Copeland LDF Issues and Options

Responses to Consultation

Summary Report

September 2009

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Introduction

The Copeland LDF Issues and Options Consultation took place between 28 May and 10 July 2009. The deadline for responses was extended further to the 7 August 2009 due to a number of public meetings which took place after the initial deadline.

At this initial consultation stage we asked for views on the issues facing Copeland borough and potential solutions (options) for addressing them. The consultation was based on a discussion paper which contained 86 questions as a focus for interested parties to respond.

It also provided an opportunity for people to put forward sites they wished to have considered for development as part of the sites allocation process.

The Issues and Options consultation report was designed to cover the Local Development Framework as a whole (i.e. the Core Strategy, Development Management Policies and site selection criteria for the Site Allocations DPD).

Responses to the Consultation

44 representations were received in response to the questions in the LDF Issues and Options Consultation document, while 32 Calls for Sites responses were also received.

Most responses to the questionnaire were from national, regional and local agencies, local community groups and statutory consultees. However, responses to the questionnaires were also received from:

- Developers, landowners and agents (8)
- Parish Councils (6)
- Copeland Borough Councillors (2) and 1 Cumbria County Councillor
- Local residents (2)

A list of those who responded to the Issues and Options questions can be found in Appendix 1.

Structure of the Report

This report considers each of the questions in the Issues and Options paper in turn. The questions are grouped under the same chapter headings that feature in the Issues and Options paper.

It should be noted that in order to avoid repetition and keep this report as short as possible the text for each of the options in the Issues and Options paper has not been repeated. As a result this report should be read alongside the Issues and Options consultation document.

Each question is outlined in turn, followed by a table that clearly indicates the preferences that were expressed from the available options (where preferences were expressed). As the number of respondents to each question is a relatively low figure these have been expressed as numbers rather than percentages.

The table is followed by a summary of the key comments that were made to provide some context for the options supported, objected to, or new proposals made.

It should be noted that some respondents selected an option and then provided comments to explain their answer, others selected the option they supported without giving any additional comments, and other respondents made comments without indicating a preference from the options available.

The comments in this report are very brief and all comments made will be made available in full as a separate appendix on the Council's website alongside this report.

Call for Sites Responses

The sites will be dealt with later in the process and have been added to the list of sites Strategic Housing Land Availability Assessment (SHLAA), or will be directly considered in the Site Allocations DPD as appropriate.

A list of new sites that were proposed can be found in Appendix 2.

Spatial Portrait, Vision and Objectives

Question 1: Do the descriptions in the Spatial Portrait adequately capture the defining features and key issues faced by the communities of Copeland?

Yes	18
No	5

The majority of respondents felt that the Spatial Portrait gave an accurate description of the issues facing the borough as a whole.

However, some comments expressed a need for further clarity and explanation regarding:

- An increasingly ageing population in the borough
- The role of the Lake District National Park Authority (LDNPA) and how Copeland Borough Council and the LDNPA interact
- The legacy of mining in the borough and appropriate remediation and regeneration of Egremont and Cleator Moor locality areas
- The need to ensure that coal resources are not sterilised by development
- Greater description of the historic environment in the borough's distinctive towns and villages
- Aspirations for the borough's principal settlements and priority areas for development, regeneration and conservation
- Making more emphasis of the coast and landscape, both in terms of work done to date and future opportunities
- The need for executive aspirational housing to cater for those in higher paid employment

Question 2: Do you agree with the Spatial Vision for the borough?

Yes	21
No	4

Most respondents generally agreed with the Spatial Vision. Some commented that it should be broadened out, while others thought that it should be more succinct.

A number of comments were made suggesting ways to improve the vision and make it more locally distinctive, including:

- Identifying a vision for Whitehaven
- Recognising that the demographic changes will offer opportunities as well as challenges
- Stronger reference to the role of renewables and reducing greenhouse gas emissions
- Requesting specific reference to
    - Sustainable development
    - Conserving and enhancing the natural environment and people's access to it
    - An improved sustainable transport network where the need to travel by car is minimised

- Provision of a variety of housing types to meet the needs of all sectors of the community
- The protection of biodiversity (on brownfield sites)

Question 3: Do you agree with the Strategic Objectives for the borough?

Yes	18
No	8

Most respondents agreed with the Strategic Objectives, and even those who said 'no' generally agreed with them in principle, but felt that some of them did not go far enough or suggested additional objectives.

The comments included:

- None of the objectives reflect the need to address ground stability issues, which they feel is a significant issue in the borough
- Exceeding the RSS housing targets and using the Energy Coast Masterplan figures as the aspirational target for development
- Develop a strategic objective for Whitehaven (and Cleator Moor, Egremont and Millom) to support the protection and enhancement and their historic environment
- Giving a stronger role to Cleator Moor, Egremont and Millom, together with the Local Centres, rather than focusing wholly on Whitehaven
- Development should be sympathetic to the character of the locality/settlement
- Reference to protection of historic buildings, other heritage assets and their settings
- Providing skills and training (for adults as well as children)

Environmental Protection and Enhancement

Question 4: How should we respond to the challenges of climate change through the LDF?

Option 1	8
Option 2	12
Other Option	3

Slightly more respondents favoured relying on other policies within the LDF to address climate change (Option 2), rather than developing a specific policy (Option 1). The reasons cited for this included:

- It seems unnecessary to develop a separate policy
- It is a wide ranging issue that would be difficult to properly address within one policy

It should be noted that a number of respondents suggested that it may be appropriate to develop a combination of the two, with an overarching policy on climate change linked to specific policies relating to flooding, design of building, renewable energy etc.

Question 5: Which of the following options should be pursued to reduce our reliance on non-renewable energy sources?

Option 1	8
Option 2	2
Option 3	12
Other Option	1

Most respondents favoured undertaking an assessment of renewable energy capacity to inform the requirement (Option 3) or requiring at least 10% renewables for new developments (Option 1).

The reasons for supporting Option 3 included:

- It will enable the policy to be tailored to suit localities
- It will reduce the long term impact on the natural environment
- It could be a joint evidence base with Allerdale

The main reason for supporting Option 1 was that increasing the targets (i.e. Option 2) would put an increased burden on development costs and could affect the viability of developments.

It was suggested that whichever approach is taken it should be allied to reducing the need for energy. Also, that any policy needs to be flexible to accommodate changing circumstances and the potential to exceed the baseline targets.

Question 6: Given the borough's 'Energy Coast' status, which of the following options should be pursued to encourage renewable energy developments in the borough?

Option 1	7
Option 2	13
Option 3	13
Other Option	3

Respondents generally favoured Options 2 and 3, with least support for large scale renewable energy projects in the borough. It should also be noted that a mix of options was also supported by a number of respondents, especially in their comments.

The additional comments indicated support for wave/hydro schemes and a reluctance towards large scale wind farms. Some respondents also commented that the environmental impact of any developments (and associated infrastructure) on the natural environment needs to be considered.

Question 7: Which of the following approaches is most appropriate in terms of addressing the potential adverse effects of renewable energy and low carbon energy developments in the Borough?

Option 1	11
Option 2	2
Option 3	7
Other Option	1

Most respondents favoured a criteria based policy for minimising the impact of renewable energy or low carbon developments in the borough (Option 1), so that impacts on landscape, the natural and historic environment, nature conservation and local amenity etc. are properly considered and addressed.

Some respondents questioned whether a specific policy is required as they feel the issue is covered by policy elsewhere.

Question 8: West Cumbria's ambition is to be 'Britain's Energy Coast' and to be at the technological forefront of renewable energy and low carbon energy generation. The achievement of this ambition is likely to require significant financial investment. Is it acceptable to place part of the financial burden of this investment on developers in Copeland?

Yes	14
No	5

Most respondents agreed that developers should contribute to low carbon and renewable generation as they will make money from the schemes they propose.

Even so, a number of respondents acknowledged that any contributions should be carefully considered and should not place such onerous demands as to make developments unviable.

Question 9: Would you be prepared to accept part of this financial burden – for example through higher council taxes to increase recycling, pay for improvements to public transport, energy efficiency measures to be installed in homes, etc.

Yes	7
No	9

This question produced a mixed response. There was a general feeling that a strategic approach, with funding from government, would be required. This could then be built on with additional resources locally if appropriate.

In addition, it was felt that large scale schemes, such as nuclear, should provide direct local benefits.

Question 10: Which of the following approaches is most appropriate for mitigation and adaptation to flood risk in the borough?

Option 1	15
Option 2	13
Option 3	3
Option 4	7
Other Option	5

Ensuring that new development is located outside areas at risk of flooding, and designed to resist flooding (Options 1 and 2) were the most popular with respondents. The sequential test in PPS 25 was referred to by some respondents in their comments.

Question 11: Which of the following approaches do you support in terms of designating areas of the coast as Developed, Undeveloped or Remote?

Option 1	10
Option 2	12
Other Option	0

Respondents were split on whether to reconsider the coastal designations that are currently in the Local Plan.

Those who thought they should remain as they are stated that the designations have been thoroughly tested (for both the Copeland Local Plan and Cumbria and Lake District Structure Plan) within the last three years, and that there have been no material changes since then.

Others felt that the evidence for the Local Plan should be revisited.

Question 12: Which of the following options is most appropriate approach to protect and enhance important sites of landscape, geological or biodiversity value in the borough?

Option 1	5
Option 2	6
Option 3	10
Other Option	4

The development of character based assessments and policies (Option 3) were favoured by most respondents who answered this question to protect and enhance landscape character, historic value or biodiversity.

Although some respondents supported local designations, others felt that existing international, national and regional designations were sufficient and were wary of further designations. Some supported a combination of the options.

An additional comment included ensuring greater connectivity between areas of habitat.

Question 13: Which of the options below is most appropriate approach for regulating new development in order to protect and enhance landscapes, biodiversity, habitats (including woodlands and trees), historic value and character?

Option 1	11
Option 2	6
Option 3	4
Other Option	3

On site protection (Option 1) was favoured by most respondents, followed by on site mitigation (Option 2), with many of those commenting stated that this is in line with RSS policy.

Green infrastructure plans and connectivity between habitats were also mentioned.

Question 14: What is your preferred approach to retaining features of historic value in the borough?

Option 1	11
Option 2	14
Option 3	14
Other Option	2

Combinations of the options were supported by many of the respondents who answered this question.

It was suggested by some respondents that this LDF process could be an appropriate time to review existing conservation areas in the borough, and produce character appraisals and management plans where possible.

One respondent also commented that features of historic value should also include buried archaeological remains.

Question 15: Which of the following approaches is most appropriate for managing potential development impacts on trees which are situated in Conservation Areas, or which are subject to Tree Preservation Orders?

Option 1	7
Option 2	11
Option 3	1
Other Option	0

Most respondents who answered this question supported a policy in the LDF to manage potential impacts on tress, with a more flexible policy (Option 2) receiving slightly more support than a restrictive policy (Option 1). In addition, it was suggested that any replacement trees should be semi mature trees of the same, or agreed, species.

Question 16: Which of the following approaches is most appropriate, in terms of enhancing urban design and the quality of public areas throughout the Borough?

Option 1	3
Option 2	18
Other Option	2

Most respondents who answered this question favoured a more generic design policy to take account of the local environment and setting for development (Option 2). However, there were some concerns that this approach may lead to a policy being applied inconsistently.

Some respondents identified items to include in any policy, including:

- Designing out crime
- Sustainable drainage
- Green infrastructure
- Pedestrian friendly public areas

Question 17: Which of the following approaches is most appropriate in relation to public art?

Option 1	5
Option 2	9
Option 3	3
Other Option	3

A contribution towards public art from development schemes of a defined size (Option 2) was favoured by most respondents who answered this question, although some respondents felt that a prescriptive requirement may be needed to ensure it is provided.

The additional comments generally supported provision of public art, although the exact mechanism and approach sometimes differed, with some supporting each proposal being considered on its own merits.

Question 18: Which of the following options would best improve access to our countryside to benefit local residents and visitors?

Option 1	15
Option 2	12
Option 3	9
Option 4	10
Other Option	3

There was support for all of the options provided, with improvements to gateways from urban areas receiving the greatest support (Option 1).

Some additional comments supported larger schemes for the borough, while others suggested that gradual and continuous incremental improvements can provide good benefits.

Another point that was made by a number of respondents was to consider the multiple uses and benefits that the green spaces can offer.

Question 19: Which of the following approaches do you support in terms of addressing the issue of stables and equine-related activities in the borough?

Option 1	2
Option 2	13
Other Option	1

The flexible policy approach was supported by most respondents who answered this question (Option 2).

The additional comments were from those respondents expressing concern that:

- Any such development should not be used as a mechanism to enable housing development outside village boundaries
- Such development can have an impact on biodiversity, and potential visual impact
- Any such facilities should be located close to the owner's property

Question 20: Which of the following approaches do you support in terms of addressing the potential adverse impacts arising from development on amenity?

Option 1	16
Option 2	5
Other Option	0

Most respondents who answered this question supported developing a specific policy on amenity in the LDF (Option 1). The main reason given for choosing this option is the certainty and clarity that any such policy would give.

Comments made by those who did not want to see a specific policy (Option 2) suggested that it would be too inflexible, or the issue could be covered by Development Management policies.

Question 21: Which of the following approaches is most appropriate in terms of determining proposals for the development of derelict or contaminated land?

Option 1	17
Option 2	4
Other Option	2

The majority of respondents who answered this question supported Option 1, which outlined the requirements the Council will make when considering proposals on derelict or contaminated land. It was generally agreed that controls were needed and Option 1 represented a standard approach.

Other points made were:

- To broaden out the issue to address the legacy and impacts of previous land uses (i.e. mining) to consider land instability
- Brownfield land can have significant biodiversity and geological interest of recognised local importance, which should be reflected

Question 22: Which of the following approaches is most appropriate in relation to regulating the impacts of advertisements?

Option 1	15
Option 2	1
Option 3	1
Other Option	0

Most respondents who answered this question supported a policy similar to the current Local Plan policy that differentiates between advertisements in the countryside and urban areas (Option 1).

Reasons supporting this option included:

- Impacts are different in urban and rural areas
- It can allow greater perspective to be taken of the local character of an area
- The relative success of the current policy

Sustainable Settlements

Question 23: Which of the following services do you consider to be 'essential', 'desirable' or 'not necessary' for sustainable communities/locations?

	Primary School	Health Centre/ Doctor's Surgery	Village Hall/ Community Centre	Shop	Post Office	Public House/ Hotel	Church	Public Transport to a main town
Essential	8	7	8	14	9	8	6	14
Desirable	11	12	11	6	10	10	8	6
Not Necessary	0	0	0	0	0	1	4	0
Don't Know	0	0	0	0	0	0	0	0

Most services were seen as essential or desirable for sustainable communities.

However, the services that were identified as most important by respondents who answered this question were a shop and public transport to a main town, being described as 'essential' by the greatest number of respondents.

Other services/facilities that were suggested as contributing to sustainable communities were:

- Access to parks, gardens and green spaces (including access to the coast)
- Recreation field/leisure facilities
- Footpath access

Question 24: With the increasing provision of mobile services in rural areas, together with improved electronic communications and on-line purchasing of goods, how important is the provision of services directly in villages?

Very important	12
Fairly important	9
Not very important	0
Not important at all	0

Despite the potential for mobile service provision and increasing internet availability and use all respondents who answered this question agreed that it was 'very important' or 'fairly important' that services were provided directly in villages.

Question 25: Taking into account the framework set out in the RSS, what is the most appropriate hierarchy of settlements for Copeland?

Option 1	5
Option 2	6
Option 3	13
Other Option	0

There was a spread of opinion to this question, but most respondents who answered this question favoured a settlement hierarchy that included Key Service Centres, Local Centres and Sustainable Villages (Option 3).

Comments made to support this option included:

- Allowing appropriate small scale development in villages can help support local services, especially schools
- Each community needs to be considered individually rather than adopting a blanket approach
- The current hierarchy is too restrictive
- If this approach is chosen it may be an opportunity to implement RSS policy RDF2's approach to more remote rural areas

Those favouring the present hierarchy of Key Service Centres and Local Centres, with or without a review of the Local Centres (Options 1 and 2) commented that this hierarchy currently works and provides a focus for development in the borough.

Question 26: How should we distribute development across the borough?

Option 1	13
Option 2	0
Option 3	12
Other Option	2

The most popular options chosen by respondents who answered this question were to continue with the current approach in the Local Plan (Option 1) and allocating proportions of development to settlements based on evidence such as Housing Needs Survey, infrastructure capacity, availability of sites etc. (Option 3).

The main reason given for supporting Option 1 is the flexibility that it can offer.

The main reason given for supporting Option 3 is that the evidence should ensure that the level of development is appropriate for the settlements and their settings. Other additional factors were suggested to consider, including:

- Whether the community needs the development
- Flood risk
- The character and environmental capacity of settlements to accommodate more development

Nobody who answered this question supported a pro-rata distribution based on the existing population distribution (Option 2).

Question 27: In terms of the distribution of development, which approach should the Council adopt to meet the needs of rural areas?

Option 1	3
Option 2	7
Option 3	10
Other Option	2

There was a split in opinion from the respondents who answered this question between focusing development in Key Service and Local Centres while allowing a more dispersed

settlement pattern (Option 2) and allowing a more dispersed settlement pattern generally (Option 3).

However, there was little support for a specific allocation to rural areas (Option 1).

Those who made supporting comments stated that it was important to recognise the main centres and support them to ensure economic viability in the borough, whilst enabling development to support sustainable villages.

Question 28: How should we manage the distinction between open countryside and the built environment?

Option 1	12
Option 2	5
Other Option	5

Most of the respondents who answered this question support the continued use of settlement boundaries (Option 1), stating that they provide certainty and clarity, and can prevent development 'creep'. Additional points made in relation to this approach include:

- Sustainable Villages (in expanded hierarchy in Question 25) should be included and have settlement boundaries
- Boundaries should not be so tightly drawn that they hamper development opportunities

Those who chose 'Other Option' all used settlement boundaries as a starting point. One respondent stated that the Council needs to recognise that open land (often brownfield) within settlements can have biodiversity and amenity/recreation value, and others asked for flexibility around the boundary.

Question 29: What proportion of new housing should be built on previously developed land?

Option 1	8
Option 2	6
Option 3	7

There was a split response between all the options from those respondents who answered this question, while a number of respondents commented without choosing a specific option.

The comments generally supported high proportions of development on brownfield land, with some commenting that less than 50% (Option 3) would not be in conformity with the RSS.

Two respondents asked that the biodiversity value of brownfield sites be considered, and that not all are automatically developed as they may have a biodiversity and amenity value.

Question 30: Which of the following approaches is most appropriate in terms of promoting sustainable development and design?

Option 1	15
Option 2	3
Option 3	6
Other Option	0

Most respondents who answered this question support a multi criteria based policy (Option 1) that reflect the issues outlined in paragraph 5.20 of the Issues and Options document.

A number of additional points to consider/reflect in the policy were suggested. These included:

- Safety and security
- Use of reclaimed materials
- Building biodiversity into developments

Question 31: Which of the following approaches do you support in relation to the sustainable construction of new buildings?

Option 1	15
Option 2	3
Option 3	5
Other Option	2

The majority of respondents who answered this question supported requirements above those in Building Regulations (Option 1). Reasons given to support this approach included:

- It will build expertise in the area
- It supports the agenda of the Energy Coast
- It is consistent with the Cumbria Climate Change Action Plan

Designing out crime was proposed as another factor that contributes to the sustainability of development.

Those who supported relying on Building Regulations commented that additional requirements would increase build costs and may affect the viability of schemes.

Question 32: Which target for additional new housing provision do you think the Council should aspire to?

Option 1	8
Option 2	11
Option 3	1
Other Option	2

Most respondents supported the RSS requirement of 230 per annum as a minimum, with half of all respondents who answered this question favouring the higher figure associated with the Energy Coast Masterplan (Option 2).

The additional comments made were concerned with ensuring that whatever was developed needed to reflect the housing that is required.

Question 33: What should the Council do to ensure that sufficient housing is provided to meet the targets in the RSS (and potentially 'Britain's Energy Coast') during the life of the LDF?

Option 1	5
Option 2	6
Option 3	10
Other Option	0

Most respondents who answered this question supported the most flexible option that focused on allocated sites in the LDF, but which also allowed for development opportunities within and adjacent to settlements (Option 3), with flexibility cited as the main reason for this choice.

Those supporting development only on allocated sites (Option 1) stated that this enabled proper assessment of the sites and their cumulative impact, and that maintaining a five year housing land supply should alleviate the pressure to allow development on unallocated sites.

Question 34: Which of the above criteria are the most important when selecting housing sites?

Proposed Site Selection Criteria	Mean Score
The location and accessibility of potential development sites to jobs, shops and services by modes other than by car, and the potential for improving such accessibility	3.40
The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and health services) to absorb further development, and the cost of adding further infrastructure	3.43
The physical and environmental constraints on development of land including, e.g. the level of contamination, stability and flood risk, taking into account that such risk may increase as a result of climate change	3.60
The views and aspirations of the local community	3.78
Housing needs identified in the Strategic Housing Market Assessment	4.00
The character of the individual settlement, most notably the sensitivity of its setting in landscape and natural heritage terms	4.56
The ability to build communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities	4.68
The priority to develop brownfield land in preference to greenfield sites	5.58
The availability (and priority) of previously developed sites and empty or underused buildings and their suitability for housing use	5.94

(**Note:** the lower the Mean Score, the greater support for the option)

The table shows the average scores and rankings that respondents gave each criterion. Most of the additional comments agreed that each factor needs to be considered and that their relative importance may vary from site to site.

Question 35: What approach should we take in relation to housing density in the borough?

Option 1	1
Option 2	9
Option 3	9
Other Option	2

Virtually all of the respondents who answered this question supported a flexible approach to housing density, although opinion was evenly split between adopting density requirements on a site by site basis (Option 2) and focusing on design considerations rather than density requirements (Option 3).

It was also stated that the national requirement of 30 dwellings per hectare was not required on every individual site.

The justification supporting these options was the need for flexibility and development appropriate to its location.

Question 36: What approach should we take to delivering a mix of housing in the borough?

Option 1	1
Option 2	1
Option 3	12
Option 4	5
Other Option	1

The majority of respondents who answered this question support a policy that requires a mix of housing based on an assessment of housing needs for a locality (Option 3).

A number of respondents felt that the market should decide housing provision (Option 4), while some commented that a combination of the two may be most appropriate.

Question 37: What approach should the Council take in terms of providing design guidance for housing development?

Option 1	10
Option 2	10
Other Option	0

The respondents who answered this question were split between whether the LDF should include a specific policy covering housing design standards.

Those supporting guidance stated that it would provide greater clarity and support to developers, while those against specific guidance stated that its removal would enable a move away from standard layouts and designs.

Question 38: What approach should we take to the delivery of affordable housing?

Option 1	8
Option 2	8
Option 3	5
Other Option	1

Most respondents who answered this question supported requiring affordable housing on sites of a specific size or greater (Option 1), or a tiered approach that links the affordable housing requirement for a location to evidence that shows the affordable housing need (Option 2).

Some respondents commented in support of a combination of Options 1 and 2.

Question 39: Which of the following groups of people with housing needs should the Council seek to provide housing for with occupancy conditions?

Agricultural workers	9
Key workers	4
To meet local housing need	15
To meet affordable housing need	11
Occupancy conditions should not be used in the borough	1
Other option	0

The majority of respondents who answered this question identified local housing need and affordable housing need as the main groups of people for targeting occupancy conditions.

Question 40: How to support the transformation of the borough's older housing areas?

Option 1	6
Option 2	14
Other Option	1

Most respondents who answered this question supported improvement of the existing housing stock supplemented by some new housing (Option 2), although additional comments indicated that it would depend upon the housing in question and that a combination of the options may be appropriate.

Question 41: Which of the following approaches should the Council take when considering Gypsy and Traveller Sites?

Option 1	5
Option 2	4
Option 3	9
Other Option	2

Responses were split from respondents who answered this question. Working with neighbouring authorities to meet any need (Option 3) was the most popular with almost half of respondents supporting this approach.

Those making comments suggested that a West Cumbria approach could provide greater choice for Gypsies and Travellers. It was suggested that a criteria based approach could be used to identify sites, while another respondent stated that sites should be close to essential services, amenities and employment opportunities.

However, there was concern that criteria based policies have failed to provide sites in the past and that allocations provide certainty (Option 2).

Question 42: Which of the following options is most appropriate in relation to replacement dwellings, conversions, residential extensions and alterations to buildings in the countryside?

Option 1	10
Option 2	5
Option 3	0
Option 4	3
Other Option	0

Most respondents who answered this question supported a criteria based approach relating to replacement dwellings, conversions, residential extension and alterations to buildings in the countryside (Option 1).

It was argued that this will encourage the reuse of buildings in the countryside where appropriate, but also needs to ensure landscape, heritage and biodiversity impacts are assessed within the criteria.

Question 43: Which of the following options is most appropriate in relation to replacement dwellings, conversions, residential extensions and alterations within settlement boundaries?

Option 1	8
Option 2	2
Option 3	9
Other Option	1

Most respondents who answered this question supported either a criteria based policy (Option 1) or an area based approach (Option 3) for dealing with residential extensions and alterations to buildings within settlement boundaries.

The justification for Option 1 is that it gives certainty and ensures all the issues are considered, while those supporting Option 3 stated that an area approach can enable appropriate development to suit an area.

Other issues that were highlighted for consideration were adaptations to reflect lifetime changes and safety in any alteration/extension.

Question 44: Which of the following policies from the Local Plan should be considered as separate policies within the LDF?

Conversions to multiple occupation	12
Chalets, caravans and mobile homes	11
Non-residential development in housing areas	11
Residential institutions and care homes	10
Beach bungalows	12

No additional comments were made.

Question 45: What approach should the Council take to the use of planning obligations?

Option 1	16
Option 2	1
Other Option	2

The majority of respondents who answered this question supported the negotiation of planning obligations on a case by case basis (Option 1). The reasons given for supporting this option were that it can lead to real gains and that they are directly related to development.

The justification given for standard tariffs is the certainty they can provide.

There were also some respondents favouring a combination of the two approaches, with a standard charge for strategic infrastructure and individually negotiated obligations that are site specific.

Some respondents made reference to Circulars 05/2005 and 02/2007 as relevant guidance.

Question 46: What do you think is reasonable to ask for in terms of contributions from developers for facilities or infrastructure?

Affordable housing	15
Transport networks (footpaths, cycleways, highways and parking)	19
Utilities infrastructure or connections to existing	13
Sports facilities or play space	17
Education (including pre-school, libraries, life-long learning)	2
Health services and facilities	4
Community facilities (e.g. youth centres and community halls)	8
Public realm improvements	9
Nature conservation and wildlife mitigation measures (including the coast)	13
Renewable energy or energy efficiency schemes to offset carbon emissions	8

Affordable housing (Option 1), transport networks (Option 2), and sports facilities/play space (Option 4) received the greatest support from respondents who answered this question.

Education (Option 5) and health (Option 6) received the lowest levels of support from respondents.

Other additional items that were suggested included:

- Green infrastructure
- Specific reference to the historic environment within the public realm

Question 47: Which of the following policy approaches is most appropriate in relation to large-scale infrastructure?

Option 1	14
Option 2	4
Other Option	2

A continuation of the Local Plan approach (Option 1) was supported by most respondents who answered this question, stating that they felt a local policy is more effective.

Additional comments stated that major schemes will be considered by the Infrastructure Planning Commission, and one respondent requested that power lines be placed under ground.

Question 48: What approach should the Council take to the protection of community facilities?

Option 1	7
Option 2	11
Other Option	1

Most respondents who answered this question want to see facilities protected in all locations (Option 2) to protect such facilities from development pressure.

However a number supported focusing the protection of facilities to the Key and Local Centres (Option 1) and there was a comment that facilities should be accessible by local walking, cycling and public transport networks.

Question 49: How should Copeland deal with the potential loss of land or buildings belonging to community services and facilities?

Option 1	16
Option 2	2
Other Option	0

Most respondents who answered this question agreed that community facilities should be retained for other community uses, unless there is no demand or sufficient provision (Option 1). Dual use of facilities was suggested as an option to consider in order to preserve facilities and services.

Question 50: Given the ageing population in the borough should more specific provision be made for the leisure and recreational needs of older people?

Yes	10
No	9

There was a fairly even split among respondents who answered this question over the issue of specific provision for the recreational and leisure needs of older people.

Those who supported specific provision suggested the following as examples:

- Bowling greens
- Improved transport
- Community gardens/allotments
- Extra facilities for adult education

Question 51: Should the Council prioritise funding towards the creation of new leisure/recreation/cultural facilities and open space or towards improving the quality of those that already exist?

Yes	12
No	3

Most respondents who answered this question favoured the creation of new leisure/recreation/cultural facilities and open space rather than improving the quality of the existing stock.

Question 52: How should Copeland maximise opportunities for people to improve their health and well being?

Option 1	9
Option 2	13
Option 3	18
Option 4	15
Option 5	12
Other Option	4

All options included in the Issues and Options paper were supported by the respondents who answered this question, and combinations of options were supported by a number of respondents. The most popular options were for more safe, car free routes for walking and cycling (Option 3) and retaining and increasing allotment provision (Option 4).

Specific additional points that were made included:

- Cycle track from St Bees to Whitehaven
- Ensuring open space is of good quality
- Improving contact with the natural environment
- Pavements in rural areas
- Improved layout of towns to make them more pedestrian friendly and accessible

Economic Opportunity and Regeneration

Question 53: Which of the following types of employment sites would you like to see provided in the borough?

Option 1	16
Option 2	15
Option 3	16
Option 4	15
Other Option	4

All options included in the Issues and Options paper were equally supported by the respondents who answered this question.

Additional comments supported:

- The provision of a range of sites
- Tourism employment sites, including activity ventures
- Rural workshops for small scale local enterprises
- Flexible space

Question 54: Which of the following approaches is most appropriate, in terms of locating employment sites?

Option 1	2
Option 2	8
Option 3	11
Other Option	1

Most respondents who answered this question supported the broadest spread for employment sites (Options 2 and 3), but that also reflected the settlement hierarchy.

One respondent asked that existing employment allocations also be included in the hierarchy alongside Whitehaven, Cleator Moor, Egremont and Millom.

Another respondent also commented that mineral safeguarding will need to be considered in the allocation process.

Question 55: Where existing employment sites allocated in the Local Plan are no longer fit for purpose, which of the following approaches should be taken, in terms of the de-allocation and alternative use of Employment sites in the borough?

Option 1	4
Option 2	10
Option 3	11
Option 4	4
Other Option	2

Most respondents who answered this question supported allowing mixed uses (Option 2) or reallocating for different uses (Option 3) as the most appropriate way of dealing with employment sites that are no longer fit for purpose.

Some respondents wished all sites to remain allocated as Employment land in anticipation of additional requirements emerging from the Energy Coast Masterplan.

There were also comments advocating a thorough assessment of employment land and other land use requirements (e.g. housing) to determine the best approach.

One respondent advocated a mixed use development for Leconfield Industrial Estate in Cleator Moor, while another requested that retail be regarded as an employer.

Question 56: Do you think any of the existing employment sites should be de-allocated?

Yes	1
No	12

Most respondents who answered this question did not want to see sites de-allocated (Option 2). The only respondent who did advocated a mixed use development for Leconfield Industrial Estate in Cleator Moor.

Question 57: Which of the following options do you support as actions to improve the uptake of existing employment sites?

Option 1	13
Option 2	13
Other Option	6

Most respondents who answered this question supported improved marketing (Option 1) and improving the external appearance of employment sites (Option 2) as ways to improve the uptake on these sites.

Other suggestions included:

- 'Easy in easy out' letting conditions
- Improving transport access to them
- Financial incentives to increase uptake on sites

Question 58: Which of the following approaches is most appropriate in terms of specifying the type of employment that should be located in the Westlakes Science and Technology Park?

Option 1	11
Option 2	5
Other Option	0

Most respondents who answered this question supported continuing with the Local Plan restrictions for uses on Westlakes Science and Technology Park (Option 1), stating that it

should continue as a flagship site for high value business, seek to attract inward investment and be complementary to Lillyhall.

There was a concern that relaxing this would result in it becoming another industrial estate.

Question 59: Should working from home be encouraged in the borough?

Yes	21
No	0

Every respondent who answered this question stated that home working should be supported (Option 1) as it can reduce the need to travel, especially by car, and can be sustainable. It also allows for flexibility, especially for families.

Question 60: If Yes, which of the following options do you support?

Option 1	15
Option 2	13
Other Option	1

Most respondents who answered this question supported policies that facilitate the development of live-work units (Option 1) and the development of small scale employment uses in residential areas (Option 2), although not necessarily for food production.

A number of additional things that could help home working were suggested including improving broadband and the mains connection which is prone to disruption.

Question 61: Which of the following approaches is most appropriate, in terms of managing the potential impacts of employment uses?

Option 1	18
Option 2	3
Option 3	4
Other Option	0

Most respondents who answered this question supported a criteria based policy based around the issues identified in paragraph 6.14 of the Issues and Options consultation document (Option 1).

Additional comments requested that the policy should be flexible and not overly prescriptive. Also, that the impacts of access and surface water were highlighted for inclusion in any criteria based policy.

Question 62: Which of the following approaches is most appropriate, in terms of planning for economic opportunity in the rural areas of the borough?

Option 1	13
Option 2	18
Option 3	4
Other Option	0

The most popular options with respondents who answered this question was for a policy that supports the conversion and reuse of existing buildings for employment use in rural locations (Option 2), and for the LDF to identify those villages where small scale employment sites may be appropriate (Option 1).

It was argued that these approaches could help to diversify the rural economy and support the sensitive reuse and conversion of existing buildings.

Question 63: Which of the following approaches is most appropriate in terms of assessing the potential impacts of farm diversification and related development?

Option 1	12
Option 2	2
Option 3	4
Other Option	0

Most respondents who answered this question supported a criteria based policy (Option 1), although there was also support for the Local Plan approach (Option 3) and a combination of the two.

Question 64: Do you agree that new nuclear power plant(s) should be considered as part of the mix of energy production in Copeland?

Option 1	8
Option 2	6
Option 3	2

Half of all respondents who answered this question supported locations on or adjoining existing sites (Option 1), with others suggesting other sites in Copeland should be considered if this was unsuitable (Option 2).

The comments arguing against nuclear new build stated that:

- They disputed the level of support for nuclear new build that was implied in the Issues and Options paper
- They question the Government's overall nuclear strategy and the management of the additional waste that nuclear new build will create
- Health risks for local residents should be highlighted

Question 65: What are your thoughts on the location of a nuclear repository for high level radioactive waste in the borough?

Option 1	1
Option 2	1
Option 3	12
Other Option	4

The majority of respondents who answered this question agreed that the borough should only volunteer to act as a location for a high level waste repository if and when a safety case is proven and a full and fair community benefits package has been agreed (Option 3).

Most respondents choosing Option 4 commented that no nuclear waste repository should be sited in Copeland, while another commented that Options 2 and 3 may not be tenable in the long term and may raise unrealistic expectations.

Those who made comments stated that a benefits package should be agreed and extend over the lifetime and clear up of the site.

The comments arguing against a nuclear waste repository stated that:

- They disputed the level of support for such a facility that was implied in the Issues and Options paper
- They question the Government's strategy and process for identifying a high level nuclear waste site and whether suitable technology exists for the safe storage of any waste from nuclear new build

Question 66: Which of the following approaches is most appropriate in terms of increasing the vitality and viability of local retail centres in the borough?

Option 1	15
Option 2	9
Option 3	2

Most respondents who answered this question supported the development of tailored strategies for each Key Service Centre (Option 1). Supporting comments stated that any strategies should consider:

- Designing out crime
- Encouraging local trade organisations
- A mix of uses to minimise empty retail space
- The role leisure and cultural facilities can play in creating vibrant town centres

Question 67: What specific improvements would you like to see made to the proposed Key Service Centres to support their function as retail/service centres?

Improvement	Town			
	Whitehaven	Cleator Moor	Egremont	Millom
Improvements to public realm (seating, lighting, litter bins etc.)	11	10	9	8
Car parking	12	8	8	6
Improvements to footpaths/cycle ways	9	7	7	6
Retention and restoration of traditional shop fronts and good design of new shopfronts	12	10	10	8
Public toilets	12	11	10	8
Other (please specify)	5	4	4	4

All of the identified improvements were supported by respondents who answered this question, with all improvements receiving a similar level of support. In addition there was support for each community retaining its own identity.

The 'Other options' that were suggested included high quality planting, car parking (especially disabled parking) and improved access to public transport.

One respondent also suggested that Whitehaven should have more traffic free space and better pedestrian connection to the harbour.

Question 68: Which of the following actions identified in *A Sea Change: Whitehaven Town Centre Development Framework* should be promoted / provided for in the Core Strategy?

Potential actions to revitalise Whitehaven	Mean Score
Improve the integration of new and existing development into the urban grain and to set higher standards of architectural and landscape design for all town centre development.	2.00
Improve links and re-establish connectivity between the town centre and the harbour.	3.56
Identify priority zones for investment that will help to strengthen leisure and retail activity in the town.	3.80
Enhance key 'gateway' sites and approaches to the town centre.	4.13
Improve the integration and prestige of public transport services in the town centre.	4.24
Create a series of new and improved public spaces as focal points for activity and to establish stronger visual links between the town centre and harbour.	4.38
Diversify the range of residential accommodation in the town centre and provide opportunities for high quality contemporary urban living.	4.44

(**Note:** the lower the Mean Score, the greater support for the option)

Additional comments suggested:

- Producing a development strategy for the town to bring all reports together in a coherent form
- Improving the relationship between the town centre and harbour
- Avoiding fast food outlets and funeral parlours on major entrances to the town
- Ensuring a balanced evening and night time economy to extend the vibrancy of the town

Question 69: Should the Council concentrate on facilitating the development of key development opportunity sites in Whitehaven, for example gateway sites to the town and sites which connect the harbour to the town, as a priority?

Option 1	4
Option 2	12
Other Option	2

The majority of respondents who answered this question supported focusing on key opportunity sites in Whitehaven, whilst allowing the development of other brownfield sites (Option 2). Reasons supporting this were that it will make greater use of the harbour, help improve the conservation area and the sites will generally be accessible.

Question 70: If Yes, which of the following options do you prefer in terms of use/type of development on the sites?

Option 1	3
Option 2	3
Option 3	9
Other Option	0

Most respondents who answered this question supported a flexible approach to the types of use based around the existing studies by Broadway Malyan/Paul Butler Associates (Option 3).

The additional comments stated that any alternative proposals will need to be appropriate to their particular context.

Question 71: What is the most appropriate approach regarding primary shopping frontages/areas to maintain vibrant towns in Copeland?

Option 1	7
Option 2	7
Option 3	1
Other Option	1

Most respondents who answered this question agreed that a local policy was required, but were split as to the most appropriate form the local policy should take (Options 1 and 2).

One respondent supporting Option 1 requested that any limits/restrictions should not include residential use on upper floors. Another suggested that an overall strategy for Whitehaven should be developed to inform any policy.

Question 72: Which of the following policy approaches is most appropriate in relation to entertainment and the evening and night-time economy?

Option 1	7
Option 2	9
Option 3	2
Other Option	0

Most respondents who answered this question agreed that a local policy was required, but were split as to the most appropriate form the local policy should take (Options 1 and 2).

Additional comments stated that the evening and night time economy is needed, but should be properly controlled. Additional suggestions included:

- An offer of support from Cumbria Constabulary in developing enforceable conditions

- A need for a close working relationship between planning and licensing
- Policing and clean up costs to be reflected in charges to relevant businesses

Question 73: What approach should the Council take in order to support future proposals for sustainable tourism development in the borough?

Option 1	9
Option 2	5
Option 3	5
Other Option	0

There was a fairly mixed response from respondents who answered this question, with just under half favouring the Local Plan approach (Option 1). Additional comments, which came from those supporting Option 3, included:

- Taking account of the recommendations in the Cumbria West Coast Tourism Study
- Working closely with Parish Councils and the Lake District National Park Authority
- Including Ennerdale via Cleator and Ehenside Tourism Opportunity Sites if Option 3 is chosen

Question 74: Which of the following approaches do you support in relation to tourism accommodation, facilities and attractions in the borough?

Option 1	13
Option 2	2
Option 3	3
Option 4	2
Other Option	0

Most respondents who answered this question supported a criteria approach to cover all types of tourism proposals (Option 1).

One respondent called for new tourism development to be directed to Key Service Centres where possible to broaden their role, and that it should assist the diversification of existing businesses in rural areas. Another wanted to be sure that sustainable tourism developments in rural areas are not discouraged by the final policy approach.

Question 75: Which of the following options do you support in terms of improving the quality of tourism accommodation in the borough?

Option 1	7
Option 2	7
Other Option	1

There was a fairly split response between respondents who answered this question, with some suggesting a combination of the two options would be appropriate.

One respondent commented that Whitehaven lacked a good quality waterfront/central hotel, while some respondents supporting Option 1 wanted it to allow high quality serviced accommodation in other locations and not just Whitehaven.

Accessibility and Transport

Question 76: Do you agree that these are the key transport issues facing Copeland?

Yes	15
No	2

Most respondents agreed with the list of the key transport issues identified in paragraph 7.4. Specific comments were then made in favour of:

- An inter-modal transport interchange at Whitehaven
- The need for improvements to the road network to link with the M6 at junction 40 and to the south of the borough (and Barrow)
- Improvements to and increased use of the railway
- Ensuring accessibility of future development to reduce the need to travel, particularly by car

However, a couple of respondents were reluctant to support physical improvements at this time.

Question 77: Which of the priorities for investment should be promoted / provided for in the Core Strategy?

Transport Improvement	Mean Score
Strategic road improvements including: A595 junction improvements A5086 improvements to provide journey time savings Selective improvements to the A66	2.41
Timetable connectivity improvements from West Cumbria to the West Coast Mainline	2.83
Improve basic public transport services, including a new interchange	3.11
Continue port and marina development at Whitehaven	4.44
Improvement in rolling stock, station and other railway infrastructure	4.78
Improve routes and facilities for walking and cycling	4.16
Explore feasibility of an airfield in West Cumbria and links to Carlisle airport	5.56

(**Note:** the lower the Mean Score, the greater support for the option)

The transport improvements that received the greatest support from respondents focused around improvements to the strategic road network and improved public transport, including a new interchange, to improve links to/from and within the borough.

Comments generally supported improving public transport, walking and cycling in the borough, but also a need to improve the quality of roads.

Question 78: Do you think that there are other, higher priorities for transport investment than those listed (e.g. improving traffic management and transport environments in town centres)?

Yes	7
No	6

Several other transport priorities were suggested by respondents, including:

- Improved traffic management
- Laybys for buses on the A595
- Improved access to health facilities (e.g. West Cumberland Hospital), possibly via a shuttle bus from the town
- Ferry service to the Isle of Man
- Parking facilities in Cleator Moor, Frizington, Arlecdon, Keekle, Hensingham
- Dual carriageway south to the M6
- Nuclear new build to fund and necessary new roads, better public transport and rail if it were to be developed in Copeland

Question 79: Do you think the standard of broadband provision available in Copeland now is acceptable, or would you expect better quality to be provided?

Yes	3
No	10

Most of the respondents who answered this question stated that they expect better quality broadband than is currently provided, especially in the rural areas.

Question 80: Would you be prepared to pay for next generation broadband provision?

Yes	12
No	1

Most of the respondents who answered this question would be prepared to pay for better provision.

Question 81: Which of the following approaches is most appropriate in relation to telecommunications in the LDF?

Option 1	14
Option 2	0
Option 3	1
Other Option	0

Most of the respondents who answered this question support the existing policy in the Copeland Local Plan, which they believe to be in conformity with PPG8 and Structure Plan policy T33.

Question 82: What specific measures should be taken to encourage use of public transport, walking and cycling and how can the Core Strategy help address these?

Option 1	11
Option 2	8
Option 3	12
Option 4	6
Other Option	3

Most respondents who answered this question favoured measures which would focus transport improvements in Whitehaven with linkages to the other towns in the borough (Option 1) and require key employers to produce travel plans to reduce car usage (Option 3).

There was some support to require developers to pay a contribution towards public transport, walking and cycling improvements for all new housing developments, although it was recognised that it may impact on viability of developments.

The comments made generally supported a combination of the options.

Question 83: Which of the following approaches is most appropriate in terms of dealing with the provision of car parking?

Option 1	10
Option 2	8
Option 3	0
Other Option	0

Most respondents who answered this question favoured adopting the parking standards set out in the RSS (Option 1), followed by a local approach based on the standards in the RSS to ensure they are relevant for Copeland (Option 2).

It was also commented that parking standards would need to take account of the emerging RSS Partial Review.

Question 84: Which of the following approaches is most appropriate in terms of assessing the requirement for Travel Plans and Transport Assessments?

Option 1	11
Option 2	3
Other Option	5

The requirements in Structure Plan policies T30 and T31 (Option 1) was favoured by most respondents who answered this question.

Question 85: Which of the following harbour-related industries would you like to see promoted in Whitehaven harbour?

Fishing	13
Cruise liners	8
Movement of freight	4
Marine repairs/ship building	12
Other	3

The options that gained the most support from respondents were fishing and marine repairs/boat building. Reasons given to support options generally focused on providing leisure, recreation and tourism based facilities that enhance the character of the harbour

The 'other' options proposed were:

- More family facilities and better co-ordination of activities
- Water sports centre
- Ferry service to the Isle of Man

Question 86: Do you have any additional comments you would like to make including any comments on the Sustainability Appraisal Scoping Report or the Habitat Regulations Evidence Gathering Report?

Three respondents made detailed comments regarding the Sustainability Appraisal Scoping Report.

These will be taken into account as the Sustainability Appraisal of the Local Development Framework is undertaken.

Appendix 1 – List of Respondents

4NW

Age Concern Northwest Cumbria

Allerdale Borough Council

CGP

Cleator Moor and District Chamber of Trade

Commission for Architecture and the Built Environment

Copeland Borough Councillor (x2)

Cumbria Constabulary

Cumbria County Council

Cumbria County Councillor

Cumbria Tourism

Cumbria Wildlife Trust

Egremont Estate

Egremont Town Council

English Heritage

Ennerdale and Kinniside Parish Council

Environment Agency

Friends, Families and Travellers

Gosforth Parish Council

H F T Gough & Co

Highways Agency

Lamplugh Parish Council

Local resident (x2)

Ministry of Justice National Offender Management Service

Mobile Operators Association

Moresby Parish Council

National Offender Management Service

Natural England

North West Development Agency

Regen NE Copeland

RSPB Northern England Region

Sainsbury's Supermarkets Ltd

St Bees Parish Council

Story Group

Taylor & Hardy Ltd

Tesco Stores Limited

The Coal Authority

The National Trust

The Theatres Trust

United Utilities Water plc

W Cumbria & N Lakes Friends of the Earth

Warner Estates (Space Northwest)

4NW

Appendix 2 – New Site Proposals

The following list provides an indication of the new sites that have been proposed in response to the Issues and Options Call for Sites.

They will now be assessed alongside the other sites that have been proposed in the Strategic Housing Land Availability Assessment.

CS34	Cleator Mills	Cleator
CS35	Rowrah Hall Garage	Rowrah
CS36	Former railway	Bigrigg
CS37	Adj Bay Vista	Whitehaven
CS38	Adj Sun Inn	Arlecdon
CS39	South Park	Frizington
CS40	Adj Bay Vista	Whitehaven
CS41	Adj Rannerdale Drive	Whitehaven
CS42	East of Bay Vista	Whitehaven
CS43	North East Bay Vista	Whitehaven
CS44	Elizabeth Crescent	Whitehaven
CS45	Alder Close	Whitehaven
CS46	Rosemary Close	Whitehaven
CS47	Round Close Farm	Moresby Parks
CS48	Brisco Bank farm	Parton
CS49	Brisco Bank	Quality Corner
CS50	Adj Cricket Club	Haverigg
CS51	Adj Boundary Lane	Millom
CS52	Wray Head	Drigg
CS53	Castle View	Distington
CS54	Adj Daleview Gardens	Egremont
CS55	Gulley Flatts East	Egremont
CS56	Gulley Flatts West	Egremont
CS57	Rear Clarack House	Moor Row
CS58	Adj Sandholes	Egremont
CS59	Industrial Estate	Frizington
CS60	Industrial Estate	Whitehaven