D, guidance likely to be applied differently depending on locality
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	+2

### Comments

A new policy would continue to ensure development proposals are considered against a set of criteria or principles that promote high quality design, minimise effects of lighting schemes, control external security measures in town centres, promote a safe environment in their design and layout and ensure shop fronts are designed in an appropriate manner. It would likely result in a strengthening of policy that creates a positive impact for meeting EC objectives particularly in respect to creating an attractive environment for economic investment – thus helping to create a platform for new employment opportunities in an indirect way. The updating of policy and guidance on shop fronts could have a direct positive impact for the strengthening of town centre economies in particular. Particular design standards or criteria could entice certain types of business to invest in the area that may currently not wish to do so.

The updating of guidance and introduction of Design SPD provides an opportunity to adopt specific guidelines and standards in order to take account of particular locational characteristics that need to be considered when assessing the impact of different types of development. This may result in positive impacts for objectives relating to the above.

### Mitigation

Ensure new policy and guidance includes consideration of meeting EC objectives to its fullest especially the role of how design can help to create an attractive environment for economic investment and growth. Any new Design SPD guidance should not just consider appearance of new development, but also its relationship with the surrounding environment, its function, accessibility, and overall attractiveness. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet EN objectives.

## QUALITY DESIGN OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S - Medium – until national policy amended or Core Strategy policy superseded
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	-2

#### Comments

Removing all local level policy and guidance will most likely result in less informed decisions being made and ability to manage the impact of development in terms of how its design may affect the social environment. It would lead to a lack of clarity and certainty around decision making relating to design; as it would leave a question mark over council expectations in this respect, this could have negative impacts in terms of the quality of proposed designs and layouts as these would be based on looser less locally derived standards and principles.

Core Strategy policy is very general and doesn't include specific guidelines and principles to make informed decisions when considering the design and layout of proposals.

Relying on National Guidance poses risks looking ahead into the future, its permanence has to be questioned, future reviews may result in existing design policies and guidance being deleted leaving the Council in an exposed position as it would remove the necessary policy framework for making decisions relating to design.

The scope and application of any specific local guidance is likely to be affected and weakened without a clear policy or policies setting out specific requirements / guidelines. For instance there would be no policy hook to create/update guidance relating to shop fronts. The option would also result in missed opportunities to link the objectives of other policies within any design policy, and enable such policies to have maximum positive impacts for the social environment.

Ultimately it would be a missed opportunity for recognising the needs of everyone.

#### Mitigation

Introduce a new or updated policy or set of policies and guidance, to avoid a policy vacuum, lack of clarity around decision making relating to design. The policy and guidance should include measures that maximise the realisation of SP objectives. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S - Medium – until national policy amended or Core Strategy policy superseded
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	-2

### Comments

Removing all local level policy and guidance will most likely result in less informed decisions being made and ability to manage the impact of development in terms of how its design may affect the social environment. It would lead to a lack of clarity and certainty around decision making relating to design; as it would leave a question mark over council expectations in this respect, this could have negative impacts in terms of the quality of proposed designs and layouts as these would be based on looser less locally derived standards and principles.

Core Strategy policy is very general and doesn't include specific guidelines and principles to make informed decisions when considering the design and layout of proposals.

Relying on National Guidance poses risks looking ahead into the future, its permanence has to be questioned, future reviews may result in existing design policies and guidance being deleted leaving the Council in an exposed position as it would remove the necessary policy framework for making decisions relating to design.

The scope and application of any specific local guidance is likely to be affected and weakened without a clear policy or policies setting out specific requirements / guidelines. For instance there would be no policy hook to create/update guidance relating to shop fronts. The option would also result in missed opportunities to link the objectives of other policies within any design policy, and enable such policies to have maximum positive impacts for the protection of the environment.

### Mitigation

Introduce a new or updated policy or set of policies and guidance, to avoid a policy vacuum, lack of clarity around decision making relating to design. The policy and guidance should include measures that maximise the realisation of EN objectives. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet EN objectives.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S - Medium – until national policy amended or Core Strategy policy superseded
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	-2

### Comments

Removing all local level policy and guidance will most likely result in less informed decisions being made and ability to manage the impact of development in terms of how its design may affect the social environment. It would lead to a lack of clarity and certainty around decision making relating to design; as it would leave a question mark over council expectations in this respect, this could have negative impacts in terms of the quality of proposed designs and layouts as these would be based on looser less locally derived standards and principles.

Core Strategy policy is very general and doesn't include specific guidelines and principles to make informed decisions when considering the design and layout of proposals.

Relying on National Guidance poses risks looking ahead into the future, its permanence has to be questioned, future reviews may result in existing design policies and guidance being deleted leaving the Council in an exposed position as it would remove the necessary policy framework for making decisions relating to design.

The scope and application of any specific local guidance is likely to be affected and weakened without a clear policy or policies setting out specific requirements / guidelines. For instance there would be no policy hook to create/update guidance relating to shop fronts. The option would also result in missed opportunities to link the objectives of other policies within any design policy, and enable such policies to have maximum positive impacts for the management of natural resources.

### Mitigation

Introduce a new or updated policy or set of policies and guidance, to avoid a policy vacuum, lack of clarity around decision making relating to design. The policy and guidance should include measures that maximise the realisation of NR objectives. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet NR objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S - Medium – until national policy amended or Core Strategy policy superseded
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, Historic Environment, Town Centres, trees and landscaping, pollution
Impact Score	-2

### Comments

Removing all local level policy and guidance will most likely result in less informed decisions being made and ability to manage the impact of development in terms of how its design may affect the social environment. It would lead to a lack of clarity and certainty around decision making relating to design; as it would leave a question mark over council expectations in this respect, this could have negative impacts in terms of the quality of proposed designs and layouts as these would be based on looser less locally derived standards and principles.

Core Strategy policy is very general and doesn't include specific guidelines and principles to make informed decisions when considering the design and layout of proposals.

Relying on National Guidance poses risks looking ahead into the future, its permanence has to be questioned, future reviews may result in existing design policies and guidance being deleted leaving the Council in an exposed position as it would remove the necessary policy framework for making decisions relating to design.

The scope and application of any specific local guidance is likely to be affected and weakened without a clear policy or policies setting out specific requirements / guidelines. For instance there would be no policy hook to create/update guidance relating to shop fronts. The option would also result in missed opportunities to link the objectives of other policies within any design policy, and enable such policies to have maximum positive impacts for the economic environment.

### Mitigation

Introduce a new or updated policy or set of policies and guidance, to avoid a policy vacuum, lack of clarity around decision making relating to design. The policy and guidance should include measures that maximise the realisation of EC objectives. Other policies notably any general requirements policy, historic environment, town centre and landscaping and trees and pollution policies should complement such a policy and guidance in helping to meet EC objectives.

# RENEWABLE AND LOW CARBON ENERGY OPTION 1

## Maintain current policy position

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	With other local planning policies such as those relating to landscape, conservation etc, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

#### Comments

Maintaining the current policy position would maintain the status quo with respect to the local policy position on renewable and low carbon energy. This option would have limited bearing on the social progress objectives although the current policy position does contribute to SP5.5 in helping improve quality of life and health and wellbeing through promoting renewable and low carbon energy to reduce greenhouse gas emissions and pollution. It also relates to SP4.3 in enabling people to live sustainable lifestyles through promoting renewable energy generation. The current policy position in relation to wind energy however is largely impacted by national government policy in particular the written ministerial statement which presents a negative position in relation to wind energy.

#### Mitigation

The current policy position is perhaps missing some opportunities for maximising renewable energy generation as required by the NPPF, and the old saved Local Plan policies are dated and do not cover all forms of renewable and low carbon energy developments. A new policy could address these issues and ensure there is policy coverage for all types of renewable/low carbon energy development. A new policy approach could also seek to give more policy support to wind energy in light of the ministerial statement, through identifying suitable areas for wind energy. This could result in more positive social progress outcomes through enabling more sustainable lifestyles and greater health and wellbeing benefits.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies such as those relating to landscape, conservation etc, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

### Comments

Maintaining the current policy position would maintain the status quo. This policy option has links with environmental objectives EN1, EN2 and EN3 but there would be no change in impacts through maintaining the current policy position.

### Mitigation

This policy option would work in combination with a number of existing and potential new DM policies to mitigate potential impacts on habitats, biodiversity and geodiversity, landscape and built environment character from renewable and low carbon energy development proposals.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

### Comments

Maintaining the current policy position would maintain the status quo. This policy option has links with natural resource objectives particularly NR1.2, NR1.3 and NR1.7 which relate to reducing greenhouse gas emissions and encouraging the use of clean low carbon energy technologies and maximising renewable energy generation. But there would be no change in impacts through maintaining the current policy position.

### Mitigation

More positive impacts could be achieved through a new policy approach that is able to more effectively promote renewable energy, through for example identifying suitable areas for wind energy. However given national government policy there is limited scope within local planning policy to promote or require increases in renewable energy generation. Existing and potential new local planning policies would mitigate against any potential negative impacts of renewable energy proposals on natural resources such as water and soil.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District and wider given economic impacts are cross boundary.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

### Comments

Maintaining the current policy position would maintain the status quo. This policy option has limited links with economic objectives including EC1 and EC3 in relation to economic benefits and jobs associated with the renewable/low carbon energy industry. But there would be no change in impacts through maintaining the current policy position.

### Mitigation

A more proactive and up to date policy approach covering all forms of technology could perhaps result in some positive economic impacts for the renewable energy industry. Although the national position in relation to renewable energy in terms of policies, subsidies etc would have much more bearing on the renewable energy economy than local policies.

## RENEWABLE AND LOW CARBON ENERGY OPTION 2

### New Policy setting out new criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	District
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

#### Comments

A new updated overarching policy that applies to all forms of renewable and low carbon energy generation could positively impact on a number of social objectives. It would provide a clearer decision making framework and may help people understand the decision making process more (SP1.3). If a new policy resulted in greater renewable energy generation it could have positive social impacts in enabling people to live sustainable lifestyles (SP4.3), help create a green working and living environment (SP5.3) and help improve quality of life and health and wellbeing (SP5.4). Any new policy approach however would still be constrained by national government policy and approaches meaning impacts are likely to be limited.

#### Mitigation

There is very limited scope to maximise potential beneficial effects given the limitations placed on the Council through national policy, for example prohibiting local authorities from requiring renewable energy provision in new developments, and limiting the scope for new wind farms. Without the national controls a new policy for renewable energy could have a greater positive impact in the district through maximising renewable energy opportunities.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N / +2

### Comments

A new policy in relation to renewable and low carbon energy would align well with climate change objectives however the impacts of having a new policy would likely be minimal when compared with the baseline position of the current local planning policies and national context. A new policy would largely be updating and combining the criteria of various technology specific policies into one overarching policy and therefore the policy direction would be largely the same. A new policy would offer the opportunity to incorporate new considerations and criteria for example in relation to the cumulative impacts of vertical infrastructure, as informed by the Cumbria wide study. This may offer more opportunities for more positive impacts in terms of protecting local landscape quality (EN2.1) and maintaining the remoteness and tranquillity of rural landscapes (EN2.2).

### Mitigation

If a new policy could more strongly promote and maximise new renewable energy projects there would be scope for more positive environmental impacts, however this scope is limited by the national context.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N / +2

### Comments

A new policy in relation to renewable and low carbon energy would align well with climate change objectives however the impacts on natural resources of having a new policy would likely be minimal when compared with the baseline position of the current local planning policies and national context. A new policy would largely be updating and combining the criteria of various technology specific policies into one overarching policy and therefore the policy direction would be largely the same. A new policy would offer the opportunity to maximise the use of energy from low carbon and renewable sources (NR1.7), dependent upon the content of the policy and the national policy context.

### Mitigation

If a new policy could more strongly promote and maximise new renewable energy projects there would be scope for more positive 'natural resources' impacts, however this scope is limited by the national context.

### **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	District and wider given the cross boundary nature of the economy.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights
Impact Score	N

#### **Comments and Mitigation**

##### Comments

A new policy in relation to renewable and low carbon energy would align well with climate change objectives however the impacts on the economy of having a new policy would likely be minimal when compared with the baseline position of the current local planning policies and national context. A new policy would largely be updating and combining the criteria of various technology specific policies into one overarching policy and therefore the policy direction would be largely the same.

##### Mitigation

If a new policy could more strongly promote and maximise new renewable energy projects there could be scope for more positive economy impacts, for example encouraging growth of businesses relating to the renewable energy industry, however this scope is limited by the national context.

## **RENEWABLE AND LOW CARBON ENERGY OPTION 3**

### **No Policy – rely on National and Core Strategy Policies and the Cumbria Wind Energy SPD**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	With other local planning policies such as those relating to landscape, conservation etc, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.

Impact Score	-2
<p><b>Comments and Mitigation:</b> (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)</p> <p><u>Comments</u></p> <p>There is uncertainty surrounding the impacts of this option given that it relies on national policy, and there is uncertainty regarding the longevity of the National Planning Policy Framework and online Planning Practice Guidance. This option would not assist helping people understand the decision making process (SP1.3) as it would not result in a clear policy framework at a local level. It wouldn't provide the opportunity to include specific local criteria relating to health and wellbeing impacts of renewable energy for example glint and glare, shadow flicker etc.</p> <p><u>Mitigation</u></p> <p>A new up to date and clear local policy on renewable energy could negate the potential negative impacts of this approach.</p>	

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
 EN2 - To conserve and enhance landscape quality and character for future generations  
 EN3 - To improve the quality of the built environment  
 EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies such as those relating to landscape, conservation etc, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

### Comments and Mitigation

#### Comments

Removing local policies and instead relaying on national policy and existing Cumbria guidance would not enable the Council to adopt a locally specific policy approach with specific criteria to address local environmental issues. For example it would not provide the opportunity for covering issues like landscape impact in more detail referring to the Cumbria vertical infrastructure study.

#### Mitigation

In the absence of a specific renewable energy policy there would still be a range of local policies that should be able to mitigate any potential negative environmental impacts, for example policies relating to landscape, heritage and biodiversity.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
 NR2 - To improve and manage water quality and water resources and services  
 NR3 - To restore and protect land and soil  
 NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District and wider given greenhouse gas emissions and climate change issues.
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights.
Impact Score	N

### Comments and Mitigation

#### Comments

Under this policy approach the Council would still have an overarching positive strategy for promoting renewable energy through CS7.7 of the Core Strategy which would help contribute to objectives NR1.2, NR1.3 and NR 1.4, although would not result in any different impacts from at present as the local policy context would remain the same. This policy option would perhaps leave the Council vulnerable to changes in renewable energy policy at a national level and introduces an element of uncertainty.

#### Mitigation

The Council would still have a range of policies in relation to issues such as pollution and water quality to ensure any potential adverse impacts of renewable energy projects are mitigated, but it would not have a specific renewable energy policy to address these issues specifically in relation to renewable energy.

### BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M – Until Local Plan Review when policy position could be reviewed.
Geographic Scale	District
Cumulative Impact	With other local planning policies, the Cumbria Wind Energy SPD, and also national policy and government position in relation to renewable energy including the Written Ministerial Statement on Wind Energy and national permitted development rights
Impact Score	N

### Comments and Mitigation

#### Comments

The absence of a local policy to help determine renewable energy projects in the district could create a more uncertain climate for the renewable energy industry and leave it more vulnerable to changes at a national level. However the industry as a whole would be more influenced by the national context rather than local policy therefore the impacts of this policy approach are likely negligible.

#### Mitigation

A new criteria based policy could help provide a more certain climate for renewable energy developers in the district.

## **RETAIL & OTHER USES IN TOWN CENTRES OPTION 1**

### **Adopt a new policy in line with current NPPF & PD rights**

#### **SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	U
Cumulative Impact	With other policies relating to the Town Centre
Impact Score	+2

#### Comments

This option would allow scope to update the current policy position to bring it into line with the NPPF, PD rights, fill gaps and generally update and improve the policy. It should result in a more flexible approach to the use of town centres, including taking account of contemporary shopping and leisure trends. This should have positive impacts for accessing services and facilities (SP2), improving wellbeing (SP5) and ensuring that communities are active, vibrant and inclusive (SP6). Potentially, more flexibility of use could also support the delivery of more residential uses in and around town centres (SP3). This option enables greater local control and ability to respond to local context.

#### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	U
Cumulative Impact	With other policies relating to the Town Centre and built environment/conservation areas
Impact Score	N / +2

### Comments

This option would allow scope to update the current policy position to bring it into line with the NPPF, PD rights, fill gaps and generally update and improve the policy. It should result in a more flexible approach to the use of town centres, including taking account of contemporary shopping and leisure trends. This could have potentially positive and negative impacts for the built environment by focusing development in the town centres (EN3). This option enables greater local control and ability to respond to local context.

### Mitigation

Other policies relating to Town Centres, those relating to Conservation Areas and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to EN objectives.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	U
Cumulative Impact	With other policies relating to the Town Centre
Impact Score	N / +2

### Comments

This option would allow scope to update the current policy position to bring it into line with the NPPF, PD rights, fill gaps and generally update and improve the policy. It should result in a more flexible approach to the use of town centres, including taking account of contemporary shopping and leisure trends. The greater flexibility could have positive impacts for reducing the need to travel (NR1) and making better use of existing buildings (NR3, NR4). There could be both positive and negative impacts for the built environment by focusing development in the town centres (NR3). This option enables greater local control and ability to respond to local context.

### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to NR objectives.



## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	U
Cumulative Impact	With other policies relating to the Town Centre
Impact Score	+2

### Comments

This option would allow scope to update the current policy position to bring it into line with the NPPF, PD rights, fill gaps and generally update and improve the policy. It should result in a more flexible approach to the use of town centres, including taking account of contemporary shopping and leisure trends. This should have positive impacts for diversification, vitality, encouraging inward investment and flexibility of approach, potentially contributing to all three EC objectives. This option enables greater local control and ability to respond to local context.

### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to EC objectives.

## RETAIL & OTHER USES IN TOWN CENTRES OPTION 2

### No Policy – rely on National, Core Strategy and Land Allocations Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	?
Geographic Scale	U
Cumulative Impact	With PD rights and other policies relating to the Town Centre
Impact Score	N / +2

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

#### Comments

There is some risk and uncertainty in relying on National, CS and LA policies as the NPPF could change at any time and CS/LA will be replaced by new Local Plan by 2021. However, doing so could result in greater flexibility and variety of uses in town centres. This could have positive impacts for accessing services and facilities (SP2), improving wellbeing (SP5) and ensuring that communities are active, vibrant and inclusive (SP6). Potentially, more flexibility of use could also support the delivery of more residential uses in and around town centres (SP3). This option does reduce the degree of local control. Some criteria, such as those relating to amusement centres, should be covered through General Requirements. Out-of-date references in current policies would be removed.

#### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	?
Geographic Scale	U
Cumulative Impact	With PD rights and other policies relating to the Town Centre/Built Environment/Conservation
Impact Score	N

### Comments

There is some risk and uncertainty in relying on National, CS and LA policies as the NPPF could change at any time and CS/LA will be replaced by new Local Plan by 2021. However, doing so could result in greater flexibility and variety of uses in town centres. This could have potentially positive and negative impacts for the built environment by focusing development in the town centres (EN3) and through less restriction. This option does reduce the degree of local control. Some criteria, such as those relating to amusement centres, should be covered through General Requirements. Out-of-date references in current policies would be removed.

### Mitigation

Other policies relating to Town Centres, Built Environment/Conservation Areas and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to EN objectives. Additional / special criteria may be needed to properly protect Conservation Areas.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	?
Geographic Scale	U
Cumulative Impact	With PD rights and other policies relating to the Town Centre
Impact Score	N

### Comments

There is some risk and uncertainty in relying on National, CS and LA policies as the NPPF could change at any time and CS/LA will be replaced by new Local Plan by 2021. However, doing so could result in greater flexibility and variety of uses in town centres. This could have positive impacts for reducing the need to travel (NR1) and making better use of existing buildings (NR3, NR4). There could be both positive and negative impacts for the built environment by focusing development in the town centres (NR3). This option does reduce the degree of local control. Some criteria, such as those relating to amusement centres, should be covered through General Requirements. Out-of-date references in current policies would be removed.

### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to NR objectives.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	?
Geographic Scale	U
Cumulative Impact	With PD rights and other policies relating to the Town Centre
Impact Score	N / +2

### Comments

There is some risk and uncertainty in relying on National, CS and LA policies as the NPPF could change at any time and CS/LA will be replaced by new Local Plan by 2021. However, doing so could result in greater flexibility and variety of uses in town centres. This should have positive impacts for diversification, vitality, encouraging inward investment and flexibility of approach, potentially contributing to all three EC objectives. This option does reduce the degree of local control. Some criteria, such as those relating to amusement centres, should be covered through General Requirements. Out-of-date references in current policies would be removed.

### Mitigation

Other policies relating to Town Centres and the General Requirements policy will need to be complimentary and will need to be fully applied to relevant schemes in order to support the contribution of this policy to EC objectives.

## RURAL HOUSING EXCEPTION SITES OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District (Rural emphasis)
Cumulative Impact	Cumulative impacts with other housing policy areas e.g. starter homes, right to buy and the National Planning Policy Framework.
Impact Score	N

#### Comments

The current strict rural exceptions policy approach limits sites to 100% affordable units, therefore schemes can only be built by RSLs as they do not stack up financially for private investment. This policy seeks to provide people in rural areas with access to decent homes in their local area (SP3.1 and SP3.2) but maintaining the current strict policy position may be missing the opportunity to facilitate more rural affordable housing by allowing some open market housing. Maintaining the current policy position would still however require the Council to take into account the NPPF (para 54) which states that local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. There is still a degree of uncertainty as to how this policy approach would be impacted by the national government's starter home initiative in relation to rural exceptions as previous announcements stated they should be delivered on rural exceptions sites whilst the Planning and Housing Act implies that Regulations may exempt local authorities from meeting the requirement on rural exception sites.

#### Mitigation

A new policy could introduce some controls as to the mix of housing that may be allowed on rural exception sites. The amount of rural affordable housing could be increased whilst maintaining the current policy position by taking into account NPPF paragraph 54 in planning decisions. A proactive policy approach towards self-build could perhaps also help increase the supply of more affordable rural housing.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District (Rural emphasis)
Cumulative Impact	Cumulative impacts with other housing policy areas e.g. starter homes, right to buy and the National Planning Policy Framework.
Impact Score	N

### Comments

There have been very few rural exception affordable housing completions under the existing policy approach therefore maintaining this position is likely to have negligible environmental impacts, given the small scale of development that will arise. However the impacts do need to be considered in conjunction with the starter homes requirement although it is not yet clear whether this will be a requirement on rural exception sites or whether Councils may be exempted through Regulations, as implied by the Housing and Planning Act 2016.

### Mitigation

Other existing local planning policies relating to landscape, protection of the environment etc will be applied to mitigate any potential negative impacts.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium (until Local Plan Review when policy position could be reviewed)
Geographic Scale	District (Rural emphasis)
Cumulative Impact	Potential cumulative impacts with starter homes requirement.
Impact Score	N

### Comments

There has been a low delivery rate of rural exception site homes due to the strict requirements of the policy therefore maintaining this position is likely to have negligible impacts on natural resources.

### Mitigation

Existing and potential new local planning policies have the potential to mitigate and negative impacts of the existing rural exceptions policy on natural resources, and to ensure the most positive impacts.



## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium (until Local Plan review when policy position can be reviewed)
Geographic Scale	District (rural emphasis)
Cumulative Impact	Potential cumulative impacts if starter homes initiative extended to rural exception sites.
Impact Score	N

### Comments

Maintaining the current policy position with regards rural exception housing sites would maintain the status quo and not therefore lead to any different impacts on the economy than the current policy position. The current rural exceptions policy position does allow for some limited building of affordable housing in rural areas. The small level of rural exception housebuilding offers opportunities to support the rural economy by allowing more people to live in rural communities and support services and businesses there. Rural exception policies may in some cases put pressure on underused rural employment sites and potentially lead to the loss of some employment sites for housing use.

### Mitigation

Other existing and potential new planning policies will mitigate potential negative impacts, for example in ensuring adequate protection for employment sites and rural facilities.

## RURAL HOUSING EXCEPTION SITES OPTION 2

### New or amended policy

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District (rural emphasis)
Cumulative Impact	With other policies and national starter homes initiative.
Impact Score	+2

#### Comments

A new rural exception sites policy that makes provision for a proportion of market housing on rural exception sites would increase the viability of these sites and enable more affordable housing to be provided in rural areas, resulting in positive impacts on the objective to provide everyone with a decent home (SP3). It would widen choice and increase the range of housing types available in rural areas and meet a wider range of needs.

#### Mitigation

In order to ensure positive impacts and the continued focus on the provision of predominantly affordable home on rural exception sites any new policy would need to have clear requirements in terms of the types of properties and the element of market housing that would be acceptable. The maximum benefits could be achieved if the policy assures that all house types provided on exception sites meet local needs even if not 'affordable' by definition. The policy has the scope to help maximise the numbers of affordable self-build properties in rural areas.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District (rural emphasis)
Cumulative Impact	With other local/national planning policies and starter homes initiative.
Impact Score	-2

### Comments

A new policy approach to support an element of market housing on rural exception sites will likely increase the delivery of rural exception sites, leading to a greater number of homes being built in rural areas and potential resultant negative environmental impacts.

### Mitigation

Existing and potential new local planning policies will be applied and will be important in mitigating effects from greater development pressure in rural areas, for example policies on landscape protection, biodiversity and green infrastructure.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District (rural emphasis)
Cumulative Impact	With other local/national planning policies and starter homes initiative.
Impact Score	-2

### Comments

A new policy approach to support an element of market housing on rural exception sites will likely increase the delivery of rural exception sites, leading to a greater number of homes being built in rural areas. This could have potential negative impacts on natural resources through promoting a more unsustainable pattern of development and increasing the need for people to travel to access services and facilities in the larger settlements.

### Mitigation

Other policies in the Local Plan will continue to promote sustainable development and should help mitigate potential negative impacts on natural resources.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District
Cumulative Impact	With other local/national planning policies and starter homes initiative.
Impact Score	+2

### Comments

A new policy approach to support an element of market housing on rural exception sites will likely increase the delivery of rural exception sites through improving site viability. This will have resultant economic benefits in terms of supporting smaller scale builders and local businesses related to construction. It would enable more people to live in rural areas, contributing to support for rural services, facilities and businesses.

### Mitigation

The positive impacts of this policy could be maximised by ensuring the policy seeks to focus rural exception development in areas that are well related to existing communities so that the new development can contribute to local communities and the local rural economy.

## SELF CATERING ACCOMMODATION OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	? Uncertain, but, potentially with other holiday accommodation.
Impact Score	0

#### Comments

Existing Local Plan Policy T4 – new build self-catering accommodation and the conversion to self-catering accommodation, outside of development boundaries, has very similar policy provisions to the existing Local Plan Policies H11 and H12. Conversions to both residential and self-catering accommodation (excluding caravans, chalets and log cabins etc), in the saved Local Plan Policies are both subject to similar policy criteria.

#### Mitigation

The application of relevant new/existing policies, including existing heritage policy.

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
EN2 - To conserve and enhance landscape quality and character for future generations  
EN3 - To improve the quality of the built environment  
EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	? Uncertain, but, potentially with other holiday accommodation.
Impact Score	0

#### Comments

No changes.

#### Mitigation

Ensure that relevant new/existing policies are applied, such as those covering the protection of the environment.

### SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
NR2 - To improve and manage water quality and water resources and services  
NR3 - To restore and protect land and soil  
NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	? Uncertain, but, potentially with other holiday accommodation.
Impact Score	0

#### Comments

No change.

#### Mitigation

Ensure that relevant new/existing policies.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	? Uncertain, but, potentially with other holiday accommodation.
Impact Score	0

### Comments

Potential conflict with NPPF. Existing Local Plan Policy T4 does not allow new build self-catering but could support e.g. diversification of businesses (rural).

### Mitigation

The enforcement of relevant new/existing policies.



## SELF CATERING ACCOMMODATION OPTION 2

### New policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	D (R -but outside development boundaries, and has a rural focus).
Cumulative Impact	Yes, with new General Requirements Policy.
Impact Score	0 / N

#### Comments

SA objective SA1 – assumptions about the overall quality of self-catering accommodation out of date. Opportunity to review and update the Policy T4 – self-catering accommodation outside development boundaries.

#### Mitigation

Anything lost needs to be covered adequately elsewhere in other policies e.g. new General Requirements Policy and other new policies will need to contain the right criteria and be enforced to ensure any loss of criteria currently in place does not have a negative impact. If any new policy includes existing criteria the impact would be neutral; if new policy provision includes additional criteria this could have a positive outcome.

A new policy could provide clarity concerning the relationship with existing Local Plan Policies H11/H12 – do we need both?

A new policy could provide clarity over whether new build self-catering accommodation is being allowed currently, despite the first sentence of existing Local Plan Policy T4.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	Yes, with new General Requirements Policy.
Impact Score	0 No impact/neutral - (if covered in the same way as the existing policy approach, through other new/updated policies. Plus if amendments to new policy represents improvement).

### Mitigation

Anything lost needs to be covered adequately elsewhere in other policies e.g. new General Requirements Policy. General requirements and other policies must contain right criteria and be enforced properly to ensure any loss of criteria currently in place does not have negative impact. If any new policy includes existing criteria the impact would be neutral; if new policy provision includes additional criteria this could have a positive outcome

A new policy could provide clarity concerning the relationship with existing Local Plan Policies H11/H12 – do we need both?

A new policy could provide clarity over whether new build self-catering accommodation is being allowed currently, despite the first sentence of existing Local Plan Policy T4.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	Yes, with new General Requirements Policy.
Impact Score	0 No impact/neutral - (if covered in the same way as the existing policy approach, through other new/updated policies. Plus if amendments to new policy represents improvement).

### Mitigation

Anything lost needs to be covered adequately elsewhere in other policies e.g. new General Requirements Policy. General requirements and other policies must contain right criteria and be enforced properly to ensure any loss of criteria currently in place does not have negative impact. If any new policy includes existing criteria the impact would be neutral; if new policy provision includes additional criteria this could have a positive outcome

A new policy could provide clarity concerning the relationship with existing Local Plan Policies H11/H12 – do we need both?

A new policy could provide clarity over whether new build self-catering accommodation is being allowed currently, despite the first sentence of existing Local Plan Policy T4.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	Yes, with new General Requirements Policy.
Impact Score	0 No impact/neutral - (if covered in the same way as the existing policy approach, through other new/updated policies. Plus if amendments to new policy represents improvement).

### Mitigation

Anything lost needs to be covered adequately elsewhere in other policies e.g. new General Requirements Policy. General requirements and other policies must contain right criteria and be enforced properly to ensure any loss of criteria currently in place does not have negative impact. If any new policy includes existing criteria the impact would be neutral; if new policy provision includes additional criteria this could have a positive outcome

A new policy could provide clarity concerning the relationship with existing Local Plan Policies H11/H12 – do we need both?

A new policy could provide clarity over whether new build self-catering accommodation is being allowed currently, despite the first sentence of existing Local Plan Policy T4.

## SELF CATERING ACCOMMODATION OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	? Depends on longevity of National Policy relied on or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	?
Impact Score	?

#### Comments

Uncertainties over future potential changes to national planning Policy (NPPF).  
 Would have to fall back on national planning policy, if changed when we had a national policy.

#### Mitigation

Clarifications required before can fully assess.

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Depends on longevity of National Policy relied on or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	?
Impact Score	?
<u>Mitigation</u>  Some mitigation from other policies covering some elements. New General Requirements, Design, Heritage, Parking, Trees and Landscaping, and Core Strategy policies biodiversity and geodiversity, design, green infrastructure and protection and enhancement of the environment.	

### SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Depends on longevity of National Policy relied on or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	?
Impact Score	?
<u>Mitigation</u>  Some mitigation from other policies covering some elements.	

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Depends on longevity of National Policy relied on or until new policy otherwise introduced; Core Strategy to 2025
Geographic Scale	D (R - but outside development boundaries, and has a rural focus).
Cumulative Impact	?
Impact Score	?

### Comments

National Policy (NPPF), Core Strategy Policy and Land Allocations Policy LA1.1, on their own, would likely mean a more positive approach to allowing new self-catering accommodation.

Relying solely on the application on national planning policy, core strategy and Land Allocations Policy LA1.1, would result in the loss of criterion (d) in existing Local Plan Policy T4 – ‘ the applicant enters into a planning obligation or the permission is subject to a condition limiting the accommodation to self-catering accommodation’.

### Mitigation

Some mitigation from other policies covering some elements.

# STARTER HOMES OPTION 1

## Rely on National and Core Strategy Policy

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Initially S but then L from 2016
Geographic Scale	District
Cumulative Impact	Cumulative viability impact
Impact Score	-4

#### Comments

This policy option would result in a reduced supply of affordable homes, an impact that would be long lasting. It would not enable everyone access to a decent home (SP3) as starter homes would only be affordable for a small sector of the market and would compromise the delivery of affordable rent and discounted for sale products. This option would not represent the best policy approach for meeting affordable need in the district. It could lead to less diverse communities and therefore have negative impacts for SP6. Having no clear local policy in relation to starter homes would not help create a clear local decision making framework or help people understand the decision making process (SP1.3).

#### Mitigation

There is limited scope for mitigating potential negative impacts from this option as it would be left to national policy. The introduction of a starter homes policy could potentially help mitigate some impacts and aim to maximize the amount of affordable housing that can still be delivered, although it is still unclear at this stage how much scope there will be for local authorities to develop local approaches to starter homes provision, and how much will be dictated at a national level.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	District, with potential more impacts in rural areas from rural exception starter homes.
Cumulative Impact	Uncertain?
Impact Score	-2

### Comments

The rural exceptions element of the starter homes approach could potentially result in more negative environmental impacts for example increased landscape impacts (EN2.1 and EN2.2) from permitting more development in rural areas that would not otherwise be allowed. However as the general starter homes requirement on new development arising from the Housing and Planning Act should increase site viability if it is to be regarded as 'affordable' and comprise part of the affordable requirement, then positive impacts could be achieved for example higher quality development (EN3) and more scope for mitigating potential impacts and securing higher quality outcomes for biodiversity or green infrastructure.

### Mitigation

Existing and proposed local planning policies should help mitigate potential negative impacts from rural starter home exception sites.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	District (with a rural emphasis for the rural exceptions site element)
Cumulative Impact	Uncertain
Impact Score	N

### Comments

The promotion of starter homes on rural exception sites by the national Government could increase the amount of development in rural areas which could lead to a more unsustainable pattern of development and increase the need to travel and increase greenhouse gas emissions, resulting in negative impacts for natural resource sustainability objective NR1. The brownfield exceptions site element of the government's starter homes initiative could help promote development on brownfield land (NR3.1).

### Mitigation

The Council would need to apply its other local planning policies to mitigate potential negative impacts.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	District
Cumulative Impact	Uncertain
Impact Score	N/?

### Comments

The national starter homes exception site policy would place pressure on existing employment sites, as whilst sites may be underused or unviable in the short term, the building of starter homes on them could in the longer term reduce the employment land supply. If the starter homes initiative however boosts housebuilding on underused sites as intended it could result in increased construction jobs and spin off benefits in the local economy. If the starter homes initiative has negative impacts on housing affordability by reducing the amount of new affordable rent and discounted for sale it could have negative impacts on the local workforce as young people may need to move away to meet their housing needs (EC1.3), or the area could struggle to attract new workers.

### Mitigation

There potentially may be some scope for a more locally appropriate policy to mitigate some negative impacts of the starter homes initiative, however it will largely be determined at a national level.

## STARTER HOMES OPTION 2

### New Starter Homes Policy

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Short initially but Long overall.
Geographic Scale	District
Cumulative Impact	Cumulative impact with other housing policies and also cumulative viability impacts.
Impact Score	-2

#### Comments

A local starter homes policy gives some potential scope to refine national policy to make it more locally appropriate. However as indicated by the Housing and Planning Act this scope will largely be constrained by national legislation. This policy option would likely therefore still result in a reduced supply of affordable homes, an impact that would be long lasting. It would not enable everyone access to a decent home (SP3) as starter homes would only be affordable for a small sector of the market and would compromise the delivery of affordable rent and discounted for sale products. This option would not represent the best policy approach for meeting affordable need in the district. It could lead to less diverse communities and therefore have negative impacts for SP6.

#### Mitigation

The mitigation of potential negative social impacts depends on how much scope locally authorities have to tailor the starter homes requirement to their local circumstances.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District (potentially more of a rural emphasis)
Cumulative Impact	?
Impact Score	-2

### Comments

The rural exceptions element of the starter homes approach could potentially result in more negative environmental impacts for example increased landscape impacts (EN2.1 and EN2.2) from permitting more development in rural areas that would not otherwise be allowed. However as the general starter homes requirement on new development arising from the Housing and Planning Act should increase site viability if it is to be regarded as 'affordable' and comprise part of the affordable requirement, then positive impacts could be achieved for example higher quality development (EN3) and more scope for mitigating potential impacts and securing higher quality outcomes for biodiversity or green infrastructure.

### Mitigation

The mitigation of potential negative environmental impacts depends on how much scope locally authorities have to tailor the starter homes requirement to their local circumstances.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District (Rural emphasis)
Cumulative Impact	?
Impact Score	N

### Comments

The promotion of starter homes on rural exception sites by the national Government could increase the amount of development in rural areas which could lead to a more unsustainable pattern of development and increase the need to travel and increase greenhouse gas emissions, resulting in negative impacts for natural resource sustainability objective NR1. The brownfield exceptions site element of the government's starter homes initiative could help promote development on brownfield land (NR3.1).

### Mitigation

The Council would need to apply its other local planning policies to mitigate potential negative impacts.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District (Rural emphasis)
Cumulative Impact	?
Impact Score	N/?

### Comments

The national starter homes exception site policy would place pressure on existing employment sites, as whilst sites may be underused or unviable in the short term, the building of starter homes on them could in the longer term reduce the employment land supply. If the starter homes initiative however boosts housebuilding on underused sites as intended it could result in increased construction jobs and spin off benefits in the local economy. If the starter homes initiative has negative impacts on housing affordability by reducing the amount of new affordable rent and discounted for sale it could have negative impacts on the local workforce as young people may need to move away to meet their housing needs (EC1.3), or the area could struggle to attract new workers.

### Mitigation

There potentially may be some scope for a more locally appropriate policy to mitigate some negative impacts of the starter homes initiative, however it will largely be determined at a national level through forthcoming Regulations.

# SUSTAINABLE DRAINAGE SYSTEMS OPTION 1

## New policy with specific requirements/local standards

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D – policy, standards may vary depending on location
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance – both local and national
Impact Score	+2

#### Comments

This option would enable the Council to adopt a local policy setting out clearly its requirements in relation to Sustainable Drainage Systems. Given there is no local policy, this in itself will be a positive given it should offer greater transparency and could increase the level of participation in democratic processes contributing to meeting of objective SP1. There are benefits in having a policy in terms of ensuring houses are safeguarded from flood risk, potential health and wellbeing benefits in terms of provision of additional open space dependent on the function of any SUDs requirements, though will need to consider implications for safety. The degree to which local standards will be adopted will be influenced by the nature of national planning guidance and advice provided by the Local Lead Flood Authority – at the Cumbria wide level. The policy should also consider foul water drainage to ensure impacts from surface water are fully addressed. Consideration needs to be given to maintenance and management of sustainable drainage systems, thinking about liability.

#### Mitigation

Introduce a policy and any guidance/local standards that maximizes the level of positive impacts in terms of meeting SP objectives. Policy must consider potential implications for safety (health and wellbeing), and consider particular local circumstances to inform the nature of any policy – for instance whether different requirements and standards should be applied dependent on locality and type of development. It needs to be clear on how systems will be maintained and managed. It should consider particular local circumstances to inform the nature of any policy – for instance whether different requirements and standards should be applied dependent on locality and type of development to ensure sensitive areas and types of development are considered appropriately. Local standards may not be considered necessary depending on the extent to which a Cumbria wide set of standards and guidance is adopted. It should also consider foul water drainage requirements to ensure the management of surface water risk is fully effective. Other policies may help to complement such a policy and standards, especially a general requirements, pollution and design policy/guidance.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D – policy, standards may vary depending on location
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance, trees and landscaping – both local and national
Impact Score	+2 to possibly +4

### Comments

This option would enable the Council to adopt a local policy setting out clearly its requirements in relation to Sustainable Drainage Systems. The introduction of a policy should help meet all the EN objectives. It may enable additional habitats to be created through the provision of new wetland areas, and enhance the local environment providing wider visual amenity appeal, creation of more open space, linkages within green infrastructure, enhancement of overall quality of the built environment and landscape quality. It could ensure existing habitats are protected even further if the policy results in them being safeguarded for flood risk management purposes as well. It will contribute specifically to elements of objective EN3 notably EN3.5 and EN3.7

The degree to which local standards will be adopted will be influenced by the nature of national planning guidance and advice provided by the Local Lead Flood Authority – at the Cumbria wide level. The policy should also consider foul water drainage to ensure impacts from surface water are fully addressed. Consideration needs to be given to maintenance and management of sustainable drainage systems, thinking about liability.

### Mitigation

Introduce a policy and any guidance/local standards that maximises the level of positive impacts in terms of meeting EN objectives. Policy must consider the role SUDs may have in helping to protect, enhance and create new habitats / biodiversity value. It should also consider the role of SUDs in shaping design and layout of developments in terms of enhancing landscape quality, and providing green spaces. It needs to be clear on how systems will be maintained and managed. It should consider particular local circumstances to inform the nature of any policy – for instance whether different requirements and standards should be applied dependent on locality and type of development to ensure sensitive areas and types of development are considered appropriately. Local standards may not be considered necessary depending on the extent to which a Cumbria wide set of standards and guidance is adopted. It should also consider foul water drainage requirements to ensure the management of surface water risk is fully effective. Other policies may help to complement such a policy and standards, especially a general requirements, pollution and design policy/guidance.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D – policy, standards may vary depending on location
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance – both local and national, trees and landscaping, open space
Impact Score	+2 to possibly +4

### Comments

This option would enable the Council to adopt a local policy setting out clearly its requirements in relation to Sustainable Drainage Systems. The introduction of a policy should help meet some of the NR objectives. It should address impacts of pollution control, and enable the council to respond to implications of climate change – the policy will need to be worded carefully in this respect, future proofed so it takes account of any changing requirements as a result of future implications of climate change. The policy may enable the objective of promoting renewable energy to be realised if it sets out requirements promoting the role of SUD's in this context. It will make a key contribution to objective NR2.4 and NR2.5 and should consider including guidance/ requirements with respect to water quality. In order to maximise the benefits in terms of meeting NR objectives it should consider the strategic impacts and wider role of land use management as far as possible. The role of SUDs in reducing the need to travel should be considered, for instance how they may contribute to provision of green corridors that aid sustainable patterns of movement.

The degree to which local standards will be adopted will be influenced by the nature of national planning guidance and advice provided by the Local Lead Flood Authority – at the Cumbria wide level. The policy should also consider foul water drainage to ensure impacts from surface water are fully addressed. Consideration needs to be given to maintenance and management of sustainable drainage systems, thinking about liability.

### Mitigation

Introduce a policy and any guidance/local standards that maximises the level of positive impacts in terms of meeting NR objectives. Policy must consider the role SUDs may have in helping to promote renewable energy and energy efficiency, reducing the need to travel, improvement and management of water quality and resources and response to effects of climate change. It should consider particular local circumstances to inform the nature of any policy – for instance whether different requirements and standards should be applied dependent on locality and type of development to ensure sensitive areas and types of development are considered appropriately. It should also consider foul water drainage requirements to ensure the management of surface water risk is fully effective. Local standards may not be considered necessary depending on the extent to which a Cumbria wide set of standards and guidance is adopted. Other policies may help to complement such a policy and standards, especially a general requirements, pollution and design policy/guidance.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D – policy, standards may vary depending on location
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance – both local and national, trees and landscaping, open space
Impact Score	+2

### Comments

This option would enable the Council to adopt a local policy setting out clearly its requirements in relation to Sustainable Drainage Systems. This in itself should be of benefit to those potential investors and developers who wish to protect, create new job opportunities, by providing certainty over what will be expected of them through the Development Management Process.

The introduction of a policy should help meet some of the EC objectives. It may help to safeguard the viability of employment opportunities if it removes / reduces flood risk where this is a constraint to investment. It may also have spin off benefits in terms of creating new employment opportunities that provide flood risk management services and products – though this could be considered as quite a tenuous benefit.

The implementation of the policy should benefit the economic environment as a whole in terms of addressing risks to future economic prosperity – providing more confidence that surface water flood risk from new development will be managed effectively.

The degree to which local standards will be adopted will be influenced by the nature of national planning guidance and advice provided by the Local Lead Flood Authority – at the Cumbria wide level. The policy should also consider foul water drainage to ensure impacts from surface water are fully addressed. Consideration needs to be given to maintenance and management of sustainable drainage systems, thinking about liability.

### Mitigation

Introduce a policy and any guidance/local standards that maximises the level of positive impacts in terms of meeting EC objectives. It should consider particular local circumstances to inform the nature of any policy – for instance whether different requirements and standards should be applied dependent on locality and type of development to ensure sensitive areas and types of development are considered appropriately. Local standards may not be considered necessary depending on the extent to which a Cumbria wide set of standards and guidance is adopted. It should also consider foul water drainage requirements to ensure the management of surface water risk is fully effective. Other policies may help to complement such a policy and standards, especially a general requirements, pollution and design policy/guidance.

## SUSTAINABLE DRAINAGE SYSTEMS OPTION 2

### Rely on National and Core Strategy Policies and National Guidance/Standards

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance –national, trees and landscaping, open space
Impact Score	N

#### Comments

This option would result in no additional benefits in terms of the current position as it is the status quo. It would remove the ability to adopt any local policy which means the Council will not be able to respond effectively to local circumstances. It will also remove the ability to adopt local standards and guidance above and beyond the national position. It would mean less certainty for developers and communities which would not help to meet objective SP1. It is likely to result in missed opportunities, less ability to apply local circumstances to the decision making process, and less ability to respond to local sensitivities. It may also result in different standards being applied for different types of development, and will leave the council exposed to changes in national guidance that may not help the council to make a robust effective response to the social impacts of developments. It may result in an assumption all systems are monitored and managed effectively.

There would need to be clarity provided over when national standards/guidance should be applied. This option would possibly result in the inability to consider foul water drainage when considering the impacts of surface water drainage, which would not maximise the ability to adopt a policy that contributes to meeting social objectives.

#### Mitigation

Adopt a local policy to provide clarity regarding local expectations and asks from developers. Adopt local guidance / standards if considered necessary to support implementation of the policy, including reference to foul water drainage management. Ensure policy and any guidance/standards maximizes realization of SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance –national, trees and landscaping, open space
Impact Score	N

### Comments

This option would result in no additional benefits in terms of the current position as it is the status quo. It would remove the ability to adopt any local policy which means the Council will not be able to respond effectively to local circumstances. It will also remove the ability to adopt local standards and guidance above and beyond the national position. It is likely to result in missed opportunities, less ability to apply local circumstances to the decision making process, less ability to be pro-active and come up with certain measures that may be needed to effectively respond to impacts on the protection of the local environment and less ability to respond to local sensitivities. It may also result in different standards being applied for different types of development, and will leave the council exposed to changes in national guidance that may not help the council to make a robust effective response to the environment impacts of developments. It may result in an assumption all systems are monitored and managed effectively.

There would need to be clarity provided over when national standards/guidance should be applied. This option would possibly result in the inability to consider foul water drainage when considering the impacts of surface water drainage, which would not maximise the ability to adopt a policy that contributes to meeting social objectives.

### Mitigation

Adopt a local policy to provide clarity regarding local expectations and asks from developers. Adopt local guidance / standards if considered necessary to support implementation of the policy, including reference to foul water drainage management. Ensure policy and any guidance/standards maximizes realization of EN objectives.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance –national, trees and landscaping, open space
Impact Score	N

### Comments

This option would result in no additional benefits in terms of the current position as it is the status quo. It would remove the ability to adopt any local policy which means the Council will not be able to respond effectively to local circumstances. It will also remove the ability to adopt local standards and guidance above and beyond the national position. It is likely to result in missed opportunities, less ability to apply local circumstances to the decision making process, less ability to be pro-active and come up with certain measures that may be needed to effectively respond to impacts on the sustainable use and management of natural resources and less ability to respond to local sensitivities. It may also result in different standards being applied for different types of development, and will leave the council exposed to changes in national guidance that may not help the council to make a robust effective response to the environment impacts of developments. It may result in an assumption all systems are monitored and managed effectively.

There would need to be clarity provided over when national standards/guidance should be applied. This option would possibly result in the inability to consider foul water drainage when considering the impacts of surface water drainage, which would not maximise the ability to adopt a policy that contributes to meeting NR objectives.

### Mitigation

Adopt a local policy to provide clarity regarding local expectations and asks from developers. Adopt local guidance / standards if considered necessary to support implementation of the policy, including reference to foul water drainage management. Ensure policy and any guidance/standards maximizes realization of NR objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	With other policies e.g. General requirements, pollution, design, and other guidance –national, trees and landscaping, open space
Impact Score	N

### Comments

This option would result in no additional benefits in terms of the current position as it is the status quo. It would remove the ability to adopt any local policy which means the Council will not be able to respond effectively to local circumstances. It will also remove the ability to adopt local standards and guidance above and beyond the national position. It is likely to result in missed opportunities, less ability to apply local circumstances to the decision making process, less ability to be pro-active and come up with certain measures that may be needed to effectively respond to impacts on the economic environment and less ability to respond to local sensitivities. It may also result in different standards being applied for different types of development, and will leave the council exposed to changes in national guidance that may not help the council to make a robust effective response to the environment impacts of developments. It may result in an assumption all systems are monitored and managed effectively.

There would need to be clarity provided over when national standards/guidance should be applied. This option would possibly result in the inability to consider foul water drainage when considering the impacts of surface water drainage, which would not maximise the ability to adopt a policy that contributes to meeting EC objectives.

### Mitigation

Adopt a local policy to provide clarity regarding local expectations and asks from developers. Adopt local guidance / standards if considered necessary to support implementation of the policy, including reference to foul water drainage management. Ensure policy and any guidance/standards maximizes realization of EC objectives.

# TELECOMMUNICATIONS & BROADBAND PROVISION OPTION 1

## Maintain current policy position

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	C18 AONB and Conservation Areas      S28 D + AONB element
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N

#### Comments

This option may not be NPPF compliant and this could be considered not a reasonable alternative. Good telecommunications and broadband infrastructure supports several SP objectives, however, this option offers the status quo. Current policy is ambiguous as to what geographical areas it applies to. It is also out of date due to new technologies and changes to PD rights. Many elements can be covered through other policies.

#### Mitigation

Policy(ies) need to be updated to reflect new technologies and need to be future-proofed to ensure adaptability to changing technologies and current issues, including taking current PD rights into account. Clarity is also needed over the geographical areas the policy covers. A new, improved policy could enhance contribution to several SP objectives such as SP1 and SP2 and SP6. Many elements/impacts will/could be covered by other policies.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	C18 AONB and Conservation Areas      S28 D + AONB element
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N

### Comments

This option may not be NPPF compliant and this could be considered not a reasonable alternative. The current policies contain specific provision to protect Conservation Areas and AONB, however, this option offers the status quo. Current policy is ambiguous as to exactly what geographical areas it applies to e.g. SSSI/CA/AONB (S28). It is also out of date due to new technologies and changes to PD rights. Many elements can be covered through other policies.

### Mitigation

Policy(ies) need to be updated to reflect new technologies and need to be future-proofed to ensure adaptability to changing technologies and current issues, including taking current PD rights into account. Clarity is also needed over the geographical areas the policy covers.  
A new, improved policy could enhance contribution to (or reduce negative impacts on) EN2 and EN3 in particular. Many elements/impacts will/could be covered by other policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	C18 AONB and Conservation Areas      S28 D + AONB element
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N

### Comments

This option may not be NPPF compliant and this could be considered not a reasonable alternative. This option offers the status quo and in any case, links to NR objectives are relatively limited. However, effective and well-planned telecommunications/broadband infrastructure could help to support a reduced need to travel. The policy is out of date due to new technologies and changes to PD rights. Many elements can be covered through other policies.

### Mitigation

Policy(ies) need to be updated to reflect new technologies and need to be future-proofed to ensure adaptability to changing technologies and current issues, including taking current PD rights into account. Clarity is also needed over the geographical areas the policy covers.

A new, improved policy could enhance contribution to NR1. Many elements/impacts will/could be covered by other policies.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	C18 AONB and Conservation Areas      S28 D + AONB element
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N

### Comments

This option may not be NPPF compliant and this could be considered not a reasonable alternative. This option offers the status quo, although effective and well-planned telecommunications/broadband infrastructure helps to support EC objectives for example through supporting homeworking, marketing, rural businesses, local, national and international trade links. There may be other impacts such as taking trade away from local high streets and other businesses as people shop more online. The policy is out of date due to new technologies and changes to PD rights. Many elements can be covered through other policies.

### Mitigation

Policy(ies) need to be updated to reflect new technologies and need to be future-proofed to ensure adaptability to changing technologies and current issues, including taking current PD rights into account. Clarity is also needed over the geographical areas the policy covers.

A new, improved policy could enhance contribution to all EC objectives. Many elements/impacts will/could be covered by other policies.

## TELECOMMUNICATIONS & BROADBAND PROVISION OPTION 2

### New Policy with amended/updated criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	+2

#### Comments

Effective and well-planned telecommunications and broadband infrastructure supports several SP objectives and should enhance the contribution to SP1 and SP2 and SP6. There are potential positives and negatives regarding social isolation and health but clear benefits relating to access and participation, education and training.

A new policy would offer the opportunity to provide clarity over the geographical areas covered by the policy requirements and to bring it up to date to reflect new technologies/infrastructure and PD rights, including future-proofing and adaptability to changes.

#### Mitigation

Many elements/impacts can be covered by other policies, such as General Requirements and Design. The AONB DPD may also include relevant AONB-specific policies.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N (possible minor +)

### Comments

A new policy would offer the opportunity to provide clarity over the geographical areas covered by the policy e.g. SSSI/CA/AONB and to bring it up to date to reflect new technologies/infrastructure and PD rights, including future-proofing and adaptability to changes. A new, improved policy could enhance contribution to (or reduce negative impacts on) EN2 and EN3.

### Mitigation

Many elements/impacts will be covered by other policies, such as General Requirements and Design, Historic Environment, Biodiversity/Geodiversity. There could be scope to strengthen the policy in relation to specific issues if there is deemed to be a need to do so. The AONB DPD may also include relevant AONB-specific policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design etc and other schemes/PD rights
Impact Score	N (possible minor +)

### Comments

Links to NR objectives are relatively limited. However, effective and well-planned telecommunications/broadband infrastructure could help to support a reduced need to travel, for example through increased homeworking, but this could be countered by impacts such as a rise in deliveries needed as a result of increased internet shopping.

A new policy would offer the opportunity to provide clarity over the geographical areas covered by the policy and to bring it up to date to reflect new technologies/infrastructure and PD rights, including future-proofing and adaptability to changes.

### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design. The AONB DPD may also include relevant AONB-specific policies.

Some NR impacts difficult to mitigate through local policies as they are the result of national and wider social change e.g. changing shopping habits, consumerism etc

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design, town centre/retail policies etc and other schemes/PD rights
Impact Score	+2

### Comments

Effective and well-planned telecommunications/broadband infrastructure helps to support EC objectives for example through supporting homeworking, marketing, rural businesses, local, national and international trade links. There may be negative impacts such as taking trade away from local high streets and other businesses as people shop more online.

A new policy would offer the opportunity to provide clarity over the geographical areas covered by the policy and to bring it up to date to reflect new technologies/infrastructure and PD rights, including future-proofing and adaptability to changes.

### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design, but also the policies relating to Town Centres will have an important relationship with this policy.

Policy could guide coverage towards those areas (specifically business in rural areas) with current poor or absent coverage.

## TELECOMMUNICATIONS & BROADBAND PROVISION OPTION 3

### No Policy – rely on National Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	?
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design, town centre/retail policies etc and other schemes/PD rights
Impact Score	N

#### Comments

This option would result in the loss of ability to take any local circumstances into account or to respond to local needs/issues, including rurality – this would not result in an automatically negative impact but has potential to be negative. The NPPF relatively strong on this topic meaning that any positive impacts (as set out re Options 1 and 2) should remain on the whole in relation to SP objectives, but there is a risk of changes to NPPF and therefore CS currency.

#### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	?
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design, town centre/retail policies etc and other schemes/PD rights
Impact Score	N

### Comments

This option would result in the loss of ability to take any local circumstances into account or to respond to local needs/issues, including rurality – this would not result in an automatically negative impact but has potential to be negative. The NPPF relatively strong on this topic meaning that likely impacts (as set out re Options 1 and 2) should remain similar on the whole in relation to EN objectives, but there is a risk of changes to NPPF and therefore CS currency.

### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design. The AONB is also likely to include dedicated relevant policies.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	?
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design, town centre/retail policies etc and other schemes/PD rights
Impact Score	N

### Comments

This option would result in the loss of ability to take any local circumstances into account or to respond to local needs/issues, including rurality – this would not result in an automatically negative impact but has potential to be negative. The NPPF relatively strong on this topic meaning that likely impacts (as set out re Options 1 and 2) should remain similar on the whole in relation to NR objectives, but there is a risk of changes to NPPF and therefore CS currency.

### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	?
Geographic Scale	D – although depending on policy, some areas such as conservation areas, AONB etc may have specific approach
Cumulative Impact	With other policies e.g. amenity, design, town centre/retail policies etc and other schemes/PD rights
Impact Score	N

### Comments

This option would result in the loss of ability to take any local circumstances into account or to respond to local needs/issues, including rurality – this would not result in an automatically negative impact but has potential to be negative. The NPPF relatively strong on this topic meaning that likely impacts (as set out re Options 1 and 2) should remain similar on the whole in relation to EC objectives, but there is a risk of changes to NPPF and therefore CS currency.

### Mitigation

Many elements/impacts will/could be covered by other policies such as General Requirements and Design.

## TREES & LANDSCAPING OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D (some elements area specific e.g. Conservation Areas)
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0

#### Comments

This option represents the status quo. There are some links with SP objectives, especially SP5. Some elements of the policy are no longer applicable in their current form (e.g. maintenance requirements) and it would be misleading to continue to apply out of date policies, which could impact SP1 negatively. This option could also represent missed opportunities.

#### Mitigation

Updating the policies would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to SP5 in particular e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach with benefits such as improving town centre air quality.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D (some elements area specific e.g. Conservation Areas)
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0

### Comments

This option represents the status quo. There are clear links with all EN objectives. Some elements of the policy are no longer applicable in their current form (e.g. maintenance requirements) and it would be misleading to continue to apply out of date policies. This option could also represent missed opportunities.

### Mitigation

Updating the policies would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to EN objectives e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach with benefits such as improving town centre urban greening and air quality as well as wider ecosystem services benefits.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D (some elements area specific e.g. Conservation Areas)
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0

### Comments

This option represents the status quo. There are clear links with NR objectives NR1, NR2 and NR3. Some elements of the policy are no longer applicable in their current form (e.g. maintenance requirements) and it would be misleading to continue to apply out of date policies. This option could also represent missed opportunities.

### Mitigation

Updating the policies would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to NR objectives e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach with benefits such as improving town centre air quality.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D (some elements area specific e.g. Conservation Areas)
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0

### Comments

This option represents the status quo. There are some links with EC objectives, especially EC3 in that trees and landscaping contribute to an attractive environment, which can in turn increase the desirability and attractiveness of an area for business investment and specific sectors such as tourism. Some elements of the policy are no longer applicable in their current form (e.g. maintenance requirements) and it would be misleading to continue to apply out of date policies. This option could also represent missed opportunities.

### Mitigation

Updating the policies would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to EC3 in particular e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach that includes specific considerations relating to the benefits of GI for the attractiveness of the area as a place to visit and in which to do business.

## TREES & LANDSCAPING OPTION 2

### New Policy with updated/amended criteria and guidance

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	+2

#### Comments

There are some links with SP objectives, especially SP5. This option would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to SP5 in particular e.g. by linking the policy approach to trees and landscaping to a wider and more positive, proactive and comprehensive GI approach with benefits such as improving town centre air quality. It would enable the removal of misleading and out of date policies, which could impact SP1 positively.

#### Mitigation

Ensure that the policy is well-connected with the wider GI approach set out in existing and other new policies. This would move the policy on from simply preventing harm to trees and instead encouraging additional planting as well as building on the scope for landscaping to do more than simply add areas of greenery to new developments.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	+2

### Comments

There are clear links with EN objectives. This option would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to EN objectives e.g. by linking the policy approach to trees and landscaping to a wider and more positive, proactive and comprehensive GI approach with benefits such as improving town centre urban greening and air quality as well as wider ecosystem services benefits, including through additional planting. It would enable the removal of misleading and out of date policies.

### Mitigation

Ensure that the policy is well-connected with the wider GI approach set out in existing and other new policies. This would move the policy on from simply preventing harm to trees and instead encouraging additional planting as well as building on the scope for landscaping to do more than simply add areas of greenery to new developments. Ensure a range of more up-to-date considerations are included such as phasing of new planting and careful consideration of species, heights etc of planting in relation to the purpose of the planting.



## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	+2

### Comments

There are clear links with NR objectives NR1, NR2 and NR3, including water management as trees and other planting act as interceptors to slow down runoff and soil protection as trees and additional planting bind the soil to help prevent erosion. This option would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to NR objectives e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach with benefits such as improving town centre air quality through the retention of trees and additional planting. It would enable the removal of misleading and out of date policies.

### Mitigation

Ensure that the policy is well-connected with the wider GI approach set out in existing and other new policies. This would move the policy on from simply preventing harm to trees and instead encouraging additional planting as well as building on the scope for landscaping to do more than simply add areas of greenery to new developments.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D (poss. mostly urban/urban edge)
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0/+2

### Comments

There are some links with EC objectives, especially EC3 in that trees and landscaping contribute to an attractive environment, which can in turn increase the desirability and attractiveness of an area for business investment and specific sectors such as tourism. Links with EC1 and EC2 are more limited. This option would improve the current position by removing elements that are no longer applicable and would provide opportunities to make other improvements that would help the policy contribute more effectively to EC3 in particular e.g. by linking the policy approach to trees and landscaping to a wider and more comprehensive GI approach that includes specific considerations relating to the benefits of GI for the attractiveness of the area as a place to visit and in which to do business. It would enable the removal of misleading and out of date policies.

### Mitigation

Ensure that the policy is well-connected with the wider GI approach set out in existing and other new policies. This would move the policy on from simply preventing harm to trees and instead encouraging additional planting as well as building on the scope for landscaping to do more than simply add areas of greenery to new developments.

## TREES & LANDSCAPING OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0 / -2

#### Comments

There are some links with SP objectives, especially SP5. Impacts depend on whether Tree Protection Orders and relevant British Standard alone would provide equivalent protection without supporting policy. The application of Core Strategy policies would cover many relevant elements but could result in a lack of clarity and a lack of specifics would mean a greater degree of inconsistency in terms of policy application and outcomes. Although out of date elements would automatically be removed under this option, this option would also represent missed opportunities to improve the current situation and contribute more to SP objectives.

#### Mitigation

Introducing a new policy would provide the opportunity to not only bring the existing policies up to date but also to improve the current position, linking trees and landscaping to a wider and more comprehensive GI approach to cumulatively enhance the beneficial impacts.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	-2

### Comments

There are clear links with EN objectives. Impacts depend on whether Tree Protection Orders and relevant British Standard alone would provide equivalent protection without supporting policy. The application of Core Strategy policies would cover many relevant elements but could result in a lack of clarity and a lack of specifics would mean a greater degree of inconsistency in terms of policy application and outcomes. Although out of date elements would automatically be removed under this option, this option would also represent missed opportunities to improve the current situation and contribute more to EN objectives.

### Mitigation

Introducing a new policy would provide the opportunity to not only bring the existing policies up to date but also to improve the current position, linking trees and landscaping to a wider and more comprehensive GI approach to cumulatively enhance the beneficial impacts.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	-2

### Comments

There are clear links with NR objectives. Impacts depend on whether Tree Protection Orders and relevant British Standard alone would provide equivalent protection without supporting policy. The application of Core Strategy policies would cover many relevant elements but could result in a lack of clarity and a lack of specifics would mean a greater degree of inconsistency in terms of policy application and outcomes. Although out of date elements would automatically be removed under this option, this option would also represent missed opportunities to improve the current situation and contribute more to NR objectives.

### Mitigation

Introducing a new policy would provide the opportunity to not only bring the existing policies up to date but also to improve the current position, linking trees and landscaping to a wider and more comprehensive GI approach to cumulatively enhance the beneficial impacts.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Yes, with other policies such as GI and Conservation Areas
Impact Score	0

### Comments

There are some links with EC objectives, especially EC3. Impacts depend on whether Tree Protection Orders and relevant British Standard alone would provide equivalent protection without supporting policy. The application of Core Strategy policies would cover many relevant elements but could result in a lack of clarity and a lack of specifics would mean a greater degree of inconsistency in terms of policy application and outcomes. Although out of date elements would automatically be removed under this option, this option would also represent missed opportunities to improve the current situation and contribute more to EC3 objectives. However, the impacts of this option are likely to be less keenly felt due to the limited links with EC objectives.

### Mitigation

Introducing a new policy would provide the opportunity to not only bring the existing policies up to date but also to improve the current position, linking trees and landscaping to a wider and more comprehensive GI approach to cumulatively enhance the beneficial impacts, including for the economy.

**PROTECTION & CREATION OF RECREATION ROUTES:  
OPTION 1**

**Maintain current policy position**

**SOCIAL PROGRSS THAT RECOGNISES THE NEEDS OF EVERYONE**

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive & open-minded communities with a strong sense of local history

Timeframe	S- M
Geographic Scale	D; L (Canal; disused railway lines)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	0

### Comments:

Current policies seek to maintain and protect existing and proposed rights of way (L10), disused railway lines (L11), and the route of the Kendal-Lancaster Canal (L12). The loss or disruption to existing rights of way is allowed for provided satisfactory diversion can be provided or secured in advance of planning consent. In the case of the Canal any development affecting it will be permitted provided arrangements are made for its restoration or alternative alignment and for the restoration or improvement of the canalside towpath and links to footpaths. Policy L10 also specifies convenient footpath links between new development and existing rights of way should be provided.

These policies have benefits for some SP objectives, particularly SP2 and SP5 and some elements of SP4 and SP6 i.e. enabling people to live sustainable lifestyles (SP4.3) & promoting recreational ... activity (SP6.3) which would continue as the status quo. Policy L10 doesn't provide a clear definition of rights of way, and it does not refer to other more informal pedestrian / cycle access routes that provide local access to the countryside, key facilities and service neighbouring residential or employment areas and town centres. Policies L10 and L11 do not refer to opportunities for enhancement of rights of way or disused railway lines, or creation of new rights of way, other routes serving purposes mentioned above. The policies do not take account of multiple functions of recreational routes or the opportunities they present – i.e. linking places-places; people-places; local/strategic; biodiversity; cultural/historic links (e.g. Canal, disused railway lines, drovers routes etc); tourism economy; amenity; SUDS etc. In this respect, retaining the current policies is likely to result in SP objectives being realised in a limited way, especially with regard to SP2 and SP5.. health, as the protection of 'other routes' (not defined as public right of way) may be at risk and maintaining a high standard of quality of all existing routes with multiple benefits possibly undermined as well as the ability to provide a comprehensive network of routes (joining up missing links).

Core Strategy policies provide strategic overview, mainly protecting, enhancing and promoting existing routes, and incorporating safe and convenient access on foot, cycle etc; limited in application due to strategic nature of policy provision – it does not define level of provision, what type, function, location etc.

### Mitigation::

- draw together elements of Saved Local Plan policies;
- provide a definition to embrace the whole spectrum of 'active' travel routes as well as informal / permissive local connections etc.
- incorporate requirements for enhancement of existing provision;
- define requirements for provision associated with new development;
- link with other policy topic areas (GI/OS; design; SUDS etc) recognizing the multiple functions that recreational routes can provide.

This will ensure SP objectives are realised to their fullest. Other policies may help to complement such a policy especially any relating to, design and general requirements.



### **EFFECTIVE PROTECTION OF THE ENVIRONMENT**

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S-M
Geographic Scale	D; L (Canal; disused railway lines)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	0

## Comments

Current policies seek to maintain and protect existing and proposed rights of way (L10), disused railway lines (L11), and the route of the Kendal-Lancaster Canal (L12). The loss or disruption to existing rights of way is allowed for provided satisfactory diversion can be provided or secured in advance of planning consent. In the case of the Canal any development affecting it will be permitted provided arrangements are made for its restoration or alternative alignment and for the restoration or improvement of the canalside towpath and links to footpaths. Policy L10 also specifies convenient footpath links between new development and existing rights of way should be provided.

These policies support in part objective EN4 – i.e. protecting ... connectivity between green infrastructure assets (EN4.1); help to deliver new green infrastructure (EN4.4). Policies also support tenuous links to other EN objectives – e.g. protecting canal and disused railway routes obliquely supports EN1 and 2 - e.g. protecting wildlife interests of the canal (L12). Policy L10 does not provide a clear definition of rights of way and does not refer to other more informal pedestrian / cycle access routes that provide local access to the countryside, key facilities and service neighbouring residential or employment areas and town centres. Policies L10 and L11 do not refer to opportunities for enhancement of rights of way or disused railway lines, or creation of new rights of way, or other routes serving purposes mentioned above. The policies do not take account of multiple functions of recreational routes, or the opportunities they present – i.e. linking places-places, people-places; local/strategic; biodiversity; cultural/historic links (e.g. Canal, disused railway lines, drovers routes etc); tourism economy; amenity; SUDS etc. In this respect, retaining the current policies misses opportunities to support EN objectives – to 'extend or enhance elements of green and blue infrastructure' (EN2.6); 'protect, enhance and maintain habitats, biodiversity...' (EN1); 'enhance connectivity' and 'multifunctional nature of green infrastructure..' (EN4)

Local Plan policies (particularly L11 & L12) could go further in supporting EN3 by recognising offer of disused railway lines / canal in terms of its historic / heritage significance (EN3.1) and in enhancing public realm and urban green infrastructure (EN3.2). Policies L11 & L12 have potential to support EN1 – would need to recognise the multi-faceted potential of these routes in terms of providing both travel options as well as habitats, biodiversity and green infrastructure. Existing policies could go further in supporting EN4 objectives by recognising strong interrelationship with open space / green infrastructure policy areas.

Core Strategy policies provide strategic overview, mainly protecting, enhancing and promoting existing routes, and incorporating safe and convenient access on foot, cycle etc; limited in application due to strategic nature of policy provision – it does not define level of provision, what type, function, location etc.

## Mitigation

Consider creation of a policy that:

- draws together elements of Saved Local Plan policies;
- provides a definition to embrace the whole spectrum of 'active' travel routes as well as informal / permissive local connections etc.
- incorporates requirements for enhancement of existing provision;
- defines requirements for provision associated with new development;
- links with other policy topic areas (GI/OS; design; SUDS etc) recognising the multiple functions that recreational routes can provide.

This will ensure EN objectives are realised to their fullest. Other policies may help to complement such a policy especially any relating to, design and general requirements.

## **SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES**

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S-M
Geographic Scale	D; L (Canal; disused railway lines)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	0

## Comments

Current policies seek to maintain and protect existing and proposed rights of way (L10), disused railway lines (L11), and the route of the Kendal-Lancaster Canal (L12). The loss or disruption to existing rights of way is allowed for provided satisfactory diversion can be provided or secured in advance of planning consent. In the case of the Canal any development affecting it will be permitted provided arrangements are made for its restoration or alternative alignment and for the restoration or improvement of the canalside towpath and links to footpaths. Policy L10 also specifies convenient footpath links between new development and existing rights of way should be provided.

Core Strategy policies provide strategic overview, mainly protecting, enhancing and promoting existing routes, and incorporating safe and convenient access on foot, cycle etc; limited in application due to strategic nature of policy provision – it does not define level of provision, what type, function, location etc.

Existing policy provision supports NR1.4 at both strategic (Core Strategy) level (CS1.1, 10.1 & 10.2 seek to minimise the need to travel and includes references to cycling and walking provision) and Local Plan level (L10, 11 & 12). Policy L12 supports NR1.5 – i.e. canal restoration. Tenuous links with NR2 if linked with other new policies – e.g. SUDS, green infrastructure, design etc.

Policy L10 doesn't provide a clear definition of rights of way, and it does not refer to other more informal pedestrian / cycle access routes that provide local access to the countryside, key facilities and service neighbouring residential or employment areas and town centres. Policies L10 and L11 do not refer to opportunities for enhancement of rights of way or disused railway lines, or creation of new rights of way, other routes serving purposes mentioned above. The policies do not take account of multiple functions of recreational routes or the opportunities they present – i.e. linking places-places; people-places; local/strategic; biodiversity; cultural/historic links (e.g. Canal, disused railway lines, drovers routes etc); tourism economy; amenity; SUDS etc. In this respect, retaining the current policies is likely to result in NR objectives being realised in a limited way, especially with regard to NR1 'reduce the need to travel by car ... promote travel by alternative means' as the protection of 'other routes' (not defined as public right of way) may be at risk and maintaining a high standard of quality of all existing routes with multiple benefits possibly undermined as well as the ability to provide a comprehensive network of routes (joining up missing links).

## Mitigation

Consider creation of a policy that:

- draws together elements of Saved Local Plan policies;
- provides a definition to embrace the whole spectrum of 'active' travel routes as well as informal / permissive local connections etc.
- incorporates requirements for enhancement of existing provision;
- defines requirements for provision associated with new development;
- links with other policy topic areas (GI/OS; design; SUDS etc) recognizing the multiple functions that recreational routes can provide.

This will ensure NR objectives are realised to their fullest. Other policies may help to complement such a policy especially any relating to, design and general requirements.

**BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S-M
Geographic Scale	D; L (Canal; disused railway lines)
Cumulative Impact	In combination with NPPF and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	0

## Comments

Current policies seek to maintain and protect existing and proposed rights of way (L10), disused railway lines (L11), and the route of the Kendal-Lancaster Canal (L12). The loss or disruption to existing rights of way is allowed for provided satisfactory diversion can be provided or secured in advance of planning consent. In the case of the Canal any development affecting it will be permitted provided arrangements are made for its restoration or alternative alignment and for the restoration or improvement of the canalside towpath and links to footpaths. Policy L10 also specifies convenient footpath links between new development and existing rights of way should be provided.

Core Strategy policies provide strategic overview, mainly protecting, enhancing and promoting existing routes, and incorporating safe and convenient access on foot, cycle etc; limited in application due to strategic nature of policy provision – it does not define level of provision, what type, function, location etc.

These policies have benefits for some EC objectives, including EC1 (new employment opportunities) and EC3 (diversify ... local economy) – protection of potential recreational routes (canal and disused railway lines) and existing rights of way provides opportunities for leisure and tourism sector. Enhancement of recreational routes offer could strengthen support of EC objectives.

Policy L10 doesn't provide a clear definition of rights of way, and it does not refer to other more informal pedestrian / cycle access routes that provide local access to the countryside, key facilities and service neighbouring residential or employment areas and town centres. Policies L10 and L11 do not refer to opportunities for enhancement of rights of way or disused railway lines, or creation of new rights of way, other routes serving purposes mentioned above. The policies do not take account of multiple functions of recreational routes or the opportunities they present – i.e. linking places-places; people-places; local/strategic; biodiversity; cultural/historic links (e.g. Canal, disused railway lines, drovers routes etc); tourism economy; amenity; SUDS etc. In this respect, retaining the current policies is likely to result in EC objectives being realised in a limited way, especially with regard to EC1 and EC3 – 'create new employment opportunities' and 'diversify ... the local economy'. Undefined rights of way may be at risk and maintaining a high standard of quality of all existing routes with multiple benefits possibly undermined as well as the ability to provide a comprehensive network of routes (joining up missing links).

## Mitigation

Consider creation of a policy that:

- draws together elements of Saved Local Plan policies;
- provides a definition to embrace the whole spectrum of 'active' travel routes as well as informal / permissive local connections etc.
- incorporates requirements for enhancement of existing provision and its offer;
- defines requirements for provision associated with new development;
- links with other policy topic areas (GI/OS; design; SUDS etc) recognizing the multiple functions that recreational routes can provide.

This will ensure EC objectives are realised to their fullest. Other policies may help to complement such a policy especially any relating to, design and general requirements.

## PROTECTION & CREATION OF RECREATION ROUTES OPTION 2

### New Policy with updated/amended criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M - L
Geographic Scale	D; L
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	+2

### Comments

Clear links with social progress objectives, particularly SP2, 5 & 6 with some relevance to SP4 – enabling people to live sustainable lifestyles. Existing Core Strategy policies provide strategic framework, though little local reference – except protection of the line of Lancaster Canal.

Having a new policy provides opportunity to address gaps in existing policy provision including:

- Providing a definition of rights of way / recreation routes / active travel routes that embraces the whole spectrum of rights of way – e.g. formal / informal; definitive / permissive; local / strategic etc – as well as recognising the multiple functions they perform – connections within and between countryside / urban areas, key facilities, residential / employment areas etc;
- Incorporates requirements for enhancement of existing provision;
- Defines requirements / opportunities for provision associated with new development;
- Links with other policy topic areas (GI/OS; design; SUDS etc) to recognise the multiple functions that recreational routes can provide.

### Mitigation

Provides the opportunity for policy provision to contribute further to social progress objectives, particularly SP2 (access to services and facilities, the countryside and open spaces) and SP5 (improve people's health and sense of wellbeing) by defining broader spectrum of rights of way and promoting opportunities for enhancement of existing and provision of new routes.

Is it appropriate to maintain separate policies with their own criteria to address specific / unique opportunities? E.g. disused railway lines / Lancaster canal.

Crucial to ensure that linked / supporting policies across other topic areas support new recreation routes policy (and vice versa) in recognition of multiple functions such routes can perform.



## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M - L
Geographic Scale	D; L
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	+2

### Comments

Provides opportunities to strengthen contribution to all EN objectives – by recognising the value of recreation routes in enhancing biodiversity opportunities (EN1), creating an attractive environment and enhancing built environment (EN3) and multi-functional nature of green infrastructure (EN4).

Having a new policy provides opportunity to address gaps in existing policy provision including:

- Providing a definition of rights of way / recreation routes / active travel routes that embraces the whole spectrum of rights of way – e.g. formal / informal; definitive / permissive; local / strategic etc – as well as recognising the multiple functions they perform – connections within and between countryside / urban areas, key facilities, residential / employment areas etc;
- Incorporates requirements for enhancement of existing provision;
- Defines requirements / opportunities for provision associated with new development;
- Links with other policy topic areas (GI/OS; design; SUDS etc) to recognise the multiple functions that recreational routes can provide.

### Mitigation

Provides the opportunity for policy provision to contribute further to EN objectives, particularly by defining broad spectrum of rights of way and promoting opportunities for enhancement of existing and provision of new routes whilst also recognizing potential biodiversity value of such routes.

Is it appropriate to maintain separate policies with their own criteria to address specific / unique opportunities? E.g. disused railway lines / Lancaster canal. In particular, could incorporate reference to biodiversity value, its protection and enhancement.

Crucial to ensure that linked / supporting policies across other topic areas support new recreation routes policy (and vice versa) in recognition of multiple functions such routes can perform.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M - L
Geographic Scale	D; L
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	+2

### Comments

Provides opportunities to strengthen contribution to NR1 – by recognising the value of enhancing existing / creating new recreation routes in reducing the need to travel by car (NR1.4); more tenuous links with NR2 – water management and the use of SUDS – e.g. criteria for new developments could promote green corridors, new routes separated next to main roads may double up as SUDS features.

Having a new policy provides opportunity to address gaps in existing policy provision including:

- Providing a definition of rights of way / recreation routes / active travel routes that embraces the whole spectrum of rights of way – e.g. formal / informal; definitive / permissive; local / strategic etc – as well as recognising the multiple functions they perform – connections within and between countryside / urban areas, key facilities, residential / employment areas etc;
- Incorporates requirements for enhancement of existing provision;
- Defines requirements / opportunities for provision associated with new development;
- Links with other policy topic areas (GI/OS; design; SUDS etc) to recognise the multiple functions that recreational routes can provide.

### Mitigation

Provides the opportunity for policy provision to contribute further to NR objectives, particularly by defining broad spectrum of rights of way and promoting opportunities for enhancement of existing and provision of new routes. Provides the potential to develop and enhance network of recreation routes to fulfill a variety of objectives including enhancing their role as sustainable means of travelling as well as recreating.

Crucial to ensure that linked / supporting policies across other topic areas support new recreation routes policy (and vice versa) in recognition of multiple functions such routes can perform.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M - L
Geographic Scale	D; L
Cumulative Impact	In combination with NPPF, Core Strategy, Land Allocations DPD and other potential new policies – e.g. general requirements, design, open space / green infrastructure.
Impact Score	+2

### Comments

Provides opportunities to promote wider economic benefits of recreation routes in terms of leisure/tourism sector – by recognising the value of enhancing existing / creating new recreation routes and extending the definition of rights of way generally provides opportunity to strengthen contribution to fulfilling EC1 and EC3 objectives – i.e. ‘create new employment opportunities ... offered by tourism’ and ‘encourage diversification ... particularly in rural areas’.

Having a new policy provides opportunity to address gaps in existing policy provision including:

- Providing a definition of rights of way / recreation routes / active travel routes that embraces the whole spectrum of rights of way – e.g. formal / informal; definitive / permissive; local / strategic etc – as well as recognising the multiple functions they perform – connections within and between countryside / urban areas, key facilities, residential / employment areas etc;
- Incorporates requirements for enhancement of existing provision;
- Defines requirements / opportunities for provision associated with new development;
- Links with other policy topic areas (GI/OS; design; SUDS etc) to recognise the multiple functions that recreational routes can provide.

### Mitigation

Provides the opportunity for policy provision to contribute further to EC objectives, particularly by defining broad spectrum of rights of way and promoting opportunities for enhancement of existing and provision of new routes. Provides the potential to develop and enhance network of recreation routes to fulfill a variety of objectives including enhancing their role as sustainable means of travelling as well as recreational value and the economic spinoff this can provide.

Crucial to ensure that linked / supporting policies across other topic areas support new recreation routes policy (and vice versa) in recognition of multiple functions such routes can perform.

## PROTECTION & CREATION OF RECREATION ROUTES OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S / ?
Geographic Scale	D; L
Cumulative Impact	In association with other policies – e.g. Green Infrastructure / Open Space, Design, General Requirements etc
Impact Score	-2

### Comments

NPPF makes provision for protection and enhancements of rights of way (para 75), encourages protection and exploitation of sustainable transport modes, including references to pedestrian and cycle movements (para 35) and protection of routes which could be critical in developing infrastructure to widen transport choice (para 41) – the latter could potentially support the protection of Lancaster canal and disused railway lines for potential to provide recreational routes. However, unable to respond to local circumstances and limit opportunity to achieve other enhancements – could result in ambiguity.

Core Strategy is also too strategic in nature to give the steering needed at a local level – it does not provide criteria against which development proposals affecting disused railway lines / Lancaster canal could be assessed.

Policy position would remain deficient in the following areas:

- Absence of definition of rights of way; thus does not formally recognise importance of informal and broad spectrum of routes;
- Does not actively support enhancement of existing provision;
- Does not define requirements / opportunities for provision associated with new development;
- Loses opportunity to provide criteria for locally significant elements of sustainable travel – e.g. opportunities arising from safeguarding route of Lancaster canal / disused railway lines;
- Risk of uncertainty due to NPPF scope to change.

Would weaken support for SP objectives, through to loss of criteria and locally defined policy provision.

### Mitigation

Core Strategy policies and NPPF would have to be rigorously applied. Other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Design, general requirements, Green Infrastructure / Open Space etc.

Introduce new policy to cover deficiencies identified above – i.e. defining rights of way, supporting enhancement of existing and providing requirements for new provision; introducing criteria to protect locally significant routes (e.g. Lancaster canal / disused railway lines).

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S / ?
Geographic Scale	D; L
Cumulative Impact	In association with other policies – e.g. Green Infrastructure / Open Space, Design, General Requirements etc
Impact Score	-2

### Comments

NPPF makes provision for protection and enhancements of rights of way (para 75), encourages protection and exploitation of sustainable transport modes, including references to pedestrian and cycle movements (para 35) and protection of routes which could be critical in developing infrastructure to widen transport choice (para 41) – the latter could potentially support the protection of Lancaster canal and disused railway lines for potential to provide recreational routes. However, unable to respond to local circumstances and limits opportunity to achieve other enhancements – could result in ambiguity.

Core Strategy is too strategic in nature to give the steering needed at a local level – it does not provide criteria against which development proposals affecting disused railway lines / Lancaster canal could be assessed. However, it does provide strategic support for EN objectives, particularly EN1 & 4 via policy CS8.1 in particular.

Policy position would remain deficient in the following areas:

- Absence of definition of rights of way; thus does not formally recognise importance of informal and broad spectrum of routes and the multiple functions they perform;
- Does not actively support enhancement of existing provision;
- Does not define requirements / opportunities for provision associated with new development;
- Loses opportunity to provide criteria for locally significant elements of sustainable travel – e.g. opportunities arising from safeguarding route of Lancaster canal / disused railway lines;
- Risk of uncertainty due to NPPF scope to change.

Local Plan policy L12 cites 'need to protect the wildlife interests of the canal' – such locally defined criteria would be lost along with opportunities to strengthen Local Plan policies to plug the deficiencies identified above. This could result in less support for objectives EN1, EN2.6 ('... blue infrastructure...') and EN4.

### Mitigation

Core Strategy policies and NPPF would have to be rigorously applied. Other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Design, general requirements, Green Infrastructure / Open Space etc.

Introduce new policy to cover deficiencies identified above – i.e. defining rights of way, supporting enhancement of existing and providing requirements for new provision; introducing criteria to protect locally significant routes (e.g. Lancaster canal / disused railway lines). Should recognise the multiple functions that rights of way can perform – i.e. supporting biodiversity / habitats etc.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S / ?
Geographic Scale	D; L
Cumulative Impact	In association with other policies – e.g. Green Infrastructure / Open Space, Design, General Requirements etc
Impact Score	-2

### Comments

NPPF makes provision for protection and enhancements of rights of way (para 75), encourages protection and exploitation of sustainable transport modes, including references to pedestrian and cycle movements (para 35) and protection of routes which could be critical in developing infrastructure to widen transport choice (para 41) – the latter could potentially support the protection of Lancaster canal and disused railway lines for potential to provide recreational routes. However, unable to respond to local circumstances and limits opportunity to achieve other enhancements – could result in ambiguity.

Core Strategy supports NR1 in terms of promoting ‘sustainable transport modes ... including provision of cycling and pedestrian infrastructure’; is strategic in nature and may not be capable of giving the steering needed at a local level – it does not provide criteria against which development proposals affecting disused railway lines / Lancaster canal could be assessed: both offer potential to provide alternative, more sustainable modes of travel this support for NR1 would be eroded in absence of such criteria.

Policy position would remain deficient in the following areas:

- Absence of definition of rights of way; thus does not formally recognise importance of informal and broad spectrum of routes;
- Does not actively support enhancement of existing provision;
- Does not define requirements / opportunities for provision associated with new development;
- Loses opportunity to provide criteria for locally significant elements of sustainable travel – e.g. opportunities arising from safeguarding route of Lancaster canal / disused railway lines;
- Risk of uncertainty due to NPPF scope to change.

Local Plan policies L10, 11 & 12 provide support for NR1.4 and NR1.5 (canal restoration); these locally specific policies and criteria would be lost.

### Mitigation

Core Strategy policies and NPPF would have to be rigorously applied. Other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Design, general requirements, Green Infrastructure / Open Space etc.

Introduce new policy to cover deficiencies identified above – i.e. defining rights of way, supporting enhancement of existing and providing requirements for new provision; introducing criteria to protect locally significant routes (e.g. Lancaster canal / disused railway lines).

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S / ?
Geographic Scale	D; L
Cumulative Impact	In association with other policies – e.g. Green Infrastructure / Open Space, Design, General Requirements etc
Impact Score	0 /-2

### Comments

NPPF makes provision for protection and enhancements of rights of way (para 75), encourages protection and exploitation of sustainable transport modes, including references to pedestrian and cycle movements (para 35) and protection of routes which could be critical in developing infrastructure to widen transport choice (para 41) – the latter could potentially support the protection of Lancaster canal and disused railway lines for potential to provide recreational routes. However, unable to respond to local circumstances and limits opportunity to achieve other enhancements – could result in ambiguity.

Core Strategy policies provide strategic overview, mainly protecting, enhancing and promoting existing routes, and incorporating safe and convenient access on foot, cycle etc; limited in application due to strategic nature of policy provision – it does not define level of provision, what type, function, location etc.

Opportunities presented by Saved Local Plan policies in conjunction with other potential new policies for strengthening EC objectives, particularly EC1 & 3, would be lost – i.e. that provide criteria for protection (and potential enhancement) of disused railway lines / Lancaster canal and the recreation / tourism potential these routes represent.

Policy position would remain deficient in the following areas:

- Absence of definition of rights of way; thus does not formally recognise importance of informal and broad spectrum of routes and the multiple functions they perform;
- Does not actively support enhancement of existing provision;
- Does not define requirements / opportunities for provision associated with new development;
- Loses opportunity to provide criteria for locally significant elements of sustainable travel – e.g. opportunities arising from safeguarding route of Lancaster canal / disused railway lines;
- Risk of uncertainty due to NPPF scope to change.

### Mitigation

Core Strategy policies and NPPF would have to be rigorously applied. Other new policies across Development Management DPD topic areas could help to fill gaps in policy framework – e.g. Design, general requirements, Green Infrastructure / Open Space etc.

Introduce new policy to cover deficiencies identified above – i.e. defining rights of way, supporting enhancement of existing and providing requirements for new provision; introducing criteria to protect locally significant routes (e.g. Lancaster canal / disused railway lines) and recognise the multiply functions they can perform.



## RETAIL AND TOWN CENTRE USES OUTSIDE OF TOWN CENTRES OPTION 1

**Adopt a policy for the 5 main town centres with new/updated criteria**

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Yes, with other policies; new development management and existing relevant core strategy policies.
Impact Score	+2

#### Comments

Use Class Orders have changed, so existing Local Plan Policies R2 and R5 are out of date. The aforementioned policies do not refer to all the town/retail centres. A new policy(s) would be an opportunity to provide clarity, making the process clearer. The status quo is not appropriate, as policies do not conform with the NPPF.

The introduction of a threshold could support SP2 and SP6. The sequential test is still in force.

#### Mitigation

Could set a threshold at a point beyond which we think there would be harm, for example, to SP6 and SP2. Threshold needs to be right; well based in evidence. Quality of impact assessment and what we do with the information.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Yes, with other policies; new development management (including with any new General requirements policy) and existing relevant core strategy policies.
Impact Score	+2

### Comments

SA objective EN3 – built environment. A Local threshold may help protect land. Stricter tests could encourage brownfield land use, active searches for the right site EN4, EN2. Sequential test is still in force.

### Mitigation

Any new General Requirements policy needs to be adequate.  
Set evidenced threshold.

Quality of impact assessment and what we can do with the information.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Yes, with other policies; new development management (including with any new General requirements policy) and existing relevant core strategy policies.
Impact Score	N

### Comments

Sequential test still in force. Local threshold may help protect land - SA objective NP3, may encourage brown field land use.

Reducing need to travel by ensuring shops are close to existing centres.

### Mitigation

Quality of impact assessment/what we do with the information. Concern that the sequential test requirement could be removed at any time. Very dependent on content, threshold, impact assessment. What we do with impact assessment recommendations and content of supporting/other policies.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Yes, with other policies; new development management (including with any new General requirements policy) and existing relevant core strategy policies.
Impact Score	+2

### Comments

Retaining investment in centres. Threshold takes local context into account. Indirect impacts, but knock-on effects on a range of factors.

Threshold takes local context into account.

Balancing potential provision and jobs with loss, if larger stores draw things out of town.

### Mitigation

Quality of impact assessment/what we do with the information. Concern that the sequential test requirement could be removed at any time. Very dependent on content, threshold, impact assessment. What we do with impact assessment recommendations and content of supporting/other policies.

## RETAIL AND TOWN CENTRE USES OUTSIDE OF TOWN CENTRES OPTION 2

**No Policy – rely on National, Core Strategy and Land Allocations Policies**

### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes

SP2 - To improve access to services and facilities, the countryside and open spaces

SP3 - To provide everyone with a decent home

SP4 - To improve the level of skills, education and training

SP5 - To improve people's health and sense of wellbeing

SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	L (potentially, but indefinite. e.g. sequential - could go outside town centres).
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Other policies; NPPF, Core Strategy and Land Allocations.
Impact Score	N

#### Comments

Almost baseline/status quo, as many requirements of existing Local Plan Policies R2 and R5 are generic and can't apply R2 and R5 anyway as out of date and the NPPF is already in play, plus Core Strategy and Land Allocations policies.

Smaller settlements are potentially at risk. Outlet villages.

#### Mitigation

This option misses the opportunity to have a new/updated local policy. Potentially, a new local policy could include a local threshold (s) which take account of the local context in the LPA's main settlements, outside of the town centres.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	L (potentially, but indefinite. e.g. sequential - could go outside town centres).
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Other policies; NPPF, Core Strategy and Land Allocations.
Impact Score	N

### Comments

Almost baseline/status quo, as many requirements of existing Local Plan Policies R2 and R5 are generic and can't apply R2 and R5 anyway as out of date and the NPPF is already in play, plus Core Strategy and Land Allocations policies.

Smaller settlements are potentially at risk. Outlet villages.

### Mitigation

Have a new development management policy. This option misses the opportunity to make/have a more local policy; could have a local threshold which takes into account the local threshold. Uncertainty of relying on NPPF.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	L (potentially, but indefinite. e.g. sequential - could go outside town centres).
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Other policies; NPPF, Core Strategy and Land Allocations.
Impact Score	N

### Comments

Almost baseline/status quo, as many requirements of existing Local Plan Policies R2 and R5 are generic and can't apply R2 and R5 anyway as out of date and the NPPF is already in play, plus Core Strategy and Land Allocations policies.

Smaller settlements are potentially at risk. Outlet villages.

### Mitigation

This option misses the opportunity to have a new/updated local policy. Potentially, a new local policy could include a local threshold (s) which take account of the local context in the LPA's main settlements, outside of the town centres.

Uncertainty of relying on NPPF.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	L (potentially, but indefinite. e.g. sequential - could go outside town centres).
Geographic Scale	Kendal and Principal Town Centres (outside town centre boundaries but within settlement development boundaries).
Cumulative Impact	Other policies; NPPF, Core Strategy and Land Allocations.
Impact Score	N

### Comments

Almost baseline/status quo, as many requirements of existing Local Plan Policies R2 and R5 are generic and can't apply R2 and R5 anyway as out of date and the NPPF is already in play, plus Core Strategy and Land Allocations policies.

Smaller settlements are potentially at risk. Outlet villages.

### Mitigation

This option misses the opportunity to have a new/updated local policy. Potentially, a new local policy could include a local threshold (s) which take account of the local context in the LPA's main settlements, outside of the town centres.

Uncertainty of relying on NPPF.



## SELF & CUSTOM BUILD HOUSING OPTION 1

### Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N

#### Comments

Current policy does not include reference but supporting text indicates general support. Maintaining the current policy position results in status-quo. No change for SP objectives. Precise implications of Housing and Planning Act unknown at time of assessment

#### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This would have bearing on SP objectives, in particular SP3.

### EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N

#### Comments

Current policy does not include reference but supporting text indicates general support. Maintaining the current policy position results in status-quo. No change for EN objectives. Precise implications of Housing and Planning Act unknown at time of assessment

#### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on EN objectives, including EN3 (variety, innovation).

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N

### Comments

Current policy does not include reference but supporting text indicates general support. Maintaining the current policy position results in status-quo. No change for NR objectives. Precise implications of Housing and Planning Act unknown at time of assessment

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on NR objectives, including NR1 as many self-build projects have high environmental credentials.

## **BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER**

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	S-M
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N

### Comments

Current policy does little more than set out 'in principle' support. Current policy does not include reference but supporting text indicates general support. Maintaining the current policy position results in status-quo. No change for EC objectives. Precise implications of Housing and Planning Act unknown at time of assessment

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on EC objectives, including in relation to demand for local building materials, energy efficiency and renewable energy technology.

## SELF & CUSTOM BUILD HOUSING OPTION 2

### New Self & Custom Build Policy (supporting in principle)

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	+2

#### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' but loses opportunity to add specific measures, requirements or criteria. Ensure clarity of approach (SP1) Self-builders may be likely to build where is most convenient for them in terms of accessing their work/services etc (SP2) Broadens options for delivering new homes to meet need, choice and variety in market (SP3). Self or custom building provides opportunities for individuals to gain new skills (SP4).

#### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on SP objectives, in particular SP3.

Approach needs to be well-thought through – avoid making assumptions and support and make the most of the benefits of this option whilst avoiding potential unintended consequences

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N / +2

### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' but loses opportunity to add specific measures, requirements or criteria.

EN3 – high proportion of self-builders seek high quality, sustainable design and environmental standards.

Risk that if a more relaxed locational approach taken in order to encourage this type of development, there could be unintended consequences such as increased development in the open countryside.

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on EN objectives, including EN3 (variety, innovation).

Approach needs to be well-thought through – avoid making assumptions and support and make the most of the benefits of this option whilst avoiding potential unintended consequences, such as increasing development in open countryside, if more relaxed locational approach taken to encourage. Other policies, such as Design and General Requirements may deliver some of the benefits identified above.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N / +2

### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' but loses opportunity to add specific measures, requirements or criteria.

NR1/NR2/NR4 – high proportion of self-builders seek high quality, sustainable design and environmental standards. Risk that if a more relaxed locational approach taken in order to encourage this type of development, there could be unintended consequences such as increased development in rural areas and thus increased travel.

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on NR objectives, including NR1 (higher sustainability standards).

Approach needs to be well-thought through – avoid making assumptions and support and make the most of the benefits of this option whilst avoiding potential unintended consequences. Other policies, such as Design and General Requirements may deliver some of the benefits identified above.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	+2

### Comments and Mitigation

#### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' but loses opportunity to add specific measures, requirements or criteria.

Likely to be positive impacts for local supply chain/businesses including skills development within the workforce and increased use of local building firms/suppliers. Benefits also to local housing market in terms of increasing choice/meeting local needs and enabling people to stay in the area, live closer to their jobs etc.

#### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. Approach needs to be well-thought through to help support EC objectives where possible. Other policies, such as Design and General Requirements may support delivery of some of the benefits identified above.



## SELF & CUSTOM BUILD HOUSING OPTION 3

### New Self & Custom Build Policy (requirements)

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	+2

#### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' including adding specific measures, requirements or criteria to manage this type of development appropriately and ensure benefits are secured. A new policy will ensure clarity of approach (SP1). Self-builders may be likely to build where is most convenient for them in terms of accessing their work/services etc (SP2) Broadens options for delivering new homes to meet need, choice and variety in market (SP3). Self or custom building provides opportunities for individuals to gain new skills (SP4). Empowers people to meet their own needs (SP3, SP5) and helps ensure that communities have a diverse range of types of people (SP6). Exact benefits/impacts will depend on specific measures employed.

On self-build sites, there is potentially less certainty that the whole site will get developed resulting in unsatisfactory amenity impacts or whether the houses will sit comfortably together if they are of disparate designs.

Potential viability challenges may result in loss of other developer contributions such as affordable housing.

#### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on SP objectives, in particular SP3.

Approach and requirements need to be well thought through – avoid making assumptions and support and make the most of the benefits of this option.

Range of types of/approaches to self-build/custom build – needs to be part of a package of options to suit different self/custom-builders e.g. some will be happy to have a plot in wider development but others will not. Pragmatic and flexible approach required but also application of all other relevant policies to avoid unintended consequences. Other policies are likely to address some of the issues raised.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	? potential +2

### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' including adding specific measures, requirements or criteria to manage this type of development appropriately and ensure benefits are secured. On self-build sites, there is potentially less certainty that the whole site will get developed resulting in unsatisfactory amenity impacts or whether the houses will sit comfortably together if they are of disparate/innovative/unusual designs. Exact benefits/impacts will depend on specific measures employed.

Risk that if a more relaxed locational approach taken in order to encourage this type of development, there could be unintended consequences such as increased development in the open countryside.

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on EN objectives.

Approach and requirements need to be well thought through – avoid making assumptions and support and make the most of the benefits of this option.

Pragmatic and flexible approach required but also application of all other relevant policies to avoid unintended consequences.

Other policies are likely to address some of the issues raised.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	? potential +2

### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' including adding specific measures, requirements or criteria to manage this type of development appropriately and ensure benefits are secured. Exact benefits/impacts will depend on specific measures employed. Self-builders may be likely to build energy efficient properties, high quality design, sustainable materials etc. If requirements focus self-build on allocated sites, then likely to be closer to services and facilities, similarly, people may be more inclined to build their own homes closer to their work/services they require by choice, alternatively, such properties may be focused in rural locations far from services creating greater need to travel.

Risk that if a more relaxed locational approach taken in order to encourage this type of development, there could be unintended consequences such as increased development in the open countryside and therefore use of land.

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on NR objectives.

Approach and requirements need to be well thought through – avoid making assumptions and support and make the most of the benefits of this option.

Pragmatic and flexible approach required but also application of all other relevant policies to avoid unintended consequences. Other policies are likely to address some of the issues raised.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	M-L
Geographic Scale	D
Cumulative Impact	Spatial Strategy, other housing policies, National Legislation
Impact Score	N

### Comments

Precise implications of Housing and Planning Act unknown at time of assessment. Opportunity to add to existing stance of 'support in principle' including adding specific measures, requirements or criteria to manage this type of development appropriately and ensure benefits are secured. Exact benefits/impacts will depend on specific measures employed. If requirements focus self-build on allocated sites, then likely to be closer to main job hubs, similarly, people may be more inclined to build their own homes closer to their work/services they require by choice, however, such properties may be focused in rural locations far from jobs.

Potential benefits for local supply chain and relevant businesses, supporting existing jobs and creating new as well as building skills base. Benefits also to local housing market in terms of increasing choice and diversity in the market.

### Mitigation

New measures through Housing and Planning Act – any new requirements placed on Local Authorities would have to be introduced and would become part of the policy position and would be expected to increase delivery of self and custom build housing. This could have bearing on EC objectives.

Approach and requirements need to be well thought through – avoid making assumptions and support and make the most of the benefits of this option.

Range of types of/approaches to self-build/custom build – needs to be part of a package of options to suit different self/custom-builders as well as ensuring viability considerations are taken into account if measures involve working with volume housebuilders to seek self-build / custom-build plots.

Pragmatic and flexible approach required but also application of all other relevant policies to avoid unintended consequences. Other policies are likely to address some of the issues raised.

## Appraisal Recording and Scoring

Sustainability Appraisal of Development Management Policies DPD					
<u>Key</u>					
<b>Impact</b>		<b>Timeframe</b>		<b>Geographic Scale</b>	
Major Positive	+4	Short Term	S	Local	L
Positive	+2	Medium Term	M	District Wide	D
No Impact	0	Long Term	L	Urban	U
Negative	-2			Rural	R
Major Negative	-4				
Uncertain	?				
Neutral	N				

### AGRICULTURAL BUILDINGS OPTION 1 Maintain current policy position

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District – Predominantly Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to development in countryside, landscape, environment etc.
Impact Score	N

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. The policy area has limited links with the social progress objectives, however, it does have some links with supporting rural communities (SP6) and may link to SP5 in terms of individual farm businesses. The current policy protects against impacts on residential and visual amenity but does not refer to the need for agricultural buildings to be located close to an existing agricultural business nor does it ask for evidence to justify the need for the building or the proposed location.

Mitigation

Given the limited links and impacts of this approach on social progress objectives there is limited scope for mitigation to maximise positive impacts. Other policies cover many of the aspects of SP objectives. However, not all aspects are covered. A new agricultural building could be built distant from any existing development, having greater/different impacts than if it were adjacent existing development. Under PD rights it could then be converted into what would be an isolated dwelling. A new/amended policy that contains more/stricter requirements could help to manage this risk. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity

EN2 - To conserve and enhance landscape quality and character for future generations

EN3 - To improve the quality of the built environment

EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District – Predominantly Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

### Comments and Mitigation

#### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. This policy area has links with the EP objectives as its purpose is to manage new agricultural building development in rural areas. Such development could potentially affect biodiversity, geodiversity, landscape, green infrastructure and the built environment of rural settlements. The current policy protects against impacts on residential and visual amenity and local nature conservation interests but does not refer to the need for agricultural buildings to be located close to an existing agricultural business nor does it ask for evidence to justify the need for the building or the proposed location.

#### Mitigation

Many of the potential environmental impacts of new agricultural buildings in the countryside should be mitigated to a degree through other local plan policies relating to biodiversity, landscape, design etc. Other policies cover many of the aspects of EN objectives. However, not all aspects are covered. A new agricultural building could be built distant from any existing development, having greater/different impacts than if it were adjacent existing development. Under PD rights it could then converted into what would be an isolated dwelling. A new/amended policy that contains more/stricter requirements could help to manage this risk. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel

NR2 - To improve and manage water quality and water resources and services

NR3 - To restore and protect land and soil

NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

## Comments and Mitigation

### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. This policy area has links with natural resource objectives. New agricultural buildings are most likely to be in rural areas and may encourage travel by car or reduce it depending on its location, use and the base of the user of the building. Such new buildings may also have impacts upon water quality and resources (NR2) and the protection of land and soil (NR3) in particular. The current policy does not refer to the need for agricultural buildings to be located close to an existing agricultural business nor does it ask for evidence to justify the need for the building or the proposed location.

### Mitigation

Many of the potential natural resource impacts of new agricultural buildings in the countryside should be mitigated to a degree through other local plan policies relating to climate change, water resources, energy etc. However, not all aspects are covered. A new agricultural building could be built distant from any existing development, having greater/different impacts than if it were adjacent existing development. Under PD rights it could then be converted into what would be an isolated dwelling. A new/amended policy that contains more/stricter requirements could help to manage this risk. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Medium – position could be reviewed during Local Plan Review.
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

## Comments and Mitigation

### Comments

This policy option would maintain the status quo therefore the impacts of the approach would not be different to the current baseline. The policy area has clear links with economic objectives. It links with objectives relating to rural diversification (EC3.4) and may help to retain rural jobs and create new rural employment opportunities (EC1). The current policy requires full regard to be given to “the operational needs of agricultural businesses” but does not refer to the need for agricultural buildings to be located close to an existing agricultural business nor does it ask for evidence to justify the need for the building or the proposed location meaning that there is great flexibility for applicants to tailor the location of their new building to best suit their business intentions. PD rights to convert agricultural buildings to dwellings could undermine some of the potential positive impacts on the rural economy if new agricultural buildings are subsequently converted into dwellings.

### Mitigation

A new/amended policy that contains more/stricter requirements could help to manage the risks relating to PD rights but could reduce flexibility for rural / agricultural businesses.



## AGRICULTURAL BUILDINGS OPTION 2

### New policy with updated criteria

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N/+2

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

#### Comments

The policy area has limited links with the social progress objectives, however, it does have some links with supporting rural communities (SP6) and may link to SP5 in terms of individual farm businesses. Under the current policy, a new agricultural building could be built distant from any existing development, having greater/different impacts on communities than if it were adjacent existing development. Under PD rights it could then converted into what would be an isolated dwelling distant from services and facilities and other community connections. A new policy with updated criteria could contain more/stricter requirements that would help to manage this risk as well as avoid detriment relating to other SA objectives. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. These measures would avoid negative impacts rather than create a new net benefit from the existing position.

#### Mitigation

Other policies do or will cover many of the aspects of SP objectives.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
 EN2 - To conserve and enhance landscape quality and character for future generations  
 EN3 - To improve the quality of the built environment  
 EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N/+2

### Comments and Mitigation

#### Comments

This policy area has links with the EP objectives as its purpose is to manage new agricultural building development in rural areas. Such development could potentially affect biodiversity, geodiversity, landscape, green infrastructure and the built environment of rural settlements.

Under the current policy, a new agricultural building could be built distant from any existing development, having greater/different impacts on biodiversity, landscape and the built environment than if it were adjacent existing development. Under PD rights it could then converted into what would be an isolated dwelling that would have different and potentially greater impacts again. A new policy with updated criteria could contain more/stricter requirements that would help to reduce the likelihood of this. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. These measures would avoid negative impacts rather than create a new net benefit from the existing position.

#### Mitigation

Other policies do or will cover many of the aspects of EN objectives.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
 NR2 - To improve and manage water quality and water resources and services  
 NR3 - To restore and protect land and soil  
 NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N/+2

## Comments and Mitigation

### Comments

This policy area has links with natural resource objectives. New agricultural buildings are most likely to be in rural areas and may encourage travel by car or reduce it depending on its location, use and the base of the user of the building. Such new buildings may also have impacts upon water quality and resources (NR2) and the protection of land and soil (NR3) in particular.

Under the current policy, a new agricultural building could be built distant from any existing development, having greater/different impacts on water resources, the need to travel and land/soils than if it were adjacent existing development. Under PD rights it could then be converted into what would be an isolated dwelling that would have different and potentially greater impacts again. A new policy with updated criteria could contain more/stricter requirements that would help to reduce the likelihood of this. This could include requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. These measures would avoid negative impacts rather than create a new net benefit from the existing position.

### Mitigation

Other policies do or will cover many of the aspects of NR objectives.

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 - To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District - Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	N

## Comments and Mitigation

### Comments

The policy area has clear links with economic objectives. It links with objectives relating to rural diversification (EC3.4) and may help to retain rural jobs and create new rural employment opportunities (EC1). A new policy with updated criteria could contain more/stricter requirements such as requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. These measures would reduce negative impacts on other SA objectives (compared to the current position) but could reduce flexibility for agricultural businesses. Businesses with a genuine case for new agricultural buildings and who propose to locate their new building to match those genuine needs and meet other policy requirements should however be able to provide the required evidence.

### Mitigation

Ensure that any additional or stricter requirements, including requirements for evidence introduced are reasonable and realistic and supportive of genuine cases for new, appropriately located and designed agricultural buildings, whilst also managing the risks relating to PD rights and preventing inappropriate development.

## AGRICULTURAL BUILDINGS OPTION 3

### No Policy – rely on National and Core Strategy Policies

#### SOCIAL PROGRESS THAT RECOGNISES THE NEEDS OF EVERYONE

SP1 - To increase the level of participation in democratic processes  
 SP2 - To improve access to services and facilities, the countryside and open spaces  
 SP3 - To provide everyone with a decent home  
 SP4 - To improve the level of skills, education and training  
 SP5 - To improve people's health and sense of wellbeing  
 SP6 - To create vibrant, active, inclusive and open-minded communities with a strong sense of local history

Timeframe	Long
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

**Comments and Mitigation:** (describe nature of impact (reversible, primary, secondary etc); reasons for impact assessment and score; and suggestions for mitigation)

#### Comments

The policy area has limited links with the social progress objectives, however, it does have some links with supporting rural communities (SP6) and may link to SP5 in terms of individual farm businesses. Removing the current policy and relying solely on the Core Strategy and National Policy would remove existing protections relating to visual and residential amenity and nature conservation and requirements for full regard to be had to the operational needs of agricultural businesses. It would also remove any opportunity for new requirements to be put in place requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. It would reduce opportunities to manage any risks relating to PD rights and agricultural to residential conversions. This option also introduces uncertainty as National Policy may change and the current NPPF supports rural business expansion but offers no qualification as to circumstances when it would be inappropriate. This weaker position could have a mixture of positive and negative impacts relating to SP5 and SP6 in particular.

#### Mitigation

Existing protections relating to visual and residential amenity and nature conservation, as well as other SP matters, would be covered through other existing or planned policies. Mitigation of the other impacts identified would be difficult without introducing a new policy.

## EFFECTIVE PROTECTION OF THE ENVIRONMENT

EN1 - To protect, enhance and maintain habitats, biodiversity and geodiversity  
 EN2 - To conserve and enhance landscape quality and character for future generations  
 EN3 - To improve the quality of the built environment  
 EN4 - To protect, enhance and maintain green infrastructure

Timeframe	Long
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	-2

### Comments and Mitigation

#### Comments

This policy area has links with the EP objectives as its purpose is to manage new agricultural building development in rural areas. Such development could potentially affect biodiversity, geodiversity, landscape, green infrastructure and the built environment of rural settlements.

Removing the current policy and relying solely on the Core Strategy and National Policy would remove existing protections relating to visual and residential amenity and nature conservation and requirements for full regard to be had to the operational needs of agricultural businesses. It would also remove any opportunity for new requirements to be put in place requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. It would reduce opportunities to manage any risks relating to PD rights and agricultural to residential conversions. This option also introduces uncertainty as National Policy may change and the current NPPF supports rural business expansion but offers no qualification as to circumstances when it would be inappropriate. This weaker position could increase negative impacts on all the EN objectives as it would reduce the degree of control over location and could result in isolated new buildings, and possibly dwellings due to PD rights, in the open countryside.

#### Mitigation

Existing protections relating to visual and residential amenity and nature conservation as well as other SP matters, would be covered through other existing or planned policies. Mitigation of the other impacts identified would be difficult without introducing a new policy.

## SUSTAINABLE USE AND MANAGEMENT OF NATURAL RESOURCES

NR1 - To improve local air quality, reduce greenhouse gas emissions, promote renewable energy and energy efficiency and reduce need to travel  
 NR2 - To improve and manage water quality and water resources and services  
 NR3 - To restore and protect land and soil  
 NR4 -To manage mineral resources sustainably, minimise waste and encourage recycling

Timeframe	Long
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.

Impact Score	-2
<p><b>Comments and Mitigation</b></p> <p><u>Comments</u></p> <p>This policy area has links with natural resource objectives. New agricultural buildings are most likely to be in rural areas and may encourage travel by car or reduce it depending on it's location, use and the base of the user of the building. Such new buildings may also have impacts upon water quality and resources (NR2) and the protection of land and soil (NR3) in particular.</p> <p>Removing the current policy and relying solely on the Core Strategy and National Policy would remove existing protections relating to visual and residential amenity and nature conservation and requirements for full regard to be had to the operational needs of agricultural businesses. It would also remove any opportunity for new requirements to be put in place requiring new agricultural buildings to be located close to existing agricultural businesses; asking for evidence to demonstrate need for such new buildings and asking for evidence to demonstrate need for new agricultural buildings to be in a particular location, where the proposed location is not adjacent an existing agricultural business. It would reduce opportunities to manage any risks relating to PD rights and agricultural to residential conversions. This option also introduces uncertainty as National Policy may change and the current NPPF supports rural business expansion but offers no qualification as to circumstances when it would be inappropriate. This weaker position could increase negative impacts on all the NR objectives as it would reduce the degree of control over location could result in isolated new buildings, and possibly dwellings due to PD rights, in the open countryside.</p> <p><u>Mitigation</u></p> <p>Existing protections relating to visual and residential amenity and nature conservation as well as other SP matters, would be covered through other existing or planned policies. Mitigation of the other impacts identified would be difficult without introducing a new policy.</p>	

## BUILDING A SUSTAINABLE ECONOMY IN WHICH ALL CAN PROSPER

EC1 - To retain existing jobs and create new employment opportunities

EC2 -To improve access to jobs

EC3 - To diversify and strengthen the local economy

Timeframe	Long
Geographic Scale	District – Rural
Cumulative Impact	Cumulative impact with other local plan policies – e.g. those relating to sustainable development, development in countryside, landscape, environment etc.
Impact Score	+2

### Comments and Mitigation

#### Comments

The policy area has clear links with economic objectives. It links with objectives relating to rural diversification (EC3.4) and may help to retain rural jobs and create new rural employment opportunities (EC1). The current NPPF supports rural business expansion but includes no qualification as to circumstances when it would be inappropriate. In addition, removing the existing policy, would remove the requirement for full regard to be given to “the operational needs of agricultural businesses”. The protection through this policy against impacts on residential and visual amenity and local nature conservation interests would also be removed. This position would therefore offer less restriction and greater flexibility for applicants wishing to build new agricultural buildings, allowing them to tailor the location of their new building to best suit their business intentions and therefore should support and diversify the local economy. PD rights to convert agricultural buildings to dwellings could undermine some of the potential positive impacts on the rural economy if new agricultural buildings are subsequently converted into dwellings. This option also introduces uncertainty as National Policy may change.

#### Mitigation

Impacts on residential and visual amenity and local nature conservation interests would be managed through other existing or planned policies. Mitigation of the other impacts identified would be difficult without introducing a new policy