

Cumberland Local Plan

Integrated Impact Assessment Scoping Report

Including:

- **Strategic Environmental Assessment (SEA)**
- **Health Impact Assessment**
- **Equalities Impact Assessment**
- **Climate Change Impact Assessment**

October 2026



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1.1. Non-Technical Summary

Good planning is about making choices that benefit people, places and the environment, both now and in the future. The Integrated Impact Assessment (IIA) supports this by identifying the likely environmental, social and economic effects of the emerging Cumberland Local Plan.

This Non-Technical Summary provides a straightforward overview of the IIA Scoping Report. It introduces the key sustainability issues facing Cumberland and explains the assessment framework that will be used to inform, test and refine future planning policies and site allocations.

The findings of the IIA will help ensure that sustainability considerations are embedded throughout the preparation of the Local Plan, supporting informed and transparent decision-making.

This IIA Scoping Report has been published for consultation alongside the Local Plan Scoping Consultation and feedback on it will be used to refine the IIA.

1.2. Key Sustainability Issues

This IIA Scoping Report has identified the following key sustainability issues that we think the Local Plan should address through its decisions on future planning policies and allocating land for development or protection:

- Climate Change and Carbon Emissions
- Flood Risk
- Ageing Population
- Housing Affordability
- Health Inequalities and Deprivation
- Digital Connectivity
- Transport Accessibility and Rural Challenges
- Water Quality
- Biodiversity Decline
- Historic Character and Conservation
- Quality Agricultural Land
- Air Quality
- Sensitive Landscapes
- Aggregates (crushed rock, sand and gravel) supplies
- Waste management

More detail on the above issues can be found in Sections 4 and 5.

1.3. The IIA Assessment Framework

The IIA will assess options for future policies and site and land designations against a set of sustainability objectives and questions and these are set out in Section 6.

We will assess whether policy and site options will have a positive or negative impact on the following objectives to help us understand which options perform the best and will deliver the most sustainable outcomes.

1) Reduce greenhouse gas emissions to reach net zero by 2037 and ensure effective climate change adaptation.

2) Protect and enhance biodiversity and geodiversity assets.

3) Maintain and enhance the character and quality of the landscape.

4) Conserve, restore and enhance green and blue infrastructure.

5) Protect and enhance air quality and reduce noise pollution.

6) Protect and enhance soils

7) Protect and enhance water resources.

8) Protect areas that are at risk of flooding and reduce flood risk.

9) Increase resource efficiency and reduce waste generation.

10) Protect and enhance the historic environment.

11) Support inclusive, prosperous and safe communities and increase people's satisfaction with their local area as a place to live.

12) Improve public health, reduce health inequalities and increase opportunities for healthy and sustainable lifestyles.

13) Increase the supply of decent, affordable, secure, safe and healthy homes.

14) Support the vitality, vibrancy and viability of town and village centres and rural communities.

15) Improve access and mobility, and facilitate and encourage the use of sustainable transport and active travel.

16) Foster a diverse, thriving, sustainable and circular economy.

More information on the proposed assessment framework can be found in Section 6.

2. Introduction

Cumberland Council is preparing a new Local Plan to guide development for at least the next 10 years.

This document is the scoping report and the first stage of the Integrated Impact Assessment (IIA) of the new Local Plan. It sets out how the IIA will be undertaken to assess the social, environmental and economic impacts of the proposed Local Plan.

We want to ensure that the new Local Plan helps deliver sustainable development in our area that brings benefits for people, the environment and our economy.

IIA is an assessment that helps us assess the impacts (both positive and negative) as we are developing policies in the plan and helps us refine them to ensure the best outcomes and to minimise harmful impacts.

IIA helps us meet legal requirements for plan-making (Strategic Environmental Assessment or 'SEA') but we are going beyond this by also including an assessment of health, equalities and climate change impacts so that we can consider all these issues together in a holistic way.

The purpose of the IIA Scoping Report is to provide the context for, and determine the scope of, the IIA and to set out the framework for undertaking the later stages of IIA.

In summary it therefore sets out what we need to do, and we will go about doing it. It's a chance for us to consult people on the framework for our assessment so we can refine it before we start plan-making.

The Scoping of IIA involves:

- Reviewing other plans, policies and programmes.
- Considering the current state of the environment, as well as social and economic factors in the plan area (in this case Cumberland).
- Identifying any key environmental, social and economic issues which may be affected by the new Local Plan.
- Setting out the 'IIA framework', which comprises specific sustainability objectives against which the likely effects of the Local Plan can be assessed.

2.1. The Plan Area

Cumberland Council is a new unitary Council formed on 1st April 2023, replacing Copeland Borough Council, Allerdale Borough Council, Carlisle City Council, and part of Cumbria County Council



Figure 1: Cumberland Local Plan: Plan Area

Cumberland covers a large and diverse area. At more than 3,026 sq. km and had an estimated population of **273,254** in 2021.

Around 1,065sq. km of the Council area is within the Lake District National Park. The national park authorities produce their own Local Plans for the national park areas.

Cumberland also includes national landscapes (previously known as Areas of Outstanding Natural Beauty or AONBs) and the only Heritage Coast in the North-West. St Cuthbert's Garden Village in Carlisle also has its own Local Plan, so will not be covered by the Cumberland Local Plan plan area.

2.2. Cumberland Local Plan

The existing Cumberland Local Plan comprises the Local Plans that were adopted by the 'legacy' authorities (Copeland Borough Council, Allerdale Borough Council, Carlisle City Council, and Cumbria County Council). Cumberland Council is currently in the early stages of preparing a new Local Plan for Cumberland which will replace these Local Plans and cover the whole of the new Council area. However, until that is adopted, the Local Plans from the legacy Councils remain in place and will be used to determine planning applications.

The government recently published the long awaited new [Local Plan making regulations](#) that enable the new plan making system to be brought into force. The Council will be preparing the new Local Plan under the [new system](#) which is a 30 month process comprising of three gateways and three formal consultation periods, starting with a scoping consultation.

The broad timeline for the Cumberland Local Plan is shown below, with the consultations and gateways shown. The timeline will be updated on a monthly basis and published on the Local Plan web page.

Stage of plan preparation	Date
Publish timetable	30 June 2026
Publish Notice of Intention to Commence Plan Making	30 June 2026
Scoping consultation - start	14 September 2026
Scoping consultation - end	23 October 2026
Gateway 1 - Self-assessment	30 October 2026
Plan content and evidence consultation- start	16 August 2027
Plan content and evidence consultation- end	1 October 2027
Gateway 2 - Advice sought	3 January 2028
Gateway 2 - Advice published	11 February 2028
Proposed plan consultation - start	15 May 2028
Proposed plan consultation - end	7 July 2028
Gateway 3 - Advice sought	2 October 2028
Gateway 3 - Advice published	30 October 2028
Plan submitted for examination	3 November 2028
Examination recommendations - published	30 March 2029
Adopted	23 April 2029

Figure 2: Cumberland Local Plan timeline

2.3. Integrated Impact Assessment

Integrated Impact Assessment (IIA) is a process that assesses the combined social, economic and environmental effects of proposed Local Plans.

It brings together legal requirements including Strategic Environmental Assessment (SEA) ([SEA Directive \(2001/42/EU\)](#)) and also includes Health Impact Assessment, Equalities Impact Assessment and Climate Change Assessment.

The integrated approach avoids the need to undertake and report on separate assessments and reduces duplication of assessment work. It helps us look at all the aspects in a joined up and holistic way where there are cross cutting issues and impacts.

The following sections explain more about the individual assessments that have been brought together into the IIA.

2.3.1. Strategic Environment Assessment (SEA)

It is a legal requirement to undertake an environmental assessment of Local Plans in accordance with the requirements of the Strategic Environmental Assessment

(SEA) Directive (European Directive 2001/42/EC) This was transposed into law in England by the SEA Regulations.

These European requirements remain in force despite the UK leaving the European Union in January 2020.

Sustainability Appraisal was previously also a legal requirement for Local Plans (set out in the amended Planning and Compulsory Purchase Act 2004). However it is understood that SA is no longer a requirement under the new plan-making system and will in due course be replaced by new 'Environmental Outcome Reports' (EOR) as set out in the Levelling-up and Regeneration Act 2023 (LURA).

The specific requirements for EOR will be set out in forthcoming regulations, along with information about transition arrangements.

However at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SEA will be addressed as appropriate as the Local Plan is prepared.

New guidance on carrying out SEA for Local Plans being prepared in the new plan making system is expected shortly and this Scoping Report will be updated in light of that guidance if required.

The SEA process comprises a number of stages, with Scoping being Stage A as shown in the image below.

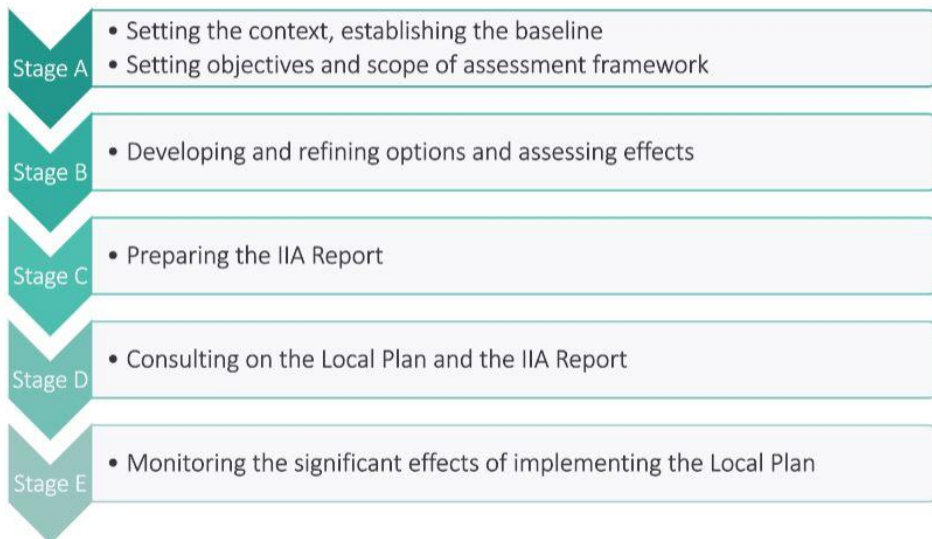


Figure 3: SEA Stages

2.3.2 Health Impact Assessment (HIA)

Planning and public health are closely interlinked and the Local Plan has the potential to improve health outcomes and address inequalities by impacting on wider determinants of health.

People spend most of their time in human-made or modified environments. Features such as neighbourhood design, housing, the food environment, transport and natural and sustainable environments are all recognised as determinants of health and described in detail in the Public Health England (PHE) document [Spatial Planning for Health](#).

Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process.

HIA is a tool used to identify the health impacts of a plan and to develop recommendations that maximise the positive health impacts and minimise the negative impacts.

HIA is being incorporated into this IIA and is being undertaken having regard to [Public Health England's Health Impact Assessment in Spatial Planning guide](#).

2.3.3. Equalities Impact Assessment (EqIA)

The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012.

Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires authorities to have due regard for equalities considerations when exercising their functions.

EqIA has therefore been incorporated into this IIA in line with the Council's policies and ambitions with regards equity, diversity and inclusion.

Cumberland Council uses the following definitions of equity, diversity and inclusion (EDI):

- **Equity:** means that, in some circumstances, people need to be treated differently in order to provide meaningful equality of opportunity.
- **Diversity:** recognising, and celebrating, that people have different characteristics, backgrounds, attributes, cultures and experience.
- **Inclusion:** actively ensuring that everyone is included, welcomed, represented and reflected, in our services, council and community.

Undertaking an EqIA will help us understand whether the policies in the Local Plan will have different impacts on people with protected characteristics.

Protected characteristics under the Equality Act (2010):

- Age
- Disability
- Gender reassignment
- Marriage/civil partnership
- Maternity/pregnancy
- Race
- Religion or belief
- Sex
- Sexual orientation

In addition to the protected characteristics above, the Council also recognises the below characteristics as equally important in its focus:

- Armed forces families
- People who are care experienced (having experience of the care system)

2.3.4. Climate Change Assessment

The Local Plan presents an opportunity to significantly contribute to climate change mitigation and adaption. The plan must help ensure significant reductions in greenhouse gas emissions to help mitigate climate change and help reach our Council target of net zero by 2037 ahead of the national net zero by 2050 target. It must also ensure that new development and our communities are resilient to the impacts of climate change and are able to adapt.

The Council is developing a Climate Impact Assessment Tool to analyse the climate impacts of Council decisions.

As well as incorporating climate impact questions throughout the IIA assessment framework we will also use the Climate Impact Assessment Tool to appraise the Local Plan.

The tool involves assessing decisions against a list of impacts across the following categories:

- Climate

- Nature
- Soils and Land Use
- Landscape and Places
- Governance
- Energy
- Transport and Connectivity
- Buildings
- Waste and Consumption
- Resilience and Adaptation
- Procurement and Investment
- People and Organisations

It uses a scoring system of -3 to +3 for each question along with a summary, and produces a decision wheel to visualise the findings.

The findings of the Climate Impact Assessment Tool will be reported in the IIA.

2.3.5. Habitats Regulations Assessment (HRA)

The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 (and updated in 2010, 2012 and 2017).

The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and remain a legal requirement despite the UK leaving the European Union.

The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to determine whether it would adversely affect the integrity of that site, either alone or in combination with other plans or projects.

The IIA will incorporate the key findings of the HRA which will be undertaken as a separate assessment.

3. Relevant Plans and Strategies

Schedule 2 of the [Strategic Environmental Assessment \(SEA\) Regulations](#) requires:

1. *“an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes” and*
2. *“the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*

In order to establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international, national and local policies, plans and strategies that are of relevance to the Cumberland Local Plan.

This chapter summarises the relationship of the Cumberland Local Plan to the relevant international and national policies, plans and programmes which should be taken into consideration during preparation of the plan and its IIA, as well as those plans and programmes which are of relevance at a sub-regional level. The objectives of these plans and programmes have been taken into account when drafting the IIA framework in Chapter 6.

A full list of all the documents reviewed, and the key priorities and targets within them, can be viewed at Appendix 1 and the following sections highlight the most relevant plans, policies, and strategies.

3.1. International

At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the National Planning Policy Framework (NPPF) and Local Plan) should be aware of and in conformity with the relevant legislation. The main sustainability objectives of international plans and programmes that are of most relevance for the Local Plan and the IIA are provided in Appendix 1.

3.2. National

There is an extensive range of national policies, plans and programmes that are relevant to the Local Plan and the IIA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the NPPF and Planning Practice Guidance of relevance to the Local Plan and the IIA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the Local Plan and IIA are provided in Appendix 1.

3.2.1 The National Planning Policy Framework and Planning Practice Guidance

[National Planning Policy Framework \(NPPF\)](#) is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012 and has been revised several times since, with the most recent adopted version being published in August 2026.

The three overarching objectives of the planning system are set out in paragraph 17 of the NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- *“an **economic** objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *a **social** objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- *an **environmental** objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution.*

The new Local Plan must be consistent with the requirements of the NPPF.

A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan.

Policy PM2 of the NPPF states that Local plans should set out a positive vision and spatial strategy which supports the delivery of the spatial development strategy for their area, and should set out specific proposals for accommodating development needs and conserving and improving the environment at a local level.

National [Planning Practice Guidance \(PPG\)](#) provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis to reflect ongoing changes to planning policy and legislation for the benefit of planning practitioners.

The overarching nature of the NPPF means that its implications for the plan making process and the IIA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan making process and the IIA is provided in more detail below.

3.2.1.1 Environmental and Social Considerations

Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development, including through the promotion of renewable energy schemes, are supported through the NPPF. One of the core planning principles is to “support the transition to net zero by 2050” and to take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change

Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures.

Climate change

The NPPF requires plans to *“take a proactive approach to adapting to climate change, taking into account the implications of extreme weather and long-term climate trends including overheating, wildfires, drought, flood risk, coastal change, water supply, biodiversity and landscapes”*. As mentioned above, local planning authorities should take full account of overheating from rising temperatures. As temperatures increase, there will be more demand for energy used for cooling, and so policies in the Local Plan should include design measures that minimise overheating and energy demand for cooling.

Transport

The NPPF requires transport issues to be considered from the earliest stages of plan-making so that opportunities to promote walking, cycling and public transport use are identified and pursued, which will help reduce reliance on the private car and associated emissions.

According to the NPPF, *“Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical”*. This can help to reduce congestion and emissions, and improve air quality and public health.

Further to this, the NPPF requires planning policies to support *“an appropriate mix of uses across the plan area, and within strategic sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities”*.

Growth will inevitably increase traffic on the roads which also has implications for air quality. The new Local Plan and the IIA can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development.

The new Local Plan, as supported by the IIA, should seek to identify opportunities to maximise the potential for alternative modes of transport to private motor vehicles which use internal combustion engines, as these contribute towards air pollution. This is particularly the case in Cumberland, much of which is rural in nature. It is noted, however, that air pollution levels are likely to be reduced by the Government’s commitment to end the sale of new petrol and diesel cars by 2030, with all new cars required to be zero-emission by 2035, the increasing uptake of electric vehicles and the gradual rollout of electric vehicle charging networks. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. It is therefore

also important to reduce the need to travel, or the need to travel so far, as this will help reduce emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

The IIA can consider the contribution that the alternatives make to climate change mitigation and adaptation, including through reducing transport-related emissions. Climate change adaptation is crucial to the health and wellbeing of residents, which is also considered through the IIA.

Health and well-being

In relation to health and wellbeing, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework. The [Building for a Healthy Life design toolkit](#) can be used by local authorities to assist in the creation of places that are better for people and nature.

One of the core planning principles is to *“take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”*. It is identified in the document that *“a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”*. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local Plans should also *“contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”*.

The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The new Cumberland Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting and design of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The IIA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the well-being of local communities.

Biodiversity

The NPPF sets out the approach Local Plans should have in relation to biodiversity and states that plans should *“help drive nature’s recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth.”*

Plans should also promote conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

The Cumberland Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should include approaches which support enhancing the connectivity of green infrastructure and promoting the

achievement of biodiversity net gain. The IIA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of significant effects, both negative and positive.

Landscape

In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic character and beauty of the countryside as well as protecting and enhancing valued landscapes..

The Local Plan should be supportive of an approach to development which would protect the landscape character of Cumberland and its surrounds including the National Parks. Where appropriate it should also seek to protect the identity of the built-up areas of Cumberland. The IIA should identify those alternatives which contribute positively to landscape and townscape character.

Historic Environment

The NPPF states *“Heritage assets are an irreplaceable resource, and range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”*. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place. The Framework places a focus on making ‘beautiful’ and ‘sustainable’ places. The use of plans, design policy, guidance and codes are encouraged.

The new Local Plan can offer enhanced protection for both designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The IIA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

Carbon emissions

There are regulations in place that seek to reduce emissions, primarily through amendments to the [Building Regulations 2010](#), which introduced interim uplifts to energy efficiency standards for new development. However, more stringent requirements will be implemented through the [Future Homes and Buildings Standards](#), which are expected to come into force from 2027 following legislation introduced in 2026. These standards are anticipated to require new homes to produce significantly lower carbon emissions (approximately 75–80% less than those built to earlier standards), alongside the adoption of low-carbon heating systems.

Further to this, a [2023 court ruling](#) clarified that local planning authorities can set higher energy efficiency standards for new homes through Local Plans, provided they are justified, viable, and deliverable, and can be supported through the examination process.

Pollution and water efficiency

The NPPF states that new and existing development should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, pollution including water pollution and air pollution. Inappropriate development in areas at risk of flooding should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision of infrastructure for water supply and wastewater.

The new Local Plan presents an opportunity to consider incorporating up-to-date targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The IIA process should seek to identify and address potential negative effects on water resources and water quality, including implications relating to wastewater.

Soils, minerals and waste

The NPPF states that the planning system should protect and enhance soils in a manner commensurate with their statutory status or identified quality in the development plan, while also encouraging the reuse of previously developed land. The new Local Plan can seek to protect soil quality, including best and most versatile agricultural land. The IIA process should inform the development of the new Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

The NPPF states that it is essential that there is sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Minerals planning authorities should plan for a steady and adequate supply of minerals and should safeguard areas of known mineral resource to ensure that other development in these areas is not permitted if it might constrain future use for mineral working. The new Local Plan will need to consider the most appropriate policy approach for maintaining the required supply of minerals going forward and the most effective way to safeguard our existing minerals resources and prevent their sterilisation by non-minerals development, as well as how minerals extraction should be managed to minimise its impact on landscape, ecology and human health.

[The National Planning Policy for Waste](#) (2014) (NPPW) sits alongside the NPPF and provides the planning framework to enable local authorities to put forward strategies that identify sites and areas suitable for new or enhanced facilities to meet the waste management needs of their areas. It includes locational criteria to be considered when testing the suitability of sites and areas in the preparation of Local Plans. The need for waste management facilities should be considered alongside other spatial planning concerns, recognising the positive contribution that waste management can bring to the development of sustainable communities. The new Local Plan should identify sufficient opportunities to meet the identified needs for the management of all waste streams, driving waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities and that adequate provision must be made for waste disposal.

Economy

The Framework sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that

sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors, with an emphasis on clusters or networks of knowledge and data-driven, creative or high technology industries.

Town Centres

The NPPF states that Local planning authorities should incorporate planning policies which *“promote the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities.”* Local Plans are required to *“set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration”*.

The new Local Plan should seek to maximise the potential benefits of nearby strategic growth, while at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities within Cumberland’s town and local centres are maintained and enhanced is also important and will also provide support for local communities. The IIA process can support the development of the new Local Plan to ensure that its policies consider impacts on the economy in Cumberland. The IIA can also be used to demonstrate that impacts on the viability of town and local centres have been considered.

3.3. Other National Policies, Plans and Programmes

A wide range of other national policies plans and programmes (PPPs) are relevant to the preparation of the Cumberland Local Plan and the IIA. In contrast to the NPPF, which provides an overarching framework for the planning system, many of these documents are topic-specific and address particular aspects of sustainable development.

Although there is some overlap in the issues covered, the PPPs most relevant to the Local Plan and IIA have been grouped according to the themes they most directly address. The sections below summarise the key implications of these PPPs for both the Local Plan and the IIA. The full list of relevant PPPs can viewed in Appendix 1.

Climate Change Adaptation and Mitigation, Energy Efficiency and Waste Minimisation

A wide range of national PPPs address climate change, energy and resource management, including the Carbon Budget Delivery Plan (2023), the Environment Improvement Plan (2023), the Third National Adaptation Programme (NAP3), and the Environment Act 2021. These are supported by longer-term commitments established through the Climate Change Act 2008 (as amended), which sets a legally binding net zero target by 2050, alongside more recent strategies focused on decarbonisation, energy security, and climate resilience.

Implications for the Local Plan and the IIA

The Local Plan should incorporate policies that contribute to both climate change mitigation and adaptation, including promoting low-carbon development, improving energy efficiency, and supporting renewable and low-carbon energy generation.

The Local Plan should also seek to ensure that development is located and designed to minimise carbon emissions, including by promoting sustainable transport patterns and reducing reliance on private vehicles. It should reflect emerging national requirements set out in updated Building Regulations and forthcoming Future Homes and Buildings Standards, which will require significant reductions in emissions from new development.

In addition, the Local Plan should address climate resilience through effective flood risk management, including the use of sustainable drainage systems (SuDS), and ensure efficient use of natural resources. Waste management should align with the waste hierarchy, ensuring that appropriate infrastructure is provided to support waste reduction, reuse and recycling.

The IIA can respond to this by including objectives relating to climate change mitigation and adaptation, sustainable design and construction, flood risk management, sustainable transport, and resource efficiency.

Health and Well-being

Relevant PPPs include the Levelling Up and Regeneration Act (2023), the Green Infrastructure Framework (2023), and national strategies relating to housing, health and communities. These emphasise reducing inequalities, improving access to services, and supporting healthier and more inclusive places.

Implications for the Local Plan and the IIA

The Local Plan should support health and well-being by ensuring that new development provides access to healthcare, services, and active transport opportunities. It should promote high-quality green infrastructure and open space to support physical and mental health outcomes.

The Local Plan should also ensure the delivery of sufficient housing to meet local needs, including a mix of types, sizes and tenures, and should consider the needs of specific groups, including older people and Gypsies, Travellers and Travelling Showpeople.

The IIA can support this by including objectives relating to health and wellbeing, social inclusion, accessibility and sustainable transport.

Environment (Biodiversity, Geodiversity, Landscape and Soils)

Relevant PPPs include the Environment Act 2021, the Environment Improvement Plan (2023), and the Levelling Up and Regeneration Act (2023), alongside a broader framework of biodiversity and environmental protection legislation.

Implications for the Local Plan and the IIA

The Local Plan should seek to protect and enhance biodiversity, geodiversity and landscape character, including both designated and non-designated assets. It should promote biodiversity net gain and strengthen ecological networks through the provision and enhancement of green infrastructure.

The Local Plan should also encourage the reuse of previously developed land, while protecting higher quality agricultural soils, and should reflect the strengthened duty to conserve and enhance National Landscapes.

The IIA can support the identification of appropriate policy approaches and site allocations by including objectives relating to biodiversity, landscape character, green infrastructure and soil quality.

Historic Environment

Relevant PPPs include the Planning (Listed Buildings and Conservation Areas) Act 1990 and guidance from Historic England, including its Corporate Plan (2023–2026).

Implications for the Local Plan and the IIA

The Local Plan should set out a positive strategy for the conservation and enhancement of the historic environment, including designated and non-designated heritage assets and their settings. Development should respect local character and distinctiveness, while recognising the wider social, cultural and environmental benefits that conservation can bring.

The IIA can support this by including objectives relating to the historic environment, townscape and landscape character, and by identifying options that minimise harm and enhance heritage assets where possible.

Water and Air Quality

Relevant PPPs include the Plan for Water (2023), the Air Quality Strategy for England (2023), and the Environment Act 2021, alongside regulations relating to water resources, flooding and pollution control.

Implications for the Local Plan and the IIA

The Local Plan should promote the efficient use of water resources, protect water quality, and minimise pollution, including air pollution. Development should be directed away from sensitive areas such as Source Protection Zones and Air Quality Management Areas, where appropriate.

The Local Plan should also consider the capacity of wastewater infrastructure and ensure that development contributes to sustainable water management. It should support development patterns that reduce the need to travel and promote sustainable transport choices, thereby helping to improve air quality.

The IIA can support this by including objectives relating to water resources, water quality, air quality and pollution.

Economic Growth

Relevant PPPs include the Levelling Up and Regeneration Act (2023), the English Devolution White Paper (2024), and national strategies relating to economic growth, infrastructure and employment.

Implications for the Local Plan and the IIA

The Local Plan should facilitate sustainable economic growth by allocating sufficient and appropriate land for employment uses and by supporting the infrastructure required for economic activity.

It should promote inclusive growth, reduce inequalities, and support the vitality and viability of town centres and local centres.

The IIA can support this by including objectives relating to economic growth, employment opportunities and the resilience of local economies.

Transport

Relevant PPPs include Decarbonising Transport (2021), the Cycling and Walking Investment Strategy, and other national transport strategies focused on sustainability, connectivity and innovation.

Implications for the Local Plan and the IIA

Transport considerations should be integrated into plan-making from the outset, with a focus on reducing the need to travel and promoting sustainable transport modes such as walking, cycling and public transport.

Site selection should take into account accessibility to services, proximity to public transport, and existing infrastructure capacity, helping to reduce reliance on private vehicles and associated emissions.

The Local Plan should support active travel and contribute to improved air quality, reduced carbon emissions, and enhanced public health outcomes.

The IIA can support this by including objectives relating to sustainable transport, climate change mitigation, air quality and health.

3.4. Regional, Sub-Regional and Local

Below the national level, a range of sub-national policies, plans and programmes are also relevant to the preparation of the Cumberland Local Plan and its Integrated Impact Assessment (IIA). These documents operate primarily at the regional, sub-regional and local authority level and provide more detailed, place-specific policy direction. Further details are provided in Appendix 1.

These strategies collectively address key themes such as climate change, housing delivery, economic development, transport, health and well-being, environmental management and infrastructure provision. Their objectives provide an important context for the development of Local Plan policies and the IIA.

Implications for the Local Plan and the IIA

Climate Change and Net Zero

The Local Plan should support the transition to net zero and climate resilience in line with the Cumberland Climate and Nature Strategy and the Cumberland Carbon and Energy Management Plan. These strategies set out commitments for the Council to achieve carbon neutrality and for the wider area to reach net zero emissions.

The Local Plan should also align with the Cumbria Local Nature Recovery Strategy (LNRS), which identifies priorities and opportunities for habitat restoration, biodiversity enhancement and nature-based solutions. The LNRS plays an important role in supporting climate change mitigation and adaptation by promoting carbon sequestration, improving ecosystem resilience and enhancing green infrastructure networks across the area.

Accordingly, the Local Plan should promote low-carbon development, improve energy efficiency, support renewable and low-carbon energy generation, and integrate nature-based solutions into development. It should also ensure that development is resilient to the impacts of climate change, including increased flood risk and extreme weather events.

The IIA can support this by including objectives relating to climate change mitigation and adaptation, energy efficiency, and biodiversity enhancement, ensuring that plan options contribute positively to both net zero and environmental recovery objectives.

Health, Well-Being and Green Infrastructure

The Local Plan provides an opportunity to maximise the well-being benefits of well-designed open spaces, green infrastructure and recreation areas. Policies should ensure that such provision is of sufficient quantity and quality to meet local needs, encouraging healthier and more active lifestyles.

Opportunities for biodiversity enhancement should also be integrated within open spaces and across the wider area, supporting the objectives of the Cumberland Joint Local Health and Wellbeing Strategy and the Climate and Nature Strategy.

The IIA can support this by including objectives relating to health and well-being, green infrastructure, and biodiversity enhancement.

Housing and Communities

The Local Plan should ensure the delivery of an appropriate level of housing to meet local needs and address inequalities in access to suitable housing. This should include a mix of sizes, types and tenures, informed by the Cumberland Housing Strategy and related evidence.

Provision should also consider the needs of specific groups, including Gypsies, Travellers and Travelling Showpeople.

The Local Plan should support sustainable economic growth alongside housing delivery, including the development of rural economies and supporting infrastructure, in line with wider regional strategies.

The IIA can support the identification of suitable housing and growth strategies by including objectives relating to housing provision, social inclusion, and economic development.

Transport and Connectivity

The Local Plan should promote sustainable transport options, including walking, cycling and public transport, in line with strategies such as the Cumbria Transport Infrastructure Plan, the Bus Service Improvement Plan and Local Cycling and Walking Infrastructure Plans (LCWIPs).

Policies should support the delivery of infrastructure required to decarbonise transport, including electric vehicle charging networks, and improve connectivity across Cumberland.

Development should be directed to locations that reduce the need to travel and enhance accessibility to key services and facilities.

The IIA can support this by including objectives relating to sustainable transport, accessibility, air quality and climate change mitigation.

Surrounding Development Plans

Development within Cumberland will not occur in isolation from neighbouring areas. Given the functional and environmental interrelationships between authorities, there is potential for cross-boundary and cumulative (in-combination) effects arising from development proposed in adjacent areas.

Accordingly, consideration has been given to the development plans of neighbouring local authorities, including Westmorland and Furness, Northumberland, as well as the Lake District National Park, which operate as a separate local planning authority.

The IIA will consider the potential for in-combination effects as it progresses, ensuring that the cumulative environmental, social and economic impacts of the Local Plan in conjunction with neighbouring plans are appropriately assessed and addressed.

4 Baseline Information

4.1. Introduction

This stage of the scoping process involves establishing the baseline by

- identifying environmental characteristics of the area that could be affected by the Local Plan
- identifying any existing environmental problems which are relevant to the Local Plan
- considering how things may evolve and change without the Local Plan being implemented.

This section presents a summary of the key social, environmental and economic characteristics of Cumberland, and signposts to where more detailed evidence is available. It should be noted that some of the data relates to the Cumberland Local Plan area (excluding the national parks) and some relates to the whole district where data has not been available at the local planning area geography. This is indicated throughout the text.

We have presented data at different geographic scales where appropriate. Cumberland is a large and diverse district, and only providing data at a district wide level can smooth over significant variation across our area. It is important that the Local Plan recognises the diversity and inequalities across our Local Plan area and tailors its approach where necessary.

4.2 Population, Housing, Health and Wellbeing

4.2.1. Population

There are an estimated 276,876 people living in Cumberland.

- More than half of Cumberland's residents live in a 'rural' area, 51.7% compared to 17.1% nationally.
- Cumberland has proportionally fewer children (0-18 years); fewer working age people (16-64 years); but more older people (65+ years) when compared to England.
- Over the last 10 years, numbers of children and working age people living in Cumberland have fallen while numbers of older people have increased.
- Cumberland has an ageing population with numbers of older people projected to increase while numbers of children and working-age people are projected to fall.

4.2.2 Health and Wellbeing

Life expectancy for both males and females in Cumberland are below national averages and have been for a number of years.

- Although life expectancy has increased over the years, the number of years people are living in good health has fallen.
- A male born in Cumberland can expect to spend 58.4 years of their life in good health, for females this increases to 59.1 years; both are below the national averages.
- A male living in Cumberland can expect to live 19 years of their lives in ill-health; for females this increases to 22.4 years.

Deaths relating to drug misuse are increasing in Cumberland and are twice the national average.

- Suicide is a significant cause of death in Cumberland with rates almost twice the national average.
- Rates of hospital admissions relating to self-harm; and mental health conditions are high in Cumberland when compared to the rest of England.
- 2 in 3 adults in Cumberland are overweight or obese;
- Levels of adult obesity in Cumberland are above the England average and have been increasing year on year, reflecting the national trend.
- Almost 1 in 4 reception age children (4-5 years) are overweight or obese; by Year 6 (10-11 years), this increases to more than 1 in 3.

4.2.3. Housing

More homes in Cumberland are owned outright compared to England, 40.8% v 32.5%.

- In some areas of Cumberland, almost half of residents are living in socially rented homes; while in others, almost half of properties are privately rented.
- Rates of homeless households in Cumberland are below national levels, however, in some areas rates of 'households threatened with homelessness' are above.
- Housing is generally more affordable in Cumberland with a ratio of 4.8 times median household income to median house prices, compared to 7.0 in England. Across Cumberland, housing is typically less affordable in rural areas.
- Median house prices in Cumberland (£151,275) are significantly lower than in England (£290,056). In Cumberland, rural house prices tend to be higher than urban house prices.
- The stock of housing in Cumberland has increased by 6.8% over the past decade which is a slower rate of increase than nationally (9.2%). Average net additional dwellings over the past 5 years increased by 917 per year.
- In 2023/24 there were 660 completed new dwellings, the lowest in recent years.

4.3. Carbon Emissions and Energy Generation

Total carbon emissions in Cumberland in 2022 (2,282.9 ktCO₂e [kilo tonnes of carbon dioxide equivalent]) are 29% lower than a decade ago, a slightly slower rate of reduction than 31% nationally.

- Industry emissions have fallen the most by 56% and by more than the national average of 39%. However, emissions from transport have only fallen by 9% and from agriculture by 3%.
- Per capita emissions in Cumberland were 8.3 tCO₂e which is higher than the national average of 5.6 tCO₂e. However, per km emissions were lower at 0.7 per km² compared to 1.5 per km² nationally.

- The median CO2 emissions per dwelling in Cumberland in 2024 was 3.5 tonnes per annum which is above the national average of 3.0.
- In Cumberland, 782,672 MWh of renewable energy was generated in 2023, mostly from onshore wind (43.5%) and biomass (31.3%).

4.4 Economy

There were 11,220 registered enterprises in Cumberland in 2024. The highest volume was in agriculture, forestry & fishing which accounted for 20% of the total followed by construction (13%) and accommodation & food services.

- The majority of registered enterprises (90%) are micro businesses employing fewer than 10 employees which is similar to the national average.
- The rate of business “births” is lower than the national average but the rate of business “deaths” is also lower indicating less degree of churn in the local economy.
- Fewer businesses are rated as high growth than average.
- There were 18.3m visitors to the area in 2023 who generated £1.8bn in revenue and supported approximately 18,100 jobs.

Businesses in Cumberland generated £6.7bn in Gross Value Added in 2023, an increase of 0.2% from 2022 but 3% lower than 5 years ago which is at odds with the national picture where GVA has grown. This is partly attributed to rebalancing in the economy due to the nuclear sector shifting from reprocessing to decommissioning.

- Economic projections suggest that GVA growth in Cumberland will stabilise and will track the UK over the next 15 years before falling back slightly up to 2050. Employment growth however is projected to be slower than nationally.
- Productivity in Cumberland was measured at £29.10 per hour in Cumberland in 2022 which is less than three quarters (73.3%) of the national average and the gap has widened over the past decade.

5. Key Sustainability Issues

5.1 Introduction

The previous sections on the review of relevant plans, policies and strategies and baseline evidence have allowed us to identify a number of key sustainability issues that we think we need to address through the Cumberland Local Plan.

This section identifies key sustainability issues and considers how these might evolve in future if a new Local Plan was not in place to address them.

5.2 Key Sustainability Issues

Carbon Emissions and Climate Change

The climate crisis remains a key challenge for our area posing significant risks to our health, homes, workplaces, infrastructure and natural environment. Impacts from ongoing and accelerating climate change will continue to occur, including an increased risk of flooding, coastal change, overheating, drought and biodiversity loss. While wider policy on climate change mitigation will help to address this issue to some degree, the new Local Plan offers an opportunity to plan strategically to direct development to the most sustainable locations to reduce greenhouse gas emissions. Without the Local Plan, opportunities to secure further reductions to greenhouse gas emissions in new development would be missed, as well as opportunities to secure locally specific climate change mitigation and adaption measures in new development.

Flood Risk

Without the new Local Plan, flood risk will continue to affect the district through increased and higher intensity flooding. While wider policy on climate change mitigation and flood protection schemes will help to address this issue to some degree, the new Local Plan offers an opportunity to plan strategically to locate new development in areas at lower risk from flooding, therefore reducing the number of properties and economic assets at risk from flooding. It also offers the opportunity to require specific flood resistance and resilience measures in new development and to set out policies on sustainable drainage and identify land for natural flood management.

Ageing Population

Cumberland has an older age profile than the national average. As well as resulting in increased pressures on services and facilities for health and social care, this affects many other aspects of planning such as the need for specific types of housing. There is a need to achieve a more balanced population by increasing numbers of children and young families and increasing the workforce to enable economic growth. The new Local Plan offers an opportunity to improve access to and increase availability of the housing, services and facilities required by older people while also setting out policies seeking to achieve a more balanced population over the longer-term, such as the provision of affordable housing and new employment opportunities. Without the new Local Plan there is likely to be an increasing strain on the housing, services and facilities needed by older people which do not meet local demand and the trend towards an ageing population may be more likely to continue if working age people are not encouraged to stay in or move to the area.

Housing Affordability

In March 2022 the median house price in Cumberland was £151,275. The national median house price is £290,000. The affordability ratio (median house prices to work based earnings) for the Cumberland is 4.8. The ratio for England is 7. The higher the affordability ratio, the less affordable it is to purchase a home. (Source: ONS House price statistics, ratio of house price to workplace-based earnings). The new Local Plan offers an opportunity to address affordability issues through affordable housing policies that will require affordable provision on appropriately sized and located new housing developments. Without the Local Plan it is unlikely that such provision will be secured through the development process.

Health Inequalities

The Local Plan can look at current community infrastructure that supports health and wellbeing when considering future strategies as well as policies that protect and enhance key facilities. The Local Plan can support the proactive approach to health and wellbeing through the promotion of active travel, protection for open spaces as well as designing new developments with health as a priority. Not only does this benefit health, but climate, inequality and air quality. Ensuring a high-quality design and access to open and natural spaces in all areas of Cumberland, regardless of socio-economics ensures opportunities to improve health for all.

Digital Connectivity Challenges

Digital connectivity across the plan area is uneven and some communities experience poor or unreliable connections. There is an increasing reliance on digital infrastructure for remote and hybrid working and access to services and older people, lower income households and some remote rural populations are affected by digital exclusion. Without the Local Plan there is already a comprehensive programme (Connecting Cumbria) to deliver improved broadband and mobile coverage. However the Local Plan has a role to play in ensuring new development is provided with high quality digital infrastructure.

Limited Transport Accessibility in Rural Areas

Transport accessibility in rural areas is limited, with high dependence on the private car to access services, facilities and employment. Activities and projects identified in the Cumbria Transport Infrastructure Plan will help to address these issues, but the new Local Plan provides an opportunity to ensure growth is focuses in well-connected areas, and helps contribute to better connections. It can also set out a framework for developer contributions to help improve transport connections and support active travel. It can help integrate land use and transport planning by working together with the emerging Local Transport Plan.

Water Quality Issues and Nutrient Neutrality

The Local Plan area suffers from water quality issues in places, arising from elevated levels of nutrients (phosphates and nitrates) in some water bodies, pressures arising from wastewater treatment works , agricultural runoff and existing development. In the absence of the Local Plan, water quality is likely to face increasing pressure from uncoordinated development, limited infrastructure planning, and climate change effects. This may result in incremental deterioration, particularly through increased nutrient loading, surface runoff and wastewater capacity constraints. The Local Plan provides a framework to manage growth in a coordinated

manner, aligning development with infrastructure capacity and improvements, requiring sustainable drainage, protecting sensitive water environments and taking a strategic approach to mitigation.

Biodiversity Decline

Cumberland's biodiversity is under pressure from development, agriculture, recreation and tourism and climate change. Habitat fragmentation and declining biodiversity pose key challenges for the Local Plan to address. In the absence of the Local Plan, biodiversity is likely to continue to decline due to uncoordinated development, habitat loss and fragmentation, and increasing pressures from climate change. Opportunities for strategic habitat protection, enhancement and connectivity would be limited, and cumulative effects on designated sites and ecological networks may not be effectively addressed. The Local Plan provides a framework to protect and enhance biodiversity by directing development away from sensitive habitats, strengthening ecological networks, and requiring mitigation and enhancement measures such as biodiversity net gain. This is likely to reduce habitat fragmentation, improve resilience to climate change, and support the long-term recovery of biodiversity including the delivery of the Local Nature Recovery Strategy.

Historic Character and Conservation

Cumberland is rich in heritage assets and historic character, but some of its heritage assets are at risk and the wider historic environment and character is at risk of being impacted by insensitive new development. In the absence of the Local Plan, designated and non-designated heritage assets including listed buildings, conservation areas and assets on the local heritage list may be subject to increasing pressure from uncoordinated development, neglect and climate change impacts. Heritage at risk may continue to deteriorate without targeted intervention, while opportunities to protect setting, reinforce local distinctiveness and address cumulative effects are likely to be missed. The Local Plan provides a framework to conserve and enhance heritage assets and historic character, through its strategy for locating new development and allocating sites, and robust design policies. It can support the proactive management and restoration of heritage at risk, safeguard the setting and significance of assets, and secure high-quality development that reinforces local character and distinctiveness.

Air Quality

In the absence of the Local Plan, air quality is likely to remain generally good, though localised issues, particularly within the existing Carlisle Air Quality Management Area (AQMA) may persist or worsen due to uncoordinated development and increased traffic. Opportunities to reduce emissions, manage traffic growth and address cumulative effects are likely to be more limited. The Local Plan provides a framework to maintain and improve air quality by directing development to sustainable locations, supporting active travel and public transport, and requiring appropriate mitigation measures. It can help address existing issues within the AQMA and minimise the risk of new air quality problems arising from growth.

Sensitive Landscapes

The Local Plan borders the Lake District National Park and contains National Landscapes and a Heritage Coast. It has varied landscape character areas, many of which are highly sensitive to new built development. The new Local Plan offers an opportunity to take into account the most

recent landscape-related evidence when planning for growth and to ensure that sensitive landscapes and townscape are protected and enhanced, with development being located and designed to take account of the variation in character and sensitivity across Cumberland. The new Local Plan also offers the opportunity to take into account the new requirement for local planning authorities to seek to further the purposes of National Landscapes. Without the new Local Plan, this issue is less likely to be addressed as it is more likely that piecemeal and ad-hoc developments would come forward, resulting in incremental impacts on landscape character, visual amenity and tranquillity, with limited ability to manage cumulative effects or protect important views and setting.

6. Integrated Assessment Framework

The approach being taken to the IIA of the Cumberland Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG). This guidance is due to be updated following the removal of the SA requirement as part of the plan-making reforms.

The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

The proposed IIA framework for the Cumberland Local Plan is presented below. The framework is based on work undertaken by the Council in preparing the Sustainability Appraisal Scoping Report which supported the Issues and Options consultation. That been subject to consultation with the statutory bodies (Environment Agency, Natural England and Historic England) in 2025 and consultation with Council Officers.

The IIA framework has also been set out to take into account the analysis of international, national and local policy objectives, the baseline information, and the current key sustainability issues identified for Cumberland.

The IIA framework comprises a series of IIA objectives against which the sustainability of the Local Plan will be appraised. The appraisal of the Local Plan options, policies and site allocations against these IIA objectives will be guided in part by the appraisal questions accompanying each objective. The questions included in the framework are not exhaustive, and some may be more relevant to certain elements of the Local Plan than others.

All of the topics specifically required by the SEA Regulations (set out in Schedule 2 of the SEA Regulations) are clearly addressed by the headline SA objectives, as listed under each SA objective below.

Objective 1

Reduce greenhouse gas emissions to reach net zero by 2037 and ensure effective climate change adaptation.

Appraisal Questions:

1a: Will the policy or option reduce greenhouse gas emissions from domestic, commercial, industrial and transport sources?

1b: Will the policy or option help to plan and implement adaptation measures for the likely effects of climate change?

1c: Will the policy or option encourage the development of renewable energy resources?

1d: Will the policy or option promote energy efficiency in buildings and new development?

Relevant SEA Topics:

- Climatic factors

Objective 2

Protect and enhance biodiversity and geodiversity assets.

Appraisal Questions:

2a: Will the policy or option conserve, enhance and avoid detrimental impacts on both designated and undesignated ecological and geological assets?

2b: Will the policy or option help to deliver Biodiversity Net Gain?

2c: Will the policy or option maintain and enhance woodland/hedgerow cover and management?

2d: Will the policy or option encourage the development of new biodiversity assets and linkages to existing habitats within/alongside development including the delivery of Local Nature Recovery Strategies?

2e: Will the policy or option provide and manage opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?

Relevant SEA Topics:

- Biodiversity, flora and fauna

Objective 3

Maintain and enhance the character and quality of the landscape.

Appraisal Questions:

3a: Will the policy or option safeguard and enhance the character of sensitive landscapes (including National Landscapes and National Parks and their settings) and local distinctiveness and identity?

3b: Will the policy or option help to maintain the remoteness and tranquillity of rural landscapes?

Relevant SEA Topics:

- Landscape

Objective 4

Conserve, restore and enhance green and blue infrastructure.

Appraisal Questions:

4a: Will the policy or option enhance or expand green and blue infrastructure?

4b: Will the policy or option increase access to existing green space?

4c: Will the policy or option improve existing green spaces?

4d: Will the policy or option provide new green spaces?

Relevant SEA Topics:

- Landscape
- Biodiversity, flora and fauna

Objective 5

Protect and enhance air quality and reduce noise pollution.

Appraisal Questions:

5a: Will the policy or option improve air quality and reduce the number of sensitive receptors exposed to areas of poor air quality?

5b: Will the policy or option help to achieve the objectives of Air Quality Management Areas?

5c: Will the policy or option reduce exposure to noise pollution?

5d: Will the policy or option facilitate the take up of low / zero emission vehicles?

Relevant SEA Topics:

- Air

Objective 6

Protect and enhance soils.

Appraisal Questions:

6a: Will the policy or option promote the re-use of previously development land and minimise the loss of greenfield land?

6b: Will the policy or option minimise development on areas of best and most versatile agricultural land?

6c: Will the policy or option ensure contaminated land is remediated where appropriate?

Relevant SEA Topics:

- Soil

Objective 7

Protect and enhance water resources.

Appraisal Questions:

7a: Will the policy or option protect and improve water quality?

7b: Will the policy or option support the efficient use of water?

7c: Will the policy or option minimise inappropriate development in Source Protection Zones?

7d: Will the policy or option ensure there is sufficient waste water treatment capacity to accommodate the new development?

7e: Will the policy or option promote development which would avoid water pollution due to contaminated runoff from development?

7f: Will the policy or option ensure that there is sufficient water resource available to support new development?

Relevant SEA Topics:

- Water

Objective 8

Protect areas that are at risk of flooding and reduce flood risk.

Appraisal Questions:

8a: Will the policy or option limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?

8b: Will the policy or option promote the use of SuDS and other elements of flood resilient design?

Relevant SEA Topics:

- Water
- Climatic factors

Objective 9

Increase resource efficiency and reduce waste generation.

Appraisal Questions:

9a: Will the policy or option reduce the amount of waste produced and support the circular economy?

9b: Will the policy or option reduce the amount of waste sent to landfill?

9c: Will the policy or option maximise the recovery, re-use and recycling of waste?

9d: Will the policy or option ensure that waste is managed at the highest practicable level within the waste hierarchy?

9e: Will the policy or option encourage the prudent use of mineral resources and ensure sufficient supply to meet development needs?

9f: Will the policy or option safeguard Cumberland's material resources, including minerals, for future use?

9g: Will the policy or option lead to reduced consumption of materials and resources?

Relevant SEA Topics:

- Material assets

Objective 10

Protect and enhance the historic environment.

Appraisal Questions:

10a: Will the policy or option conserve and enhance designated and non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?

10b: Will the policy or option provide opportunities for improvements to the conservation, enjoyment, management and enhancement of the area's heritage assets, particularly heritage at risk?

Relevant SEA Topics:

- Cultural heritage including architectural and archaeological heritage

Objective 11

Support inclusive, prosperous and safe communities and increase people's satisfaction with their local area as a place to live.

Appraisal Questions:

11a: Will the policy or option integrate new development with existing communities?

11b: Will the policy or option promote equity, diversity and inclusion and ensure no negative effects for people with protected characteristics and additional groups defined by the Council?

11c: Will the policy or option reduce levels of crime, anti-social behaviour and the fear of crime?

11d: Will the policy or option help reduce health, social and economic inequalities?

11e: Will the policy or option help prevent loneliness and social isolation?

11f: Will the policy or option contribute to improving educational outcomes, including by improving access to educational facilities and making provision for new or improved facilities where required?

Relevant SEA Topics:

- Population
- Human Health

Objective 12

Improve public health, reduce health inequalities and increase opportunities for healthy and sustainable lifestyles.

Appraisal Questions:

13a: Will the policy or option help improve people's health and reduce ill-health?

13b: Will the policy or option promote active wellbeing?

13c: Will the policy or option help to promote healthy eating?

13d: Will the policy or option reduce incidents of environmental health breaches?

Relevant SEA Topics:

- Human Health

Objective 13

Increase the supply of decent, affordable, secure, safe and healthy homes.

Appraisal Questions:

14a: Will the policy or option help to meet local housing need, including for affordable housing, by delivering an appropriate mix of housing types and specialist housing in the locations it is needed?

14b: Will the policy or option improve access to affordable housing?

14c: Will the policy or option improve the standards, quality and performance of new housing?

Relevant SEA Topics:

- Population
- Material assets

Objective 14

Support the vitality, vibrancy and viability of town and village centres and rural communities.

Appraisal Questions:

15a: Will the policy or option support the vitality/viability of town and local centres?

15b: Will the policy or option support easy access to a range of high-quality services and facilities?

15c: Will the policy or option support the sustainability of rural communities?

Relevant SEA Topics:

- Population
- Human Health

Objective 15

Improve access and mobility, and facilitate and encourage the use of sustainable transport and active travel.

Appraisal Questions:

16a: Will the policy or option improve accessibility and connectivity in the district?

16b: Will the policy or option reduce the need to travel?

16c: Will the policy or option promote the use of sustainable modes of transport including walking and cycling and help reduce reliance on private vehicles?

Relevant SEA Topics:

- Climatic factors
- Air

- Human health

Objective 16

Foster a diverse, thriving, sustainable and circular economy.

Appraisal Questions:

17a: Will the policy or option support the delivery of land and infrastructure to meet the economic needs of Cumberland?

17b: Will the policy or option provide employment opportunities for local people including disadvantaged groups?

17c: Will the policy or option support opportunities for the expansion and diversification of businesses and economy?

17d: Will the policy or option support the development of sustainable/eco-tourism and manage the impacts of the tourism industry?

17e: Will the policy or option support the rural economy?

Relevant SEA Topics:

- Population
- Material assets

6.3 Use of the IIA Framework

The SEA framework will be used to appraise emerging Local Plan options and will run alongside the whole Local Plan framework to help refine the strategy, policies and sites.

Strategic policies and site allocations, including the reasonable alternative options, will be appraised against the SA objectives in the SA framework, with symbols being attributed to each policy or site option to indicate their likely effects on each SEA objective.

Where a potential positive or negative effect is uncertain, a question mark will be added to the relevant symbol (e.g. +? or -?) and the symbol will be colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgements to be made. The appraisal will attempt to differentiate between the most significant effects and

other more minor effects through the use of the symbols. The dividing line in making a decision about the significance of an effect is often quite small.

Where either (++) or (--) will be used to distinguish significant effects from more minor effects (+ or -) this will be because the effect of an option or policy on the SEA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

The findings of the SEA will be presented using colour coded symbols showing the likely effect of each option against each of the SEA objectives along with a concise justification for the effect identified. It may be possible to group the appraisal of strategic and development management policies by theme. The key to the SEA symbols is shown below.

Symbol and Colour Code ▴ ▾	Description ▴ ▾
++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
+/-or, ++/- or ++/--	Mixed positive and negative effects likely
-	Minor negative effect likely
--	Significant negative effect likely
X	No relationship/ not relevant
?	Uncertain effect

Figure 4: SEA Assessment Scoring

In relation to the appraisal of site allocation options, detailed sets of site assessment criteria will be developed and applied during the next stage of the IIA.

The criteria will relate specifically to each type of site option (i.e. residential, employment, mixed use etc.). We will try to automate the site appraisals as much as possible using geographic parameters and GIS analysis however we will need to combine this with the professional judgement of subject specialists and planning officers.

In determining the significance of the effects of the options for the new Local Plan it will be important to bear in mind the relationship of the Local Plan with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Reasonable Alternatives

The IIA must appraise not only the preferred options for inclusion in the Local Plan but also any 'reasonable alternatives'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, local objectives or are outside the plan area are unlikely to be reasonable.

Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA can help to

identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

The IIA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account. Future iterations of the IIA will describe how the appraisal of options has been taken into consideration when developing the draft Local Plan.