

Copeland LDF - Submission

EXECUTIVE MEMBER: Councillor George Clements

LEAD OFFICER: John Groves

REPORT AUTHOR: Chris Bamber

PURPOSE OF REPORT: To consider the following:

1. The content of representations received after the Core Strategy was published in May 2012.
2. The next steps before submission to the Secretary of State.
3. Proposed minor changes to the document

RECOMMENDATION: That the Working Party note the report and approve the submission of the Core Strategy and Development Management Policies document, with suggested minor changes, to the Secretary of State

1.0 RESULTS OF THE CONSULTATION ON PUBLICATION OF THE PRE-SUBMISSION DRAFT OF THE CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES

- 1.1 As Members will recall, the Core Strategy and Development Management Policies DPD was published on May 31 for a six week consultation period. The responses have now been analysed and the submission documents are on course to be ready to be sent to the Secretary of State (in fact, to the Planning Inspectorate) on the scheduled date of October 31.
- 1.2 The published DPD is the version which will be submitted to the Secretary of the State for examination. At this stage only the Inspector, not the Council, can change the document. However, the Council can suggest minor changes where objections or other representations have suggested valid improvements. It is not permissible for changes to be made at this stage which make significant alterations to the plan; any such change would require further

public consultation, therefore causing considerable delay and some additional expense. The Planning Policy team propose to submit, in the schedule, 35 suggested changes.

- 1.3 The Proposed Minor Changes schedule and the Statement of Consultation are appended. A 'tracked change' version of the DPD, showing the proposed minor changes, will be available as a background document on Sharepoint. This text has not been circulated as it is substantially the same as the published document; the key proposed changes are described below. The Planning Policy team has also conducted a 'soundness self-assessment' based on templates supplied by the Planning Advisory Service. This will be discussed with the Inspectorate shortly, and is also available as a background document.

2.0 THE REPRESENTATIONS AND PROPOSED CHANGES

- 2.1 148 representations were made by 32 organisations and individuals. 35 of these were supporting the plan, and 55 comments suggesting improvements (such as textual errors or omissions). Thus only 58 were objections questioning the soundness of the plan. Of these, 29 were from Parish Councils and refer to matters of detail which are unlikely to jeopardise the plan at examination. In particular, we have explained to Millom Without Parish Council that their concerns (which are based on the plan not having enough detail) can most appropriately be met by incorporating them in their proposed Neighbourhood Plan, with which the Parish Council appears to be content.
- 2.2 By way of comparison, other Core Strategies submitted by second tier districts in recent months have generated between 400 and 2000 objections, with up to 300 changes being submitted to Inspectors.
- 2.3 The main content of the representations, and the Planning Policy team's intended responses, are in Appendix 3 of the Statement of Consultation (this is a bulky document; its content is laid down by regulation). About 80 changes have been suggested, and about a third of those have been accepted in whole or in part, another third rejected as being contrary to what has emerged during production of the plan and previous consultations, with the remainder being considered unnecessary (including the comments of Millom Without, who will have the support and advice of the Planning Policy team as they express their concerns in their own plan).
- 2.4 The Planning Policy team has identified three main objections which it would be wise to meet, as follows.
- 2.5 Firstly, there is a series of objections, mostly from Sainsbury's but also from wind power generators, that the plan is not compliant with the National Planning Policy Framework and does not support growth. We do not agree with this, but Inspector reports from other districts indicate that the Inspectorate is insisting that authorities explicitly refer to NPPF requirements that there is a 'presumption in favour of development' and that applications consistent with the plan will be approved. Thus insertions are proposed which will deal with that.

- 2.6 Sainsbury's have also objected, with respect to out-of-centre retail applications, that the plan does not have arrangements and floorspace size thresholds for impact assessments. The council's longstanding practice has been to use the 'sequential test' and thresholds for impact assessment as laid down in national policy, and it is proposed to insert text making that explicit.
- 2.7 Finally, wind power generators have suggested that the policy on renewable energy generation is too negative and thus contravenes national policy. We propose to address this by changing the wording of policy DM2 from 'Proposals ... must satisfy the following criteria' to 'Renewable energy development will be encouraged and planning permission granted where ...'. This wording is more in keeping with the strategic policy ER2. Most importantly, we do not propose to change the policy criteria themselves. In other words, our position at examination will be that we accept that national policy towards wind farms is positive, and we are willing to support that, subject to proper consideration of the environment of this scenically sensitive area.
- 2.8 A list of the proposed changes, as it will be submitted, can be found at Appendix 2.

3.0 NEXT STEPS – SUBMISSION AND EXAMINATION

- 3.1 The Local Development Scheme (the project plan for the Local Development Framework) sets the scheduled submission date as October 2012, and we expect to be able to submit the plan on October 31. The Planning Inspectorate has been informed of this, and it is understood that an Inspector has been earmarked for the Public Examination to start then, with a public hearing, if needed, probably in February 2013.
- 3.2 The plan will be submitted along with the Sustainability Appraisal (which was complete before publication), the Statement of Consultation and a selection of key supporting documents – notably the Strategy for Infrastructure, Topic Papers on such subjects as housing and employment land, and the West Cumbria Economic Blueprint. (Supporting documents are accessible on the Local Development Framework Evidence Base page on the Council web site.) The suggested minor changes, and 'tracked change' text incorporating them, will also be submitted.
- 3.3 Assuming that the plan is found to be sound, and that the Inspector is able to stick to the standard timetable, a report should be received about May 2013, enabling the Council to adopt the plan soon after that.

APPENDICES

- Appendix 1 Statement of Consultation
- Appendix 2 Schedule of Proposed Minor Changes

BACKGROUND PAPERS

'Tracked change' text of Core Strategy and development Policies, to accompany the submitted document.

Core Strategy and development Management Policies Soundness Assessment

Available on Sharepoint or from the Planning Policy team.



Proud of our past. Energised for our future.

Copeland

Local Development Framework

Core Strategy and Development Management Policies

Statement of Consultation - Submission

October 2012

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The consultation and involvement process

The Statement of Community Involvement

This was adopted in January 2008, and revised in September of that year to incorporate procedural changes brought in by the 2008 Planning Act.

Although the 2008 Act did away with the 'Issues and Options' and 'Preferred Options' terminology, the former stage had already been set in motion, and it has been considered logical to present the subsequent (2010) consultation as a 'preferred option'.

The SCI sets out a range of consultation and involvement possibilities. In keeping with a strategic document, consultation, especially in the later stages, has focused on the methods which the SCI sets out as standard (advertisement of published documents, use of the Council's web site, and local mass media), along with targeted locality-based meetings – either to invited stakeholder audiences or public 'drop in' sessions. The SCI is available on the Ldf section of the Council's web site www.copeland.gov.uk/ldf, and its Executive Summary is at Annex 7 (page).

Early engagement

'Stakeholder Launch' events were held in November 2008, one for stakeholders in the Borough and another for external invitees. This set the agenda for further work; the framework of identified issues is set out in an Appendix to the report of the 'Issues and Options' stage (page 18).

The Issues and Options stage

This stage of consultation took place in May to July 2008 and the report of the process is at Annex 6 (page). The consultation report from that stage, and the summary of responses, are on the LDF pages of the Council's web site.

Policy options set out at that stage were set out with reference to national and regional planning policy, and the circumstances of the Borough. The general policy approach was carried forward from that already expressed in the adopted Local Plan, which at that stage was only two years old. In general there was support for this, although opinion was more split with reference to how development should be distributed between Copeland's settlements.

Preferred Options document consultation

The 'Preferred Options' document was published in May 2010 for consultation in May to July of that year.

Alongside publicity in accordance with the Statement of Community Involvement, public meetings were held in Cleator Moor, Egremont, Millom, Seascale and Whitehaven. The report of that stage of consultation is at Annex 5 (page).

In total 467 representations, were received from 77 respondents. Only 60 of these were expressed as objections. About half of the objections have either been

accepted, with the plan modified, or have been met (in the Council's opinion) by clarificatory comment. Others will be addressed in the site allocation process. A few (mostly relating to the nuclear power station proposals) have been overtaken by events or by the introduction of the major infrastructure planning process. Only nine have not been accepted.

In addition, over 300 comments were made suggesting amendments. Most of these were made by statutory consultees and by the County Council. The Borough Council has endeavoured to take these suggestions on board and has met, or at least corresponded with, those bodies to agree common positions wherever possible. In total 201 comments have been met, at least in part, by amendments incorporated in the final draft, while 187 were either not accepted or had been superseded by events or by other changes made.

Main issues

The main area of debate remains around the strategic distribution of development between settlements. The Council remains convinced that it is desirable in the cause of regeneration, and inherently more sustainable, to focus the bulk of development in the four towns. Whilst there is disagreement, there is also broad support for this approach; in response to comments there have been amendments and clarifications to strategic policies, particularly with reference to rural settlement viability and sustainability. The question is looked at in detail in topic papers on housing and employment land.

Other key areas of concern relate to nuclear-related development and wind energy. In these instances, policy has to conform to national policy, and in the former case must defer to National Policy Statements and the role of the Major Infrastructure planning process.

A full summary of the representations made at that stage, and the Council's responses, is at Annex 4 (page).

Publication ('pre-submission draft')

The Core Strategy and Development Management Policies document was published in its final draft form in May 2012, with the consultation period running to mid-July. The number of representation received totalled 148, from 33 representors. The representors included 2 individual members of the public, 11 business (including trade organisations), 12 general consultees (including statutory undertakers), 2 local authorities and 6 parish and town councils.

The representations comprise

- 35 supporting
- 55 comments suggesting changes
- 58 objections citing issues of soundness.

The representations are summarised, with the Council's response, at Annex 3 (page 3).

Main issues

Of the objections thirty came from Parish Councils. The majority of these are points of detail which can be clarified by factual amendments, or picked up via neighbourhood planning.

The main issues of principle arising from objections are

- whether the plan supports the NPPF presumption in favour of sustainable development;
- the lack of a policy concerning out-of-centre retail development;
- failure to be sufficiently supportive of development enhancing the vitality of rural settlements;
- whether the plan is unduly negative towards wind turbines.

Some of these objections are in effect asking that the plan repeat national policy; the Council will propose minor changes which make it explicit that the policies concerned are supportive of national policy or that, where they are silent, decisions will be made according to national policy. Where wording has been interpreted as negative, this is generally not intended and minor changes will be proposed to deal with that.

ANNEX 1

CONSOLIDATED LIST OF REPRESENTORS

The responses are listed in the database by respondent ID, as follows. In Annexes 3 and 4, responses are listed by policy theme as far as possible.

Respondent ID number	Organisation	Issues and Options rep. nos.	Preferred Options rep. nos.	Reg. 20 rep. nos
01	Ministry of Justice	I01		
02	National Offender Management Service	I02		
03	CABE	I03		
04	Friends, Families and Travellers	I04	P001	
05	Cllr John Jackson	I05		
06	St Bees Parish Council	I06		
07	The Coal Authority	I07	P002-P006	
08	Cumbria Tourism	I08	P007-P015, P430-P431	S126
09	Regen NE Copeland	I09	P372-P389	
10	Mobile Operators Association	I10		S101
11	NWDA	I11	P016-P030	
12	Cumbria Constabulary	I12		
13	Environment Agency	I13	P355-P370, P425	S059
14	Moresby Parish Council	I14	P250-P254	
15	Age Concern North West Cumbria	I15		
16	Allerdale Borough Council	I16	P263-P265	S060-S066
17	Mr & Mrs Martin (through Gough's Solicitors)	I17		
18	Cllr M A McVeigh	I18		
19	Taylor & Hardy Ltd	I19	P352-P354	
20	Natural England	I20	P435-P452	S056
21	Tesco Stores Ltd	I21		S057-S058
22	Ennerdale and Kinniside Parish Council	I22		S077
23	Egremont Town Council	I23		S125
24	CGP	I24		
25	English Heritage	I25	P031-P050	
26	Highways Agency	I26	P051-P073	
27	Mr R Mullholland	I27	P394-P412	S087-S09
28	Cleator Moor & District Chamber of Trade and Commerce	I28		S080-S086
29	Theatres Trust	I29	P074-P078	S100

Respondent ID number	Organisation	Issues and Options rep. nos.	Preferred Options rep. nos.	Reg. 20 rep. nos
30	Warner Estates (Space North West)	I30		
31	4NW	I31	P079 -P095	
32	Cumbria Wildlife Trust	I32	P096-P115	
33	RSPB	I33	P266	
34	United Utilities	I34	P371	S095-S099
35	Egremont Estate (through Smiths Gore)	I35		
36	Millom Without Parish Council			S102-S122
37	Sainsbury's Supermarkets Ltd	I37		S030-S037
38	Cumbria County Council	I38	P189-P247	S139-S148
39	The National Trust	I39	P315-P351	S010-S029
40	Story Group	I40	P116-P120	
41	CLlr W Skillicorn	I41		
42	Lamplugh Parish Council	I42		
43	Gosforth Parish Council	I43		
44	Dr Clive Narrainen	I44		S002
45	Sport England		P121-P141	S051-S053
46	GONW		P142-P154, P428-P429, P433	
47	Mr G Garrett		P155-P156, P426-P427	
48	Ponsonby Parish Council		P157-P158	
49	Rhodia UK Ltd		P159-P162	
50	Mr A Millie		P163	
51	Sellafield Ltd		P164-P168	
52	Mr Powe		P169	
53	Lorna and Mark Ritchie		P170	
54	Mark Sarrington		P171-P172	
55	Mr D Jordan		P173	
56	Mr Kevin Jordan		P174	
57	Elaine Jordan		P175	
58	Applied Management		P176	
59	Paul Skelton		P177	
60	R L Barlow		P178	
61	Port Millom		P179	
62	Invest in Cumbria		P180	S087
63	Mr R Curwen		P181-187	
64	CLlr D Wilson		P189	
65	Haile and Wilton Parish Council			S001
66	Friends of the Lake District		P248-P249	

Respondent ID number	Organisation	Issues and Options rep. nos.	Preferred Options rep. nos.	Reg. 20 rep. nos
67	Parton Parish Council		P255-P260	
68	Howgate Distington Partnership		P261	
69	F J McLean		P262	
70	RWE npower		P267-P283	
71	Cleator Moor Town Council		P284-P293	
72	Cllr J Hully		P294-P304	
73	Leconfield Estate		P305-P314, P434	S067-S076
74	West Cumbria Land LLP		P390-P393	
75	Copeland Flood and Coastal Defence Engineer		P413-P419	S123
76	Bob Riley		P420-P424	
77	Ramblers Association		P432	
78	Renewable UK			S003-S009
79	REG Windpower			S038-S048
80	NuGeneration Limited			S049-S050
81	Northumbria Healthcare NHS Foundation Trust/North Cumbria University Hospitals NHS Trust.			S054
82	The Woodland Trust			S055
83	Harwood Real Estate (through R Metcalfe, MJN Associates)			S078
84	Whicham Parish Council			S079
85	Banks Group			S124
86	National Grid			S129
87	Marine Management Organisation			S130
88	Seascale Parish Council			S131-138

Text to be added

.

ANNEX 3

REPRESENTATIONS MADE ON PUBLICATION (Regulation 20)

GENERAL OR OVERARCHING COMMENTS

Respondent ID	37
Response ID	S033
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	All policies
Paragraph	
Theme	All sections
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	<p>The Core Strategy appears to have been affected by the timing of the NPPF with many of the policies still referring to PPSs and the NPPF merely mentioned in the form of bullet points. More importantly, we do not consider the policies have been thoroughly reviewed and revised to reflect the guidance set out in the NPPF. Many of the policies (specific references are made below) are overly restrictive. They do not incorporate sufficient flexibility and do not encourage or support economic growth. As such, consider the document to be unsound.</p>
Changes?	<p>Our client recommends a thorough review of ALL policies, specifically those relating to retail and employment land, is carried out to ensure that they fully reflect the NPPF by ensuring that a pro-development approach is integrated into the Core Strategy and Development Management Policies and that the presumption in favour of sustainable development runs through the whole of the Core Strategy. Any reference to PPSs and the guidance within them should be removed and the policies revised.</p>
Council's response	<p>We are grateful to the representor for finding PPS-related references (three in all) which we had missed. These will be deleted. References in the 'boxes' following policies are intended to indicate the genesis of those policies and PPSs are referred to because they were in force at the time. The references to NPPF paragraphs demonstrate that the plan was indeed reviewed to assess its consistency with the Framework. We do not accept that the plan is insufficiently flexible or overly restrictive. The suggestion that it does not support growth is risible - the Council is eager to encourage growth, which is badly needed, and the plan clearly reflects that.</p>

Respondent ID	79
Response ID	S038

Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	Various
Paragraph	
Theme	General
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	<p>The Core Strategy currently does not include the model policy wording issued by the Planning Inspectorate accounting for the local application of the 'presumption in favour of sustainable development' at Paragraph 15 of the NPPF.</p> <p>The Draft Copeland Core Strategy adopts a largely positive stance on renewable energy, which is supportive of the direction of national guidance in the NPPF and associated National Policy Statements for Energy and Renewable Energy (EN-1 and EN-3, respectively). Paragraph 182 of the NPPF is clear that in order for Local Plans to be found to be sound, they should be consistent with policies of the NPPF and positively prepared, whereby they are based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. Key policies within the NPPF of relevance to the soundness of Local Plans from a renewable energy perspective include paragraph 93, which confirms that planning can play a key role in securing radical reductions in greenhouse gas emissions and supporting the delivery of renewable and low carbon energy and associated infrastructure. It states: "This is central to the economic, social and environmental dimensions of sustainable development."</p> <p>Further, Paragraph 97 advises that local authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources and they should have a positive strategy in place to promote energy from renewable or and low carbon sources.</p>
Changes?	<p>In order for the Core Strategy to be sound, the model wording below should be included:</p> <p>Insertion of this model wording will ensure that the presumption in favour of sustainable development is embodied in the Core Strategy. This effectively means applications for development can be fully determined in accordance with the development plan, removing the need to refer to the principle in the NPPF.</p>
Council's response	Accepted in part. The Planning Inspectorate has not issued a model policy but recommends that its model wording is one way of making a plan compliant with the presumption. See references elsewhere to a minor change incorporating a suitable form of words in supporting text to policy ST1, which in itself reflects the presumption.

Respondent ID	84
Response ID	S079

Organisation	Whicham Parish Council
Policy	All
Paragraph	
Theme	All
Sound?	
Unsound grounds	
Comments	<p>Whicham Parish Council have briefly considered this consultation document but in view of the size and complexity of the Pre submission draft and the supporting/background documents do not feel able to form at this stage an expression of support or objection. Perhaps the one proposal it would make is that the framework provides for the content of local Parish Plans to be given appropriate weight as regards Parish matters including planning.</p> <p>The Council would wish to be kept informed of developments.</p>
Changes?	
Council's response	<p>Comment noted. Parish Plans are given some weight in development management decision making, and the Parish is at liberty if it wishes to give its policies statutory weight by producing a Neighbourhood Plan, and using this plan's evidence base to assist in doing so.</p>
Respondent ID	23
Response ID	S125
Organisation	Egremont Town Council
Policy	All
Paragraph	All
Theme	All
Sound?	Yes
Unsound grounds	
Comments	<p>Egremont Tiown Council has discussed the above pre-submission draft and Councillors think it is an excellent piece of work. Members have noted that the general principle for sustainable development and await with interest the site allocation document to follow.</p>
Council's response	Support noted.
Respondent ID	80
Response ID	S050
Organisation	NuGeneration Limited
Policy	

Paragraph	Evidence Base
Theme	Evidence Base
Sound?	Yes
Unsound grounds	
Comments	<p>The Core Strategy provides a strategic framework and the policy context for development management decisions, and has had regard to the evidence base that ought to precede its production. These evidence base documents support the Core Strategy and will accompany the Submission Core Strategy when it is submitted to the Secretary of State for the purposes of Public Examination. We consider further clarification is needed regarding a number of documents that form the evidence base and we would wish to see their full alignment with the content of the Core Strategy and DPD policies.</p>
Changes?	<p>It would be helpful to have further clarification regarding the background documents forming the evidence base to the Core Strategy. These include, in particular, the extent of consultation on the Infrastructure Deficit Plan, Infrastructure Strategy and Nuclear Topic Paper and the status and extent of consultation on the Strategic Housing Land Availability Assessment. With regards to the Strategic Housing Land Availability Assessment, this is currently listed in the LDF Evidence Base. However, there is no report available to view as part of the public consultation. We are interested to understand whether any of these documents classed as evidence base are likely to change further, or be updated, and if so when that is anticipated and we would wish to be included in any discussions or consultations. We would wish to see, for the purposes of consistency and a sound evidence base, the full alignment of these documents with the content of the Core Strategy and DPD policies, for example by clarifying that infrastructure improvement needs that are identified (in particular to the transport network) will be delivered in connection with a need caused by the project, or a need to mitigate the impact of the project.</p>
Council's response	<p>No change needed. Evidence base documents are now on the Council's web site and will be available in the Examination library. A report summarising the final SHLAA output is now available and the SPD on developer contributions will give more detailed clarification on the role of infrastructure funding - which is in any case a matter to be considered separately, as far as Nugen's activity is concerned, when the Development Consent Order is submitted. This has been discussed with Nugen and common ground reached.</p>
Respondent ID	20
Response ID	S056
Organisation	Natural England
Policy	All
Paragraph	
Theme	All

Sound?	Yes
Unsound grounds	
Comments	<p>Thank you for consulting us on the above which was received by Natural England on 31 May 2012. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. As we stated in our letter dated 3 April 2012, reference 47577 we are pleased that our comments at the Preferred Options stage have been comprehensively reported and specifically addressed in the council's responses, resulting in a number of helpful changes and improvements in the wording of the Core Strategy and Development Management Policies.</p>
Council's response	Support noted.
Respondent ID	87
Response ID	S130
Organisation	Marine Management Organisation
Policy	None
Paragraph	None
Theme	None
Unsound grounds	
Comments	<p>Thank you for inviting the MMO to comment on the Copeland Local Development Framework proposed Core Strategy and Development Management Policies Submission Document. The MMO is not in a position to comment on the overall soundness of the document at this stage. The MMO would welcome the opportunity to engage at an earlier stage in any future plan documents. If you would like any further information on the work of the MMO please visit our website www.marinemanagement.org.uk or get in touch via stakeholder@marinemanagement.org.uk</p>
Changes?	
Council's response	<p>Comment noted. The MMO was not founded early enough to participate in front-loaded debate, but will be involved at all stages in future.</p>

CHAPTERS 1 AND 2 - INTRODUCTION AND SPATIAL PORTRAIT

Respondent ID	80
Response ID	S049
Organisation	NuGeneration Limited
Policy	
Paragraph	1.5.1
Theme	The Approach to NSIPs
Sound?	Yes
Unsound grounds	
Comments	<p>The Core Strategy and Development Management Policies DPD are sound subject to the final wording and the clarifications sought. We welcome the inclusion of the description of the regime for dealing with Nationally Significant Infrastructure Projects (NSIPs) by applying for consent for a Development Consent Order (DCO), on page 6 of the Core Strategy "The Approach to Nationally Significant Infrastructure Projects". Overall we support your general approach on page 6 of the Core Strategy which we would summarise as follows: - National Policy Statements (NPSs) set out planning policy for NSIPs - NPSs are not part of the statutory development plan: however, the Borough Council must have regard to them in preparing the Core Strategy and other documents in the Local Development Framework. - NSIPs are subject to a separate planning process within the national planning regime. - The Core Strategy does not have policy status for NSIP decision making which is made by the Secretary of State.- The Council will be an important statutory consultee when the DCO application is made. - The Council will prepare a Local Impact Report, which the Secretary of State must have regard to.- The Core Strategy, along with other relevant evidence and considerations will inform the Local Impact Report and any other representations the Council makes to the Secretary of State. - The Council will also seek a Statement of Common Ground with the developer before the submission of the DCO. - The Council would be the decision maker for any elements of development associated with or ancillary to the NSIP development to the extent an application is made to the Council in respect of such matters under its powers as a Local Planning Authority rather than included as part of the DCO. Any such development will be considered by the Council against National Policy Statements and its Local Development Framework, including this Core Strategy. This provides the clarity required to understand the approach that will be taken to NSIPs by the Planning Inspectorate and the relationship any NSIP scheme will have with Copeland Borough Council's LDF and Local Plan policies. It is therefore important that the final version of the Core Strategy reflects the above principles.</p>
Changes?	
Council's response	Support noted.

CHAPTER 3 – SETTING THE STRATEGY (VISION AND OBJECTIVES)

Respondent ID	78
Response ID	S003
Organisation	RenewableUK
Paragraph	Vision
Theme	The Vision for Copeland
Sound?	?
Comments	<p>RenewableUK welcomes the publication of the Copeland Core Strategy and Development Policies – Pre-Submission Draft. We are pleased to provide this response on behalf of the UK wind, wave and tidal energy industry. RenewableUK welcomes the provisions for renewable energy contained in the pre-submission draft document. Below we outline the Core Strategy provisions which are supported by Renewable UK and sought to be retained in the final document. We also include an outline of renewable energy's contribution to the security of energy supply and stable electricity prices, as well as to job creation and the green economy. We are concerned that these benefits of renewable energy are not reflected in the Core Strategy, and seek that they be adequately addressed. All areas of the UK will need to significantly increase their levels of renewable energy generation. In addition, given the large number of power stations which will close and require replacement over the next fifteen years, it is essential that we take this opportunity to rebuild our energy infrastructure – at a local as well as national scale – using renewable and low carbon technologies wherever possible. The contribution of renewable energy to carbon reduction and climate change objectives; job creation and other local benefits; and the stabilising of energy prices should therefore be recognised, together with the need to meet our energy needs and preserve the environment. This is in line with the national policy context.</p>
Changes?	<p>In RenewableUK's view renewable energy and environmental sustainability are closely interconnected under the umbrella of sustainable development. Renewable energy is an overarching element of sustainable development and should not be categorised under economic sustainability only (as currently drafted). It should be recognised as key prerequisite for economic, environmental and social responsibility.</p>
Council's response	<p>Not accepted. Minimising the carbon footprint of the borough is mentioned in the 'Environmentally responsible' statement. Supporting renewable energy is widely recognised to be a way of minimising the carbon footprint along with energy efficiency etc. The main benefits in terms of social sustainability for Copeland would be in the numbers of jobs created and the community benefits packages provided. These are economic benefits and therefore are mentioned in the 'Economically Sustainable' section. The 'Socially Sustainable' statement says that Copeland will be 'a place that meets the needs of the whole community'. This includes energy requirements etc.</p> <p>The Vision statement is supposed to be a concise statement explaining what the LDF aims to achieve for the plan area. It therefore does not go into too much detail, this being provided in the objectives, policies and supporting text that follows.</p>

Respondent ID	73
Response ID	S067
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	
Paragraph	3.3.8-3.3.13
Theme	Setting the Strategy
Sound?	?
Unsound grounds	
Comments	<p>The Core Strategy correctly draws upon the 'Blueprint' Scenarios, identifying a housing demand of between 109 and 161 dwellings per year. However, the Council then go on to base their housing figures (paragraph 3.3.12) on what the 'market has proved itself capable of producing' (up to 200 units per annum). We welcome this more realistic and positive approach to housing delivery in line with the general focus of the NPPF.</p> <p>To allow for more choice and competition in the market and a realistic prospect of achieving the planned supply should the economic delivery targets be met, 300 units is an appropriate starting point. We would suggest that some additional provision be built in however should the 'nuclear investment' scenario become a realistic prospect. Paragraph 5.3.5 of the Core Strategy identifies a demand for 600 homes per year across West Cumbria. Additional provision must be built in to ensure successful cross boundary working.</p>
Changes?	
Council's response	<p>Support noted. The upper level of proposed provision, of 300 homes per annum, is to cope with growth which would arise if economic growth aspirations are fulfilled. It is not a ceiling, but past history suggests that demand is highly unlikely to exceed that level. If that scenario arises, demand could be coped with within the parameters set by overarching strategic policies ST 1 to 4; in any event, the timescale of such an eventuality would take it into the normal plan review cycle. For the time being, enough housing land has been identified to cope with substantial growth in demand in the short to medium term.</p>
Respondent ID	79
Response ID	S039
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	
Paragraph	3.3.21
Theme	Vision
Sound?	Yes

Unsound grounds

Comments The approach advocated in national policy and summarised above is reflected in the 'Vision for Copeland' (paragraph 3.3.21). This seeks economic sustainability by, inter alia, building on opportunities, "including those presented by the low-carbon and renewable energy sectors." In addition, the vision seeks environmental responsibility in Copeland through being, "a place that adapts to climate change and minimises its carbon footprint". REG consider this approach to be consistent with the NPPF (i.e. it is justified) and the vision is therefore considered to be sound.

Changes?

Council's response Support noted.

Respondent ID	79
Response ID	S040
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy Paragraph	Strategic Obj 1
Theme	Strategic Objectives
Unsound grounds	
Comments	Strategic Objective 1 of the Draft Core Strategy builds on the Vision for Copeland by seeking to support future renewable energy and low carbon generating capacity in Copeland, in line with 'Britain's Energy Coast'. The 'Britain's Energy Coast' initiative is of strategic importance both nationally and regionally. West Cumbria is identified as having a key role to play in delivering the critical elements of the national energy strategy that meets the priorities of both combating climate change and securing the nation's energy supply. It is on this basis that seeking to encourage renewable energy development in line with the Energy Coast initiative is considered an appropriate and justified approach. REG therefore consider Strategic Objective 1 to be sound.
Changes?	
Council's response	Support noted.

Respondent ID	79
Response ID	S042
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy Paragraph	Strategic Obj 2

Theme	Strategic Objectives
Sound?	No
Unsound grounds	Not Justified
Comments	<p>Strategic Objective 2 seeks to promote the diversification of the Borough's rural and urban economic base to enable a prosperous mixed economy, including the energy sector. Whilst REG agree with the main sentiment of this policy they are concerned that, as presently drafted, it could be misread as only offering support for the nuclear energy sector. This is because (in the context of energy) it only refers to "building on Copeland's nuclear skills base".</p> <p>REG do not consider this to be appropriate, as the economic benefits of on-shore wind energy are well-established and could bring important regeneration benefits to urban and rural areas, such as Millom.</p> <p>A report examining the economic benefits of onshore wind farms was published in May 2012 by BiGGAR Economics on behalf of the Department of Energy and Climate Change and RenewableUK. Some of the notable conclusions of the report include: • 98% of expenditure on the designing and planning of wind farms up to the point of securing permission is retained in the UK; • 45% of expenditure on the construction of the wind farms (manufacture and construction on site) is retained in the UK; • 90% of expenditure on the operation and maintenance of wind farms is retained in the UK; • It is estimated that in 2011 the onshore wind industry supported 8,600 jobs in the UK and generated £548 million in GVA across the UK. • Based on the scenarios for the future deployment of onshore wind in the UK as set out in the UK Renewable Energy Strategy (2011) and the National Renewable Energy Action Plan (2010) it is estimated that the contribution of the onshore wind sector to the UK economy could increase (by 2020) to 8,700 jobs and £580million GVA (under lowest deployment scenario) to 17,900 jobs and £1,183 million GVA (under the highest deployment scenario). • In addition, there is and could be a range of wider economic impacts. Spending by persons employed in the industry presently contributed a further £85million in GVA to the UK economy in 2011 and supported a further 2,400 jobs. This could increase to between £90 million / 2,500 jobs (lowest deployment) and £192million / 5,400 jobs (highest deployment). • Further GVA and jobs up to £27million / 800 jobs could be created through the effects of employee expenditure during the construction phase of wind farms. • Persons employed in the onshore wind industry contributed £94.3million in taxes to the exchequer in 2011. This could grow by up to £218million (under highest deployment and job creation scenario) by 2020.</p> <p>The onshore wind industry paid £12million in business rates from the operation of wind farms in 2011. This could increase to £52million by 2020 (under the highest deployment scenario) • While the majority of wind turbine manufacturers are based overseas it is instructive to note that many of the components can and are being manufactured in the UK. On this basis REG do not consider the policy to be justified, as it does not represent the most appropriate strategy when considered against this evidence. REG therefore considers Strategic Objective 2 to be unsound as currently drafted.</p>

Changes?	In order to make this policy sound, it is recommended that it be reworded to state: "Promote the diversification of the Borough's rural and urban economic base to enable a prosperous mixed economy, including creative and knowledge based industries, specialist
Council's response	Not accepted. Whilst it is important to acknowledge the future importance of wind energy to the area's economy, the benefits of the nuclear industry are already felt and there is a significant amount of nuclear expertise in the borough. The same cannot be said for renewable energy technologies. Strategic objective 2 is talking about diversifying the economy by building on the skills we know we have rather than potential future skills (though of course skills diversification may open up new avenues).
Respondent ID	39
Response ID	S015
Organisation	National Trust
Policy	
Paragraph	Sections 2 and 8.3
Theme	Spatial Portrait
Sound?	No
Unsound grounds	Not effective
Comments	National Trust's particular interest remains the Colourful Coast initiative and how this transforming work can be extended and enhanced through the DPD. The majority of the approach set out and the detailed text is supported. However, it is considered that the related plan is confusing in how it deals with this locality and that references to new built development require some qualification.
Changes?	The reference to 'a small high quality business park for offices and craft workshops is not objected to, but it is important that this is appropriately located away from the high quality coastal landscape. It is suggested that the text is supplemented with the words "....located on brownfield land within or immediately adjacent to an existing built up area".
Council's response	Not accepted. The representation of the West Whitehaven area in diagrammatic form is appropriate for the Spatial Portrait and provides a general indication of the location of the area in relation to the other identified regeneration sites in Whitehaven. Protection and enhancement of the coastal strip will form an important and integral aspect of the area's other suitable tourism opportunities arising in the future that would not damage this valued resource. The Core Strategy is clear that the undeveloped coast will be protected from inappropriate tourism development.
Respondent ID	7
Response ID	S127
Organisation	The Coal Authority

Policy	
Paragraph	Strategic Objs
Theme	Strategic Objectives
Sound?	Yes
Unsound grounds	
Comments	<p>BACKGROUND ON THE COAL AUTHORITY</p> <p>The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining. The Coal Authority re-engaged with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making relate to:</p> <ul style="list-style-type: none"> • the safeguarding of coal as a mineral in accordance with the advice contained in the National Planning Policy Framework, paragraphs 143 and 144; and • ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in the National Planning Policy Framework, paragraphs 109, 120, 121 and 166. <p>Surface Coal Resources and Prior Extraction</p> <p>Although it is acknowledged that the Copeland DPD does not cover minerals specifically as this is contained within the Cumbria Minerals and Waste documents, you will be aware that the northern part of Copeland, from St Bees northwards contains coal resources which are capable of extraction by surface mining operations.</p> <p>The current Energy White Paper, published in May 2007, estimated that “by 2020 fossil fuels are expected to supply the great majority of UK energy needs and 14% of primary energy demand will be met by coal.” In March 2008, the Rt Hon. John Hutton MP, Secretary of State for Business Enterprise and Regulatory Reform stated that “...Fossil fuels will continue to play an important role in ensuring that flexibility of the electricity generation system as well. Electricity demand fluctuates continually, but the fluctuations can be very pronounced during winter, requiring rapid short term increases in production. Neither wind nor nuclear can fulfil that role. We therefore will continue to need this back up from fossil fuels, with coal a key source of that flexibility...”</p> <p>The UK Low Carbon Transition Plan White Paper, which builds on the 2007 White Paper and was published in July 2009 to set out the national strategy for climate and energy, suggests that by 2020 clean coal will contribute 22% to the overall energy mix (this is actually an increase on the level predicted in the 2007 Energy White Paper). The 2009 White Paper re-confirms that “coal and gas will remain important to ensure our electricity supply is reliable and secure as we move towards greater dependence on intermittent sources like wind...The UK needs to maintain security of supplies of fossil fuels, which will remain an essential input to our electricity supplies for many years to come.</p>

Around a third of this is supplied by the UK coal industry.”

In February 2010, Lord Hunt reiterated the role for coal within the UK’s future energy mix and

stated that: “Take the 3 week cold spell after Christmas and over New Year as an example, coal generation accounted for a weekly average of nearly 40% and a daily average of 36% [of the UK’s total electricity supply]. ... Coal has been fundamental to UK energy needs for more than two centuries, and will continue to be so. Providing that its carbon by-products can be managed. Fossil fuels are abundant and relatively cheap, are able to respond flexibly to variations in demand, and are likely to remain an important part of our energy supply for some time to come.”

In March 2011, Rt Hon Chris Huhne MP, Secretary of State for Energy and Climate Change

confirmed that the Blueprint for our energy future rests on three pillars: renewable energy; nuclear energy without public subsidy; and clean coal and gas delivered by carbon capture and storage.

The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new

development. In cases where this may be the case, The Coal Authority would be seeking prior

extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers’ website at www.coalpro.co.uk/members.shtml.

As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

Coal Mining Legacy

As you will be aware, the northern part of Copeland has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur. The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of these coal mining legacy issues. Within Copeland there are approximately 611 recorded mine entries and around 17 other coal mining related hazards. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property

transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy occurs as a result of mineral workings it is important that new development delivered through the Local Plans/Local Development Framework recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

The Coal Authority supports Strategic Objective 19 which conforms with the relevant National Planning Policy in the NPPF in relation to mineral safeguarding and addressing mining legacy.

Changes?

Council's response

Support noted.

Respondent ID

78

Response ID

S004

Organisation

RenewableUK

Paragraph

Strategic Objectives

Theme

Strategic Objectives

Comments

RenewableUK welcomes the publication of the Copeland Core Strategy and Development Management Policies – Pre-Submission Draft. We are pleased to provide this response on behalf of the UK wind, wave and tidal energy industry.

RenewableUK welcomes the provisions for renewable energy contained in the pre-submission draft document. Below we outline the Core Strategy provisions which are supported by Renewable UK and sought to be retained in the final document. We also include an outline of renewable energy's contribution to the security of energy supply and stable electricity prices, as well as to job creation and the green economy. We are concerned that these benefits of renewable energy are not reflected in the Core Strategy, and seek that they be adequately addressed.

Renewable Energy in Context

All areas of the UK will need to significantly increase their levels of renewable energy generation. In addition, given the large number of power stations which will close and require replacement over the next fifteen years, it is essential that we take this opportunity to rebuild our energy infrastructure – at a local as well as national scale – using renewable and low carbon technologies wherever possible. The contribution of renewable energy to carbon reduction and climate change objectives; job creation and other local benefits; and the stabilising of energy prices should therefore be recognised, together with the need to meet our energy needs and preserve the

environment. This is in line with the national policy context.

RenewableUK wishes to emphasise the important role that local authority decision making can have in the wider deployment of renewable energy and therefore in contributing to:

- Reaching the UK's renewable energy generation targets;
- Ensuring the security of energy supply;
- Stabilising energy prices to the customer and reducing fossil fuel dependence; and
- Job creation and other local benefits.

The Core Strategy should reflect these benefits.

Energy prices

Given the large number of power stations which will be decommissioned in the next 15 years, the UK needs to build new capacity to keep the lights on. Now is the time to take a positive step towards a renewable energy future and develop a mix of energy sources. Energy bills are already rising due to rising fuel costs – Ofgem has indicated that gas prices are 40% higher this year than they were last year. When carbon capture technology is introduced, reflecting the true cost of fossil fuels, they will become even more costly. There are also many uncertainties in the supply of fossil fuels – they are often sourced from unstable regions of the world, thus there is no security of supply. The Fukushima nuclear disaster, for example, dramatically increased gas demand on the world markets, highlighting our dependence and vulnerability to global fossil fuel supply fluctuations.

Investing in renewable energy, which is indigenous and uses free fuel, will help us keep energy prices stable, and provide us with a green, low-carbon energy future. For example, Germany and Denmark have already found that wind generated power has brought down the cost of wholesale electricity.

Changes?

In RenewableUK's view renewable energy and environmental sustainability are closely interconnected under the umbrella of sustainable development. Renewable energy is an overarching element of sustainable development and should not be categorised under economic sustainability only (as currently drafted). It should be recognised as key prerequisite for economic, environmental and social responsibility.

Council's response

No need for change. The NPPF does say that the LPA should have a 'positive strategy' for renewable energy. Cumbria County Council along with all the LPAs in Cumbria, produced a Wind Energy SPD in 2008 which provides more of a strategy, looking at ways of minimising the impacts of onshore wind energy and testing the capacities of different areas in the county to accommodate large

Respondent ID	39
Response ID	SO17
Organisation	National Trust
Policy	
Paragraph	3.3.25
Theme	Strategic Objectives

Sound?	Yes
Unsound grounds	
Comments	It is considered that through previous consultations and relevant early engagement a sound set of Strategic Objectives for Environmental Protection and Enhancement that are relevant to the circumstances of Copeland has been developed. It is also considered that they continue to be consistent with national planning policy as now set out in the National Planning Policy Framework. Accordingly National Trust is pleased to support this set of Strategic Objectives.
Changes?	
Council's response	Support noted
Respondent ID	28
Response ID	S080
Organisation	Cleator Moor and District Chamber of Trade
Policy	
Paragraph	SO1 SO3 SO4
Theme	Strategic Objectives
Sound?	?
Unsound grounds	
Comments	Strategic Objective 1 - future developments must avoid a negative impact on tourism Strategic Objective 3 - The Council should encourage high quality employment in the smaller settlements. Strategic Objective 4 -the spend on Whitehaven & Egremont has not assisted such as Millom, Cleator Moor and other centres; a new wider ranging strategy needs to be adopted.
Changes?	Strategic Objective 1 should say (new text in CAPITALS) 'Support LOW VISUAL IMPACT future renewable and low carbon energy generating capacity in Copeland in line with Britain's Energy Coast: A Masterplan for West Cumbria.' Strategic Objective 3 should say 'Provide a wide range of modern, high-quality employment sites and premises THROUGHOUT THE AREA and promote the creation of a high-end knowledge based employment cluster at Westlakes Science and Technology Park.' Strategic Objective 4 should say 'Promote the vitality and viability of ALL towns and Local Centres, taking advantage of the built heritage that exists in Copeland's towns and villages to enhance the shopping experience for residents and visitors.
Council's response	Not accepted. SO1 - Unfortunately neither nuclear new build or large scale wind energy developments have low visual impact. The planning system can mitigate the impacts of these developments through appropriate siting and landscaping. However, by their very nature they are going to have an impact. The future economy of West Cumbria

depends to some degree on this type of development and the Council will support it in appropriate locations.

SO3 - The Core Strategy allows for the provision of high quality employment in the smaller centres at an appropriate scale. The Council is not willing to support employment development in the open countryside other than those sites which are already allocated or safeguarded. This would go against the Core Strategy sustainable principle of concentration of development, rather than dispersal.

SO4 - The current objective states that the vitality and viability of the towns and Local Centres will be promoted. This obviously includes Cleator Moor and Millom. The Council does not feel that the extra word needs to be added here, as the intention of SO4 is quite clear.

Respondent ID	27
Response ID	S088
Name	Mr R W & E Mulholland
Policy Paragraph	SO1 SO3 SO4
Theme	Strategic Objectives
Unsound grounds	
Comments	<p>Strategic Objective 1 - future developments must avoid a negative impact on tourism</p> <p>Strategic Objective 3 - The Council should encourage high quality employment in the smaller settlements.</p> <p>Strategic Objective 4 -the spend on Whitehaven & Egremont has not assisted such as Millom, Cleator Moor and other centres; a new wider ranging strategy needs to be adopted.</p>
Changes?	<p>Strategic Objective 1 should say (new text in CAPITALS) 'Support LOW VISUAL IMPACT future renewable and low carbon energy generating capacity in Copeland in line with Britain's Energy Coast: A Masterplan for West Cumbria.'</p> <p>Strategic Objective 3 should say 'Provide a wide range of modern, high-quality employment sites and premises THROUGHOUT THE AREA and promote the creation of a high-end knowledge based employment cluster at Westlakes Science and Technology Park.'</p> <p>Strategic Objective 4 should say 'Promote the vitality and viability of ALL towns and Local Centres, taking advantage of the built heritage that exists in Copeland's towns and villages to enhance the shopping experience for residents and visitors.</p>
Council's response	<p>Not accepted.</p> <p>SO1 - Unfortunately neither nuclear new build or large scale wind energy developments have low visual impact. The planning system can mitigate the impacts of these developments through appropriate siting</p>

and landscaping. However, by their very nature they are going to have an impact. The future economy of West Cumbria depends to some degree on this type of development and the Council will support it in appropriate locations.

SO3 - The Core Strategy allows for the provision of high quality employment in the smaller centres at an appropriate scale. The Council is not willing to support employment development in the open countryside other than those sites which are already allocated or safeguarded. This would go against the Core Strategy sustainable principle of concentration of development, rather than dispersal.

SO4 - The current objective states that the vitality and viability of the towns and Local Centres will be promoted. This obviously includes Cleator Moor and Millom. The Council does not feel that the extra word needs to be added here. The intention of SO4 should be quite clear.

Respondent ID	73
Response ID	S068
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	
Paragraph	Strategic Obj 6
Theme	Strategic Objectives
Sound?	?
Unsound grounds	
Comments	The Leconfield Estate welcome Strategic Objective 6 although we would question whether reference to 'complementary' development is required. The scale and function of the key service centres of Egremont, Cleator Moor and Millom indicate that they have distinctly separate requirements from new housing and service provision. Development within the service towns are not required to be 'complementary' to Whitehaven and we would seek that this reference be removed to ensure adequate flexibility to allow each of the major towns to meet the needs and aspirations of the housing market in line with Policy ST1
Changes?	The level of additional development must also be in line with the growth scenarios and in response to market demand. We suggest that Objective 6 be reworded as follows: "Focus major development in Whitehaven, and encourage additional development in Cleator Moor, Millom and Egremont and in local centres where opportunities exist, in line with strategic infrastructure provision and where it supports economic growth scenarios and response to market demands".
Council's response	No change needed. The reference to 'complementary' development

does not preclude the development of essential services and facilities in each of the Key Service Centres. It merely seeks to give each centre, especially Cleator Moor and Egremont (due to their proximity to Whitehaven) their own distinctive retail and service role so that people from North Copeland visit each of the Centres to fulfill particular service/retail needs. The rationale behind this is not to limit growth and provision, but rather to halt the decline of retail/service provision. Millom is further away from larger service centres and performs a more significant service role to residents of South Copeland. This is acknowledged in the supporting text to Policy ST2.

Respondent ID	36
Response ID	S102
Organisation	Millom Without Parish Council
Policy	
Paragraph	3.3.23-3.3.25
Theme	Strategic Objectives
Sound?	No
Unsound grounds	Not effective
Comments	<p>The Millom Without Parish Council's concern is, in the light of the new circumstances relating to the Localism Act 2011, that your consultation procedure does not give adequate scope for the expression of local concerns. The Parish Council's observations are below:</p> <p>The draft LDF does not, we believe, differentiate sufficiently between the needs of the urban centres of population and the rural areas. In this respect we would question whether it meets the spirit or even the letter of the Localism Act. It is appreciated that the Localism Act apparently imposes huge demands on the principal authorities. However, the Millom Without Parish Council is drafting its own Neighbourhood Plan and no doubt other Parish Councils have, or will do, the same. It is felt that the relevant policies and concerns from the Millom Without and other Parish Councils should be acknowledged and reflected in the Copeland LDF and the concerns of Millom Without are set out in the following representations.</p>
Changes?	
Council's response	<p>The Council will be entirely willing to support the Parish council in drawing up a Neighbourhood Plan. The Core Strategy is a strategic, borough-wide plan and it would become unwieldy if it took into account the sort of detailed local considerations referred to here. Happily, localism as set out in the Localism Act means that the Local Development Framework can now accommodate local policies via Neighbourhood Plans, which will be incorporated in the LDF when adopted.</p>
Respondent ID	39

Response ID	SO19
Organisation	National Trust
Policy	
Paragraph	3.3.24
Theme	Strategic Objectives
Sound?	No
Unsound grounds	Not justified, not effective and not consistent
Comments	National Trust remains concerned about the `approach suggested by Objective 13 and the implicit intention to promote the development of new road improvements including, but not limited to, connections to the A66 and the M6. As previously argued it is considered that such an approach is inconsistent with other objectives (such as those relating to climate change and the importance of landscapes to tourism) as well as not reflecting national planning policy or the reality of deliverability within the timescale of the plan.
Changes?	It is considered that a more appropriate and realistic alternative would be: "Maintain safe, efficient, high quality, modern and integrated transport networks with good internal links and connections to key routes."
Council's response	Accepted. Removal of specific references to particular road and rail links would remove the risk of deliverability issues.

Respondent ID	34
Response ID	S095
Organisation	United Utilities
email	planning.liaison@uuplc.co.uk
Policy	ST3D
Paragraph	
Theme	Providing Infrastructure
Sound?	?
Unsound grounds	
Comments	<p>United Utilities PLC will need specific development locations as soon as possible to determine if the infrastructure could accommodate the builds.</p> <p>There are issues in West Cumbria from a large scale supply and demand [growth] perspective due to the habitats directives; with further constraints from the fluoridation programme which is only being allowed in certain parts of the region.</p> <p>Investment programme and funding mechanism</p> <p>Every 5 years United Utilities PLC and other water and sewerage companies [WaSC] assemble and submit business case to Ofwat for approval; this process is known as the Price Review.</p> <p>Within the Price Review process, Ofwat will set the price limits that each</p>

WaSC can charge their customers.

The outcome of the Price Review process will define what, where and when capital investment is undertaken over the next 5 years; set the serviceability limits and measures to meet new regulatory standards and any additional enhanced levels of service.

The Price Review process includes a five year capital investment programme known as the Asset Management Plan [AMP]; there have been five AMPs since privatisation and the current AMP is AMP5 [1 April 2010 – 31 March 2015].

The AMP has a number of defined funding areas; the area covering capital investment for growth is 'supply and demand'.

There are a number of funding mechanism for supply and demand; the main funding process involves the identification of defined outputs to meet growth needs; this funding is ring fenced and cannot be used to support growth elsewhere.

The Price Review is the only wastewater supply and demand funding mechanism available to WaSC.

United Utilities PLC is currently producing detailed plans [Integrated Asset Plans – (IAP)] for each wastewater catchment and water supply demand zone to identify their future requirements and therefore capital investment needs.

The IAP process will review and identify future supply and demand needs across the North West.

The output from the IAP will support and inform United Utilities PLC's Price Review business case submission to Ofwat for AMP6 [2015-2020] and beyond.

It is essential that neighbourhood groups; LPA and developers support United Utilities PLC in this process, to ensure the correct sustainable solutions are delivered.

Unfortunately, United Utilities PLC cannot guarantee Ofwat will support and/or approval United Utilities PLC's Price Review submission and/or any of the identified supply and demand projects.

National Planning Policy Framework [NPPF]

The presumption in favour of sustainable development

LPA should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:

- ⑦ the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- ⑦ the provision of health, security, community and cultural infrastructure and other local facilities; and
- ⑦ climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Crucially, Local Plans should:

- ☐ plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- ☐ be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- ☐ be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- ☐ indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- ☐ allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- ☐ identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- ☐ identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- ☐ contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Infrastructure

NPPF 162. Local planning authorities should work with other authorities and providers to:

- ☐ assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- ☐ take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

To ensure key sites and strategic locations are deemed sustainable, planned and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure.

An example would be the development of a joint working group [lead by the LPA] that identifies a strategic drainage solution/s for each key site and/or strategic location.

The joint working group will include the LPA; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc.

The aim of the joint working group will be to develop a sustainable strategic drainage solution that:

- ☐ protects the existing customer and maintains their service and quality of life;
- ☐ protects the environment;
- ☐ is a robust and deliverable;
- ☐ proactively not reactively delivered;
- ☐ meets the needs of the not only the key sites/strategic locations but also the neighbouring LPA; and
- ☐ is conditional for future developments within the key site and/or strategic location.

Future development must be sustainable; prevents environmental

damage and preserves the quality of life for the existing and future generations; therefore, developments should not be permitted until infrastructure capacity is available.

United Utilities PLC cannot confirm if capacity is available until the connection point/s, flows and completion dates are available.

If additional supporting infrastructure is required then the LPA should work closely with United Utilities PLC [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval; failure may result in the deterioration of the community's quality of life and/or environmental damage.

The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable.

United Utilities PLC has a number of recent examples where infrastructure has been provided based on identified growth, but not delivered; this has resulted in major operational issues; the treatment process is under loaded; it is failing to operate because it cannot reach its operational capacity.

Additional temporary engineer solutions are in place; this represents a significant risk to the existing customers; the environment and United Utilities PLC; not forgetting the additional financial burden on United Utilities PLC's customers.

The Council has a number of capacity issues; any additional developments in these and/or adjoining areas without firstly ensuring infrastructure solutions are implemented could result in an increased number and frequency of sewer flooding incidents.

The Council should also consider the constraints [are not limited to, but include] that are outside the control of United Utilities PLC and may influence the timely delivery of supporting infrastructure:

- ☐ Regulatory approval
- ☐ Environmental constraints
 - ☐ Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage?
 - ☐ Small river : large development
- ☐ Environmental consents and permits
 - ☐ Timescales involved in the construction/delivery of new processes to meet new consents and/or permits
- ☐ Planning approval
 - ☐ The LDF process has not highlighted and/or specified land for infrastructure use, therefore future planning applications for future supporting utilities infrastructure may be thwarted or a prolonged process
 - ☐ Historical local resistance to the expansion of utilities assets
 - ☐ Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets
- ☐ Land acquisition
 - ☐ Timescales involved in the purchased land needs
 - ☐ Land may not be available for expansion due to the encroachment of development

- ☐ Access into the highway
 - Limitations from the highway departments for road works
- ☐ Environmental restrictions
 - bird breeding and/or nesting seasons; great crested newts; badgers etc.
- ☐ Implementation and commissioning restrictions
 - Planning application approval conditions; working hours etc.
 - Environmental consents/permits conditions
 - Its psychical delivery

[Reason: Ensure timely delivery of development and infrastructure to protect the good quality of life and the environment]

Changes?

Council's response The comment is noted; we have already been in dialogue with United Utilities and anticipate that this will continue through the site allocation process.

CHAPTER 3 – SETTING THE STRATEGY (STRATEGIC POLICIES)

Respondent ID	44
Response ID	S002
Name	Mr C Narrainen
Policy	ST1
Theme	Principles for Development
Sound?	Yes
Comments	Protect/enhance areas, sites, species and features of biodiversity value, landscapes and the undeveloped coast.
Council's response	Support noted

Respondent ID	78
Response ID	S005
Organisation	RenewableUK
Policy	ST1
Paragraph	
Theme	Principles for Development
Sound?	
Unsound grounds	
Comments	See S003
Changes?	Renewable energy is a key element of sustainable development and needs to be explicitly referred to in the Strategic Development Principles.

Council's response	Not accepted. ST1Bi specifically refers to development that minimises carbon emissions. It should be clear that this would include renewable energy development as well as low carbon development and energy efficient construction.
Respondent ID	37
Response ID	S030
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	ST1
Paragraph	
Theme	Principles for Development
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	The NPPF sets out the Government's approach to 'positive growth' with the central theme of a 'presumption in favour of sustainable development' underpinning the Framework. Sainsbury's do not consider the Core Strategy to reflect either the 'presumption in favour of sustainable development' or that it encourages 'positive growth'. As such, Sainsbury's consider the Core Strategy to be unsound due to non-compliance with national policy.
Changes?	Policy ST1 should include an explicit reference to the Council adopting a presumption in favour of sustainable development and that the Council will plan for 'positive growth' as per the NPPF. The Planning Inspectorate has produced a 'model wording' which, if included in the draft Local Plan, is considered an appropriate way of meeting the expectation to allow for a presumption in favour of sustainable development. It is recommended that the Council incorporate this model wording within their Local Plan.
Council's response	Accepted in part. The Council strongly rejects any assertion that the plan does not encourage growth, as an attentive reading of the whole document should confirm. The Council also does not agree that policy ST1, which is clearly in favour of sustainable development, needs to refer to the presumption (which anyway applies as part of national policy, whether the plan refers to it or not). It should be pointed out that the Planning Inspectorate's advice does not insist that the model wording be incorporated in policy. The Council does, however, propose to introduce a minor change to the supporting text to make it clear that the presumption is supported.
Respondent ID	73
Response ID	S069
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	ST1
Paragraph	

Theme	Strategic Development Principles
Sound?	Yes
Unsound grounds	
Comments	Policy ST1 is supported where it seeks to create an appropriate residential offer to meet the needs and aspirations of the housing market. It is clear from the SHMA, that the Egremont Housing Market Area needs to increase housing provision to provide a wider housing 'offer' in appropriate sites and we welcome Policy ST1.
Council's response	Support noted.

Respondent ID	28
Response ID	S081
Organisation	Cleator Moor and District Chamber of Trade
Policy	ST1
Paragraph	
Theme	Strategic Development Principles
Sound?	?
Unsound grounds	
Comments	Policy ST1B(ii) - flood insurance for householders on flood risk areas is becoming a national and local major problem.
Changes?	<p>Policy ST1A(iv) should say: (NEW TEXT IN CAPITALS) 'Support development that PROTECTS THE LANDSCAPE AND provides or contributes to the Borough's social and community infrastructure enabling everyone to have good access to jobs, shops, services and recreational and sports facilities.</p> <p>Policy ST1B(ii) should say: 'Focus development on sites that are at least risk from flooding and where development in areas of flood risk is unavoidable, ensure that the risk is minimised or mitigated through appropriate design WHICH IS TO BE FUNDED AND MAINTAINED THROUGHOUT DEVELOPMENT LIFE BY THE DEVELOPER AND IN THE CASE OF RESIDENTIAL DEVELOPMENTS, EXTERNAL FLOOD DISASTER COVER PROVIDED TO THE HOUSEOLDER FREE OF CHARGE.'</p> <p>Council's response ST1A(iv) - Not accepted. Protection of the landscape is dealt with in ST1C(i). When reading the policy as a whole it is clear that the Council aims to protect the landscape.</p> <p>ST1B(ii) - Not accepted. ST1 deals covers the general principles for development in the borough. It would not be appropriate to go into this level of detail on one issue in this policy statement. The provision of flood insurance to residents is not a planning issue. The Council is committed to miniming flooding and the effects of unavoidable flooding</p>

in the borough. ENV1 and DM24 deal with the issue in more detail.

Respondent ID	27
Response ID	S089
Name	Mr R W & E Mulholland
Policy	ST1
Paragraph	
Theme	Strategic Development Principles
Sound?	?
Unsound grounds Comments	Policy ST1B(ii) - flood insurance for householders on flood risk areas is becoming a national and local major problem.
Changes?	<p>Policy ST1A(iv) should say: (NEW TEXT IN CAPITALS)</p> <p>'Support development that PROTECTS THE LANDSCAPE AND provides or contributes to the Borough's social and community infrastructure enabling everyone to have good access to jobs, shops, services and recreational and sports facilities.</p> <p>Policy ST1B(ii) should say:</p> <p>'Focus development on sites that are at least risk from flooding and where development in areas of flood risk is unavoidable, ensure that the risk is minimised or mitigated through appropriate design WHICH IS TO BE FUNDED AND MAINTAINED THROUGHOUT DEVELOPMENT LIFE BY THE DEVELOPER AND IN THE CASE OF RESIDENTIAL DEVELOPMENTS, EXTERNAL FLOOD DISASTER COVER PROVIDED TO THE HOUSEOLDER FREE OF CHARGE.'</p>
Council's response	<p>ST1A(iv) - Not accepted. Protection of the landscape is dealt with in ST1C(i). When reading the policy as a whole it is clear that the Council aims to protect the landscape.</p> <p>ST1B(ii) - Not accepted. ST1 deals covers the general principles for development in the borough. It would not be appropriate to go into this level of detail on one issue in this policy statement. The provision of flood insurance to residents is not a planning issue. The Council is committed to miniming flooding and the effects of unavoidable flooding in the borough. ENV1 and DM24 deal with the issue in more detail.</p>

Respondent ID	79
Response ID	S041
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	ST1
Paragraph	
Theme	Principles for Development

Sound? Yes

Unsound grounds

Comments Strategic Development Principle ST1 (a) (i) states support for the development of energy infrastructure. Principle (b) (i) also encourages development that minimises carbon emissions, maximises energy efficiency and helps us to adapt to the effects of climate change. The introductory sentence to the policy confirms that it is these principles which underpin the Borough's planning policies and it is considered a reasonable approach, which is consistent with the messages set out in the NPPF (Paragraph 3.4.3 of the NPPF confirms these statements are "a local expression of national policies that are a requirement on all planning policies). On this basis, REG find these parts of draft Policy ST1 to be sound.

Changes?

Council's response Support noted.

Respondent ID	16
Response ID	S062
Organisation	Allerdale Borough Council
Policy	ST1 ST2 ST3
Paragraph	
Theme	Development Principles, Strategy and Priorities
Sound?	Yes
Unsound grounds	
Comments	The strategic development principles, spatial development strategy, including the settlement hierarchy is a valid approach making the best use of existing infrastructure and focussing the majority development within the main towns that provide the best range of services. This approach has the added benefit of maximising the opportunity to deliver regeneration to the main towns. All three policies seek to place sustainability at the core of the strategy which is supported.
Council's response	Support noted.

Respondent ID	38
Response ID	S141
Organisation	Cumbria County Council
Policy	ST1, ST2
Paragraph	
Theme	Principles for Development & Spatial Development Strategy

Sound? Yes

Unsound grounds

Comments

It is considered that policies ST1 and ST2 are sound, however, it is considered that the policies could be strengthened as detailed below, which would improve the soundness of the policies.

To guide development, the Borough Council has proposed settlement hierarchy to which development would be distributed in a sequential fashion, this is shown below. Principal Town – Whitehaven. Key Service Centres – Cleator Moor, Egremont and Millom. Local Service Centres – Arlecdon/Rowrah, Beckermest, Bigrigg, Cleator, Distington, Frizington, Haverigg, Kirkland, Ennerdale Bridge, Lowca/Parton, Moor Row, Moresby Parks, Seascale, St. Bees, Thornhill.

Outside settlement boundaries – All other parts of the Borough, including small villages and settlements and open countryside.

Excluding nuclear-related development it is expected that development should be

distributed broadly as follows:-

- Whitehaven – at least 45%
- Cleator Moor – at least 10%
- Egremont – at least 10%
- Millom – at least 10%
- Local Centres – not more than 20% (in combination)

With this in mind it is recommended that Copeland Borough Council and Allerdale Borough Council look at the scales of development for Whitehaven and Workington to ensure that they are complementary. At the Preferred Options stage, the County Council commented that the spatial distribution and the development emphasis identified under Policy ST2 (Spatial Development Strategy) is broadly consistent with the County Council's policies. However, it referred to focusing the 'largest scale' of development and regeneration in Whitehaven, supporting development 'reflecting the respective scale and functions' of Key Service Centres and permitting 'minor development' in defined Local Centres. This terminology was not considered compatible with the Cumbria Sub-Regional Spatial Strategy. Copeland have amended the policy, which now states "permitting appropriately scaled development in defined Local Centres which helps to sustain services and facilities for local communities".

It is now considered that the terminology is broadly compatible with the Cumbria Sub-Regional Spatial Strategy. However, it is still considered that the Policy could be strengthened to enable appropriate business development, such as plots for small-scale workshop, live work, manufacturing, and production uses to come forward in Local Centres in order to sustain local services particularly in rural areas, and meet local needs and support rural businesses. This would ensure that the Policy is in accordance with the Cumbria Sub Regional Spatial Strategy and better reflects the greater flexibility afforded by the NPPF.

The Cumbria Sub Regional Spatial Strategy highlights that development sites should be selected having regard to a sequential consideration of potential development sites, insofar as previously developed land (PDL) should be prioritised over greenfield. The NPPF has granted Local

Planning Authorities flexibility about how PDL should be considered. This point should be reflected within the Core Strategy Development Management Policies document given the sustainability and potential regeneration benefits associated with the prioritising of previously developed land.

Changes?

Council's response

These comments are welcomed and accepted in principle, but we do not feel that the policy would be improved by incorporating the suggested amendments. Points about implementation of land release can be picked up in the Site Allocation DPD, the County Council's input into the site allocation process, which will be valued.

Respondent ID	78
Response ID	S006
Organisation	RenewableUK
Policy	ST2
Paragraph	
Theme	Spatial Development Strategy
Sound?	
Unsound grounds	
Comments	See S003
Changes?	We support the provisions in Cii on support for renewable energy and seek that these be retained in the final version of the document.
Council's response	Support noted.

Respondent ID	37
Response ID	S036
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	ST2
Paragraph	
Theme	Spatial Development Strategy

Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	Sainsbury's support the proposed settlement hierarchy as set out in policy ST2 as it seeks to ensure that the pattern and scale of new development is appropriate and sustainable by directing future retail development to existing centres, as set out in the NPPF. However, the Core Strategy fails to make specific reference to how proposals for main town centre uses in edge/out of centre locations would be assessed. In addition , there is no reference to the threshold which would trigger the need for Retail Impact Assessment as required by the NPPF.
Changes?	
Council's response	Accepted in part. As per response to S031 relating to policy ER9 - "Demand for retail development in Copeland is muted. The NPPF does not require that the sequential test should be included in policy, merely that it should be applied, and as there is no evidentially-based reason to depart from the national norm, the intention has always been that applications should be determined according to the national policy specifications. This is not inconsistent with the NPPF; but it is accepted that, in the interests of clarity, the plan should make reference to this, and that this is done appropriately in the supporting text, so that the policy itself is not repetitive of the NPPF.

Respondent ID	73
Response ID	S070
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy Paragraph	ST2
Theme	Spatial Development Strategy
Unsound grounds	
Comments	The Estate support the general approach contained within Policy ST2, in particular paragraph (a). We cautiously welcome the council's position outlined in paragraph (b) seeking settlement focused development. However, reference needs to be made to the need for a review of settlement boundaries to ensure all growth scenarios can be adequately met over the plan period.
Council's response	No change needed. The Council agrees that boundaries need to be looked at, but considers that the text reference in 3.5.13-14 is sufficient; the site allocation plan is the most appropriate place to do this and we would not want to pre-empt that by going into detail in policy.

Respondent ID	73
Response ID	S071
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	
Paragraph	Figure 3.2
Theme	Spatial Development Strategy
Sound?	?
Unsound grounds	
Comments	<p>We disagree with the wording of Figure 3.2: Settlement Hierarchy/Key Service Centre /Housing and would seek the removal of the reference to 'moderate' allocations and 'general' needs. This is a particularly negative approach to allocations within the Key Service Centres and disproportionate to the rest of the plan in this respect. We do not agree with the conclusion of the Housing Topic Paper that 'house building elsewhere [other than Whitehaven] should be focused on maintaining the viability of local service centres'. The key service centres have a far more important role to play in meeting housing needs and supporting economic growth. As identified previously, Egremont will play a central role in meeting the housing needs of economic in migrants, providing a wider housing 'offer' and supporting the vitality of the town centre in line with the SHMA. The settlement has sufficient suitable land to do so. The thrust of the NPPF (particularly at paragraph 14) is to positively plan for economic growth, positively seek opportunities to meet the development needs of the area and provide sufficient flexibility to adapt to rapid change.</p>
Changes?	<p>Although the Estate do not support an unconstrained level of growth over the plan period, we would seek a significant boundary review as part of the Allocations DPD to allow for market choice and in order to provide a rapid response to the changing economic scenarios and and subsequent level of housing demand. We would suggest rewording the paragraph as follows:</p> <p>"Allocations in the form of extensions to the towns to meet identified housing needs and facilitate the right supply of new homes in the right location".</p>
Council's response	<p>Not accepted. The Council agrees with the general sentiment of the representation, but part of the focus of Figure 3.2 is to establish the relationship whereby, in the interest of promoting the greater viability of the Borough's main town, the largest proportion of development should be there. We do not expect or intend that the result of this wording will be restrictive on on development in the other towns.</p>
Respondent ID	73
Response ID	S072

Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	
Paragraph	3.5.7
Theme	Spatial Development Strategy
Sound?	
Unsound grounds	
Comments	<p>Paragraph 3.5.7 of the Core Strategy allocates 45% of the Borough's development requirements to Whitehaven, 10% each at least to Cleator Moor, Egremont and Millom and not more than 20% to the Local Centres.</p> <p>While we accept the spatial approach of settlement focused growth, there is little evidence to support a 45% share of development at Whitehaven and a 20% total across the Local Centres. Indeed, the document acknowledges that the Local Centres are unlikely to be able to accommodate 20% of new development. This creates a degree of uncertainty and we would seek that the 20% total within the local centres is reduced to a more achievable level.</p>
Changes?	<p>We suggest a more realistic distribution of the targets as follows:</p> <ul style="list-style-type: none"> • Whitehaven at least 35% • Egremont at least 25% <ul style="list-style-type: none"> • Millom at least 15% • Cleator Moor at least 15% • Local Centres not more than 10% in combination
Council's response	<p>Not accepted. (1) It is an established strategic priority, for the whole Borough, or at least the northern part of it where most people live, that growth in Whitehaven should be fostered, and the evidence is that the housing land supply can sustain it. (2) The evidence of the SHLAA (and of previous market performance) does not suggest that the figure under policy ST2 would be likely to restrict development in the three smaller towns. In terms of land supply we note that Egremont is best placed (and, in view of proximity to Moorside, located) to exceed 345 or 450 dwellings over the plan period, and ST2 would not restrict that - hence the 'at least' in paragraph 3.5.7.</p> <p>(3) Whilst identified site availability is not likely to give enough capacity in Local Service Centres to fulfil 20% of the supply, we would expect 'windfall' sites to emerge, and to go below an assumption of 675-900 dwellings, over 15 years, in a total of 14 settlements would be unduly restrictive.</p>

Respondent ID	73
Response ID	S073
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	
Paragraph	3.5.13-3.5.15

Theme	Spatial Development Strategy
Sound?	?
Unsound grounds	
Comments	The Estate welcomes the proposed review of the settlement boundaries as part of the forthcoming Site Allocations DPD and in light of the Core Strategy distribution targets. Notwithstanding the comments made above, the distribution targets are flexible and form part of the changing economic position of West Cumbria. The NPPF (paragraph 14) seeks sufficient flexibility within local plans to adapt to rapid change. We would welcome further discussion with the council in due course regarding the boundary review.
Council's response	No change indicated. The Council believes that the variance in house building figures gives flexibility and the settlement boundary review will be undertaken with the objective of facilitating that. The Leconfield estate will be consulted at an early stage in the site allocation process.

Respondent ID	36
Response ID	S103
Organisation	Millom Without Parish Council
Policy	ST2?
Paragraph	3.5.16-3.5.19
Theme	Spatial Development Strategy
Sound?	No
Unsound grounds	Not effective
Comments	<p>Maintenance of the Rural Nature of the Area:</p> <p>The rural nature of the area ought to be respected and the individuality of the small communities preserved. Settlement boundaries are under pressure and at the Hill and The Green these have been considerably extended. The number of dwellings at the Green for example, has increased in excess of 400% since the early 1950s. Throughout that same period there has been a major decline in local opportunities for employment. Therefore, rural development has had the effect of increasing the travel to work distances and road traffic with all the consequential costs both environmental and economic. It is feared that the area may come under pressure for further inappropriate development on an even larger scale.</p>
Changes?	
Council's response	No need for change. The Green and The Hill are now considered to be in the open countryside with no settlement boundaries. Therefore the amounts and types of development permitted in these areas will be more limited than they have been in the past.

Respondent ID	79
Response ID	S043
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	ST2
Paragraph	3.5.19
Theme	Spatial Development Strategy
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	<p>Spatial Development Strategy ST2 (c) (ii) takes a similar approach to the existing adopted local plan, whereby development outside settlements is restricted to a specified range of acceptable uses. Acceptable uses include renewable energy developments which make best use of resources and minimise environmental and amenity impacts. For the avoidance of doubt, the inclusion of wind farms within the list of acceptable uses is affirmed in the supporting text at 3.5.19. Whilst REG welcome the underlying objective of the policy, the detailed drafting of part (c) (ii) is considered to be unsound. Restricting development to those which “minimise” environmental and amenity impacts is ambiguous and is not consistent with the provisions of the NPPF.</p> <p>Paragraph 97 of the NPPF states that in order to increase the supply of renewable energy, local planning authorities should, “design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.” Paragraph 98 goes on to state that when deciding applications, local planning authorities should, “approve the application if its impacts are (or can be made) acceptable.” [emphasis added].</p> <p>Put more simply, there is no requirement in the NPPF for environmental / amenity effects to be “minimised”. The draft Core Strategy, by requiring effects to be “minimised”, therefore introduces a higher policy test than is set out in the NPPF.</p>
Changes?	Therefore, it is recommended that in order for the policy to be consistent with NPPF it is amended so that emphasis is placed upon supporting renewable energy: “...at sites which best maximise renewable resources and where impacts are (or can be made) acceptable.”
Council's response	Not accepted. (1) The word 'minimise' is used for the following reason. As far as wind energy is concerned, the level of local hostility to turbines is such that, in most of the Borough, it would be impossible for a developer to produce a proposal which would be considered to be 'acceptable'. However, if a developer can demonstrate that all reasonable efforts have been made to reduce or mitigate impacts, then it has been demonstrated that the impacts have

been minimised. In this context, 'minimised' is less restrictive (and more easily verifiable) than 'acceptable'.

(2) The representation omits to acknowledge that NPPF paragraph 98 has a footnote 'unless material considerations indicate otherwise'. In Copeland a material consideration is that no part of the Borough is more than five miles from either the Lake District National Park or the Heritage Coast. In those circumstances it is entirely reasonable to ask that the minimisation of environmental impacts is what is required to make a project acceptable.

Respondent ID	83
Response ID	S078
Organisation	(MJN Associates on behalf of) Harwood Real Estate Ltd
Policy	ST2
Paragraph	
Theme	Spatial Development Strategy
Sound?	No
Unsound grounds	Not Justified
Comments	<p>This paragraph indicates the intent to review the development boundary on the north side of Cleator in an allocations document. This is unjustified as:</p> <ul style="list-style-type: none"> a) There is adequate land within the existing development boundary to facilitate development of the likely required housing numbers for the centre principally on the Cleator Mills site. b) This site is deliverable and sustainable as shown in documents, including a Development Appraisal and an FRA submitted to the Council. This includes proposals for housing development utilising brownfield land and leaves sufficient land for employment use as per current policy. c) Alternative sites as considered in the SHLAA process lie outside the current settlement boundaries and comprise solely green field locations or sites constrained by access and TPO (land adjacent to Ennerdale Country House Hotel). d) The settlement boundaries at Cleator Mills were extended at the last Local Plan review to include all brownfield land here, particularly at the southern end of the site. It would be illogical to now reconsider the boundary in any new document.
Changes?	A statement that the development boundaries in this area will not be subject to change
Council's response	Not accepted. The review will be just that, and the statement does not imply a decision to change the boundary. The review, during the site allocation process, will determine whether there is a need to change it, which would result if land there (which has been identified in the SHLAA) were allocated for development. The existing land supply will be a consideration in taking that decision.

Respondent ID	28
Response ID	S082

Organisation	Cleator Moor and District Chamber of Trade
Policy	ST2
Paragraph	
Theme	Spatial Development Strategy
Unsound grounds	
Comments	
Changes?	ST2B should say the following (NEW TEXT IN CAPITALS): 'Concentration: development will be located in the Borough's settlements at an appropriate scale, within defined settlement boundaries OR SUITABLE EXTENSION, in accordance with the Borough's settlement hierarchy as set out in Figure 3.2:'
Council's response	No need to change the plan; the policy is indeed that development will be within "defined settlement boundaries", that is, as defined now, or as defined post-review.
Respondent ID	27
Response ID	S090
Date Received	11/07/2012
Name	Mr R W & E Mulholland
Policy	ST2
Paragraph	
Theme	Spatial Development Strategy
Sound?	?
Unsound grounds	
Comments	
Changes?	ST2B should say the following (NEW TEXT IN CAPITALS): 'Concentration: development will be located in the Borough's settlements at an appropriate scale, within defined settlement boundaries OR SUITABLE EXTENSION, in accordance with the Borough's settlement hierarchy as set out in Figure 3.2:'
Council's response	No need to change the plan; the policy is indeed that development will be within "defined settlement boundaries", that is, as defined now, or as defined post-review.
Respondent ID	7
Response ID	S128
Organisation	The Coal Authority
Policy	ST2, ST3

Paragraph	
Theme	Spatial Strategy and Strategic regeneration Priorities
Sustainability Appraisal	
Sound?	?
Unsound grounds	Query consistent with NPPF
Comments	<p>Whilst The Coal Authority has no preference as to how development should be distributed across the Borough, it is likely that major development if focussed on the larger settlements would fall within the coalfield area. This will raise issues of mineral safeguarding which will need to be addressed through the site allocation process in order to avoid the unnecessary sterilisation of the coal resource. The presence of coal resources need not prevent any chosen development strategy as options such as the prior extraction of surface mineral resources, including coal, where economically viable and appropriate in planning terms, can be built into the site allocation process. The prior extraction of surface coal resources can also assist in removing future public safety hazards from land which is to be developed.</p>
Changes?	
Council's response	Comment noted. The Council is satisfied that the policies referred to provide an adequate safeguard.
Respondent ID	36
Response ID	S111
Organisation	Millom Without Parish Council
Policy	ST2, ER6
Paragraph	
Theme	Location of Employment
Sound?	No
Unsound grounds	Not effective
Comments	<p>Existing employment sites</p> <p>The expansion of existing premises in existing communities should only be considered if the following criteria are met.</p> <p>i) Any new buildings are appropriate in scale and design to their surrounding area.</p> <p>li) Any change in, or increased activity does not unacceptably affect the residential amenity or the environment of the surrounding area.</p>
Changes?	
Council's response	No need for change. We generally agree with this representation and consider that the Core Strategy and Development Management policies provide sufficient guidance for these types of development to be controlled adequately. Protection of employment land from use change

is a principle in ER4, though national policy would prevent it being applied too restrictively.

Respondent ID	36
Response ID	S106
Organisation	Millom Without Parish Council
Policy Paragraph	
Theme	ST2C?
Unsound grounds	Not effective
Comments	<p>Major development is not appropriate in the Parish and should not be permitted except in exceptional circumstances.</p> <p>Proposals for major development should be subject to the most rigorous examination and must clearly demonstrate that they are in the public interest.</p> <p>The examination of such proposals should include an assessment of the criteria below:</p> <ul style="list-style-type: none"> i) The need for the development at a national level and the impacts on the local economy. li) The cost and scope of developing outside the Parish or for meeting the need in some other other way. Applicants will be required to demonstrate that alternative solutions have been fully examined and no suitable alternative site is available. lii) The impacts on the environment and the landscape, and the extent to which it should be moderated. Any construction or restoration must be carried out to high environmental standards. lv) no development should be permitted which has a tendency to merge existing distinct and separate settlements.
Changes?	
Council's response	No need for change. In principle the Council would support this position and the strategic framework (particularly ST2C and ST3) militates against large scale development in the countryside. We must, however, also recognise national policy on these matters, especially if it constitutes Nationally Significant Infrastructure, in which case the Council would not be the determining authority.

Respondent ID	36
Response ID	S107
Organisation	Millom Without Parish Council
Policy Paragraph	ST2, ENV3, SS3, ENV1?
Paragraph	3.5.8 & 3.5.16

Theme	Housing type,Biodiversity & Geodiversity, Heritage, Flooding
Sound?	No
Unsound grounds	Not effective
Comments	<p>Maintenance of the Rural Nature of the Area:</p> <p>The rural nature of the area ought to be respected and the individuality of the small communities preserved. Settlement boundaries are under pressure and at the Hill and The Green these have been considerably extended. The number of dwellings at the Green for example, has increased in excess of 400% since the early 1950s. Throughout that same period there has been a major decline in local opportunities for employment. Therefore, rural development has had the effect of increasing the travel to work distances and road traffic with all the consequential costs both environmental and economic. It is feared that the area may come under pressure for further inappropriate development on an even larger scale.</p>
Changes?	
Council's response	No need for change. The strategy is to focus most development on the towns, and the Core Strategy does not provide for any development at all at rural settlements such as the Hill and The Green, except to meet local needs. The plan therefore is in accordance with the Parish Council's position.

Respondent ID	22
Response ID	S077
Organisation	Ennerdale and Kinniside Parish Council
Policy	ST2 ST3
Paragraph	5.4.8 8.4.9-8.4.16
Theme	
Sound?	No
Unsound grounds	Not Justified
Comments	<p>1. Although the 2010/2011 LDNPA Housing Needs Survey identified Ennerdale Bridge as a village suitable for affordable housing, it found that a need for such housing was not evident. See current LDNPA Core Strategy. Likewise Copeland BC's 2010/2011 Strategic Housing Market and Needs Assessment found no need. Ennerdale and Kinniside PC, at today's date considers that there is no need to provide affordable housing in the village of Ennerdale Bridge.</p> <p>2. Ennerdale and Kinniside PC does not agree that 'the locality as a whole is deficient in parks, gardens and amenity spaces' - see para 8.4.15 on page 97. This statement is incorrect and Ennerdale ward should be deleted therefrom along with any proposals for corrective action</p> <p>3. Ennerdale and Kinniside PC does not support the view that there is a need for a small gypsy and traveller transit site within Copeland. See page 56, para 5.4.8 and policy SS3. Nor does this parish council agree that there is an opportunity to locate such in Cleator Moor -page 100 (SS3).</p>

Changes?	<ol style="list-style-type: none"> 1. Delete "Ennerdale" from page 97, para 8.4.15 2. Delete "Kirkland/Ennerdale Bridge" bullet point from implications table 3. Delete last paragraph from ST2 implications table on page 98, from 'It should be noted
Council's response	<p>Not accepted.</p> <p>(1) The policy reference in ST2 relates to the designation of Ennerdale Bridge/Kinniside as a Local Service Centre. This matches the differently named but equivalent designation of the other half of Ennerdale Bridge as a Village in the National Park Core Strategy, which thus encourages small scale housing development. Regardless of the current housing need situation, we must recognise that the plan has a fifteen year time frame and need may arise during that time; this settlement is suitable for a small amount of house building, which might help to sustain its services.</p> <p>(2) The reference to public open space deficiency is based on the statistical fact, in the survey, that this ward lacks the type of provision referred to. The Council of course recognises that the parish is well endowed with opportunities to enjoy the open air and it is not conceivable that resources would be put into creating parks, gardens and amenity spaces.</p> <p>(3) The fact is that survey work has identified that there may be need for gypsy and traveller provision and the plan has to reflect this. The reference on page 100 has no policy status and there are no proposals to locate provision in the Cleator Moor locality.</p>
Respondent ID	45
Response ID	S051
Organisation	Sport England
Policy	ST4
Paragraph	
Theme	Providing Infrastructure
Sound?	Yes
Unsound grounds	
Comments	<p>Sport England broadly supports Policy ST4 which seeks to ensure that the demands on infrastructure from developments are met. The scope of the policy, as indicated by the infrastructure documents in the evidence base, includes indoor and outdoor sports facilities. This is important as development can create significant demand for sports facilities. Moreover, the strategy seeks to address qualitative issues as well as quantitative ones.</p>
Changes?	<p>Paragraph A should be amended to read:</p> <p>Development that generates a demand for physical, social or environmental infrastructure will be permitted if the relevant infrastructure is in place and has the capacity to meet the additional demand, or there is a reliable mechanism in place to ensure that it will be provided when and where required.</p>

Council's response	The point is understood but no change is needed . The point of the policy (and the supporting SPD in preparation) is that, where infrastructure is either not present or may be put under pressure, this lack is what justifies seeking contributions. ST4A says, in effect, that if existing or projected infrastructure is sufficient to cope with what the proposed development will demand of it, then there is no ground to seek contributions and the development can be permitted without s.106 obligations being sought.
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Respondent ID	38
Response ID	S142
Organisation	Cumbria County Council
Policy Paragraph	ST4
Theme	Providing Infrastructure
Unsound grounds	
Comments	<p>It is considered that policy ST4 is sound, however, it is considered that the policy could be strengthened as detailed below, which would improve the soundness of the policy.</p> <p>Policy ST4 - Providing Infrastructure Cumbria County Council has responsibilities for delivering and managing significant areas of infrastructure. Where the needs of development cannot be accommodated within the capacity of infrastructure, it will be important that the developer provides the necessary infrastructure (e.g. via Section 106 agreement).</p> <p>At the Preferred Options stage the County Council raised concerns that within Policy ST4 there is a lack of specificity as to types of infrastructure fundable by developer contribution, notably school places, which could mean that the County Council may have difficulty in negotiation with developers.</p> <p>It is acknowledged that the County Council's areas of interest will be covered in Copeland's 'Strategy for Infrastructure' and the forthcoming 'Planning Obligations Supplementary Planning Document'. However, these are not statutory planning documents and would not be part of the adopted development plan policy. It is therefore the County Council's view that specific reference to types of infrastructure fundable by developer contribution should therefore be included in ST4. An example of a Core Strategy which does include reference to specific types of infrastructure fundable by developer contribution is Eden District Council's Policy CS6 'Developer Contribution', and it is recommended that this approach should also adopted by Copeland Borough Council.</p> <p>It would also be welcomed if reference in the supporting text was made to working with the County Council to ensure that high quality education is provided in the right locations, as part of achieving wider socio-economic regeneration and the creation of sustainable communities.</p>

Cumbria County Council is currently advanced in the development of a consolidated policy with respect to planning obligations. It will be important that this is given significant weight in consideration of planning obligations and the development of other guidance around infrastructure.

The Core Strategy also highlights that provided that Copeland Borough Council are satisfied that development viability would not be compromised, CIL could be adopted in the Borough.

Should CIL be pursued, it will be essential that Cumbria County Council is fully engaged in its development given the range of strategic infrastructure and service that Cumbria County Council has responsibility for. To this end it is considered that formalised arrangements between authorities could be put in place for the development and implementation of CIL.

Changes?

Council's response

Not accepted. Whilst we agree with the tenor of these comments, the Council's view remains that in terms of presentation, it is preferable to leave the policy reasonably open and flexible, allowing detailed points of implementation to be dealt with via the SPD and informed by other supporting documents. These may be updated from time to time, more readily and quickly than the DPD policy.

Respondent ID	36
Response ID	S105
Organisation	Millom Without Parish Council
Policy	ST4, T1, DM25, DM22?
Paragraph	
Theme	Infrastructure, Transport and Environment
Sound?	No
Unsound grounds	Not effective
Comments	Where development impacts on the infrastructure, or is likely to have unavoidable adverse effects on the environment, appropriate planning conditions should be imposed to mitigate any adverse effects of the proposed development. The use of rail transport should be strongly supported for both personal and industrial use (in particular quarry products from Ghyll Scaur Quarry).
Changes?	
Council's response	No need for change. Policy ST4 and the forthcoming SPD on Developer Contributions will provide the policy basis for such mitigation. The Council would support rail shipment from Ghyll Scaur, but it is not within our power to bring it about.

CHAPTER 4 – ECONOMIC OPPORTUNITY AND REGENERATION

Respondent ID	62
Response ID	S087
Organisation	Invest in Cumbria
Policy	
Paragraph	Chapter 4
Theme	Economic Opportunity and Regeneration
Sound?	Yes
Unsound grounds	
Comments	In the Economic Opportunity and Regeneration section (4), there needs to be reference to the recently published West Cumbria Economic Blueprint which to some extent replaces the Economic Masterplan which was produced in 2007. Invest in Cumbria welcomes the policies that Copeland BC is putting in place to encourage Economic Development in the Borough. We look forward to continuing to work as a key partner to the Council in attracting inward investment projects in the future.
Changes?	
Council's response	Support noted. The 'Blueprint', its predecessor the Energy Coast Master Plan, and evidential work common to the Blueprint and this plan, are referred to at various places in the plan, and Topic Papers also make reference to it. The Council supports the Blueprint (which had not been finally adopted when this plan was published) and the Core Strategy's aims are closely integrated with it. It is, however, not a statutory planning document and we feel that the level of reference to it is about right.

Respondent ID	28
Response ID	S083
Organisation	Cleator Moor and District Chamber of Trade
Policy	ER1
Paragraph	
Theme	Planning for the Nuclear Sector
Sustainability Appraisal	
Unsound grounds	
Comments	
Changes?	Policy ER1F should say: 'Work with Sellafield Ltd and companies operating at Sellafield to optimise the number of functions and jobs that do not have to be based on site and can be located at, or relocated to, sustainable locations in the Borough.'

Council's response	Not accepted. The point of this clause is that the Council supports moving 'back office' functions from Sellafield specifically into towns, because they are the most sustainably accessible locations, and also to increase demand for and spending on their services and facilities. The Council thus cannot support the proposed wording, which would dilute that intention.
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Respondent ID	27
Response ID	S091
Name	Mr R W & E Mulholland
Policy	ER1
Paragraph	
Theme	Planning for the Nuclear Sector
Sound?	?
Unsound grounds	
Comments	
Changes?	Policy ER1F should say: 'Work with Sellafield Ltd and companies operating at Sellafield to optimise the number of functions and jobs that do not have to be based on site and can be located at, or relocated to, sustainable locations in the Borough.'
Council's response	Not accepted. The point of this clause is that the Council supports moving 'back office' functions from Sellafield specifically into towns, because they are the most sustainably accessible locations, and also to increase demand for and spending on their services and facilities. The Council thus cannot support the proposed wording, which would dilute that intention.

Respondent ID	36
Response ID	S108
Organisation	Millom Without Parish Council
Policy	ER1
Paragraph	4.5? 4.2
Theme	Planning for the Energy Coast
Sound?	No
Unsound grounds	Not effective
Comments	Summary: The Parish Council does not support the current proposals for the following reasons: i) The present consultation to identify a suitable site is too narrowly focussed, offers no geographic comparisons and gives priority to community acceptance in the areas volunteered by principal councils rather than the geological suitability and secure containment.

- ii) The extreme longevity of this project and nature of the elements to be stored makes the utmost caution essential.
- lii) The opportunity for the Parish Council's views to be influential may be lost when decision making defaults to principal councils, perhaps before the extended consultation period ends

Changes?

Council's response No need for change. There is as yet no proposal for a high level waste repository, merely a search for a suitable site. If the site selected proved to be unacceptable, the Council would oppose it; but it should be noted that the repository will almost certainly be classed as a Nationally Significant Infrastructure Project and the Borough Council would in that case not be the determining authority

Respondent ID	38
Response ID	S147
Organisation	Cumbria County Council
Policy	ER1
Paragraph	
Theme	Planning for the Energy Coast
Sound?	Yes
Unsound grounds	
Comments	<p>It is considered that Policy ER1 is sound, but would benefit from a number of clarifications which are detailed below.</p> <p>At the Preferred Options stage, the County Council commented that the infrastructure implications of nuclear new build, both temporary and permanent, needed further clarification, including for transport, housing and educational infrastructure requirements.</p>

Changes?

Council's response Comment understood, but it is not accepted that the provisions in the plan need to be changed. "Appropriate arrangements" are indeed in place to separate benefits attainable under planning law from those legitimately negotiable under the law affecting Nationally Significant Infrastructure Projects, and the plan does not seek to circumvent or subvert those. The Council's position will be that NSIP mitigation and/or community benefits should be mindful, wherever appropriate, of the provisions of the Core Strategy, and that is why they are referred to here. Note that there is no mention of community benefit in policy, and the word "appropriate" in the final sentence of ER1.

Respondent ID	78
Response ID	S007
Organisation	RenewableUK
Policy	ER2
Paragraph	
Theme	Renewable Energy
Sound?	
Unsound grounds	
Comments	See S003
Changes?	The policy is supported but, in the view of RenewableUK, it should be expanded to include the benefits of renewable energy as outlined in response S003.
Council's response	Not accepted. The benefits of renewable energy are well attested and can be read elsewhere. In our view the purpose of supporting text is to explain the policy and how it relates to national planning policy.

Respondent ID	79
Response ID	S044
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	ER2
Paragraph	
Theme	Renewable Energy
Sound?	No
Unsound grounds	Not effective and not consistent with NPPF
Comments	Policy ER2 is a high level statement on renewable energy, which confirms the Council will seek to maximise renewable resources and minimise environmental and amenity impacts. This is consistent with the Spatial Development Strategy described in Policy ST2 (c) (ii) and for the same reasons described above, it is considered draft Policy ER2 is presently unsound (i.e. in that it seeks to minimise impacts).
Changes?	Whilst the supporting text to Policy ER2 expresses an aspiration to deliver 46MW of renewable energy over the plan period and confirms that this is not a ceiling to renewable energy development it is considered that such aspirations should appear in the main body of the the policy in order for it to be more effective and to avoid ambiguity. It is considered that including an indicative target within the policy would accord with the pro-active stance of the NPPF and would allow the contribution which Copeland plays in meeting national objectives to be measured. Therefore, in order for the policy to be sound and more effective, it is recommended that it be reworded to state: "The Council will seek to support and facilitate new renewable energy generation,

at locations which best maximises renewable energy resources where impacts are (or can be made) acceptable. The Council will seek to deliver 46MW of energy from renewable sources by 2030, but this is not a ceiling to delivery within this timeframe...”

This accords with the approach advocated in national policy, which REG consider appropriate in light of the need for renewable energy development, which is in the nation’s interest.

Council's response

Not accepted. The Council prefers not to express targets like in policy, as they may change during the duration of the plan. The NPPF does not require the insertion of targets in policy. In any event the figure quoted here is an expression of capacity derived from the Cumbria study, not a target. The aim to 'maximise' is more open-ended.

Respondent ID

28

Response ID

S084

Organisation

Cleator Moor and District Chamber of Trade

Policy

ER2

Paragraph

Theme

Renewable Energy

Sound?

?

Unsound grounds

Comments

Changes?

ER2 should say (NEW TEXT IN CAPITALS):

The Council will seek to support and facilitate new renewable energy generation, at locations which best maximise renewable resources and minimise environmental, LANDSCAPE and amenity impacts. Criteria on renewable energy development I generation are set out in Policy DM2.

Council's response

Not accepted. We would regard landscape as coming under 'environmental and amenity impacts'; and landscape is referred to specifically in policy DM2 as a development management consideration.

Respondent ID

27

Response ID

S092

Name

Mr R W & E Mulholland

Policy

ER2

Paragraph

Theme

Renewable Energy

Sound?

?

Unsound grounds

Comments	
Changes?	ER2 should say (NEW TEXT IN CAPITALS): The Council will seek to support and facilitate new renewable energy generation, at locations which best maximise renewable resources and minimise environmental, LANDSCAPE and amenity impacts. Criteria on renewable energy development I generation are set out in Policy DM2.
Council's response	Not accepted. We would regard landscape as coming under 'environmental and amenity impacts'; and landscape is referred to specifically in policy DM2 as a development management consideration.

Respondent ID	36
Response ID	S109
Organisation	Millom Without Parish Council
Policy	ER2, ER3, DM2
Paragraph	
Theme	Renewable Energy, Energy Infrastructure
Sound?	No
Unsound grounds	Not effective
Comments	<p>The Parish Council is aware of the need for renewable energy generation and broadly supports this. However, the proliferation of very large wind turbines both at sea (possibly set to become the largest such project in Europe) and on land is causing concern.</p> <p>The increasing height of such turbines and their number is of major concern. Millom Without has common borders with South Lakeland and Barrow in Frnesh both of which have wind turbine 'farms' on sites which have unobstructed visibility from Millom, Millom Without and Whicham and the National Park. The massive, and expanding, wind generation facility uin the Irish Sea is also clearly visible. Applications are already in the pipeline for additional, very large, turbines</p> <p>The increasing height of such turbines and their number is of major concern. Millom Without has common borders with South Lakeland and Barrow in Frnesh both of which have wind turbine 'farms' on sites which have unobstructed visibility from Millom, Millom Without and Whicham and the National Park. The massive, and expanding, wind generation facility uin the Irish Sea is also clearly visible. Applications are already in the pipeline for additional, very large, turbines on local land to the north of Haverigg and the Council now feels, on the grounds of cumulative impact, that 'enough is enough'. However, It may be that some small scale facility of purely local importance may be reasonable and therefore the following is proposed.</p> <p>Renewable energy developments: Small scale renewable energy developments to meet local energy needs</p>

should be considered if all the following criteria are met:

i) It will not adversely affect the character of the landscape, settlements or buildings either individually or as a consequence of a cumulative impact.

ii) It does not adversely affect the natural environment and wildlife or, in the case of rivers or streams, aquatic life.

iii) It does not adversely affect the archaeological interest, residential or recreational amenity of the surrounding area.

Small scale renewable energy schemes that result in local environmental benefits, for example the removal or avoidance of overhead wires could be considered.

Large scale renewable energy developments of more than local importance should not be considered unless it can be demonstrated that the development will not have any significant adverse effect on the qualities of the area and its infrastructure.

In the case of wind energy, development a ground to hub height of 25m (82ft) or more should not be considered.

Utility Service Lines

In the case of new overhead utility service lines, these should, as far as possible, be placed underground.

Changes?

Council's response

The concerns expressed here are understood, but local plan policy has to be consistent with national policy and provide for applications to be considered in the light of Government support for renewable energy generation, balanced against environmental considerations. A Neighbourhood Plan may be able to add detail to the context already provided by the Cumbria Wind Energy Supplementary Planning Document

Respondent ID	38
Response ID	S146
Organisation	Cumbria County Council
Policy	ER2, DM2
Paragraph	
Theme	Renewable Energy
Sound?	Yes
Unsound grounds	
Comments	Core Strategy Policy ER2 and Development Management Policy DM2 refer to renewable energy. Policy DM2 highlights a range of considerations that regard should be given to during the consideration of renewable energy schemes. The approach is considered broadly appropriate and has appropriate safeguards to ensure amenity, visual impacts, residential proximity and cumulative impacts can be considered. However, it is considered that it would be useful if Policy ER3 or the supporting text make reference to the potential benefits to the local economy and local community that renewable energy developments can bring.

Changes?

Council's response Comment noted. However, we do not think it necessary to refer in the plan to the benefits of any particular policy, especially when those benefits are well-attested elsewhere.

Respondent ID	39
Response ID	S010
Organisation	National Trust
Policy Paragraph	ER3
Theme	Energy Infrastructure

Unsound grounds **Not Justified and not consistent with NPPF**

Comments The wording of this policy is considered to be incomplete as it does not take into account the full range of likely environmental impacts in Section A. Specifically there is no reference to heritage assets and their settings, whether designated or of local importance. Energy infrastructure can have a range of impacts upon the historic environment, including below ground archaeology (e.g. when laying cables) or on the settings of heritage assets (e.g. siting of infrastructure within designated vistas that form part of the historic landscape).

Changes? The historic environment is identified in the NPPF as a key component of sustainable development and its protection, and where possible enhancement, needs to be built into this policy.

Amend section A of the policy to read:
"Ensure that any new energy transmission infrastructure minimises potential impacts upon the Borough's landscape, natural environment, heritage assets and their settings, and on the health and amenity of its residents and visitors."
(A complementary statement needs to be added to the supporting text (at paras 4.3.11-4.3.16)

Council's response Not accepted. The landscape and natural environment are mentioned specifically because they are most likely to be affected by transmission lines. Energy transmission proposals will be considered under the NSIP process and impacts on built heritage would be covered in the Local Impact Report. Other relevant development proposals would be covered by ER3C ("minimise undesirable impacts") and by Development Management policy DM27.

Respondent ID	16
Response ID	S060
Organisation	Allerdale Borough Council
Policy	ER3 ER4 ER5 ER6

Paragraph	
Theme	Energy Infrastructure and Employment Land and Premises
Sound?	Yes
Unsound grounds	
Comments	The approach outlined in policies ER3-6 mirrors the emerging Allerdale Core Strategy. The policy approach to provide a flexible high quality supply of land and premises for both existing businesses and emerging sectors is supported. These policies are based on a shared evidence base produced by the two authorities and support the delivery of the West Cumbria Blueprint.
Council's response	Support noted.
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Respondent ID	86
Response ID	S129
Organisation	(AMEC on behalf of) National Grid
Policy	ER3
Paragraph	
Theme	Support Infrastructure for the Energy Coast
Sound?	?
Unsound grounds	
Comments	National Grid infrastructure within Copeland Borough Council's administrative area Electricity Transmission National Grid has no electricity transmission assets located within Copeland Borough Council's administrative area.
Changes?	
Council's response	Comment noted.
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Respondent ID	38
Response ID	S144
Organisation	Cumbria County Council
Policy	ER4, ER6
Paragraph	
Theme	Land and Premises for Economic Dev. & Location of Employment

Sound? ?

Unsound grounds

Comments

Previously the County Council raised concern that neither Policy ER4 or ER6 identified the amount of employment land in hectares necessary to support delivery of the economic objectives for each of the Key Service Centres and Local Centres, for example, by the use of targets.

The justification for such an approach is that Saved JSP Policy EM13 (Employment Land Provision) sets out the amount of readily available land necessary for employment purposes in 5-year bands, disaggregated to each District/Borough in Cumbria within identified employment market sectors (i.e. regional investment site, strategic employment site, local employment site, and business/science park). It is considered that this planned approach to ensuring a sufficient supply and range of employment land, should be reflected at a local level in the Core Strategy. It is also easily measured, so that progress towards meeting specified goals can be established as part of the Monitoring and Implementation Framework.

The approach which Copeland has taken in the Pre-Submission Draft is to address the above issues in the supporting text with reference to supporting evidence base documents. This in turn allows the policy to be flexible in the current climate of economic uncertainty, but also allow for the Site Allocations Development Plan Document to bring forward a supply of, which will be in excess of identified demand levels.

The evidence base indicates that the need for the next 20 years (2011-2030) based on the 2005-2010 take up is for 24.84ha of business park (B1) and 8.28 ha of industrial (B2) land resulting in 33.12ha in total we note that the current supply is identified at 88ha. However, there has been an historic issue in Copeland over the retention of too many small allocated employment sites, where there has been no incentive to develop them, and they are effectively undevelopable. It is therefore considered that it is appropriate for Copeland to review the sites which are included within the supply, and to de-allocate, or identify alternate uses as part of the Site Allocations process, this in turn will allow for the Site Allocations Development Plan Document to allocate suitable deliverable sites in accordance with the terms of the NPPF.

It is considered that the approach taken in the Core Strategy Pre-Submission Draft will allow for Copeland to identify enough supply to deliver against the needs of the Borough. It is also considered that the flexible approach will allow Copeland to respond to the needs of major infrastructure projects, which could have a significant impact upon the supply and demand of employment land in Cumbria.

Changes?

Council's response

Accepted in principle on the basis that this can be taken forward in the Site Allocation DPD. With the expected onset of nuclear new build and possible requirements arising from the National Grid upgrade, the Borough Council does not at present consider it feasible to set realistic targets for employment land availability, or sensible to reallocate or de-

allocate employment sites, some of which are close to Sellafield or otherwise potentially suitable in terms of location.

Respondent ID	39
Response ID	S011
Organisation	National Trust
Policy	ER6
Paragraph	
Theme	Location of Employment
Sound?	No
Unsound grounds	Not Justified and not consistent with NPPF
Comments	In most respects the National Trust is content with this policy and its detailed wording. However, it is most concerned that the bullet points in part B make no specific reference to heritage considerations. This is a key matter in the assessment of the sustainable development credentials of new development, as confirmed by the NPPF, and needs to be incorporated into the criteria applicable to this policy.
Changes?	Amend the final bullet point of Part B of the policy so that it reads: " - impact on landscape character, settlement character, heritage assets (including their settings) and biodiversity."
Council's response	Not accepted. The criteria are those considered 'particularly important' in this context. Proposals would still have to satisfy Policy DM27 as regards the built environment.
Respondent ID	39
Response ID	S012
Organisation	National Trust
Policy	ER7
Paragraph	
Theme	Developing Town centres and Other Centres
Sound?	No
Unsound grounds	Not Justified, not effective and not consistent
Comments	The policy is generally supported but is considered to be deficient in its assessment of the assets in Whitehaven that make it an important tourist and visitor destination. Elsewhere the DPD notes and supports the Colourful Coast Initiative (e.g. Policy ER8 at Part E, para 4.10.7, Policy ENV2) which is based upon the attractiveness of the coastal area linking Whitehaven Harbour to St Bees Heritage Coast. It is considered that Part B of the proposed policy should be supplemented to recognise this strong link.

Changes?	Amend part B of the policy to read: "Support Whitehaven's role as a tourist and visitor destination linked to its unique heritage, independent and specialist retailers, and the Colourful Coast."
Council's response	Not accepted. The Colourful Coast is part of Whitehaven's 'unique heritage', and does not need a separate mention, particularly given that it is mentioned elsewhere.
Respondent ID	37
Response ID	S031
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	ER7, ER8 & ER9
Paragraph	
Theme	Developing Town Centres and Other Centres
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	The NPPF states that LPAs should use their evidence base to identify the "need for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development". As the Core Strategy does not identify the quantitative or qualitative need for additional retail floorspace, or any other form of development, as required by the NPPF, the Core Strategy is considered unsound.
Changes?	Although this DPD isn't a Site Allocations document, in line with the NPPF (para 22), details of the scale and location of future retail development should be identified. As required by the NPPF policies should be realistic and flexible enough to accommodate needs not anticipated in the plan. As such there should be an express acknowledgement that any changes to the evidence base over the plan period will be reflected in policy. In addition, within policy ER7, the Core Strategy should also include a policy that sets out the threshold for the need for a Retail Impact Assessment as required by the NPPF. It recommended that the Council should adopt the default figure of 2500 sqm of additional retail floorspace.
Council's response	(1) Not accepted. Research on likely future capacity and resultant demand for retail development is available in the Evidence Base. The Council's opinion is that it does not indicate an urgent need to do what is proposed here, but that it is appropriate to consider its implications in the site allocation process. This is entirely consistent with the NPPF. (2) Accepted in part. Demand for retail development in Copeland is muted. The NPPF does not require that the sequential test should be included in policy, merely that it should be applied, and as there is no evidentially-based reason to depart from the national norm, the intention has always been that applications should be determined according to the national policy specifications. This is not inconsistent with the NPPF; but it is accepted that, in the interests of clarity, the plan should make reference

to this, and that this is done appropriately in the supporting text, so that the policy itself is not repetitive of the NPPF.

Respondent ID	37
Response ID	S034
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy Paragraph	ER9
Theme	Developing Town Centres and Other Centres
Unsound grounds	Not consistent with national planning policy
Comments	It is considered that policy ER9 restricts further growth and development in Local Centres and smaller centres that could provide local communities with vital services and amenities (including shops). This is contrary to the pro-development message set out in the NPPF.
Changes?	It is suggested that ER9 be reworded as follows: "in the local and smaller centres: The provision of shops and services will be maintained and where appropriate enhanced to ensure they continue to serve their small catchment areas with basic goods and services".
Council's response	Accepted in principle. The policy is not intended to restrict development which maintains the vitality of small settlements. (It might be read with Policy ST1, explained by Figure 3.2, which explains the nature of development which will be supported in villages.) The Council would support a an addition to ER9B (differently worded to the suggestion here) which makes this clear. Minor change proposed.

Respondent ID	21
Response ID	S057
Organisation	Tesco Stores Limited
Policy Paragraph	ER8
Theme	Whitehaven Town Centre
Sound?	?
Unsound grounds	
Comments	In Policy ER8 it states that it is the Council's intention to redraw Whitehaven Town Centre boundary to reflect the anticipated growth and development within the area. As you will appreciate Tesco has an existing store that abuts the current town centre boundary. We remain committed to investing in this location and consider that the store functions as a part of the town centre, supporting linked trips to shops and other services within the town centre. As such we would kindly request that the town centre boundary is redrawn to include the Tesco site - we can discuss in more detail the extract boundary when you are at the site specific stage.

Changes?

Council's response Noted; this will be considered in the site allocation process, when the boundary is reviewed.

Respondent ID	21
Response ID	S058
Organisation	Tesco Stores Limited
Policy Paragraph	ER9
Theme	Key Service Centres, Local Centres and smaller centres
Unsound grounds	Not consistent with national planning policy?
Comments	In Policy ER9 A (i) the word 'needs' is used when referring to retail provision.
Changes?	We suggest some thought is given to redrafting this section of the plan to avoid any confusion with the needs test, which as you will appreciate is no longer a factor in the assessment of retail planning applications.
Council's response	The policy is based on a wish to see retail development on a scale appropriate to those communities, and not syphoning custom away from higher order cetnres. It is accepted, however, that there are grounds for confusion here; the Council suggests that 'meet the needs of local residents' be replaced by 'serve local communities' as a minor change.

Respondent ID	16
Response ID	S061
Organisation	Allerdale Borough Council
Policy Paragraph	ER7 ER8 ER9
Theme	Whitehaven Town Centres, Key Service Centres & Local Centres
Sound?	Yes
Unsound grounds	
Comments	Support the complementary roles of Whitehaven and Workington as identified in the joint West Cumbria retail study and contained in policy ER7. Support the retail hierarchy in Copeland and the roles of Cleator Moor, Egremont and Millom. ER8 helpfully defines Whitehaven's role. Overall the retail strategy complements the emerging approach in the Allerdale Core Strategy.
Council's response	Support noted.

Respondent ID	28
Response ID	S085
Organisation	Cleator Moor and District Chamber of Trade
Policy	ER9
Paragraph	
Theme	Key Service Centres, Local Centres and other smaller centres
Sound?	?
Unsound grounds	
Comments	Maintaining the existing shops and services does not cover for recent losses.
Changes?	ER9B should say (NEW TEXT IN CAPITALS): In the Local Centres and smaller centres: The provision of shops and services will be maintained AND IMPROVED to ensure they continue to serve their small catchment areas with basic goods and services.
Council's response	Accepted in principle. The policy is not intended to restrict development which maintains the vitality of small settlements. (It might be read with Policy ST1, explained by Figure 3.2, which explains the nature of development which will be supported in villages.) The Council would support a an addition to ER9B (differently worded to the suggestion here) which makes this clear. Minor change proposed.

Respondent ID	27
Response ID	S093
Name	Mr R W & E Mulholland
Policy	ER9
Paragraph	
Theme	Key Service Centres, Local Centres and other smaller centres
Sound?	?
Unsound grounds	
Comments	Maintaining the existing shops and services does not cover for recent losses
Changes?	ER9B should say (NEW TEXT IN CAPITALS): In the Local Centres and smaller centres: The provision of shops and services will be maintained AND IMPROVED to ensure they continue to serve their small catchment areas with basic goods and services.
Council's response	Accepted in principle. The policy is not intended to restrict development which maintains the vitality of small settlements. (It might be read with Policy ST1, explained by Figure 3.2, which explains the nature of development which will be supported in villages.) The Council would support a an addition to ER9B (differently worded to the suggestion

here) which makes this clear. Minor change proposed.

Respondent ID	16
Response ID	S064
Organisation	Allerdale Borough Council
Policy Paragraph	ER10
Theme	Renaissance through Tourism
Unsound grounds	
Comments	Support this policy in terms of providing a complementary offer to the Lake District and the location of major attractions and accommodation in the main towns.
Council's response	Support noted.
Respondent ID	39
Response ID	S013
Organisation	National Trust
Policy Paragraph	ER10
Theme	Renaissance through Tourism
Sound?	No
Unsound grounds	Not justified, not effective and not consistent
Comments	<p>Firstly, National Trust does wish to acknowledge that significant improvements have been made to the wording of this policy in response to previous representations.</p> <p>However, the Trust does still have a concern about the detailed wording of part C, in particular in the context of the Colourful Coast (part iii - Whitehaven Coastal Fringe). The change that has been made specifically refers to 'the character of the surrounding area' but makes no reference to the character of the identified sites themselves. In the case of the Colourful Coast where the Trust has particular knowledge, it is in large measure the character of the site itself, rather than that of the areas that surround it that is of particular landscape quality, rarity and attractiveness.</p>
Changes?	<p>Amend the text in ER10C to read:</p> <p>"Support appropriate tourism development which accords with the principles of sustainable development and does not compromise the special qualities and character of allocated Tourism Opportunity Sites or the areas that surround them, or public access thereto in the following locations:</p>
Council's response	Accepted; policy modification suggested as a minor change.

Respondent ID	8
Response ID	S126
Organisation	Cumbria Tourism
Policy	ER10
Paragraph	4.10.1 & 4.10.4
Theme	Renaissance Through Tourism
Sound?	Yes
Unsound grounds	
Comments	Cumbria Tourism broadly supports the policy ER10, "Renaissance through Tourism".
Changes?	Two minor suggested amendments: Para E - add importance of connections to visitor infrastructure such as car parks, toilets and signage, in addition to transport connections. Para F - replace 'Cumbria Tourist Board' with 'Cumbria Tourism'. In key policy text (after para 4.10.8) add 'Tourism Strategy for Cumbria 2008-2018'
Council's response	(1) Comment noted; but the Council considers that the reference in 4.10.4 is adequate as an explanation of how the policy should operate, whilst ER10E is about connections, between destinations and amenities, rather than the infrastructure provided at them. (2) The suggested corrections are appreciated and the Council proposes them as minor changes.

Respondent ID	16
Response ID	S065
Organisation	Allerdale Borough Council
Policy	ER11
Paragraph	
Theme	Developing Enterprise and Skills
Sound?	Yes
Unsound grounds	
Comments	Developing the local skills base to take maximum advantage of the opportunities emerging from the nuclear sector and associated businesses is a key element of the West Cumbria Economic Blueprint. Support the inclusion of this skills policy.
Council's response	Support noted.

CHAPTER 5 – SUSTAINABLE SETTLEMENTS

Respondent ID	16
Response ID	S066
Organisation	Allerdale Borough Council
Policy	SS1 SS2 SS3
Paragraph	
Theme	Housing Offer, Growth and Affordability
Sound?	Yes
Unsound grounds	
Comments	Support the overall approach put forward by policies SS1-SS3. The strategy reflects the need to provide a greater mix and range of housing to support the aspirations in the local economy while recognising the need to address the existing housing stock which require renewal.
Council's response	Support noted.

Respondent ID	36
Response ID	S112
Organisation	Millom Without Parish Council
Policy	ST2, SS1, SS2, SS3
Paragraph	
Theme	Housing Offer, Housing Growth and Affordability
Unsound grounds	Not effective
Comments	<p>Affordable Housing - throughout the Parish</p> <p>Small scale housing schemes should be considered on land or through the conversion of buildings adjoining the defined housing development boundaries of settlements, where it is clearly demonstrated that there is a proven local need for affordable housing that cannot reasonably be provided within a development boundary. Additionally the following criteria should be met:</p> <ol style="list-style-type: none">1. All dwellings should be, and should remain, available for people with a local housing need, at an affordable cost to rent or shared ownership. An obligation would normally be sought from the developer that the scheme will be managed by a housing association or trust. It should be a condition of any such planning permission that a binding legal obligation will be put in place, to ensure that the above restrictions apply to the property in perpetuity.2. The development must respect the character and appearance of the settlement and its setting in the countryside.

Sub-division of existing houses

The sub-division of an existing house to form two or more dwellings should be considered if it does not have an adverse effect on the amenity of the neighbours or the character of the area.

Outside of the housing boundaries of the existing settlements all additional dwelling units created through the sub-division should be restricted to meet local needs where it is clearly demonstrated that there is a proven local need for affordable housing that cannot reasonably be provided within a development boundary.

Replacement Dwellings

The construction of a replacement dwelling in the countryside outside a settlement should only be permitted where:

1. residential use has not been abandoned
 2. It is demonstrated that the repair of the existing building is not economically feasible or that the replacement building would bring about an environmental improvement in terms of its impact on its surroundings and the landscape surroundings.
 3. The building is in a location where replacement would not cause unacceptable harm to the landscape and
 4. The new building will be in the same position as that which exists and will be of similar size and scale with a suitable residential curtilage.
- Any extensions that would increase the size of the replacement dwelling to the detriment of the locality, should not be permitted.

Settlement Historic Arrangement

Within a settlement, development should not be permitted that would result in the loss of or obscure building layout and plot patterns, where these provide evidence of the historic development of the settlement, and contribute to its character.

Building Design

All new buildings must be in sympathy with their surroundings in terms of siting, scale, form and design, meeting the requirements stated above. The use of external materials consistent with local building traditions should be required to maintain the character of the area.

Development within barns and other buildings

Development involving the total or substantial destruction of a traditional barn or other building should not be considered if the barn is

1. Sound and substantially complete and important to the landscape or
2. Of architectural or historic interest

Demolition of modern ancillary elements of a barn or building could be acceptable where this would help to secure the long term integrity of the main structure.

Conversion of traditional buildings

The conversion of buildings of traditional design and materials in accordance with other agreed policies should only be considered where:

1. The building is large enough to accommodate the uses proposed without the need for alterations to the roof line or significant extension.
2. The building is capable of conversion to the proposed use without such change to its external appearance as to detract significantly from its contribution to the character of the area.
3. The building is capable of conversion without the need for substantial rebuilding and the external walls are structurally sound. The developer should, if requested, provide a full structural survey where the condition

of the building is in doubt or dispute.

4. The proposal includes the retention of all existing external features which contribute significantly to the building's character including any surviving original openings or roofing materials.

5. the original roofing material, if absent or if in need of replacement, should be replaced with a material and in a manner consistent with its age and location.

6. The proposal does not detract from the vernacular architecture of the building, not adversely affect the contribution of its character to the local scene through the insertion, attachment, or erection of additional openings, accoutrements or buildings which are other than essential to the proposed use. Planning permission granted for conversion of traditional buildings should be conditional upon the withdrawal of permitted development rights relating to such ancillary development.

7. The proposal does not result in any unacceptable loss of amenity for occupiers of neighbouring properties.

Where conversion of a traditional building is likely to result in the loss or obscurity of historical evidence important to the understanding of the development or the vernacular architectural traditions of the area, the developer will be required to provide an appropriate level of recording of the building in advance of works commencing, or during the period of development.

Extensions and alterations to buildings

Development involving the extension or alteration of a building that is not listed should be considered if the proposal accords with other Council policies (e.g. Building Design etc.) and would not:

1. be seen to dominate the existing building in terms of shape, height, materials or windows.
2. result in any unacceptable loss of amenity for occupiers of neighbouring properties
3. result in the loss of curtilage, including parking provision, leaving sufficient space to meet the needs of the property as altered or extended.

Any extension should respect the architectural integrity of the existing building and its setting in terms of design and use of materials.

Re-occupation of former houses

The re-occupation of former houses within or outside settlements should be considered provided that:

1. the building is of such architectural or historic interest that its restoration in the landscape or village is justified
2. the re-occupation can take place without the need to substantial rebuilding in that external walls of the buildings are structurally sound.

The planning authority should reserve the right to require a full structural survey where the condition of the building is in doubt or dispute.

3 the re-occupation of the building does not give rise to the requirement for an additional curtilage or car parks which would adversely affect the character of the building or its setting.

Changes?

Council's response

No need for change. Policy SS3 envisages that rural house building will be on an 'exception site' basis, and that such dwellings will have their occupancy secured, as it is in the Lake District National Park (which

covers about half of this parish).

Respondent ID	37
Response ID	S035
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	SS1
Paragraph	
Theme	Improving the Housing Offer
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	The NPPF clearly sets out that the plans should be realistic and flexible enough to accommodate needs not anticipated in the plan and that development should reflect the community's need (para 7). On this basis SS1 in it's current form is at odds with the guidance set out in the NPPF.
Changes?	Whilst Sainsbury's support the focus of housing growth within Whitehaven, to ensure the Core Strategy is sound, pro-growth and that there is flexibility to allow for currently unidentified needs, Sainsbury's request that policy SS1 is expanded to acknowledge the need for local scale shops and services as part of housing developments in order to create sustainable communities. This approach is acknowledged in policy SS4 which states that the range of service and facilities serving local communities will be protected by: "Allowing the expansion and/or enhancement of existing community facilities to assist continuing viability, particularly in areas where new development will increase the demand for facilities.
Council's response	Not accepted. The suggested amendment would not be consistent with the thrust of SS1, which is about the quality and range of housing. The kind of development referred to is encouraged by policy ER9A(i), making the change unnecessary.

Respondent ID	37
Response ID	S037
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy	SS2 & ST2
Paragraph	
Theme	Sustainable Housing Growth
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	Sainsbury's support the scale of housing development proposed as a baseline figure in this policy. However, the suggested provision for

growth over and above the baseline figure of 30% is considered to be at odds with the pro-growth message set out in the NPPF, as such this policy is considered to be unsound due to its non-compliance with national policy.

Changes?

The policy currently allows for 30% growth above the baseline figure. This is helpful but could still be restrictive to future growth. For example if there was a period of economic uncertainty and a low number of net additional dwellings were delivered or conversely the population projections over the plan period were increased. Both scenarios would require an increase in the baseline figure. Therefore, it is suggested that to be compliant with the NPPF, the text should make it clear that the baseline figure is not to be interpreted as a cap or maximum, to ensure that future growth is not restricted. To reinforce this, it is suggested that the policy should also include a line to allow for flexibility in either the level of net additional dwellings delivered or changes to population projections over the plan period.

In all locations identified for residential growth in policy ST2, an acknowledgement should be made that these areas may require additional services and amenities on a suitable scale (including retail, in order to meet the needs of local residents.)

Council's response

Not accepted. It strikes us as odd to assert that policy provision, specifically inserted to be flexible and to provide for growth well above identified need or currently anticipated demand, is not 'pro-growth'. The figure of 300 per annum is highly aspirational and in any case not a ceiling - as the policy and supporting text (5.3.5) explain, it is based on making available enough land for that much development, not on restricting it to that level in the extremely unlikely event that demand exceeds it. With regard to the point about population projections, it should be noted that the evidence base discusses a range of projections and even the lower figure (230) is above the highest projection for Copeland. Topic Paper 2 goes into this.

Respondent ID	73
Response ID	S074
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	SS2
Paragraph	
Theme	Sustainable Housing Growth
Sound?	?
Unsound grounds	
Comments	The Estate fully supports the approach to 'deliver as much brownfield land as is feasible'. This provides adequate flexibility to ensure a focus on brownfield sites but also guarantees that where such sites are unviable and undeliverable within the plan period, alternative sites can come forward.

Changes? In accordance with this approach, we seek that Policy SS2 (d) be reworded to remove the reference to “seeking to achieve 50% of new housing development on previously developed ‘brownfield’ sites”. The SHLAA and Viability Assessment indicate that 25 – 35% brownfield development is more realistic. It would be more appropriate to ‘seek to achieve as much brownfield land as is feasible’.

Council's response No change. The point is understood but the council wishes to retain the 50% figure, as an aspiration but also a contingency in the event of unforeseen brown field land release - and that land would have to be viable for development. We accept that, if only SHLAA sites are developed and not other land emerges, 25-35% is the likely figure, and there is no likelihood that viable green field sites will be impeded, as the site allocation process will have to identify an adequate supply of viable sites (which will probably include all the currently identified acceptable green field sites).

Respondent ID	34
Response ID	S096
Organisation	United Utilities
Policy	SS2
Paragraph	5.3.7
Theme	Sustainable Housing Growth
Sound?	?
Unsound grounds	
Comments	<p>The density of new housing can have a major impact on water and wastewater resources and its supporting infrastructure; United Utilities PLC, uses the RSS density data to determine the capacity needs for development.</p> <p>It is essential that any deviation from RSS [30 unit per ha] is defined and therefore ensure the supporting infrastructure needs are correctly assessed and provided.</p>
Changes?	

Council's response Comment noted. The main location for development in excess of 30 per hectare is likely to be central Whitehaven. Elsewhere, we anticipate that most development will be at or near 30dph, with some sites in appropriate circumstances being at a lower density. We anticipate that the site allocation process will lay down site-specific guidelines about density.

Respondent ID	38
Response ID	S140

Organisation	Cumbria County Council
Policy	SS2, SS3
Paragraph	
Theme	Sustainable Housing Growth and Housing Needs, Mix & Afford..
Sound?	Yes
Unsound grounds	
Comments	The proposed level of future new house building growth in the Borough is supported and welcomed. The Preferred Options offered a sliding scale of new house building, ranging from 230 to 299 dwellings per annum. The higher level of housing would be greater than currently set in the Regional Spatial Strategy for the North West (September 2008) (230 dwellings per annum for the Borough), although recent actual house completion rates have been lower at 192 dwellings per annum. At the time based on evidence published in the Interim Strategic Housing Market Assessments (SHMAs) for Copeland, the County Council recommended that an annualised dwelling requirement of 300 units per annum should be the minimum that should achieved over the long-term.
Changes?	
Council's response	Support noted.
Respondent ID	73
Response ID	S075
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy	SS3
Paragraph	
Theme	Housing Needs, Mix and Affordability
Sound?	?
Unsound grounds	
Comments	As referenced above, the Estate fully support Copeland's vision for a mix of high quality housing to meet people's needs and aspirations, reverse outward migration and increase the resident population. The SHMA particularly identifies a general lack of choice in the housing stock, in particular high quality family accommodation. An overall limitation of 30 units per annum in Egremont will fail to deliver sufficient housing choice in the market and an adequate level of affordable and special needs housing. In order to meet policy SS3, sufficient land allocations will be required within all of the main settlements in order to successfully meet existing and future housing aspirations. The proposal for 15 – 25% affordable housing, subject to development viability and consideration of local housing markets is supported.
Changes?	

Council's response	It is not accepted or intended that there will be a restriction as far as Egremont is concerned. The phrase 'at least' is used, and market uplift towards the 30 per annum figure would not override that. In fact, the recent history of Egremont suggests that to reach 30 per annum would be a challenge under any circumstances.
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Response ID	S104
Organisation	Millom Without Parish Council
Policy	SS3, DM11, DM25?
Paragraph	
Theme	Housing Needs, Mix and Affordability
Sound?	No
Unsound grounds	Not effective
Comments	<p>The MWPC supports limited development of a sympathetic nature which would be appropriate to community needs . For example, affordable, environmentally friendly homes (espeically starter homes) for local people, bearing in mind the nature of the area and the need for well designed houses, sympathetic to the vernacular architecture. There are already sufficient, or even too many, large new 'executive style' homes, some with very inappropriate architecture.</p> <p>Design excellence should be encouraged and all developments should be based on sustainable principles.</p> <p>Any development which may disturb the habitat of protected species should only be considered if adequate provision is made for the protection of such species. If planning permission is granted conditions should be imposed to ensure their continued protection.</p>
Changes?	

Council's response	No need for change. SS3 and DM11 are supportive of these sentiments and will be further backed up by the forthcoming SPD on design quality.
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Respondent ID	81
Response ID	S054
Organisation	DTZ on behalf of Northumbria/North Cumbria NHS Trust
Policy	SS4?
Paragraph	5.5
Theme	Community Facilities and Services
Sound?	?
Unsound grounds	

Comments	<p>Background</p> <p>The acquisition of North Cumbria University Hospitals NHS Trust by Northumbria Healthcare NHS Foundation Trust continues to move forward as both Trusts have now signed a 'Heads of Agreement', setting out the next stages of the transaction. Northumbria Healthcare NHS Foundation Trust is now formally the 'acquiring organisation'. The Trusts are currently working together to achieve a deadline to complete the acquisition process by 1 December 2012, although exact timescales will be influenced by a complex regulatory approval process.</p>
Changes?	<p>Suggested Amendments</p> <p>It is very likely that modernisation and improvements will be forthcoming at West Cumberland Hospital in the next few years. Therefore, it is considered that a new 'Development Management' policy should be introduced to deal specifically with healthcare facilities (or institutional uses, including healthcare facilities). This would state the Council's support for healthcare and how they will work positively with healthcare providers to seek improvements to healthcare facilities in the Borough of Copeland. The introduction of such a policy, perhaps further supported by a bespoke allocation in the forthcoming 'Site Allocations Document', would provide re-assurance to the Trusts in moving forward with forthcoming planning applications.</p> <p>Alternatively, if it is considered that the currently worded Development Management policies are appropriate (eg Policy DM10 'Achieving Quality of Place'), then the Trust looks forward to working with Copeland Borough Council on a site allocation for West Cumberland Hospital in Whitehaven.</p>
Council's response	<p>No change needed. We do not consider it appropriate to include a policy at this level of detail in the Core Strategy. It is, however, worthy of consideration as a site allocation policy.</p>

Respondent ID	45
Response ID	S052
Organisation	Sport England
Policy Paragraph	SS4
Theme	Community Facilities and Services
Unsound grounds	Not effective and not consistent with NPPF
Comments	<p>Sport England supports the principle of policy SS4 which seeks to protect community facilities and services, and also to provide for their improvement or their enlargement in relation to additional demand arising from a development. However, the text supporting the policy contains a typographical error that makes the scope of the policy very difficult to determine. Paragraph 5.5.2 states that community facilities include: Leisure facilities: playing fields and sports pitches, play areas, allotments and informal open space accessible to the public, (covered</p>

also by policy SS5, sports and leisure centres). However, Policy SS5 is actually titled "Provision of Access to Open Space and Green Infrastructure". This leads me to conclude that the comma after SS5 (in para 5.5.2) should have been a closing parenthesis and that sports and leisure centres are covered by policy SS4.

The error in the policy wording makes it ineffective.

I also consider that policy SS4 is not consistent with national planning policy. The National Planning Policy Framework (paragraph 74) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one of three specific criteria are met. In brief these are where the land and buildings have been demonstrated by an assessment to be surplus to requirements; where equivalent replacement provision is made; or where the development is for alternative sports / recreational provision (the need for which outweighs the loss).

Paragraph C of policy SS4, though, would appear to allow development of say a sports facility for another form of community use (say a library). This considerably weakens the protection given by the NPPF and could over time lead to a reduction of sports facilities.

Changes?

1. The typographical error in para 5.5.2 should be corrected to make the scope of the policy clear.
2. Bullet point i) of paragraph C should be amended to make clear that it does not apply to sports and recreational facilities.

Council's response

Accepted in principle. (1) The suggestion of a typographical error is correct and the Council proposes to deal with this as a minor change. (2) The reference relevant to sports facilities is in fact SS4C(ii), backed up by DM21. The Council proposes to support this by inserting a reference to NPPF paragraph 74 criteria in the supporting text (new paragraph after 5.5.7).

Respondent ID	29
Response ID	S100
Organisation	The Theatres Trust
Policy Paragraph	SS4, DM21
Theme	Community Facilities and Services
Unsound grounds	Not effective and not consistent with NPPF
Comments	It is unsound because Policy SS4 does not include the word 'cultural' and Policy DM21 is inadequate in protecting your cultural facilities as it also does not include the word 'cultural'. The Key Policy Context box at the foot of page 58 of the Core Strategy refers to NPPF para.s 28 and 70 but does not include the word 'cultural' which is quite clearly used in the NPPF.

One of the recommendations in Item 28 on page 9 of the NPPF for a prosperous rural economy is to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

Changes?	The changes we suggest are <ul style="list-style-type: none"> that the word 'cultural' is included within the text of Policy SS4 to reflect the NPPF at C and D – community and cultural facilities;
Council's response	Accepted. Although the intent is that the wording in these policies would cover 'cultural' as 'community' facilities, we have no objection to clarifying this and will suggest a minor change to meet the objection.

Respondent ID	36
Response ID	S117
Organisation	Millom Without Parish Council
Policy	ST4C(i), SS4, SS5
Paragraph	
Theme	Community Facilities - Sport and Recreation
Sound?	No
Unsound grounds	Not effective
Comments	<p>Provision of community sport and recreation facilities</p> <p>New, or improvements to existing community sport and recreation facilities should be considered if all the following criteria are met.</p> <p>i) There is a proven local community need for the facility.</p> <p>ii) It is appropriately located within or adjacent to settlements or school to serve the needs of the local community.</p>
Changes?	
Council's response	No need for change. In the Council's opinion policies SS4, SS5 and DM21 adequately deal with this issue in line with national policy. Sport England has supported it subject to one minor clarificatory change.

Respondent ID	45
Response ID	S053
Organisation	Sport England
Policy	SS5
Paragraph	
Theme	Green Infrastructure
Sound?	Yes
Unsound grounds	
Comments	Sport England supports the principle of Policy SS5 which seeks to protect

Changes?	and promote open space and green infrastructure (including playing fields) as these are important resources for sport and recreation.
Council's response	Support noted.
Respondent ID	34
Response ID	S097
Organisation	United Utilities
Policy	SS5
Paragraph	5.6
Theme	Green Infrastructure
Sound?	?
Unsound grounds	
Comments	<p>The Council should seek opportunities to use developer financial and/or resources contributions to meet common objectives.</p> <p>Use green and open spaces, sports and recreation facilities to address surfacewater and climate change issues.</p> <p>Building green infrastructure assets such as ponds, swales and wetlands will not only meet the Council's Green Space needs but also their local existing and/or future surface water/ climate change issues.</p>
Changes?	
Council's response	Comment noted and green infrastructure is a theme in the forthcoming SPD.

CHAPTER 6 – ACCESSIBILITY, TRANSPORT AND COMMUNICATIONS

Respondent ID	39
Response ID	S014
Organisation	National Trust
Policy	T1
Paragraph	6.2.5
Theme	
Sound?	No
Unsound grounds	Not justified, not effective and not consistent
Comments	National Trust remains supportive of the majority of this policy but continues to have concerns about Cii - in particular the lack of well

reasoned justification for the significant number of road improvements sought on the inability of the Council to deliver these as they are outside its jurisdiction.

It is also apparent that the approach has not had regard to other relevant considerations relating to the sustainable development - including not only the social and environmental implications but also the economic ones in terms of opportunity costs [i.e. would a better return be achieved by alternative investment proposals].

Changes? It is requested that section C of Policy T1 is deleted.

Council's response Not accepted. It cannot be denied that Copeland's transport network and its connections with the strategic route (road and rail) network need to be improved. The Sustainable Community Strategy (page 9; "We want to see easy access into, out of and within Copeland") and the West Cumbria Economic Blueprint (transport improvements needed, described on pp 35/36) both stress this. Some road improvements will facilitate more sustainable movement, such as to the Port of Workington for short sea shipping (including bulk movement for nuclear power station construction). Note that this clause does not actually specify road improvements although it does include a list of roads which need safety and capacity improvement (which may in itself improve sustainability of use by enabling smoother flow of traffic).

Respondent ID	16
Response ID	S063
Organisation	Allerdale Borough Council
Policy	T1
Paragraph	
Theme	Improving Accessibility and Transport
Sound?	?
Unsound grounds	
Comments	The role of the Port of Workington is an important part of the local transport infrastructure serving West Cumbria and its role is recognised as part of the West Cumbria Economic Blueprint.
Changes?	Under paragraph C in policy T1 suggest that reference is made to connections to the Port of Workington.
Council's response	Agreed that the reference needs to be more specific. Minor change suggested.
Respondent ID	36
Response ID	S120
Organisation	Millom Without Parish Council

Policy	T1A, T2, ENV2B, ENV6, DM22, DM23
Paragraph	
Theme	Accessibility, Transport and Communications
Sound?	No
Unsound grounds	Not effective
Comments	<p>Protection of public rights of way and access opportunities.</p> <p>Any proposed planning application which will cause obstruction, damage or lead to an unacceptable use of a public right of way should not be considered unless a suitable alternative route is available or provided and has been included in the planning application. All steps to approve such diversion must be agreed by the proper authorities. Any work will be subject to a condition that it does not commence until the alternative route has been provided.</p> <p>New or improved public rights of way or access. Proposed developments should:</p> <ul style="list-style-type: none"> i) not inhibit or obstruct existing and potential public access routes; ii) be linked to the public access network; and iii) enhance, where appropriate, the extension or improvement of the public access networks including footpaths, cycle and equestrian ways and provision for people with disabilities. <p>N.B. A missing link of the Cumbrian coastal way needs to be activated on the Duddon Estuary embankment section between the railway viaduct at Lady Hall to Duddon Bridge. A short length of about 25 m is inaccessible where it crosses farm land on the river embankment adjacent to Duddon Bridge. This can only be used at present by applying for permission to the farmer who keeps the gate locked.</p> <p>Pedestrians, cyclists and equestrians</p> <p>The design and layout of development proposals will where appropriate be required to include measures that address the needs of pedestrians, cyclists, equestrians and people with disabilities, including acceptable means of access to and within the development.</p> <p>Applicants must consider the needs of public transport users and include appropriate facilities in their scheme to improve the quality and accessibility of public transport for both residents and visitors.</p> <p>Public access and transport facilities</p> <p>Development should be considered for facilities that would help to maintain or improve the public transport network subject to all the following criteria being met:</p> <ul style="list-style-type: none"> i) is fully integrated with the public rights of way network. ii) would not significantly affect residential amenity of the surrounding area. iii) reflects the special qualities of the surrounding area. iv) is fully integrated with the transport and public access network of the area. v) Bus and Train services should be coordinated to complement each other. Buses should be linked to railway stations to deliver and collect passengers. Through ticketing is recommended. vi) The train service north of Millom should be improved, particularly in the evenings. A service should be provided on Sundays.

Journey generating developments

Developments that would either individually or cumulatively generate significant numbers of journeys should only be considered if both the following criteria are met.

- i) It is adequately served by public transport.
- ii) It is accessed from the public rights of way network.

Provision of off road parking

Any new dwelling or converted dwelling should have sufficient off-road parking or garage space within the curtilage of the dwelling for a minimum of two cars. In the case of larger dwellings more parking space will be required as appropriate.

Broadband and Telecommunication links – Many areas in South Copeland have poor electronic communication links. Some areas are not able to receive Broadband internet connections and in general Broadband speeds are very slow (a recent survey has shown most speeds to be below 1Mb/s and one as slow as 0.18 Mb/s, in addition many dwellings have very poor or zero cell phone connectivity. Every effort should be made to improve this situation. It is very difficult to operate any modern business under these conditions (e.g. tourism, hospitality, farming, brewing, etc.).

Telecommunications

Telecommunications development, including masts, structures and associated development should only be considered if:

- i) the applicant can demonstrate that the proposal is part of a telecommunication code operator's network strategy for the provision of telecommunications within the Parish.
- ii) the applicant can demonstrate that the needs of network coverage and capacity cannot be provided through solutions which are less environmentally harmful, sharing existing telecommunications masts or sites, or by using existing buildings or structures.
- lii) the siting, size and design of all elements of the proposal are such as to minimise the impact on the landscape and the wider environment of the Parish.
- iv) The design of any new mast is such that reasonable provision can be made for future sharing if appropriate.

Where appropriate a planning condition will be imposed to ensure that the mast or site would be available for sharing. When permission is granted it will be subject to a condition requiring the removal of the apparatus or structure as soon as reasonably practical after it is no longer required for telecommunications purposes.

The precautionary principle in relation to health effects of mobile phone base stations should be employed. In considering proposals that include the development of base stations, applicants will be required to include with their application a statement confirming that the apparatus when operational will meet the International Commission on Non-Ionising Radiation Protection (ICNIPR) guidelines for public exposure.

Changes?

Council's response	Comment noted. The Council considers that these matters are adequately covered in the plan, and additionally form part of standard scrutiny of planning applications. Policies T1, DM10, DM 12 and DM22 cover these matters in which the County Council as highways authority also has a role (Rights of Way).. Further work exists in the Infrastructure Deficit Report
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Respondent ID	38
Response ID	S143
Organisation	Cumbria County Council
Policy	T1
Paragraph	
Theme	Improving Accessibility and Transport
Sound?	Yes
Unsound grounds Comments	<p>It is considered that Policy T1 is sound, but would benefit from a number of clarifications which are detailed below.</p> <p>It is particularly important to note the County Council's position in relation to Policy T1 relating to the safeguarding of land for development of the Whitehaven Town Centre Transport Interchange. From a Highways Authority perspective 'Transport Interchanges' is now considered old terminology. The County Council are now seeking to develop a programme of Transport 'hubs', with Corkickle being the focus for delivery in Whitehaven. The 'Hubs' will have less emphasis on the interchange between different passenger transport modes. 'Hubs' will be a combination of suitable levels of parking provision, improved passenger facilities/information and safe, attractive walking and cycling routes to the town centre and key residential areas. It is suggested that any reference to 'interchange' be changed to 'hub' within the document.</p> <p>Policy T1 – In reference to 'A595 Capacity Improvements' it is suggested that this is amended to 'A595 Improvements' to allow for a range of measures to be considered. It is also considered that it would be worth including a reference to safeguarding land for a Calder Bridge diversion.</p> <p>Accessibility and Transport Page 80 – Key transport priorities include the A595 Eastern Relief Road/Bypass: The Whitehaven Eastern Relief Road is on the list of potential major schemes being drawn up by the County Council and this list (of around 40+ schemes) will be prioritised shortly. However this scheme does not currently carry priority status from a Highways Authority perspective.</p> <p>Accessibility and Transport Page 80 (actually page 116?) – It is considered that the phrasing;- 'The council will resist any changes to the management of traffic serving Sellafield which would be to the detriment of the locality' could be portrayed as being negative. The role that Copeland Borough Council and Cumbria County Council are playing is much more proactive and positive than this statement implies. It is</p>

considered that statement should reflect this more positive approach.

Appendix 3 – It is stated that the thresholds are in accordance with Policy TSP7, which is listed in Appendix 1 as being superseded by Policies T1 and DM22. In relation to the Travel Plan thresholds, the Appendix should make it clear that this is a general list of requirements, and not a definitive list of situations in which a Transport Assessment or Travel Plan will be required. The County Council would expect Transport Assessments and Travel Plans to be submitted in accordance with the thresholds set out in national guidance, in particular Guidance on Transport Assessment and Good Practice Guidelines: Delivering Travel Plans through the Planning Process.

It is considered that the Appendix should be amended to indicate that a Travel Plan will be required for residential developments greater than 80 units (this threshold is the same for Transport Assessments).

Changes?

Council's response

Accepted in part, with minor changes put forward. However ...

(1) The Borough Council is not persuaded that a 'hub' based at Corkickle is a useful solution for the town, and continues to support the idea of an interchange at the main town station. In any event, the concept of 'interchange' does not rule out other 'hub' type solutions.

(2) The comment on the A595 improvements is accepted and put forward as a minor change.

(3) The Whitehaven Eastern Bypass is a priority for the Borough Council and expressed as such in the West Cumbria Economic Blueprint. The Borough Council wishes it to remain in the plan, in the event of other funding opportunities coming forward.

(4) Note that the reference on page 116 is not policy, nor does the Borough Council accept that it is negative; rather, that it is a reasonable expression reflecting local concerns .

The comment regarding Appendix 3 is accepted and a minor change will be put forward.

CHAPTER 7 – ENVIRONMENTAL PROTECTION AND ENHANCEMENT

Respondent ID	34
Response ID	S098
Organisation	United Utilities
Policy	ENV1

Paragraph	7.2
Theme	Flood Risk
Sound?	?
Unsound grounds	
Comments	<p>Site drainage should be a major consideration for LPA and developers when selecting possible development sites; ground conditions; local flooding issues; development layout; design and planning policy.</p> <p>The treatment and processing of surface water [storm water; rainwater] is a not a sustainable solution; the sites' current natural discharge solution should be continued and/or mimicked; if the existing surface water does not have an existing natural solution, United Utilities PLC questions the development of a flooded site.</p>
Changes?	
Council's response	<p>Comment noted. It is not likely that there will be development in floodplains, except in a small area of already-developed land in central Whitehaven, which does have protection from tidal flooding. The plan makes it clear (7.2) that sustainable drainage solutions are favoured. The Environment Agency is content with the plan.</p>

Respondent ID	75
Response ID	S123
Position	Flood and Coastal Defence Engineer
Organisation	Copeland Borough Council
Policy	ENV1
Paragraph	
Theme	Flood Risk and Coastal Management
Sustainability Appraisal	ENV1, ENV2
Sound?	?
Unsound grounds	
Comments	<p>Policy ENV1 – Flood Risk and Risk Management</p> <p>I have concerns that key sites within Whitehaven will permit new build development. PPS25 did allow certain types of development in areas of flood risk, depending upon their vulnerability classification. Has the sequential test been taken out for these sites? What measures are included for mitigation of flooding? New build properties after 2012 will not be taken into account in funding bids for flood and coastal erosion defences, meaning that these developments should have protection included within the scope of the scheme.</p>

The Sustainability Assessment for Policy ENV2 – Coastal Management
Some sections which may be misleading. The principles behind these need amended along the lines of:

1 Biodiversity: and 2 Landscape and Conservation: “The use of the word protection could possibly be misinterpreted, as protection in coastal terms means coastal erosion defences.

3 Water Resources: The main factor affecting bathing water quality and hence the cleanliness of coastal waters is heavy rainfall, which there is no control over. Other influencing factors are obviously sewer cross connections and overflows, agricultural land run off and also the use of the beaches by animals and vehicles.

Changes?

The Sustainability Assessment for Policy ENV1 – Flood Risk and Risk Management

The following could be included within the “5 Flood Risk” section: Embracing the principles of PPS25, development, even in areas of low flood risk can have a positive influence on flood risk elsewhere, if the proper controls are put in place.

Council's response

The only sites, at risk of flooding, where development would be considered, are key regeneration sites in Whitehaven. These are currently protected by flood defences and the benefits of the regeneration of these sites will outweigh the risks. Developments on these sites will be designed to address the existing levels of flood risk without increasing levels of flooding elsewhere. No change needed.

Comments on the Sustainability Appraisal:

Comments noted. In the statement relating to flood risk, protection shall be replaced with 'safeguarding'.

Respondent ID	36
Response ID	S121
Organisation	Millom Without Parish Council
Policy	ST4, ENV1, DM11G, DM24
Paragraph	
Theme	Flood Risk and Risk Management
Sound?	No
Unsound grounds	Not effective
Comments	<p>Flood Risk – Much of Millom Town and all of the estuarial boundary of Millom Without Parish (approximately 8 km) is at risk of flooding from the sea and/or rivers. These areas are the largest tidal ‘at risk’ areas in Copeland.</p> <p>The Environment Agency, at a series of public meetings, and in consultation papers, has indicated that it is considering reducing its efforts in defence of the coast. A plan covering the next hundred years has postulated the abandonment of embankment maintenance in about twenty-five years’ time. Though this is not a firm position at this stage it</p>

Changes?	is being seriously discussed.
Council's response	Policies ENV1 and DM24 prevent development taking place in areas at risk of flooding. No change needed.
Respondent ID	39
Response ID	S016
Organisation	National Trust
Policy Paragraph	ENV2
Theme	Coastal Management
Unsound grounds	Not justified, not effective and not consistent
Comments	National Trust is a little reluctant to submit an objection to this policy as many improvements have been made to it from the previous version and it wishes to support these. However, the Trust remains concerned about the unqualified support for 'tourism' in the undeveloped coast (part B) Potentially there is a wide range of tourism uses and activities (especially those involving built development and changes of use to provide holiday accommodation) that would be extremely damaging to the qualities of the undeveloped coast, in particular its landscape character, biodiversity and cultural heritage.
Changes?	Amend Part B to read as follows: "Maximise the opportunities along the undeveloped coast for outdoor recreation and appropriate tourism development through support for the North West Coastal Trail and Colourful Coast projects."
Council's response	Not accepted. Para 7.3.5 states that it is important to enable opportunities for an appropriate level of outdoor recreation and tourism. The undeveloped coast is an important tourism resource and whilst it is believed that the large majority of tourism activity will be centred around the North West Coastal Trail and the Colourful Coast initiatives, there may be other suitable tourism opportunities arising in the future that would not damage this valued resource. The Core Strategy is clear that the undeveloped coast will be protected from inappropriate tourism development.
Respondent ID	38
Response ID	S145
Organisation	Cumbria County Council
Policy Paragraph	ENV2, ENV3, ST1, DM25
Theme	Strategic Development Principles & Biodiversity & Geodiv....
Sound?	Yes

Unsound grounds

Comments

At the Preferred Options stage the County Council made a number of specific comments in relation to Biodiversity and it is considered that the majority of these have been taken into account. There are a number of areas to which the County Council considers that Copeland Borough Council could reasonably amend, and these are detailed below. The Cumbria Biodiversity Evidence Base for Local Authorities is a series of documents and data. The link given is to the general Tullie House Museum front page, and so it is not apparent what documents have been used. The web page that holds the documents is <http://www.lakelandwildlife.co.uk/biodiversity/index.html>

It is recommended that the explanatory text should also make reference to the Cumbria Biodiversity Evidence Base, as this is the most up-to-date representation of current knowledge in Cumbria. Reference could also be made to www.cbdc.org.uk. In relation to the glossary, it is considered that some updating would be beneficial to include the following:-

- Green Infrastructure definition to be included
- The habitat definition is limited; it suggested that the definition should be extended to... 'The natural home or environment of a plant or animal, these areas can be small, such as a log, or small pond, or larger, such as woodland, moorland or flower-rich grassland habitat'.
- The infrastructure definition should also include reference to greenspace

Policy ST1 C – The County Council acknowledges that the policy has been amended as requested at the Preferred Options stage. However, it is considered that the policy could better define the biodiversity assets.

Policy ENV2 B – The increased emphasis on managing more of undeveloped coast for biodiversity is welcomed. However, the word 'more' is vague. It is suggested the following wording for ENV2 C is used:- 'Support the management and expansion of natural habitat of the undeveloped coast'.

Paragraph 7.4 - The document needs to better define the biodiversity assets that are covered by ENV3, to assist with policy delivery. Table 6.1 lists the designated sites, but it would appear to not identify other habitat and species assets.

Paragraph 7.4.1 - The role of ecosystem services is now included, however it is only mentioned in relation to economic benefits. It is suggested that this should be widened to include the value of a healthy and resilient environment for climate change adaptation and for other ecosystem services that are not only beneficial in economic terms, such as flood management.

It is considered ENV3 should read:- '...priority and protected species.' since priority species aren't always protected species. ENV3 E refers to wildlife corridors as referred to in the NPPF paragraph 117. It is suggested that 'stepping stones' as in paragraph 117 of the NPPF are included. It is suggested that ENV3 E is re-worded to:- 'Boost the biodiversity value of existing wildlife corridors and create new corridors and stepping stones to develop a functional ecological network.'

It is considered that the Cumbria Biodiversity Action Plan should be made referenced. This could be dealt with by adding:-
'.....implementation of the UK and Cumbria Biodiversity Action Plans....'.

This would help to ensure that if the CBAP adds to the UK scene this will be picked up, and also if the CBAP is not updated to represent that national scene at the local level this will also be referred.

Table 6.1 lists the designated sites, but fails to identify other habitat and species assets, it is considered that the table is both too limited and too detailed (listing individual sites). It would be useful to include a list of the biodiversity assets which are detailed below:- European sites • Special Areas of Conservation • Special Protection Areas • Ramsar Sites National sites and features • National Nature Reserves • SSSIs, • Statutorily protected species) Locally important sites and features • Local Nature Reserves • County Wildlife Sites • Regionally Important Geological and Geomorphological Sites • Species and habitats listed as of principal importance for the conservation of biodiversity in England (s41 NERC Act) (this list is the same as the UK priority species list but adds the Hen Harrier) • UK list of priority habitats and species • Cumbria Biodiversity Action Plan species in addition to UK list, • Landscape features of major importance for wildlife that are essential for migration, dispersal and genetic exchange and part of the functional ecological network

Policy DM25 – It is suggested that where there is reference to protected species in the text (10.5.3) and policy (in the title to the policy). This should be changed from 'protected species' to 'species' in order to ensure that both protected and priority species are covered.

Policy DM25 C - It is considered that further guidance should be worked up in due course to clarify the multipliers for different assets. Section 10.5.6 starts with 'Occasionally'. It is suggested that this word is un-necessary and that, in any case, this is often more than occasionally, as it depends on the site. The word 'may' is adequate in clarifying that this will not be in every case.

Changes?

Council's response The Cumbria Biodiversity Evidence Base is listed in the Policy References box at the end of Section 7.4. No change needed.

Reference is made to the Cumbria Biodiversity Data Centre in the supporting text to policy DM25. No change needed.

It is accepted that there should be a definition of green infrastructure in the Glossary.

The suggested glossary entry for 'habitat' is accepted.

It is accepted that the glossary entry for infrastructure should include 'greenspace'.

ST1C - no change needed. ST1 is an overarching policy that provides the strategic development principles and is therefore not detailed, the detail being provided in ENV3 and DM25.

ENV2B - No change needed. The intention of the policy statement is clear and the suggested alternative wording does not add anything to the intention stated already.

Table 6.1 - in the final version of the Core Strategy this table will appear in an appendix, rather than in the body of the document. It may be appropriate to add a list of protected species and habitats to this appendix also, or it may be more appropriate to direct readers to an online resource for this information, such as the Cumbria Biodiversity Data Centre Website.

Policy ENV3E - Accepted. A minor change will be suggested adding the phrase 'and stepping stones' to ENV3E.

ENV3 first sentence: Accepted - a minor change will be suggested so that the first sentence now reads '.....implementation of the UK and Cumbria Biodiversity Action Plans....'.

DM25: Accepted – deletion of 'protected, from policy title, and addition of 'priority' to the preamble, will be suggested as a minor change.

Para 10.5.6 - Accepted. Deletion of the word 'occasionally' to be put forward as minor change.

Respondent ID	39
Response ID	S024
Organisation	National Trust
Policy	ENV3
Paragraph	7.4.2
Theme	Biodiversity and Geodiversity
Sound?	Yes
Unsound grounds	
Comments	National Trust is pleased to welcome and support the proposed approach to biodiversity and geodiversity considerations. The link between the two is also of key importance and in that context the text at para 7.4.2 is particularly appropriate.
Changes?	
Council's response	Support noted.
Respondent ID	28
Response ID	S086
Organisation	Cleator Moor and District Chamber of Trade
Policy	
Paragraph	Table 6.1 Para 7.4.6

Theme	Biodiversity and Geodiversity
Sound?	?
Unsound grounds	
Comments	Page 69 Sites of Special Scientific Interest: River Ehen (Ennerdale Water) to Keekle confluence is not shown in SSSI listing.
Changes?	
Council's response	Accepted. This omission will be corrected.
Respondent ID	27
Response ID	S094
Name	Mr R W & E Mulholland
Policy Paragraph	Table 6.1 Para 7.4.6
Theme	Biodiversity and Geodiversity
Unsound grounds	
Comments	Page 69 Sites of Special Scientific Interest: River Ehen (Ennerdale Water) to Keekle confluence is not shown in SSSI listing.
Changes?	
Council's response	Accepted. This omission will be corrected.
Respondent ID	39
Response ID	S018
Organisation	National Trust
Policy Paragraph	ENV4
Theme	Heritage Assets
Sound?	Yes
Unsound grounds	
Comments	This policy relating to Heritage Assets has been carefully honed from the initial wording and in particular to reflect firstly the planning policy changes introduced by PPS5 and more recently in the NPPF. The current approach is considered to be both consistent with the NPPF and appropriate to Copeland and the National Trust is pleased to support it.
Changes?	
Council's response	Support noted

Respondent ID	36
Response ID	S113
Organisation	Millom Without Parish Council
Policy	ENV1, ENV3, ENV4, DM24, DM25, DM27
Paragraph	
Theme	Built Heritage and Archaeology
Sound?	No
Unsound grounds	Not effective
Comments	<p>Listed buildings or buildings of historic and/or architectural merit:</p> <ol style="list-style-type: none"> 1. The demolition, or substantial destruction of a listed building or structure should not be considered unless a very strong case is made as to why the building or structure, or part thereof, cannot be retained or is not worthy of retention. 2. External alterations, internal alterations or extensions to a listed building or structure or a building attached to, or within the curtilage of a listed building or structure should only be permitted if the development is in keeping with the character of the building or structure and does not detract from or prejudice its special interest. Materials, components and finishes must be appropriate in all respects to the retention of the character of the building.
Changes?	
Council's response	<p>No change needed.</p> <p>Listed Buildings - This issue is dealt with in policy ENV4 and DM27. The Council has consulted English Heritage during the preparation of the Core Strategy and DM Policies document. Policies ENV4 and DM27 meet with their requirements. English Heritage advocate that extensions to listed buildings should be of their time so that it is clear to future generation what changes have been made to the building and when. This does not mean that they should be incongruous or detracting from the listed structure. The Council feels that the policies relating to heritage features serve their purpose. Any further detail could be included in a Neighbourhood Plan for example.</p> <p>Historic Landscapes - It is felt that this matter is dealt with adequately under policies ENV4, ENV5, DM26 and DM27.</p> <p>Development in Protected or Sensitive Areas</p> <p>The Council agrees with this sentiment and development in these areas is dealt with in the Core Strategy ENV policies and related Development Management Policies. No changes are required.</p>
Respondent ID	39
Response ID	S023
Organisation	National Trust

Policy	ENV5
Paragraph	7.6.3
Theme	Landscape
Sound?	Yes
Unsound grounds	
Comments	Overall the approach to landscape and landscape character is supported. It is a little disappointing that the more detailed landscape character assessment work referred to at para 7.6.3 is not yet available and it is to be hoped that this will be ready before the DPD is adopted.
Changes?	<p>Pending the availability of (and a commitment to use) that more detailed landscape character assessment, it would be helpful if para 7.6.3 was less passive in its reference to the Cumbria LCA Guidance and Toolkit 2011 and promoted its use as a relevant tool in reviewing landscape</p> <p>Pending the availability of (and a commitment to use) that more detailed landscape character assessment, it would be helpful if para 7.6.3 was less passive in its reference to the Cumbria LCA Guidance and Toolkit 2011 and promoted its use as a relevant tool in reviewing landscape impacts, e.g. "Cumbria County Council has undertaken a Historic Landscape Characterisation Programme (2009) and also published a Landscape Character Assessment Guidance and Toolkit (2011) both of which provide relevant advice to protect the intrinsic qualities of the County's landscapes and will be used to assess and inform decisions on planning proposals."</p>
Council's response	Not accepted. The Council is keen to continue to use the 'Landscapes of County Importance' designation until the more detailed borough scale Landscape Character Assessment is completed.

Respondent ID	79
Response ID	S045
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	ENV5
Paragraph	7.6.4
Theme	Landscape
Sound?	No
Unsound grounds	Not justified and not consistent with NPPF
Comments	Policy ENV5 seeks to protect and enhance the borough's landscapes. Part (b) of the policy and paragraph 7.6.4 are considered to be unsound. This is because they seek to protect / enhance the borough's landscapes by ensuring that the impact of developments is "minimised".
Changes?	As outlined above, the test of 'minimising' landscape harm is in conflict with the provisions of policies 97 and 98 of the NPPF where the approach is to permit developments where impacts are (or can be made) acceptable.

Council's response	<p>Not accepted. (1) The word 'minimise' is used for the following reason. As far as wind energy is concerned, the level of local hostility to turbines is such that, in most of the Borough, it would be impossible for a developer to produce a proposal which would be considered to be 'acceptable'. However, if a developer can demonstrate that all reasonable efforts have been made to reduce or mitigate impacts, then it has been demonstrated that the impacts have been minimised. In this context, 'minimised' is less restrictive (and more easily verifiable) than 'acceptable'.</p> <p>(2) The representation omits to acknowledge that NPPF paragraph 98 has a footnote 'unless material considerations indicate otherwise'. In Copeland a material consideration is that no part of the Borough is more than five miles from either the Lake District National Park or the Heritage Coast. In those circumstances it is entirely reasonable to ask that the minimisation of environmental impacts is what is required to make a project acceptable.</p>
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Respondent ID	38
Response ID	S139
Organisation	Cumbria County Council
Policy	ENV5
Paragraph	
Theme	Landscape
Sound?	Yes
Unsound grounds	
Comments	It is considered that Policy ENV5 will protect and enhance Copeland's landscapes and it is noted that support is also given to the reference to the Cumbria Landscape Character Assessment Guidance and Toolkit (2011).
Changes?	
Council's response	Support noted.

Respondent ID	39
Response ID	S025
Organisation	National Trust
Policy	ENV6
Paragraph	
Theme	Countryside Access
Sound?	Yes
Unsound grounds	
Comments	National Trust continues to welcome the inclusion of this Policy and

remains content with the detailed wording. It is essential to ensure that everyone has access to the countryside and coast in Copeland including for refreshment and health benefits.

Changes?

Council's response

Support noted.

CHAPTER 8 – LOCALITIES IN COPELAND

Respondent ID	39
Response ID	S026
Organisation	National Trust
Policy	
Paragraph	8.5
Theme	Localities - West Copeland
Sound?	Yes
Unsound grounds	
Comments	<p>National Trust's specific interest in this locality relates to the St Bees Head area.</p> <p>In the context of that specific interest the Trust has no objections to this part of the Core Strategy. The trust particularly supports the statements relating to a) controlling chalet development in the vicinity of St Bees (under policy ER10); b) conservation of the undeveloped coast (under policy ENV2).</p>
Changes?	
Council's response	Support noted

Respondent ID	65
Response ID	S001
Organisation	Haile & Wilton Parish Council
Paragraph	8.5.18
Theme	Localities - West Copeland
Sound?	Yes
Comments	<p>We do have concerns regarding Copeland BC's ability to deliver the Strategy, as their track record for delivering on previous Local Development Framework Plan is poor to say the least!</p> <p>We felt that there was nothing particularly new in the document over and above what has been published previously.</p>

Haile & Wilton has updated its Parish Plan in 2010/11 so the section 8.5.18 needs to be updated to reflect this. A copy of the feedback/new plan is available on the Haile and Wilton Parish Council website.

Council's response	<p>Section 8.5.18 will be updated as a minor change.</p> <p>Non-achievement of the previous (Local Plan) strategy is mostly due to lack of market interest in identified sites. The updated strategy is consistent with the updated Energy Coast Master Plan (now West Cumbria 'Blueprint'), which is continuing to push for exploitation of opportunities already identified.</p>
Respondent ID	73
Response ID	S076
Organisation	Smiths Gore on behalf of Leconfield Estate
Policy Paragraph	
Theme	Localities - West Copeland
Unsound grounds	
Comments	<p>In general, the Leconfield Estate agree with the approach in Chapter 8.5. The document identifies Egremont as the main service centre with good road links but a settlement which faces economic and educational challenges. The town centre is in decline with a large proportion of social rented housing. A new nuclear power station is proposed adjacent to Sellafield. The approval of this will be a significant boost to the local economy of Egremont and bring about both substantial benefits and additional housing pressures.</p>
Changes?	<p>We strongly disagree with the allocation of a 10% development target. The approach seems contrary to many of the other aspirations of the plan. The available land at Egremont is available, deliverable and achievable. A 25% target is deemed to be more appropriate for the settlement.</p>
Council's response	<p>It is not accepted or intended that there will be a restriction as far as Egremont is concerned. The phrase 'at least' is used, and market uplift towards the 30 per annum figure would not override that. In fact, the recent history of Egremont suggests that to reach 30 per annum would be a challenge under any circumstances.</p>
Respondent ID	88
Response ID	S131
Organisation	Seascale Parish Council
Policy Paragraph	
Paragraph	8.6
Theme	Localities - Mid Copeland
Sound?	No

Unsound grounds	Not Justified
Comments	The Parish Council notes the poor quality of the maps in the Core Strategy document and the location of of the Seascale Community Plan in the West Copeland (8.5.18) rather than the Mid Copeland section (8.6.13)
Changes?	Move 'Seascale Community Plan' to the list in para 8.6.13.
Council's response	Comment noted. The correction will be put forward as a minor change.
Respondent ID	88
Response ID	S132
Organisation	Seascale Parish Council
Policy	
Paragraph	8.6
Theme	Localities - Mid Copeland
Sound?	No
Unsound grounds	Not Justified
Comments	The Parish notes the flooding risk in the area of Cringley Stream.
Changes?	
Council's response	Comment noted. Cringley Stream is not identified in the Strategic Flood Risk Assessment, but any concerns could be voiced and investigated if any development proposals emerge which might affect or be affected by it.
Respondent ID	88
Response ID	S133
Organisation	Seascale Parish Council
Policy	
Paragraph	8.6
Theme	Localities- Mid Copeland
Sound?	No
Unsound grounds	Not Justified
Comments	The Parish Council notes the current poor quality of road and rail infrastructure in regard to a recently reported road traffic survey by Cumbria County Council in which c. 300 cars were recorded using the section of the B5344 at the junction of Seascale Village and Cross Lanes.
Changes?	

Council's response	Comment noted. Improved rail service is a concern being picked up in the Infrastructure Strategy and work connected to the proposed nuclear power station. Concerns about traffic on the B5344 are best communicated to the County Council who might take action to improve the junction, or take account of it in developing proposals to reduce Sellafield's traffic impact.
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Respondent ID	88
Response ID	S134
Organisation	Seascale Parish Council
Policy	
Paragraph	8.6
Theme	Localities - Mid Copeland
Unsound grounds	Not justified or effective
Comments	The Parish Council requests that consideration be given to the capacity of Seascale Primary School.
Changes?	

Council's response	Comment noted. School capacity is an infrastructure issue which might be addressed via developer contributions from housing development in the catchment; otherwise it is an operational matter for the County Council.
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Respondent ID	88
Response ID	S135
Organisation	Seascale Parish Council
Policy	
Paragraph	8.6
Theme	Localities - Mid Copeland
Sound?	No
Unsound grounds	Not justified or effective
Comments	The Parish Council requests consideration of extra pressure on evacuation procedures and on the Offsite Emergency Plan.

(Minutes from the Parish Council meeting 23 May 2012:

Mr Moore raised the issue of evacuation procedures due to Seascale's proximity to Sellafield. In terms of the Offsite Emergency Plan only permanent homes were considered able to provide protection and this excluded caravans, park homes and other such structures.....Mr Moore advocated expansion of Seascale to the right properties in the right areas, with which the meeting agreed. Mr Woolass supported Mr Moore's advocacy of 'the right properties in the right areas', noting the

constraints of the current transport infrastructure. He argued that if these problems could be solved then further expansion of the village would be appropriate. He also felt that was a need for a mix of housing and affordable housing..... Although the need for affordable housing was agreed, it was felt that developers might do a little more than provide the statutory 13% affordable provision in their plans. There was no guarantee when this affordable quota would be built.)

Changes?

Council's response This is under consideration elsewhere but the Council does not consider that it can be addressed via the spatial planning process, except insofar as Seascale is in the Nuclear Safeguarding Zone requiring that the Office for Nuclear Regulation be apprised of development proposals. No objection to the plan has been made from those quarters, and it should be noted that the level of development proposed for local service centres such as Seascale is low.

Respondent ID	88
Response ID	S136
Organisation	Seascale Parish Council
Policy Paragraph	8.6.8
Theme	Localities - Mid Copeland
Unsound grounds	Not justified or effective
Comments	The Parish Council requests that the document is checked and found to be factually accurate. (There is no mention of the railway stations at Drigg and Sellafeld even though Seascale station and Ravenglass station are included - from Parish Council meeting minutes).

Changes?

Council's response Comment noted and we are grateful for the correction. The stations will be inserted as a proposed minor change

Respondent ID	88
Response ID	S137
Organisation	Seascale Parish Council
Policy Paragraph	8.6.4

Theme	Localities - Mid Copeland
Sound?	No
Unsound grounds	Not justified or effective
Comments	<p>The Parish Council requests that this paragraph is clarified to reflect Seascale more effectively.</p> <p>(Minutes of Parish Council meeting para 6.2:</p> <p>'It was noted that Seascale was the largest service centre in Mid Copeland. The application for development by Persimmon Homes highlighted the issue of service provision and it was agreed that Gosforth, Drigg and Eskdale Green all impacted on Seascale Services. Mr Woollass asked that section 8.6.4 be further developed in terms of what services Seascale offers. He felt that descriptions of provision within Mid Copeland were not consistent.')</p>
Changes?	
Council's response	The comment is understood but the Council feels that the paragraph is adequate as it stands, and the relationship between Seascale and Gosforth would require further research before a definite conclusion could be reached.
Respondent ID	88
Response ID	S138
Organisation	Seascale Parish Council
Policy	
Paragraph	8.6.2
Theme	Localities - Mid Copeland
Sound?	No
Unsound grounds	Not justified or effective
Comments	The Parish Council requests that this paragraph be developed more fully.
Changes?	
Council's response	Comment noted, but the Council feels that the paragraph says enough for the purposes of this document.
Respondent ID	79
Response ID	S046
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	
Paragraph	8.7.1 - 8.7.15
Theme	Localities - South Copeland
Unsound grounds	Not consistent with national planning policy

Comments	<p>Chapter eight of the draft Core Strategy sets out priorities for a number of 'localities'. Paragraphs 8.7.1 to 8.7.15 present a spatial, environmental and economic portrait of the South Copeland area. Whilst generally accurate, there are a number of notable omissions which REG request to be addressed through further amendments to the aforementioned paragraphs. A key omission is the absence, in the description of the area, of any reference to the presence of onshore wind farm developments of which there are a number in South Copeland. Similarly, there is no reference to the locality being situated within the Core Area of the Energy Coast Masterplan or its obvious potential to accommodate further renewable energy developments. The Economic Implications of the Core Strategy's Policies for South Copeland are presented at Pages 121-122. Currently the Council only expresses support in the Strategic Policies section (pg 121) to "new nuclear, off-shore wind and (potentially) tidal generation".</p> <p>REG do not consider this reflects or lends the necessary support to on-shore wind generation in this locality. In the circumstances, they consider this part of Section 8.7 to be in conflict with the provisions of the NPPF and it is therefore unsound. As has been highlighted in relation to Strategic Objective 2 (see reference to the BiGGAR Economics report), there is significant evidence in support of the economic benefits brought about by onshore wind developments. REG consider that the potential economic benefits of further onshore wind development in the locality and the role which such benefits may play in the regeneration of the area are not recognised at Pages 121 / 122.</p>
Changes?	<p>We request that an additional paragraph is added in the context and background section (8.7.1 – 8.7.3) to state: "South Copeland is an important location in the Borough for renewable energy generation. It is currently host to a number of windfarms including Haverigg, with the potential for other sites to come forward within the plan period which could add to sustainable energy supply."</p> <p>text at page 121 within paragraph 8.7 should be amended to read:</p> <p>"The Council will encourage related investment in South Copeland, including support functions for new nuclear, onshore and offshore wind and (potentially) tidal generation."</p> <p>Through making this amendment, it confirms that onshore wind will be encouraged in sustainable and appropriate locations, such as South Copeland, which is in accordance with the Vision for Copeland and Strategic Objectives (as amended by representations within this letter).</p>
Council's response	<p>Not accepted. This section is entirely descriptive and has been included in response to demand to demonstrate the implications of the plan for each locality. There is no need to alter it as suggested - it is long enough already.</p>

Respondent ID 39

Response ID S021
 Organisation National Trust
 Policy
 Paragraph 8.7.6

Theme	Localities - South Copeland
Sound?	Yes
Unsound grounds	
Comments	National Trust is pleased to support this paragraph and in particular the recognition of the special environmental qualities of the Duddon Estuary. There is already tourism activity associated with the Duddon and indeed the potential to expand this having regard to the environmental assets of this location - not least its water and coastal land / sea-scape and related biodiversity and geodiversity.
Changes?	
Council's response	Support noted.

CHAPTER 9 – MONITORING FRAMEWORK

Respondent ID	39
Response ID	S027
Organisation	National Trust
Policy	
Paragraph	Fig 9.1
Theme	Monitoring Framework
Sound?	Yes
Unsound grounds	
Comments	In respect of the Monitoring Framework and Outputs (Fig 9.1) the references relating to Objectives 14 and 16 and working with partners / in cooperation with, inter alia, National Trust is noted. The Trust is pleased to conform its willingness to contribute to this work, in particular through its continuing close involvement with the Colourful Coast Initiative.
Changes?	
Council's response	Support noted and the Trust's continuing interest is greatly appreciated.

CHAPTER 10 – DEVELOPMENT MANAGEMENT POLICIES

Respondent ID	79
Response ID	S047

Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy	DM2
Paragraph	10.2.6
Theme	Renewable Energy Proposals
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	<p>This is the development control policy for renewable energy. It is very similar to existing policies EGY1 and 2 of the Local Plan, but is negative in its wording in that it asserts development proposals must satisfy a set of criteria. Therefore, it is not considered to be 'positively planned' (in accordance with the NPPF) and at present it also does not accord with the positive stance taken on renewable energy development by the rest of the Draft Core Strategy. A number of the criteria also currently refer to "unacceptable impacts" or "no significant adverse effects." As highlighted throughout these representations, paragraphs 97 and 98 of the NPPF instructs local planning authorities to grant permission where impacts are (or can be) made acceptable.</p> <p>It is also considered part E regarding heritage impacts is not in accordance with the NPPF. The NPPF states that in determining applications where heritage assets are affected, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (paragraph 132). Where a development will lead to substantial harm to the significance of a designated heritage asset, permission should be refused, unless it is demonstrated the harm is necessary to achieve substantial public benefits, or a number of other criteria as listed apply (paragraph 133). Where less than substantial harm would be caused, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134). The policy should therefore be amended to refer to 'substantial harm to the significance or features of heritage conservation importance and impacts on nature conservation should, in fact be a separate point. In light of this REG consider the draft policy as currently drafted to be unsound.</p>
Changes?	<p>In order to make the policy sound, it suggested it be re-worded to say: "Renewable energy development will be encouraged and planning permission granted where:</p> <p>A Proposals are developed with the Borough's community and key stakeholders in accordance with the Council's current adopted approach to stakeholder involvement</p> <p>B Any adverse visual impacts are (or can be made) acceptable</p> <p>C Any adverse impacts on landscape or townscape character and distinctiveness are (or can be made) acceptable</p> <p>D Any adverse impacts on biodiversity or geodiversity are (or can be made) acceptable</p> <p>E The proposals would not lead to substantial harm to the significance of a feature of heritage conservation importance</p> <p>F Any adverse impacts on feature of nature conservation importance are (or can be made) acceptable</p> <p>G Any adverse impacts arising from noise, odour, dust fumes, light or other nuisance that is likely to affect residents and adjoining land users are (or can be made) acceptable</p>

H Any waste arising as a result of the development will be minimised and managed appropriately

I Provision is made in proposals for the removal and site restoration at the end of the operating life of the installation.

Adequate mitigation measures would be secured to ensure potential impacts of any renewable energy development proposal can be made acceptable and to deliver significant benefits to the community where the scheme is to be sited wherever possible. If necessary such measures would be secured through planning obligations.”

In accordance with this approach, paragraph 10.2.6 should be amended to read:

“....As a result Policy DM2 is designed to ensure potential adverse effects of renewable energy schemes are within established acceptable limitations (which will vary according to relevant technical guidance on a particular issue). Impacts and issues that will be taken in to account include:

- Impacts on the character of an area, either on their own or cumulatively
- Impacts on existing development, including noise, odour, vibration, (in the case of wind turbines, shadow flicker and electromagnetic interference)
- Provision for the removal of all equipment and installations and site restoration at the end of the scheme’s lifetime;
- The siting and design of proposals having regard to the capacity / character of the landscape.”

Council's response

Accepted in part. We agree that the wording of the introduction is more in keeping with national policy, and will put forward a minor change to meet this. But, as the policy criteria set out what would make the development acceptable, we do not see how they are inconsistent with the NPPF.

Respondent ID	78
Response ID	S008
Organisation	RenewableUK
Policy	DM2
Paragraph	
Theme	Renewable Energy Proposals
Sustainability Appraisal	
Sound?	
Unsound grounds	
Comments	See S003
Changes?	In RenewableUK’s view the criteria in DM2 should be expanded to include renewable energy’s contribution to meeting climate change objectives, reductions in carbon emissions, economic benefits, contribution to the security of electricity supply and the

	stability of energy prices.
Council's response	Not accepted as this would make the policy unwieldy; the benefits of renewable energy can be taken as read, the essential point here being that national planning policy is favourable to it.
Respondent ID	85
Response ID	S124
Organisation	Banks Group
Policy Paragraph	DM2
Theme	Renewable Energy Proposals
Unsound grounds	Not consistent with national planning policy
Comments	<p>Policy DM2 is the main development management policy which will be applied to all renewable energy development proposals in the district. The policy sets down a series of criteria which, as worded, it appears development "must satisfy" in their entirety i.e. the full list from A to H.</p> <p>The policy test set down in criteria B and C which relate specifically to landscape and visual effects is that developments must have "no significant adverse effects". This is in contrast to the policy tests in relation to "ecological effects" (criteria D and E) or technical effects (criteria F) which refer to unacceptable effects.</p>
Changes?	Amend criteria B and C of policy DM2 to reflect the policy test as set down in national planning policy i.e. development not to have a "unacceptable" landscape and/or visual effects. Such an assessment to be based on the landscape character and capacity baseline assessments
Council's response	Not accepted. The Council's view would be that significant adverse visual effects, in this valuable and scenic area on the edge of the Lake District National park, would be unacceptable.
Respondent ID	37
Response ID	S032
Organisation	Turley Associates acting for Sainsbury's Supermarket Ltd
Policy Paragraph	DM3 C
Theme	Safeguarding Employment Areas
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	Sainsbury's support policy DM3C preference for the reuse of allocated employment land for uses which provide employment opportunities

over single use residential development. However, they feel that the policy should be expanded to to reflect NPPF (para 22) and not to restrict the release of employment land for which there is no likely demand over the plan period. It also fails to acknowledge or provide criteria against which the benefits associated with alternative uses could be assessed. For example, retail can often "enable" a wider mix of uses for which there is a local need that would otherwise not be viable, particularly on those sites with, for example, high remediation costs. Such sites would often lie vacant making little or no contribution to the growth of the economy. Further, derelict or vacant sites can directly influence negative perceptions of an area, deterring investment.

Changes?

Sainsbury's suggest the Council expands the policy text of justification to acknowledge the role of retail as an employment generating use under part C. In addition, the policy should be amended so as to specifically encourage alternative uses on employment land for which there is not likely over the plan period. It should acknowledge that other uses such as retail can "enable" development and achieve plan objectives. In addition, specific reference should be made to the fact that retail uses can act as a buffer between traditional employment and residential areas to help overcome issues that could impact residential amenity.

Council's response

Not accepted. As explained in the Evidence Base and Topic Paper 1, the Council considers it important to maintain a stock of employment land that, even if not in demand now, may be needed for development associated with the Moorside project. Thus release of it for other purposes will be done only exceptionally. Such applications would be dealt with on their merits and we do not consider it useful to second-guess justifications by trying to develop a list of criteria. In particular, we do not wish to identify retail development specifically, as this might give the impression that it is being specially encouraged in preference to other uses.

Respondent ID	36
Response ID	S110
Organisation	Millom Without Parish Council
Policy	SS1, DM10, DM11, DM22, DM25, DM24, DM26
Paragraph	5.2
Theme	Improving the Housing Offer
Sustainability Appraisal	
Sound?	No
Unsound grounds	Not effective
Comments	<p>General Design:</p> <p>The Parish Council considers that development in its area should only be considered if all the following criteria are met:</p> <ul style="list-style-type: none"> i) it is of a kind, scale, density and detailed design which is sympathetic to or enhances the landscape character, special qualities and local distinctiveness of the surrounding area ii) It uses materials that are appropriate to the local character and

distinctiveness of the surrounding buildings and wider landscape.

lii) It must be located within or adjoining an existing group of buildings already having a residential content and enjoying basic services.

Changes?

Council's response

No need for change. These matters, with which the Council is in agreement, are covered by plan policy and will be supported in detail by the Design Quality SPD in preparation.

Respondent ID	78
Response ID	S009
Organisation	RenewableUK
Policy	DM11
Paragraph	
Theme	Sustainable Development Standards
Sustainability Appraisal	
Sound?	
Unsound grounds	
Comments	See S003
Changes?	This policy is supported and should be retained in the final version of the document.
Council's response	Support noted.
Respondent ID	13
Response ID	S059
Organisation	Environment Agency
Policy	DM11
Paragraph	
Theme	Sustainable Development Standards
Sound?	?
Unsound grounds	
Comments	We strongly support Policy DM11 – Sustainable Development Standards in particular point F which requires water saving technology, including grey water recycling to be incorporated in all developments.
	Policy DM11 seems proportionate and suitable for the current situation

in West Cumbria in relation to water resources. However if the proposed Nuclear New Build goes ahead in this area it is important to consider how this growth will effect the supply and demand balance.

Changes? We are aware that Copeland are commissioning a Local Impact Report (LIR) to consider a rise in population, we feel that a commitment within the Core Strategy and Development Management Policies DPD should be made to ensure the findings from the LIR are incorporated.

Council's response The point is accepted, but it is probably not lawful for the Core Strategy to make stipulations about the content of the LIR. The concerns raised will inevitably be considered, however, and the Agency will undoubtedly be able to contribute or comment at some stage.

Respondent ID	36
Response ID	S119
Organisation	Millom Without Parish Council
Policy	DM9, DM19
Paragraph	
Theme	Camp sites and caravans
Sound?	
Unsound grounds	
Comments	<p>Tented camp sites</p> <p>The use of land as a tented camp site may be considered provided that:</p> <ul style="list-style-type: none"> i) The site is located so that it has a minimal impact on the landscape and is appropriately screened at the time of application. ii) It is located close to a group of buildings with residential content. iii) It does not require the provision of new or improved vehicular access, new buildings or overground utility services. iv) It will not result in detrimentally intrusive parking provision. v) It will not have a significant adverse effect on residential amenity or on the special qualities of the area. vi) It is a temporary facility for a limited period and will be specified as such in any planning consent. <p>Sites for touring caravans</p> <p>The establishment of sites for touring caravans in the Millom Without area will not normally be considered. Short-term small scale parking may be considered if:</p> <ul style="list-style-type: none"> i) The site is located so that it has a minimal impact on the landscape and is appropriately screened at the time of application. ii) It is located close to a group of buildings with residential content. iii) It does not require the provision of new or improved vehicular access, new buildings or overground utility services. iv) It will not result in detrimentally intrusive parking provision. v) It will not have a significant adverse effect on residential amenity or on the special qualities of the area.

Sites for static holiday caravans

Sites for permanent static caravans, for multiple or single units, should not be considered.

Residential caravans, mobile homes and other, non-residential structures.

The siting of caravans or mobile homes should not be permitted for use as permanent dwellings. Temporary permission may be given during construction or other site works. Structures such as shipping containers used as site offices or for storage purposes must be removed when the principal work is completed, in no circumstances can they become permanent.

Changes?

Council's response

No need for change. In the Council's opinion policies DM9 and DM19 should be adequate to control these uses.

Respondent ID	36
Response ID	S122
Organisation	Millom Without Parish Council
Policy	ST1C(iv), ST2C(v), DM9, DM30,
Paragraph	
Theme	Agricultural developments
Sound?	No
Unsound grounds	Not effective
Comments	<p>Introduction - Farmers have always played an essential role in forming and managing the landscape of this area and maintaining the quality of the environment. The farming industry, however, is becoming increasingly difficult to sustain and its future remains uncertain. Farming is not only important for land management but also remains central to the cultural heritage of this area.</p> <p>Significant changes have taken place in agriculture and further pressure for change is likely to arise as the emphasis in agricultural support continues to shift from maximising production to embracing environmental objectives. Some new development in the countryside is necessary to enable farmers to continue to farm effectively and to respond to changing circumstances. The role of this document to ensure such development is carried out in a way that minimises the impact on the special qualities of the Parish.</p> <p>Objectives - The farming objectives for this document are:</p> <ul style="list-style-type: none">• to support the growth and diversification of the farming economy where this is in accordance with the special qualities of the area;• to ensure the sensitive siting and design of new farm buildings and

associated structures; and

- to prevent the loss of important agricultural land.

Agricultural buildings and structures - Agricultural and forestry buildings and structures should be considered if all the following criteria are met:

- i) It is necessary in that location and its proposed function cannot be achieved by the appropriate and economically viable adaptation of an existing traditional building.
- ii) In terms of siting and external appearance, it will not detract significantly from the surrounding landscape, including any wildlife, archaeological or building conservation interest.
- iii) It will not adversely affect residential amenity or the use of any public right of way.
- v) It will not create significant traffic problems on access or approach roads.

Where necessary in the granting of approval, an agreed landscape enhancement scheme will be required meeting the requirements of Policy 3 above.

Buildings and structures granted planning permission under this policy will be required to be dismantled and removed from the site when no longer in agricultural use, unless permission is given for change of use.

Farm diversification - Farm diversification activities will be considered if all the following criteria are met.

- i) Its location, scale and character will not adversely affect the special qualities of the surrounding area.
- ii) It assists viability and does not prejudice the farming enterprise.
- iii) It will not adversely affect the residential amenity of neighbouring properties.
- iv) It will not result in unacceptable traffic levels.

Development involving new buildings should only be considered where it can be demonstrated that the conversion or re-use of a suitable existing building cannot accommodate the proposed activity.

Residential lets and self-catering holiday accommodation. The conversion of traditional buildings to provide residential lets or short-stay, self-catering accommodation should be considered if the following criteria are met.

- i) It is part of an established agricultural business.
- ii) The buildings are part of the core of the agricultural holding and located within existing groups of buildings that have a close physical and visual relationship to each other and have a residential content.
- iii) Parking provision will not be detrimentally intrusive in the landscape.
- iv) In the case of residential use occupancy will be restricted to those categories of local need set out under 'Affordable Housing' above and tenure will be restricted to letting only.
- V) Secure arrangements by way of a legal agreement will be required relating to only so much of the agricultural holding as is necessary to ensure the accommodation will remain as part of the agricultural business.
- Vi) The development accords with Policy (1) above.

Important agricultural land

Changes?	Development involving the loss of agricultural land should only be considered if it can be demonstrated that the development cannot be accommodated on previously developed land or on land within a settlement. If the use of agricultural land is unavoidable the development should be accommodated on land of lower quality.
Council's response	No change needed. Policy ST2C(v) and DM30 deal with the development of agricultural and rural development in adequate detail. The level of detail provided in this comment is more appropriate for a Neighbourhood Plan.
Respondent ID	10
Response ID	S101
Organisation	(Mono Consultants for) Mobile Operators Association
Policy	DM23
Paragraph	
Theme	Development Management for Information & Communications Tech
Sound?	
Unsound grounds	
Comments	We would like to offer our support to for the inclusion of Policy DM23 Information and Communications Technology, within the Submission version of the Core Strategy and Development Management Policies DPD. We welcome the inclusion of this policy within the LDF to facilitate telecommunications development and support its provisions which wer find to be in accordance with the guidance within the recently published National Planning Policy Framework relating to both development planning and to support for communications infrastructure.
Changes?	
Council's response	Support noted.
Respondent ID	34
Response ID	S099
Organisation	United Utilities
Policy	DM24
Paragraph	
Theme	
Sound?	?
Unsound grounds	
Comments	Text and references such as 'unacceptable'; should be replaced with measures that are specific, measurable, achievable, realistic and timely.

See also United Utilities PLC response to 7.2 Flood Risk (S098)

Changes? Text and references such as 'unacceptable'; should be replaced with measures that are specific, measurable, achievable, realistic and timely.

Council's response We consider the policy to be consistent with national policy and the Environment Agency is content with it.

Respondent ID	39
Response ID	S029
Organisation	National Trust
Policy	DM25
Paragraph	
Theme	Nature Conservation, Habitat Protection & Protected Species
Sound?	Yes
Unsound grounds	
Comments	The changes that have been made to this policy are noted. It is considered that the proposed wording is appropriate, fit for purpose and relevant to the circumstances of Copeland. Accordingly it is supported.
Changes?	
Council's response	Support noted.
Respondent ID	36
Response ID	S114
Organisation	Millom Without Parish Council
Policy	SS5, ENV3, DM10, DM15, DM25, DM27, DM28
Paragraph	
Theme	Green Infrastructure
Sound?	No
Unsound grounds	Not effective
Comments	<p>International Sites of Nature Conservation Importance</p> <p>Development that is likely to have an adverse effect, directly or indirectly, on the integrity of a designated or proposed Ramsar Site, SPA or SAC should not be considered. Development affecting internationally protected sites will require a thorough evaluation. The applicant should be required to provide such relevant information as required by any regulations for the time being in force for such areas before any application can be determined. The provision of such information will be at the applicant's cost.</p> <p>Protection of Species Protection of Species</p> <p>Development that is likely to affect internationally or nationally</p>

protected species adversely will not be considered unless all the following criteria are met.

1. It is demonstrated that there is an essential need for the development that is sufficient to override nature conservation considerations.
2. There is no alternative solution for the development that would lessen the impact
3. Measures to protect the threatened species are included in the planning conditions. Development affecting protected species will require a thorough evaluation at the cost of the applicant before any application can be determined.

Preventing habitat fragmentation and species isolation:

Development that is likely to impact on the movement of species along wildlife corridors or are likely to result in the fragmentation of habitats will only be considered if it can be demonstrated that the corridor or habitat is not adversely affected.

Trees, woodlands and hedgerows:

Development that would lead to the loss of, or damage to trees, woodlands and hedgerows should only be granted in exceptional circumstances and subject to the planting of replacement trees wherever possible.

Protecting trees at risk from development

Development in close proximity to existing healthy trees should only be considered if both the following criteria are met:

1. Adequate space has been left around existing healthy trees so as not to lead to future loss or damage.
2. The developer has specified how the trees will be protected in the course of development.

The planning authority should require a detailed tree survey to be submitted with a planning application.

New or improved habitats:

As part of an acceptable development proposal, the restoration and enhancement and conservation of existing sites and for the creation of new areas of nature conservation interest should be required.

Historic Landscapes

Historic Landscapes

Development that would cause loss or damage to the integrity of historic landscapes or introduce incongruous elements into such landscapes should only be considered if the following criteria apply:

1. The benefits of the proposal clearly outweigh the negative impacts
2. Any negative impacts are minimised.

Scheduled ancient monuments or buildings of historic interest and other nationally important historical archaeological sites:

Development that would remove, damage or obscure a scheduled ancient monument, historic building or other nationally important archaeological sites or their settings should not be permitted except in exceptional circumstances. A thorough archaeological field evaluation of the impact of the proposal must be submitted before the consideration of any planning application affecting a scheduled ancient monument, historic building or other nationally important archaeological or historic site. Planning permission will not be

considered without full account being taken of the nature, extent and significance of the said buildings or sites and the degree to which the proposed development is likely to affect them. The developer will be required to provide an evaluation at his or her expense in accordance with the requirements of the Parish Council. Where appropriate, protective and mitigation measures will be required by condition or legal agreement.

Open spaces:

Development should not be permitted in those areas identified as open spaces, or elsewhere where development would result in loss to or would significantly harm the character of the open space which:

1. Provides recreational resource to the local community or
2. Allows important public views
3. Are of historical significance in contributing to an understanding of the development of the built form of the settlement, or is recognised as representing an important archaeological resource or
4. contributes to the setting of important buildings, or are important to the character or setting of the area

Settlement Historic Arrangement

Within a settlement, development will not be permitted that would result in the loss of or obscure building layout and plot patterns, where these provide evidence of the historic development of the settlement, and contribute to its character.

Building design

All new buildings should be in sympathy with their surroundings in terms of siting, scale, form and design. The use of external materials consistent with local building traditions will be required where to maintain the character of the area.

Development within barns and other buildings - Development involving the total or substantial destruction of a traditional barn or other building will not be considered if the barn or building is:

- i) sound and substantially complete and important to the landscape, or
- ii) of architectural or historic interest.

Demolition of modern ancillary elements of a barn or building may be acceptable where this would help to secure the long-term integrity of the main structure.

Changing land to domestic use

Development involving the change of use of land to form domestic gardens and amenity space will be considered if it can be achieved without adverse effect on the special qualities of the area.

Where permission is granted it will be conditional upon the withdrawal of permitted development rights in respect of ancillary development within the curtilages of dwelling houses, and to the erection of means of enclosure compatible with the character of the area.

Changes?

Council's response

No change needed :-

International Sites: SPAs, SACs and Ramsar sites are protected by European Legislation and do not need protection in policy. However, policy DM25F does make reference to these sites and the supporting text goes into more detail on the need for a Habitats Regulations

Assessment where necessary. The Council feels there is no need to make any changes to the current text.

Protection of Species: ENV3 states that populations of protected species will be protected and strengthened. DM25 states that development that would cause a direct or indirect adverse effect on protected species will not be permitted unless the benefits clearly outweigh the negatives, and prevention, mitigation and compensation measures are in place. It may be appropriate to add a line to the policy which states that 'the developer should show that the development cannot be provided on an alternative site where less harm would result.' ????

Preventing habitat fragmentation and species isolation:
Policy ENV3 states that the Council will seek to boost the biodiversity value of existing wildlife corridors and create new corridors to develop a functional Ecological Network. DM25 states that all development proposals should maximise opportunities for the connection of natural habitats. It is felt that this issue is covered appropriately in these two statements.

Issues relating to the protection of trees are dealt with in policies DM26 and DM28. With the exception of an addition to policy DM28 giving protection to areas of ancient woodland and veteran trees, the Council does not plan to make any further alterations to the text of these policies.

New or improved habitats: Policy ENV3 states that the Council will seek opportunities to extend, restore and create new areas of habitat. DM25 states that development proposals should maximise opportunities for the creation of new habitat. The Council feels that there is no need for additional text relating to this issue.

Comments relating to landscape, design, heritage assets and the surroundings: The Core Strategy and Development Management DPDs deal with these issues in a manner that is appropriate for the purpose of protecting and enhancing these assets. The level of detail provided here is appropriate for a Neighbourhood Plan.

Respondent ID	82
Response ID	S055
Organisation	The Woodland Trust
Policy	DM25
Paragraph	
Theme	Nature Conservation, Habitat Protection and Protected Species
Sound?	No
Unsound grounds	Not effective
Comments	We welcome policy DM28 on the protection of trees and the commitment to increasing the amount of tree cover. However, we are concerned that taking this in conjunction with the wording of Policy DM25 does not give adequate protection to ancient woodland. There is

a reference to protection of habitats specified in the Cumbria Biodiversity Action Plan and in this document we note that the categories of woodland referred to are upland ash woodland, wet woodland and upland oak woodland. We do not have detailed knowledge of all the woods in Copeland district but we are concerned that there may be ancient or long established woods which fall outside these categories.

Changes? We would like to see a statement either in Policy DM25 or in DM28 that ancient woodland and ancient and veteran trees will be given absolute protection from development so as to ensure that the irreplaceable habitats which they contain are not lost.

Council's response Accepted in part. There does need to be a statement protecting areas of ancient woodland and veteran trees in DM28 and this will be suggested as a minor change. However, it would not be sensible to give absolute protection to these features. The most robust protection the Council would be able to provide would be to add the statement that any development would be refused unless the benefits clearly outweigh the harm. This would undoubtedly cover all but the most significant developments of national importance.

Respondent ID	36
Response ID	S116
Organisation	Millom Without Parish Council
Policy	ST1C(vi) & D(iv), DM25
Paragraph	
Theme	Strategic Development Principles -Protecting the environment
Sound?	No
Unsound grounds	Not effective
Comments	<p>Protecting the environment</p> <p>Development should not be considered where it would result in an unacceptable impact on either:</p> <ul style="list-style-type: none"> i) the quality or quantity, or flow of surface or ground water; or ii) the quality of the air, land or soil; or iii) the level of noise, dust, vibration or light; or iv) the health and safety of the public <p>Contaminated and unstable land</p> <p>Development on or near to land known or suspected of being contaminated or unstable should only be considered where the site has been fully assessed and it has been demonstrated that any proposed development of the site will not result in a risk to human health or the environment (air, land or water).</p>
Changes?	
Council's response	The Core Strategy and Development Management policies aim to prevent air, water and land from becoming polluted. Whilst the detail here is

appropriate for a Neighbourhood Plan, the Council does not intend to add additional detail to the Core Strategy or DM Policies documents.

Respondent ID	39
Response ID	S022
Date Received	13/07/2012
Organisation	National Trust
Policy Paragraph	DM27
Theme	Built Heritage and Archaeology
Unsound grounds	
Comments	The changes that have been made to this policy are noted, including to ensure consistency with national planning policy and in particular the approach to non-designated heritage assets. It is considered that the proposed wording is appropriate, fit for purpose and relevant to the circumstances of Copeland. Accordingly it is supported.
Changes?	
Council's response	Support noted
Respondent ID	79
Response ID	S048
Organisation	REG Windpower (C/O Laurie Lane, Turley Associates)
Policy Paragraph	DM27 10.5.10 - 10.5.11
Theme	Built Heritage and Archaeology
Sound?	No
Unsound grounds	Not consistent with national planning policy
Comments	Part B of draft policy DM27 asserts development proposals which "adversely affect" a scheduled ancient monument or its wider site or setting "will not be permitted". Similarly part D(iii) of policy DM27 indicates that developments which affect listed buildings or their settings "will only be permitted" where it does not have an "adverse" effect on the setting or important views of the building. Both parts of the policy therefore essentially seek to resist all adverse impacts of whatever magnitude. In doing so they are in conflict with the provisions of the NPPF and are unsound. Paragraph 132 of the NPPF makes it clear that harm (both substantial and less than substantial) to the significance of heritage assets may be permissible, subject to certain criteria being met including a weighing of the identified harm against the benefits of the proposal.

Changes?

In order to bring the policy in line with the NPPF, it is recommended that part B is reworded to state:

"Development proposals which would lead to a loss of, or result in harm to, the significance of a SAM will only be permitted where the identified degree of harm is outweighed by the public benefit of the proposed development or all of the following apply:

- [Text contained within the four bullet points of paragraph 133 of the NPPF to be inserted]"

And part D(iii) be amended to read:

"the public benefits of the proposed development outweigh the identified harm to the setting of or important views affected listed buildings".

Council's response

Accepted in part. It could be argued that the policy is too restrictive in saying that any development which would have an 'adverse effect' on a heritage asset or its setting should be refused. Therefore a minor change is suggested in that the word 'significant' could be inserted before 'adverse effect'. However para 132 of the NPPF states: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.' This suggests that the development would have to be of enormous importance to justify damage to e.g. a scheduled ancient monument.

The Council does not intend to repeat sections of the NPPF within the Core Strategy.

Respondent ID	39
Response ID	S028
Organisation	National Trust
email	alan.hubbard@nationaltrust.org.uk
Policy Paragraph	DM26
Theme	
Unsound grounds	
Comments	The changes that have been made to this policy are noted. It is considered that the proposed wording is appropriate, fit for purpose and relevant to the circumstances of Copeland. Accordingly it is supported.
Changes?	

Council's response	Support noted.
Respondent ID	36
Response ID	S115
Organisation	Millom Without Parish Council
Policy	DM29
Paragraph	
Theme	Advertisements
Sound?	No
Unsound grounds	Not effective
Comments	<p>Permanent Signs and Advertisements</p> <p>Fascia and hanging advertisement signs will only be permitted if both the following criteria are met:</p> <p>i) They are designed to be sympathetic in appearance to traditional signs and use simple lettering and colours appropriate to the character of the area.</p> <p>ii) They are not unduly large or out of proportion to the building on which they are to be displayed, and not so positioned on the building as to detract from its appearance or from its contribution to the landscape. Internally illuminated signs or fixed projecting canopies will not be considered.</p>
Changes?	
Council's response	No need for change. In the Council's opinion DM 11 supported by the Design Quality SPD, and DM29B, meet these concerns.
Respondent ID	36
Response ID	S118
Organisation	Millom Without Parish Council
Policy	DM30
Paragraph	
Theme	Rural Development
Unsound grounds	Not effective
Comments	<p>Private equestrian developments</p> <p>The erection of a stable or loosebox, or other associated development for horses kept for private recreational use, should only be considered if it is located within or adjacent to an established settlement or a residential curtilage and where it can be demonstrated that the conversion or re-use of an existing building cannot accommodate the need. In all cases, a proposal will only be considered if all the following criteria are met.</p> <p>i) Its scale, character and location would not adversely affect the special qualities of the surrounding area.</p>

ii) It will not adversely affect residential amenity.

Changes?

Council's response

No need for change. Broadly speaking, these uses can adequately be controlled using the plan's development management policies.

'PREFERRED OPTIONS' STAGE

Local Development Framework Preferred Options Consultation 10 May 2010 – 30 July 2010

Introduction

The LDF Preferred Options document was published on the 10 May 2010 for a period of consultation. The original deadline for comments was 2 July but this was extended to the end of July to allow for a public meeting taking place in Millom in mid July and also to allow those affected by the tragic events of the 2nd June extra time to respond.

The Preferred Options document was prepared to cover both the Core Strategy and the Development Management Policies DPDs but deals with these separately in two distinct sections of the document.

The Consultation Process

The Planning Policy team maintains a Local development Framework Consultation database. The database contains the contact details of Members, Officers at other Authorities, various NGOs, statutory consultees, developers / agents and members of the public. Anyone can ask to have their contact details added to or removed from the database.

Letters were sent to all consultees at the beginning of the consultation period telling them that the document was available on the Council's website and inviting them to comment on the document. In order to conserve resources, copies of the Preferred Options document were only sent out to Members, Parish Councils and statutory consultees. Additional copies were left at all Council Offices and public libraries in the borough.

The consultation period was publicised in both the Whitehaven News and the Spring edition of Copeland Matters, the Council's quarterly newsletter that is delivered to every household in the Borough.

they paid him £10, only to witness the man jump into a waiting Volkswagen Passat

want to warn other people not to be taken in by this scam."

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Future planning policies

A RAFT of documents which set out how land can be used in Copeland over the next 17 years is currently being formulated and the public are asked for their views.

Known as the Local Development Framework (formerly called the Local Plan), the documents set out the council's planning policies to deal with new development up until the period 2027.

When formally adopted they will replace the existing

BY MARGARET CROSBY

Copeland Local Plan. They cover the part of the borough outwith the National Park (over which the Lake District National Park has jurisdiction).

An eight-week period of public consultation will begin on May 6. This will involve a wide circulation of the document and summary leaflets together with presentations, public meetings and events.

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Whitehaven News – 29 April 2010

Help us plan Copeland's future

Copeland Borough Council is currently preparing an important plan that will influence development over the next 20 years.

It's called the Local Development Framework, or LDF, and it focuses on where and how much new development should take place.

We have published a discussion document and we'd like to share it with you. Over the next 8 weeks, you will have the chance to tell us what you think of our proposals. Your comments now can make a big difference to the final version. If you want to get involved please visit the Copeland Borough Council website and look out for the Copeland LDF Preferred Options Report

<http://www.copeland.gov.uk>

Paper copies are available at all the Council's offices and all the libraries in the Borough during normal opening hours.

Commenting is easy – just download a Representation Form from the website and email it back to ldf@copeland.gov.uk before the 2nd July 2010. You can get paper copies from the Council offices and libraries or by contacting the Planning Policy department on 01345 598351

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Speak out

YOUR views are needed by Copeland Council as part of changes it is making to planning policy for the borough.

The authority is preparing a new Local Development Framework – a collection of documents that will replace its current local plan.

And now the council is publicly consulting on its preferred options and asking for views on areas such as infrastructure improvements and environmental standards.

Coun Geoff Blackwell, portfolio holder for planning, said: "The Preferred Options document sets the scene for future development in Copeland. The government has changed the system of development planning in the country, and this document will be part of our new approach in Copeland."

"It is wide-ranging and covers a number of issues that people will be interested in."

To have your say visit the Copeland Council website, www.copeland.gov.uk and look for the 'Copeland LDF Preferred Options Report'.

Download a Representation Form from the website and email it back to ldf@copeland.gov.uk before July 2.

Paper copies are available at all the council's offices and libraries.

Whitehaven News – 27 May 2010

VIEWS SOUGHT

Your planning views sought on radical changes to planning policy

- Should climate change influence planning policy?
- Should we support energy development outside our towns and villages?
- Should most new developments be in Whitehaven?

The way we make planning decisions raises big questions for us all and want to hear from you.

A new document will set out how we approach planning policy, and in creating it we want your views on questions like:

- Should infrastructure improvements be secured as part of any future developments?
- What environmental standards should we demand in new housing?

The "Preferred Options" document we are asking you about will outline our approach to these issues and more, and will eventually become part of the new Local Development Framework – a suite of documents replacing the current local plan.

Cllr Geoff Blackwell, the Council's Portfolio Holder for planning, said: "The Preferred Options document sets the scene for future development in Copeland. It is wide-ranging and covers a number of issues people will be interested in."

"We're keen for as many people as possible to have their say, so we can ensure Copeland's new Local Development Framework is robust, and meets the borough's development needs for many years to come."

The Preferred Options document is the second major step in preparing a new planning framework for Copeland. It follows the consultation on an Issues and Options paper last year.

Your views on this earlier paper were used to shape the new Preferred Options document. This document is being published now so you can see how we took your views into account and give your views on this latest stage.

"The Preferred Options document will be published in the next few weeks, and there will be eight weeks for you to have your say in a range of ways - including online, filling in the response form, or sending your comments to ldf@copeland.gov.uk. Public meetings will also be arranged, and an easy-to-understand leaflet will be available."

Copeland Matters – Spring edition

Additionally a special pull-out leaflet was inserted in the Summer edition of Copeland Matters. The leaflet described briefly, in layman's terms, the purpose of the Preferred Options document and what impact the preferred policy direction would have for communities in each locality.

Public Meetings

Five public meetings were organised, one in each of the borough's localities to introduce the document and give members of the public a chance to ask questions and express views verbally. Presentation boards displayed more detailed information regarding possible uses for particular sites to help illustrate how Core Strategy policies and proposals might be applied on the ground.

Despite advertising the dates, times and venues for the public meetings (see below) there was a very modest turnout at the Egremont, Cleator Moor, Mid Copeland and Millom meetings. The Whitehaven meeting was well attended largely due to the strength of feeling around the possible development of land adjacent to the Bay Vista residential area. (Site allocations will be the subject of future consultations during the preparation of the Site Allocations DPD due for publication in 2011/12.) There are a number of possible reasons for the low turnout at the other meetings, not least the recent tragic events of June 2nd only two weeks before the first event in Egremont on the 17th June.

THE COUNCIL OF CITIES FOR CONSIDERATION OF THE PROPOSAL FOR
outstanding representations and objections.
Head of Legal Services, 8 June 2010

**Help us plan
Copeland's future**

Copeland Borough Council is currently preparing an important plan that will influence development over the next 15 years and we would like to share our ideas with you. Come along to your nearest public meeting to find out how our plans will affect your area and how you can get involved.

West Copeland - Egremont Market Hall
17th June at 7.00pm

Whitehaven - Whitehaven Civic Hall
22nd June at 7.00pm

Mid Copeland - Seascale Methodist Hall
24th June at 7.00pm

North East Copeland - Cleator Moor Civic Hall
29th June at 7.00pm

South Copeland - Millom Network Centre
13th July at 7.00pm

If you have any questions about any of the public meetings, please contact us on 01946 598351

Times of public meetings

Planning Aid Event

Planning Aid North held an event for Schools in Millom on the 13th July as a means of engaging children in the process of plan making. Officers did not attend the event as Planning Aid prefers to act independently of Local Planning Authorities, helping them to remain an impartial source of advice for members of the public and community groups. A report describing the outcomes of this exercise is expected very soon. Initial verbal feedback was very positive. The children were very receptive to the idea of planning and place shaping with transport issues around the Millom area being cited by pupils.

Another Planning Aid event had been planned to take place in Whitehaven on 22nd June. This event was to take place over 2 days, with one half day session for adult community groups and two shorter sessions for Whitehaven schools (both primary and secondary). Despite significant efforts on the part of Planning Aid to invite various community groups and schools, there was a very limited response and the event was cancelled. Again this was partially down to unfortunate timing. Planning Aid are staying in contact with Whitehaven schools and future events have been discussed although no dates have yet been agreed.

Consultation Responses

Over 400 comments were received from 51 different respondents. These responses have been collated according to subject area so that comments on related core strategy and development management preferred options can be considered together.

Register of Preferred Options Consultation Responses

General comments

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P030/11	NWDA	The Core Strategy, including its glossary, will need to reflect the legislative position at the time the document is published.	Noted - any necessary corrections will be made.
P078/29	The Theatres Trust	All references to PPS6 should be amended to PPS4.	Noted - any necessary corrections will be made.
P079/31	4NW	The wording of the DPD should not rely on references to RSS policy, but use other guidance and evidence base to support the policy approach.	Taken on board – a robust evidence base will underpin all Core Strategy policies.
P142/46	GONW	The submission draft of the Core Strategy and Development Management Policies DPDs should be the Council's 'final word'. There should be no surprises and no or minimal changes after this. The Council may need to consider the need for a further round of consultation on any issues where decisions are yet to be made. The Core Strategy focuses on a preferred policy direction at the expense of the overarching strategy. It is important that stakeholders have had adequate opportunity to appraise the Council's strategic direction as well as the individual policies.	Comments relating to submission draft and further consultation - Noted
P145/46	GONW	Paragraph 2.3.2 contains the only reference to the West Cumbria Sustainable Community Strategy. It would be appropriate for the Core Strategy to say much more about its content and how the two documents are consistent.	Agreed – reference expanded.
P163/50	Mr A Millie	Comment questioning the need for an LDF document when the Local Plan is adopted until 2016.	The requirement to prepare an LDF was set out by the previous Government in 2004.
P264/16	Allerdale Borough Council	It is important to make sure that Copeland's and Allerdale's Core Strategies are aligned as far as possible, especially with regards to plans for nuclear new build.	The point is supported, and the policy encompasses such provision. See also ER11. No change needed here, but there is already considerable joint working on this.
P171/54	Mr M Sarrington	The Preferred Options document is too complicated.	Efforts will be made to make the document shorter and simpler to navigate.

Introduction

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P435/20	Natural England	We are pleased that the vital importance of climate change is mentioned in paragraph 1.1.1, the opening paragraph of the document, and that some of the natural assets of the borough are	Support noted.

		recognised in paragraph 1.1.2.	
P144/46	GONW	There is an inaccuracy in the fourth bullet point in para 1.5.1. The 6 weeks consultation period after the publication of the submission draft gives stakeholder an opportunity to comment only on the 'soundness' of the document.	Taken on board – this point will be made in the statements that are published when the consultation begins.
P143/46	GONW	There is an inaccuracy in the final bullet point of para 1.5.1. It should say that, after the consultation in bullet 4, the document will be examined by a Planning Inspector and, subject to his/her comments, will then be adopted.	Taken on board – the correction will be made.
P145/46	GONW	Fig 1.4 (and elsewhere) refers to the 'final draft for submission'. This should not be considered a 'draft' but the Council's final word and should be called the 'Pre-submission Publication Core Strategy'.	Taken on board
P436/20	Natural England	We would hope that the protection and enhancement of the environment could be explicitly included alongside the drive for economic and social success, which are included in the introductory remarks under paragraph 1.1.4. (Note from the Leader of the Council).	This is adequately referred to throughout the policies and supporting text of the plan.

Setting the Strategy – Section 2.1

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P315/39	National Trust	This section is deficient in terms of the adequacy of the consideration given to environmental matters, especially the biodiversity and landscape assets of the Plan area. There are no references to heritage assets.	Not accepted. The Core Strategy as a whole, along with the Development Management DPD, places a proper degree of priority on the nurture of these assets. The purpose of this section is to set the Core Strategy in the context of other development strategies affecting Copeland, and it is not necessary to give specific attention here to biodiversity, landscape or built heritage.
P437/20	Natural England	We welcome the recognition in paragraph 2.2.1 and subsequent paragraphs of climate change and the drive for greater sustainability amongst the 'drivers for change'. The importance of green infrastructure, biodiversity, geodiversity, landscapes and access to the countryside and other greenspace are well recognised in paragraphs 2.2.4 and 2.2.5 , which we also welcome.	Support noted.
P438/20	Natural England	In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically	No change needed in this section. Production of the Core Strategy has taken place in full awareness of the importance of these natural assets. They are protected by national and transnational legislation which does

		designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	not need to be repeated here, and their continuing protection has been considered in the Habitats Regulations Assessment. The Core Strategy takes them into account implicitly throughout and explicitly where the Council has felt the need to make a specific strengthening reference.
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Drivers of Change and the Growth Agenda – Section 2.2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P097/32	Cumbria Wildlife Trust	Cumbria Wildlife Trust supports this paragraph on the basis that it identifies biodiversity as relevant to sustainability.	Noted; this section is now redrafted to be more concise.
P315/39	National Trust	This section is deficient in terms of the adequacy of the consideration given to environmental matters, especially the biodiversity and landscape assets of the Plan area. There are no references to heritage assets.	Not accepted. The Core Strategy as a whole, along with the Development Management DPD, places a proper degree of priority on the nurture of these assets. The purpose of this section is to set the Core Strategy in the context of other development strategies affecting Copeland, and it is not necessary to give specific attention here to biodiversity, landscape or built heritage.
P182/63	Mr R Curwen	2.2.3 - Support the urban concentration & prioritise the use of brownfield land over Greenfield sites. The aim of 50% brownfield allocation is a realistic achievable target. The strategic objective to “support the sustainability of rural communities” is also in support of this.	Support noted.
P267/70	RWE npower	2.2.6 & 2.2.7 - npower welcome the recognition that the energy sector in terms of nuclear, wind and water generation is likely to play an important part in the economic objectives of the strategy. Given that Copeland has 3 sites identified in EN-6 there is likely to be significant reinvestment in the Nuclear Energy sector.	Support noted. However there is now only one site in Copeland that has been identified for nuclear new build i.e. the Moorside site.
P251/14 P256/67	Moresby Parish Council Parton Parish Council	2.2.16 - does not fully explain the position so far as the question of Geological Disposal Facility is concerned. The government Managing Radioactive Waste Safely policy is based on voluntarism and partnership and communities can withdraw at any stage.	This section has been substantially redrafted, to remove descriptive content not needed in the final strategy. The Geological Disposal Facility proposal is dealt with in policy ER1.
P253/14 P257/67	Moresby Parish Council Parton Parish Council	2.2.17 - does not make clear that benefits from hosting a repository may be different from that of the building of new nuclear generating plants. Whilst the latter may require improved infrastructure and ‘planning gains’ through the planning process a community which hosts a repository will be volunteering an essential service to the nation and the benefits to the community must be over and above those normally associated with a large development.	This section has been substantially redrafted, to remove descriptive content not needed in the final strategy. This point is acknowledged, but the distinction goes beyond the scope of the Local Development Framework. The Council will pursue a proper level of community benefit associated with the hosting of a repository at the appropriate time. At present we do not know if the repository will go ahead or if the Council will support it.

P305/73	Leconfield Estates	Fig. 2.5 - the Council should allow for additional growth beyond the recession (i.e. 2016), being informed by both the economic activity derived from the implementation of the masterplan ('planning for success') and a robust SHLAA and SHMA. The provision for a 5-year review of the housing figures needs to be clarified.	No change, although the Council agrees with the sentiment. The Core Strategy seeks to demonstrate that it is providing realistically for a supply of land under current circumstances, while also being flexible enough to accommodate growth. This is reflected in appropriate policies, notably ER4, ER5, SS1 and SS2. Evidence base documents and the economic development and housing topic papers support this case. It is anticipated that the Site Allocation plan will set out phasing arrangements allowing for accelerated release of land if growing demand requires it.
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Vision

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P015/8	Cumbria Tourism	The ambition to grow the tourism sector is reflected in the preferred Options Vision under 'Beautiful' and 'Place of Choice'. Both these statements are supported.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings so nothing has been lost in terms of aspiration. Tourism is still mentioned as an important part of the economy that the Council wishes to expand and grow as a means of diversifying the economy.
P098/32	Cumbria Wildlife Trust	Cumbria Wildlife Trust supports the Spatial Vision for Copeland in 2027 which indicates that biodiversity will be protected and enhanced.	Support noted.
P268/70	RWE npower	npower supports the Spatial Vision for Copeland which seeks to encourage a sustainable and broad economic base that builds on opportunities, including those presented by the low carbon and renewable energy sectors.	Support noted.
P306/73	Leconfield Estates	The Spatial Vision for Copeland is supported, in particular the Council's vision to create an economically sustainable place and a place of choice.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings so nothing has been lost in terms of aspiration.
P428/46	GONW	The Vision is not locally distinctive enough. As a result the policies	The new vision is locally distinctive as it mentions opportunities

P016/11	NWDA	seem to repeat national policy instead of addressing identified local need and delivering local aspirations. Policies should have been driven by issues within each of the locality areas.	presented by the low carbon and renewable energy sectors, the coastal location and abundant natural assets. These are aspects that are particular to Copeland. The Vision would be too detailed if individual settlements are mentioned. The strategic objectives cover issues in specific settlements and the introductory context setting chapters make the issues faced in each part of the borough clear.
P189/38	Cumbria County Council	Support is given to the Spatial Vision of an environment that is able to adapt to climate change. Support is given to the Vision of green infrastructure and biodiversity that is protected and enhanced in their own right and that the biodiversity of Copeland is valued as a tourism asset.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings but biodiversity is no longer expressed as a tourism asset, although it undoubtedly is. The protection and enhancement of biodiversity is still included under the heading 'Environmentally Responsible'.
P031/25	English Heritage	The Vision does not address the totality of the historic environment and only refers to heritage in the context of tourism. It is suggested that the Vision emphasises the borough's sense of place, its heritage assets and the challenges faced in achieving a high quality built environment.	The vision has been reworked and is now a shorter statement. It acknowledges the heritage of the borough to be very important and worthy of protection. The detail around the historic environment and its value to the borough is covered in the Strategic Objectives and policies. The Vision statement needs to be concise and not cover any aspect of Copeland in detail.
P051/26	Highways Agency	The Agency is generally supportive of the Spatial Vision and welcomes the references to providing a well-connected place with improved access to sustainable modes of transport and reducing the need to travel.	Support noted.
P122/45	Sport England	The Vision should make explicit reference to sport and recreation.	A specific reference to sport does not fit into the Vision very well but it has been added to para 1.1.3 under Strategic Objectives.
P316/39	National Trust	Under 'beautiful' – there is apparent lack of ambition with regards to the landscape, heritage and biodiversity assets. These are merely 'recognised'. There is no aspiration to protect. Alternative wording is suggested.	The wording of the vision has now been changed to make the statement more concise. However under 'Environmentally responsible' the aim is now to protect and enhance the landscape, heritage and biodiversity rather than just recognise its value.
P316/39	National Trust	Under 'well-connected' there is some ambiguity and duplication in the wording. Alternative wording is suggested.	Well-connected - The text has been altered to remove any duplication.
P444/20	Natural England	We recommend that the vision for the borough should encompass 'where the character and quality of its distinctive landscapes are conserved and enhanced', thus recognising that all landscapes matter	The protection and enhancement of the landscape is mentioned in the Vision. As the vision statement is now shorter, more detailed statements are included in the strategic objectives and in the case of landscapes

		– not just the most outstanding landscapes.	particularly SO16. This objective specifies that all landscapes should be conserved and enhanced.
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Strategic Objectives

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P269/70	RWE npower	npower particularly support Strategic Objectives 1 and 16 which seek to secure future renewable and low carbon energy generating capacity in Copeland in line with Britain's Energy Coast Document.	Support noted.
P430/8	Cumbria Tourism	We recognise and fully support the inclusion of 'Tourism' as an opportunity for economic diversification, as set out in Strategic Objective 2 and in section 4, Economic Opportunity and Regeneration.	Support noted.
P433/46	GONW	The Objectives are not locally distinctive enough. As a result the policies seem to repeat national policy instead of addressing identified local need and delivering local aspirations.	The Strategic Objectives have now been changed to be more locally distinctive.
P002/7	The Coal Authority	None of the strategic objectives reflect the need in PPG14 to address ground stability issues, despite this being a problem within the plan area. Alternative wording was suggested for Strategic Objectives 1 & 9.	This is now covered in SO19 – 'addressing the impacts of mining, iron working, nuclear energy and other former land uses'.
P002/7	The Coal Authority	The LDF should reflect the need to safeguard minerals in the borough. Alternative wording is suggested for Strategic Objectives 6 & 20.	The word 'safeguard' has been used in SO19 instead of protect at the request of the Coal Authority.
P017/11	NWDA	The Agency welcomes and supports Strategic Objectives 1-6 relating to economic opportunity and regeneration.	Support noted. (SO3 and SO6 have been combined to form one objective. Therefore there are now only 5 objectives in this section.)
P017/11	NWDA	Strategic Objective 12 seems to be at odds with paras 2.2.10 – 2.2.15 which say that the population is due to grow by up to 5000 and Policy ST2 aiming to facilitate growth in the local economy and demand for housing. Alternative wording is suggested for Strategic Objective 12.	The latest projections prepared specifically for Copeland by GVA using the POPGROUP model tell us that the population is likely to decline. This will be reflected in the new text of chapter 2. The number of households will increase though due to the drop in household size. The reference to maintaining a stable and balanced population within communities in the borough has been dropped. SO8 says that it is an objective of the Council to 'ensure that settlements are sustainable'. Inherent in this is population stability and balance.
P032/25	English Heritage	Strategic Objectives 1-6 do not actually address regeneration. PPS5 says that LDFs should cover the potential for heritage to be a catalyst for regeneration. This should be incorporated into an existing objective or be the subject of a new objective.	Objectives 3 & 6 have been merged so there are now only five objectives under the heading 'Objectives for Economic Opportunity and Regeneration'. The following text has now been added to Strategic Objective 4: 'taking advantage of the built heritage that exists in Copeland's towns and

			villages to enhance the shopping experience for residents and visitors.' Regarding Objectives 1-5: 'regeneration' is generally thought of as the integration of actions that bring about an improvement in an area's economic, social and environmental wellbeing. In this sense it is felt that the aforementioned objectives do this.
P052/26	Highways Agency	The Agency is supportive of the aims to develop and maintain safe, efficient, high quality, modern and integrated transport networks and improve access to employment opportunities and services by more sustainable means of transport.	Support noted.
P099/32	Cumbria Wildlife Trust	An additional objective should be added that deals with encouraging carbon sequestration. Potential wording has been provided by the respondent.	A sentence has been added to SO14 that aims to improve tree cover in the borough, a recognised form of carbon sequestration.
P123/45	Sport England	There is no direct reference to protecting, enhancing and providing open space, sport and recreation facilities. This requirement is covered in national policy but as the LDF policies should do this, it would be advisable that this requirement is included in the objectives.	Para 1.1.3 says that it is important to ensure that settlements meet the needs of their communities and this includes access to leisure and sporting facilities. SO8 underneath this heading states that facilities that are already present will be protected and that appropriate new provision will be supported. Although sporting facilities are not specifically mentioned they are included in the collective term 'facilities'.
P190/38	Cumbria County Council	Strategic Objective 10 should be revised to include high design standards for biodiversity / environmental enhancement.	Objective 10 - Strategic objective 9 (previously SO10) now states that developments should be of high design quality and should make provision for biodiversity.
P190/38	Cumbria County Council	The reference to improving green infrastructure could be strengthened in SO19.	Objective 19 - SO18 (previously SO19) strengthens the statement on improving green infrastructure with particular regards to biodiversity although it is recognised that green infrastructure includes other types of open space e.g. sports pitches. These are, however, dealt with in SO8.
P190/38	Cumbria County Council	A minor amendment to the wording of SO20 is suggested.	Objective 20 - The subject of dealing with former land uses is now addressed in SO19.
P190/38	Cumbria County Council	It is recommended that the Strategic Objectives should cover the health and social wellbeing agenda generally.	1.21 - Health and social wellbeing are inherent in the objectives. Almost all the objectives make reference to something that is a factor in the overall health and wellbeing of the community.
P190/38	Cumbria County Council	Another objective should be added that ensures that a range of additional infrastructure provision is in place before nuclear new build commences.	1.22 Knowledge of the procedural context of Nationally Significant Infrastructure Projects has evolved since these comments were made. The Council's position is that such projects and associated development should have regard to the Core Strategy. Policy references as now

			drafted have given voice to these issues, and go as far as is likely to be permissible. We have considered inserting a strategic objective but it might be argued that such an objective would be unlawful; we consider that the intentions of this comment, which we support in principle, are adequately fulfilled by the amended Core Strategy as a whole.
P307/73	Leconfield Estates	SO7 underplays the importance of the Key Service Centres. Whilst it is important to direct most of the new development to Whitehaven, additional recognition needs to be given to the Key Service Centres.	The overall proportions given in para 3.5.7 of the pre-submission draft have not changed a lot. However, the figures for Whitehaven and the Key Service Centres are expressed as a minimum and not expressed as an absolute proportion any more.
P317/39	National Trust	There is an implicit intention in SO14 to promote the development of new road improvements. This is inconsistent with other objectives and does not reflect national policy or the reality of delivery within the plan period.	SO13 (previously SO14) has not been changed. Good roads remain an important part of an efficient, high quality, integrated transport network even though public transport will play a larger part than it has previously. Good roads will be required to attract more business to West Cumbria and therefore the objective must remain as it is.
P445/20	Natural England	In objective 18, our view is that the text should read 'protect and enhance the character and quality of all landscapes', as recommended above in relation to the spatial vision.	SO18 comment - SO16 (previously SO18) now says that the Council will conserve and enhance all landscapes in the borough.
P445/20	Natural England	In objective 19, mention should also be made of geological conservation or geodiversity.	SO19 comment - SO18 (previously SO19) now states that the Council will protect and enhance the rich biodiversity and geodiversity of the borough
P445/20	Natural England	In relation to objective 20, soils should be included in the compass of this objective as a natural resource.	SO20 comment - SO19 (previously SO20) now says 'Safeguard and where possible enhance the natural (including mineral & soil) resources in the borough'.

Principles for Development (ST1)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P003/7	The Coal Authority	The Coal Authority supports the policy, particularly how it seeks to facilitate the reclamation, restoration and redevelopment of the Borough's derelict and vacant sites.	Support noted.
P007/8	Cumbria Tourism	We are pleased to see the inclusion of principles which – B(i) support the development of energy infrastructure, related economic clusters, rural diversification and tourism	Support noted.

		<p>C(ii) provide and enhance recreational opportunities for the Borough's residents and visitors and</p> <p>D(i) Quality Places – apply rigorous design standards which retain and enhance locally distinctive places and increase their quality.</p> <p>This is very much in line with our comments at the Issues and Options stage, where we stated our view that Quality is a cross-cutting issue, which should be applied not just to tourism but to all development proposals, including public realm.</p>	
P033/25	English Heritage	Policy ST1 is supported; it reflects the diverse role of the historic environment in planning for a successful and sustainable future for the borough.	Support noted.
P053/26	Highways Agency	The Agency is generally supportive of Preferred Options Policy ST1 and in particular parts v) and vi) under 'Environmental Sustainability' which promote minimising the need to travel, the provision of sustainable transport infrastructure and prioritising development where there is infrastructure capacity. The Agency is also supportive of part iii) under 'Ensure the creation and retention of quality places', to accommodate traffic and access arrangements to make it safe and convenient for people to move around in.	Support noted.
P308/73	Leconfield Estates	Preferred Options Policy ST1 is supported.	Support noted.
P080/31	4NW	The policy could be improved by including reference to green infrastructure and ecological networks as well as features and sites.	A new statement has been added (ST1B(iii))
P100/32	Cumbria Wildlife Trust	The Core Strategy should include a preferred policy referring to the role of the natural environment in meeting some of the environmental challenges and therefore the sustainability of the borough.	Added another statement now ST1B(iii)
P446/20	Natural England	We concur with the Cumbria Wildlife Trust's comment on ST1 that the natural environment is both a valued asset and has an important role to play in a sustainable Copeland, in mitigating against the effects of climate change and in providing a robust and sustainable environment.	Added another statement now ST1B(iii)
P124/45	Sport England	There is no reference to protecting existing leisure facilities or sport in general. The link between this aspect of the strategic policy and earlier strategic objectives is not clear.	Some leisure facilities are classed as green infrastructure and these will be protected by ST1B(iii). Other sporting facilities would be supported under ST1A(iv).

P125/45	Sport England	The box below paragraph 3.2.3 in the core strategy contains reference to PPS6 which has been cancelled and replaced by PPS4.	Reference to PPS6 and been changed to PPS4
P191/38	Cumbria County Council	There appears to be some duplication between the objectives and policy ST1. ST1 should be a logical progression of the objectives. This section should be simplified to ensure a clearer direct message.	ST1 puts the principles in the Strategic objectives into policy and is required. ST1 is clear in that the overall message is one of increased sustainability. There are many messages within that and these have to be covered here. It would be difficult to simplify the policy without detracting from it.
P191/38	Cumbria County Council	It is important to recognise in ST1A(iii) that some brownfield land can be of high biodiversity value. It is also recommended that policy ENV3 and DM24 and their supporting text is strengthened to enable appropriate protection and mitigation.	1.24 - This is now dealt with in ST1C(v). This is noted and information will be passed on to colleagues working on the SHLAA.
P191/38	Cumbria County Council	The heading to ST1C should be should be reworded to 'Protect, enhance and restore the borough's valued assets'.	The title of ST1C has been changed as suggested.
P191/38	Cumbria County Council	ST1C(i) should refer to areas, sites, features and species of nature conservation, possibly with a list of these in the explanatory text . It is considered to be too general a statement. Consideration should also be given to the settings of these areas and features, buffer zones around them and the potential for expanding resources.	The text of the policy has been changed as suggested. ENV 3 expands on this as ST1 is not able to go into too much detail.
P191/38	Cumbria County Council	Policy ST1C(v) does not seem to fit well with the principle of protecting the boroughs assets. This policy could lead to the loss of biodiversity assets. Alternative wording has been suggested.	The text of ST1C(v) has been changed to include the suggested wording.
P270/70	RWE npower	The wording of ST1 fails to recognise that there may be conflicts between the development of new nuclear power stations and the protection of valued assets. The policy should make it clear that development proposals will be considered on their merits and where conflict exists, mitigation measures will be sought.	<p>Policy DM1 states that proposals for nuclear developments will be subject to an Environmental Assessment. Policy ENV3 states that any development will have to 'incorporate measures to protect any biodiversity interest.'</p> <p>Policy DM25 states that mitigation and compensatory measures will be secured through planning obligations or conditions.</p> <p>It is felt that there is enough provision for this issue in later policies and that specifics are not needed in the text of ST1 which deals with general principles only.</p>
P318/39	National Trust	The measures in ST1A do not cover all the environmental considerations and would more accurately be under the heading 'Climate Change Sustainability'.	The matters covered in ST1B (previously ST1A) are broader now and it seems appropriate to retain the current title of Environmental

			Sustainability.
P318/39	National Trust	A locational caveat is needed in ST1B(i) to be more in line with the policy statements in ST1A(iii), (iv) and (v). The words 'in appropriate locations' could be added to the end of the statement.	Bi) Have added the wording 'in appropriate locations' to the end of ST1A(i) (previously STB1i) as suggested.
P318/39	National Trust	ST1C(ii) – the words 'and their settings' should be added after 'historic features' to conform with PPS5.	C(ii) - Have added the words 'and their settings' to STC(ii) as suggested.
P385/9 P394/27	Regen NE Copeland Richard Mulholland	ST1A(ii) should be made more stringent. Alternative wording suggested: "Focus development on sites which are at least risk from flooding and provide design measures that minimise or mitigate that risk"	ST1 A(ii) - This is now ST1B(ii) - Design measures would only be needed where the risk of flooding was present. To ask developers building on sites at low risk to incorporate design measures for dealing with flooding may put an unnecessary and possibly prohibitive financial burdens on important regeneration projects. Therefore design measures that minimise or mitigate the risk will only be asked for if the risk of flooding is unavoidable.
P385/9 P394/27	Regen NE Copeland Richard Mulholland	Add: "ii.i) prohibit any residential development in areas of significant chance of flooding which may have an adverse affect on residents of the development and other communities".	ST1 A(ii.i) - Noted – ENV1 deals with this adequately
P385/9 P394/27	Regen NE Copeland Richard Mulholland	The words 'minimise the need to travel' should be removed from ST1A(v).	ST1 A (v) - Removing reference to 'minimising the need to travel' is unlikely as both PPS1 and PPG13 state the importance of reducing the need to travel as a key element of sustainable development. Therefore, in order to remain in conformity with national policy the phrase will need to remain part of the policy statement.
P385/9 P394/27	Regen NE Copeland Richard Mulholland	In ST1A(vi) - 'Prioritise development in the main towns' should be changed to 'develop in the main towns'. Another statement should be added to ST1A that supports development 'throughout the borough' in order to assist inward migration.	One of the principles of sustainable development is to focus development in areas with access to public transport (PPS1 - para 27 (vii)). Supporting a dispersed pattern of development in a largely rural borough would go against this principle.
P420/76	Bob Riley (Resident)	It would be better to build on greenfield sites than on sites at risk of flooding.	The only sites that are at risk of flooding where development could be permitted is in Whitehaven Town Centre

Spatial Development Strategy (ST2)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P008/8	Cumbria Tourism	Support the premise that spatial development should be based on a growth assumption. Particularly pleased to see the inclusion of provision for development outside the settlement boundaries, specifically the mention of 'tourism activities. Pleased to see that tourism development is supported across the whole settlement hierarchy in Fig 3.1 (now fig 3.2).	Support noted.
P119/40	Story Group	Story Group support the principle of focusing the majority of development within Whitehaven as the main town of the borough to support regeneration aims and objectives.	Support noted.
P272/70	RWE npower	npower welcomes the recognition that new power plants, by their nature, will have to be developed outside settlement boundaries.	Support noted.
P434/73 P314/73	Leconfield Estates	More development should be allocated to Egremont as it has the ability to offer executive homes near to local employment hubs.	No change, although the principle of growth in Egremont is supported. The level of development foreseen by the Core Strategy for Egremont provides for a realistic response given the levels of development over the last ten years. The figures quoted are not a ceiling, and there is sufficient land identified (in the SHLAA) to accommodate significant growth if the demand is there. This will be a matter for the site allocation process. (It should be noted, though, that growth may be constrained by factors such as the adequacy of the road network, the Ehen flood plain and other physical factors.)
P004/7	The Coal Authority	Major development, if focussed in the larger settlements would fall within the coalfield area, raising issues of mineral safeguarding. This need not prevent any development from taking place if prior extraction where appropriate is built into the site allocation process. It is likely that the major regeneration of Whitehaven will raise the issue of needing to address mineral legacy issues. This should not prevent development if adequate and appropriate remediation measures are undertaken.	No change here. This comment is noted and will be a factor in the site allocation process, including site release phasing. The Council is confident that the strategy, and evidence regarding the land supply, will mean that the plan can be realised without compromising mineral resources.
P018/11	NWDA	In particular we welcome references to: - providing for and facilitating growth in the local economy and - supporting the development of new nuclear and renewable energy generating capacity and essential infrastructure to support this.	Support noted.
P018/11	NWDA	ST2C(iv) should be split into two different clauses, one dealing with Westlakes and safeguarded employment sites, and one dealing with the other employment types.	Clause C(iv): agreed in part. The Council does not agree that a separate clause is needed, but the existing clause has been reworded for greater clarity.
P034/25	English Heritage	It will be important that evidence about the historic environment	3.3.9: agreed. Historic environment referred to in extended reference to

		informs the revision of settlement boundaries. This could be reflected in paragraph 3.3.9 .	settlement boundaries (3.3.10)
P182/63	Mr R Curwen	3.3.10 - Support the urban concentration & prioritise the use of brownfield land over Greenfield sites. The aim of 50% brownfield allocation is a realistic achievable target. The strategic objective to “support the sustainability of rural communities” is also in support of this.	
P034/25	English Heritage	Paras 3.3.13 and 3.3.14 refer to activities that would be acceptable outside settlement boundaries. It will be important to clearly set out the criteria for acceptability including the impact upon the historic environment.	No change needed. It is important to note here that development outside settlements will generally be resisted. Where acceptable in principle, it will have to satisfy policies ENV 3-5 and DM 23-29. Repetition of those criteria is not considered necessary here.
P054/26	Highways Agency	Regarding growth in the energy sector – consideration may be required of the specific transport issues and challenges associated with this growth.	No change needed here. The Strategy for Infrastructure refers to this issue, as far as current knowledge about developer intentions permits. The Highways Agency's comments will be sought both prior to and during the preparation of the Site Allocations DPD, and the Agency will be involved, along with the County Council, in planning for Nationally Significant Infrastructure Projects.
P081/31 P192/38	4NW Cumbria County Council	Fig 3.1 may not enable a sufficient level of development in the Local Centres. Small scale employment uses should be encouraged in Local Centres.	Agreed in part. The Core Strategy focus is on concentrating development in the towns. Policy ER6, as amended, sets out criteria for employment development elsewhere. It should allow for development on a scale sufficient to support rural vitality whilst not deflecting development away from the locations, which ST2 prioritises, in line with the Core Strategy's overall thrust. Figure 3.1 has also been reworded slightly to remove references which may appear overly negative.
P192/38 P081/31	Cumbria County Council 4NW	Whilst concentrating development in Whitehaven and the three Key Service Centres will be beneficial in the long term for sustainable transport options, it will be important to promote car sharing and rural wheels schemes in areas where public transport is less available. There may also be scope for developers building in rural areas making a contribution to alternative rural transport initiatives.	No change needed here, though the point is accepted. Policies ER6 (as amended) and T1 refer to greater transport sustainability.
P081/31 P193/38	4NW Cumbria County Council	Consideration should be given to whether concentrating 50% of development in Whitehaven would undermine the sustainability of smaller centres and lead to a greater need to travel.	No change. The Core Strategy aims to improve the sustainability of the towns, particularly Whitehaven, by promoting development there, reversing the trend of recent decades whereby sustainability has been undermined by too great a share of development happening in rural areas. It is not accepted that urban concentration will increase the need to travel overall; the reverse is more likely. Neither is it anticipated that the Core Strategy will unduly restrict development which will protect the

			viability of villages.
P081/31 P193/38	4NW Cumbria County Council	If nuclear new build is to take place there will be intense development pressure on the surrounding rural area. This will need to be taken into consideration.	No change needed here (but see ER1/ER3 and supporting text). The Council's position is that development associated with nuclear new build should take place in accordance with the Core Strategy. The Council believes that there is enough suitably located land to accommodate this, and that will be the starting point in negotiations with the developer and representations to the Major Infrastructure Planning Unit.
P193/38	Cumbria County Council	The Core Strategy would benefit if it were demonstrated how the proportions of development for each of the settlement types were derived and whether or not they are related to existing service provision, the findings of the SHMA etc.	Agreed; see revised Chapter 3 and supporting evidence base and topic papers. The development allowances reflect the Council's wish that regeneration of the towns should be promoted actively, supported by evidence (SHLAA and employment research) that the land supply can support this.
P146/46	GONW	Para 3.3.6 includes some proportions of development but does not specify whether these apply to development other than housing and if so how it will be calculated (hectares, number of applications etc.)	Agreed; see redrafted paragraph 3.3.6.
P311/73	Leconfield Estates	The proportion of development that has been allocated to Egremont needs to be revisited. Egremont is very well placed in relation to employment opportunities and therefore could accommodate more housing.	No change, although the principle of growth in Egremont is supported. The level of development foreseen by the Core Strategy for Egremont provides for a realistic response given the levels of development over the last ten years. The figures quoted are not a ceiling, and there is sufficient land identified to accommodate significant growth if the demand is there. This will be a matter for the site allocation process. (It should be noted, though, that growth may be constrained by factors such as the adequacy of the road network, the Ehen flood plain and other physical factors.)
P156/47	Mr G Garrett	Low Moresby should be designated as a Local Centre as it is only a short distance from local services and facilities.	Although there are a number of services within a short drive of Low Moresby there are none actually within the settlement itself. This makes it very difficult for the Council to justify designating it as a Local Centre. Note also that Policy ST2 and Table 3.1 allow for appropriate development in villages.
P156/47	Mr G Garrett	The LDF is too reliant on the nuclear industry which is currently in decline. In the short term there will be less demand for housing in the Whitehaven area and existing stock will be devalued.	Reliance on nuclear industry and the housing supply: not accepted. The Council's duty is to recognise the importance of the nuclear industry and plan for its anticipated needs, whilst also seeking to make the Borough more attractive for diversifying investment. The Council believes that the Core Strategy achieves an appropriate balance. House building provision is based on forecast need.
P157/48	Ponsonby Parish Council	Para 8.7.6 says that ST2 gives support to a high level nuclear waste repository in the general area around the Sellafield complex. This	Policy ST2 C(i) states that there is a 'willingness to discuss' a potential High level Waste repository. Whether or not the Council will support

		has not yet been discussed with the Parish Councils.	hosting this national facility will depend very much on the outcome of discussions around the extent of community benefits. Consideration needs to be given to changing the text to make this very clear. Regarding a review of Sellafield security - an Emergency Plan for the site exists and is dealt with as a standalone issue, separate to the LDF.
P183/63	Mr R Curwen	Clarity is required as to why prisons are included in ST2C(iv).	Prisons fall into a category of development that, for the sake of amenity, should be sited away from settlements.
P192/38	Cumbria County Council	The terminology used in ST2 with regards to the scale of development in each of the types of settlement does not reflect that used in the Cumbria Sub-Regional Spatial Strategy. It is suggested that it should. (see para 1.31 in the County Councils response)	The terminology in ST2 has been modified, but it is not accepted that it needs to be coterminous in order to be consistent with the Sub-regional Spatial Strategy. The Borough Council considers that the words adopted are a better basis for managing development. The different terminology in ER10 reflects a differing focus applied specifically to tourism development.
P192/38	Cumbria County Council	The term 'Higher Activity Waste Repository' is more commonly termed a 'Geological Disposal Facility'.	Reference deleted from this section, though the point is correct and has been addressed elsewhere (ER1)
P192/38	Cumbria County Council	Copeland should reflect the County Council's view not to support nuclear new build at Braystones and Kirksanton within the text of ST2.	Comment no longer relevant as Braystones and Kirksanton have been rejected.
P194/38	Cumbria County Council	Para 3.3.10 should clarify which villages have a settlement boundary and those that do not.	Revisions (now 3.2.10) give more guidance on the evolution of settlement boundaries. This will be taken forward in the site allocations document. The boundaries themselves are and will remain on the Proposals Map; the Council does not see any gain in listing the settlements here.
P271/70 P273/70	RWE npower	ST2 states a preference for nuclear new build at Sellafield. EN-6 does not provide a preference for some sites over others. Strategic Site Assessments will be carried out by Government and all 3 sites could potentially be developed. In the absence of detailed environmental and technical information all 3 sites should be considered equally.	Comment no longer relevant as Braystones and Kirksanton have been rejected.
P289/71 P300/72	Cleator Moor Town Council Cllr J Hully	The amount of development directed to Cleator Moor should be increased from 10% to 30%.	Whilst the Council strongly supports the regeneration and growth of Cleator Moor and will do its utmost to bring this about, the Core Strategy has to demonstrate that it is feasible. 30% would almost certainly be unachievable given the supply of developable land available. It should also be noted that the figure quoted (now 'at least' 10%) is not a ceiling, and development proposals above that level, if they emerge, would be likely to be supported.
P309/73	Leconfield	Enabling sustainable long term growth requires a more flexible	No change here but the point is accepted; SS2, along with supporting

	Estates	housing target post 2016. ST2 should provide some clarity regarding the mechanism to regularly review the housing figures.	text and background evidence, addresses this, and the Site Allocation DPD will take it further. The published Core Strategy puts forward an approach which is based firstly on demonstrating that the Borough can supply enough land to build homes to meet forecast need, whilst also showing that there is a capability to supply land to accommodate an aspirational level of growth, if that growth is generated. Monitoring will be carried out regularly as laid out in the revised Monitoring Framework, and the strategy will be reviewed in the future as necessary. For the time being, phasing of the delivery of the housing land supply will be a matter for the site allocation plan.
P309/73	Leconfield Estates	A wider overview needs to be taken of the benefits of growing Egremont. ST2B does not allow for the expansion of the settlement boundaries and only permits supporting development that contributes to the regeneration of the Town Centres. There is likely to be a need to review the settlement boundaries of the Key Service Centres and this should be supported by robust evidence.	It is not accepted that ST2 (B) is not in line with the strategy. However, the published Strategy explains more clearly how development can be accommodated in the Key Service Centres, including a more explicit recognition that the development figures envisaged are not a ceiling, and providing for settlement boundary changes (to be consulted on in detail in the site allocation process).
P310/73	Leconfield Estates	Fig 3.1 (Key Service Centre) needs to be reworded to provide more than local employment sites and more than just general needs housing, the hierarchy needs to reflect the Core Strategy Vision and the Masterplan.	In line with this, Figure 3.1 (Key Service Centre) needs to be reworded to provide wider than local employment opportunities and extensive, carefully planned allocations for new housing to meet more than 'general' needs. The hierarchy needs to reflect the Core Strategy Vision and the Masterplan.
P312/73	Leconfield Estates	We welcome the recognition of the need to revise the Settlement Boundaries at Paragraph 3.3.9 and suggest that the boundaries of Egremont be revised to accommodate additional development in response to long term development needs.	Noted. The text now lays the ground for detailed reconsideration of Egremont's settlement boundary in the site allocation process.
P442/20	Natural England	In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Nuclear new build will be a matter for the Major Infrastructure Planning Unit, whilst other low carbon energy proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies. Natural England can expect to be engaged where any proposal may have impacts on protected areas.
P319/39	National Trust	ST2C(iii) – should include the same locational condition as C(ii) i.e. 'at sites ...which minimise environmental and amenity impacts (to?) within acceptable limits.'	Not accepted. As infrastructure supports development, the critical factor is where development goes. The considerations for supporting infrastructure are different to those for the developments themselves, and will be taken into account when applications for development are considered. The environmental impact of infrastructure provision may also be a factor in the site allocations process. (The reference to 'within

			acceptable limits' in ST2 (ii) has been removed as unnecessary verbiage when the objective is already to minimise impacts.
P319/39	National Trust	The way that ST2C(iv) is currently worded, any employment use might be contemplated outside settlement boundaries. Alternative text is offered.	Accepted in part. The policy text has been sharpened although it is not considered necessary to adopt the format suggested.
P319/39	National Trust	In ST2C(v) the use of the word 'including' suggests that a range of other housing development might also be located outside the main settlements. Alternative text is offered.	Not accepted that the policy should have a finite list of uses. However, the policy wording has been amended to be more specific about why such uses are permissible.
P352/19	Taylor & Hardy	ST2 B uses the term "within defined settlement boundaries". Figure 3.1 clearly anticipates "extensions" in all of the settlement hierarchies where further housing is anticipated. This potential conflict could be resolved by deletion of the term "within defined settlement boundaries".	The point is accepted and paragraphs 3.2.9 to 3.2.11 now clarify the position as regards settlement extension.
P352/19	Taylor & Hardy	An additional criterion (vi) should be added to C to allow for opportunities to redevelop or restore vacant or derelict sites to accord with policy ST1C(v).	Not accepted; the policy lays down types of development which might be acceptable if they have a proven requirement to be outside settlements. The suggested clause could be inferred as inviting it to be overridden.
P372/9 P395/27	Regen North East Copeland Richard Mulholland	In ST2C(v) the need to meet proven specific local needs should be removed from the text and instead 'housing that supports the community for local needs and growth' should be inserted instead.	There is a presumption against development in the open countryside. The suggested alternative wording for ST2 C (v) will give the reader the impression that housing that does not fulfil the criteria will not necessarily be refused whereas the opposite is true. For this reason it is likely that the current wording of the policy statement will be retained (or revised only slightly so as not to change its meaning).
P391/74	West Cumbria Land LLP	The Core Strategy has perhaps missed the opportunity to identify a range of strategically linked areas where leadership and guidance would help deliver long term objectives. The document should make reference to the area that would link the opportunities at Pow Beck to Woodhouse/Kells and to the former Rhodia site – a strategic priority area that would help focus investment and create impetus.	Agreed in part and the amended ST3B refers to south and central Whitehaven as a location encompassing all these sites, which are already identified in the Energy Coast Master Plan. This is amplified in the Whitehaven Locality strategy section and will be a factor, as a package of sites of major significance for Whitehaven, in further development of plans in the Local Development Framework. (This area may also be suitable for off-site development associated with nuclear new build.)
P396/27	Richard Mulholland	The text of ST2D should be changed to say that 60% of all non-nuclear development should be accommodated in Whitehaven and the three service centres (instead of 80%) with more detailed figures to achieve sustainable regeneration for each settlement to be defined.	Not accepted. The stated approach has been generally supported and is seen as essential if regeneration is to succeed in the towns.
P397/27	Richard Mulholland	Concentrating 80% of the areas future development in the towns will discourage inward migration as most people are attracted by the	Not accepted. The dispersal to rural settlements in recent decades has not been sustainable. The vitality and sustainability of the towns (which

		pleasant surroundings offered by our less populated areas. Development should be allowed in smaller settlements where people with skills and disposable income are more likely to want to settle.	induce most of the areas of greatest deprivation), and the economy of the Borough as a whole, will be boosted by their regeneration, which can only be achieved if urban concentration is a focus. The Council intends to work with developers to ensure that new housing in and adjacent to the towns achieves a standard which will be attractive to incomers. There is already housing in Whitehaven which demonstrates that this can succeed.
P426/47	Mr G Garrett	There should be restricted or no new development within a five mile radius of Sellafield until the Legacy ponds and silos have been fully decommissioned. There should be minimum development within a ten mile radius until improvements to road infrastructure take place.	Point understood, but no change needed. The strategy will tend to achieve this as only a small scale of development is anticipated in villages. The Council does not consider that growth in Egremont and Whitehaven, although arguably within 5 and 10 miles respectively, would be problematic. Safety zones are under review but indication from the Health and Safety Executive and Office of Nuclear Regulation have not so far indicated that such extensive restricted development zones would be needed.
P426/47	Mr G Garrett	The main areas of residential development should be in Millom, Frizington, Parton, Distington and Lowca – the edges of the borough basically where there is good access in and out of the area. Old housing stock should be replaced with new energy efficient housing in these areas.	Agreed that growth should be encouraged in Millom, but otherwise not accepted, though some development will be acceptable in the smaller settlements, as indicated by ST2 and table 3.1. Accessibility is maximised by concentrating the greatest proportion of development in the towns, where most services are located and where there is the greatest choice of transport. Whilst access in and out of the Borough needs to be improved, it is not accepted that development should be focused in places where people might tend to use services outside the Borough, rather than creating jobs within it.
P426/47	Mr G Garrett	Whitehaven does not have enough retail and office accommodation to justify any increase in housing stock. Housing will only reduce the number of development sites for employment.	Not accepted. House building supports retail provision, not the other way around, and the Council is working with the NDA and others to create more office provision in Whitehaven. Whilst residential and commercial development close to the centre would be encouraged, the policy refers to encouraging development in the whole town including housing sites on its outskirts, not only centrally. (It is agreed that the removal of education facilities from the centre was unfortunate, but that cannot be rectified in the short term.)

Strategic Regeneration Priorities (ST3)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P019/11	NWDA	There is a question as to whether referring to nuclear new build at	Change to ST3 title: agreed.

		Sellafield and the continuing development of Westlakes as 'regeneration' priorities. Perhaps a more appropriate title for ST3 is 'Strategic Development Priorities'.	
P019/11	NWDA	ST3 D mentions sites that are subsequently identified in Chapter 8. These sites appear to be of local rather than strategic importance. If the Council intends to allocate strategic sites in the Core Strategy, we suggest that these are specifically named in the policy and their boundaries shown on a Proposals Map.	Identification of sites in Chapter 8: no change. The priorities are strategic, the sites are important, being the means by which those priorities will be achieved. There is no site which is so important as being in itself critical to fulfilling the strategy, which is why there is no designated strategic site.
P042/25	English Heritage	Many of the sites listed are in conservation areas and affect listed buildings and their settings. It will be necessary to investigate whether existing information about the environment needs to be supplemented by a townscape and historic environment analysis.	Agreed, but no change needed. The work undertaken by Paul Butler Associates (Whitehaven Town Centre Conservation Area Appraisal and Design Guide) forms part of the evidence base for the Core Strategy. The Whitehaven SPD and a more general Design SPD will guide further work.
P055/26	Highways Agency	The Agency advises that the potential impact of individual development proposals, the cumulative impact of multiple proposals and the requirements of supporting infrastructure and sustainable transport improvements should be determined as part of the evidence base to support the strategy. The Agency can provide assistance with undertaking such assessments and therefore would welcome further details regarding the scale of development proposed.	Noted. The Agency has been consulted about the Strategy for Infrastructure.
P195/38	Cumbria County Council	The Council should reflect the County Councils position on the proposed sites at Braystones and Kirksanton.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P274/70	RWE npower	ST3 states a preference for nuclear new build at Sellafield as opposed to Braystones and Kirksanton. The text should be reworded to say that all three sites are proposed.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P320/39	National Trust	ST3E should be deleted as sites that are a priority regeneration sites should be known throughout the LDF work to date. (An alternative approach would be to adopt a criteria based policy setting out the requirements of other Strategic Regeneration sites in terms of a) what their characteristics would be, and b) the process for agreeing that they should be added in to Policy ST3.)	Agreed. The clause is deleted and replacement wording allows for consideration of sites currently not foreseen, whilst specifying that they must reflect established strategic principles.
P390/74	West Cumbria Land LLP	A policy that seeks a joined up approach to the development of the south-eastern end of town and aims to provide a greater residential and commercial identity to Whitehaven would be welcomed. A more strategic approach would help to capture the potential benefits and transformation that could flow from more co-ordinated development.	No change here, but the point is supported. The Whitehaven locality strategy (Chapter 8) and Whitehaven SPD, supported by the Energy Coast Master Plan and further LDF documents, should ensure an approach that can achieve a joined up outcome.

P443/20	Natural England	In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies, and the advice of Natural England will be sought as appropriate and/or required.
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Strategic Infrastructure Policy (ST4)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P181/63	Mr R Curwen	Good recognition of the implications of the Nuclear Industry & also of the requirement to improve the associated transportation infrastructure.	Support noted.
P035/25	English Heritage	It will be important for any document dealing with S106 contributions to cover the historic environment.	No change, but the point is supported. The Strategy for Infrastructure recognises this, and the Developer Contributions SPD will also make allowance for it.
P056/26	Highways Agency	CIL provides a better mechanism for funding sub-regional strategic infrastructure and infrastructure that mitigates the cumulative impacts of multiple developments. With the new limitations to the use of S106 contributions, consideration should be given to using CIL.	Agreed. ST4 and supporting text now make provision for the production of a CIL document if circumstances justify it.
P101/32	Cumbria Wildlife Trust	Para 3.5.2 should make reference to biodiversity in the green infrastructure bullet. It is important to ensure habitat connectivity when assessing development proposals.	Agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.
P102/32	Cumbria Wildlife Trust	ST4 - Cumbria Wildlife Trust supports the inclusion of the environment in the list of infrastructure contributions it will seek.	Support noted.
P103/32	Cumbria Wildlife Trust	In para 3.5.6 – contributions should also be sought for the long term management that will be needed to make sure that there are positive biodiversity outcomes from compensation, mitigation and enhancement conditions attached to planning decisions.	Agreed. Paragraph 3.4.4 now refers to this and the SPD will develop it.
P126/45	Sport England	It is not clear what is meant by 'strategic' infrastructure and also what role the infrastructure plan would play. Will contributions only be sought for infrastructure identified in the plan or will these be in addition to any site specific requirements?	No change here but the point is agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.
P127/45	Sport England	With regards to establishing any deficits in sports and leisure infrastructure, quality, quantity and accessibility will have to be assessed.	No change here but the PPG17 study in the evidence base goes further than capacity and provides a basis to develop a broad approach in the Developer Contributions SPD.
P128/45	Sport England	Would it be more appropriate to set out the approach to developer	The Council believes that ST4 does this as far as is necessary or

		contributions in the Core Strategy, rather than an SPD?	appropriate in a Core Strategy. It is backed up by the infrastructure work in the evidence base and will be taken forward in the SPD. The elimination by the CIL regulations of the possibility of a tariff removes the complication referred to.
P155/47	Mr G Garrett	Any monies gained from the NDA to fund infrastructure should be spent on one or two larger projects that will make a difference rather than spread across a larger number of small projects.	Noted. As far as the future is concerned, this will be a matter for decision at the time; at present (by way of illustration and precedent) it is a matter for the panel overseeing the Low Level Waste-related community benefit fund, a large part of which has already been earmarked for one major project.
P164/51	Sellafield Ltd	At this stage, it is not clear what the Council's view is of infrastructure needs. Given the clear preference for continuing the practice of negotiating planning obligations on a case by case in the short to medium term, we would seek further clarity and indeed the opportunity to comment and shape both the "Infrastructure Plan" and proposed "Planning Obligations Supplementary Planning Document" going forward.	No change, but the point is supported. This will be an important consideration in considering the Development Consent Order and any related planning applications.
P196/38	Cumbria County Council	ST4 would benefit from providing more information on the infrastructure needed for the borough's development. ST4 could have a separate policy that makes it more explicit what contributions are necessary to support additional schools, roads, open space etc. The need for flood prevention should be made more explicit in the policy so that subsequent policies can be seen to be joined up in a robust way.	This is provided in the evidence base (Infrastructure Deficit Report) and the Strategy for Infrastructure. Work on nuclear new build is still at an early stage. The need for an additional policy is not accepted. The principles are agreed, but this level of detail is more appropriate for the SPD.
P196/38	Cumbria County Council	ST4 needs to make explicit reference to the importance of highways and transport infrastructure. It would be appropriate for travel planning and transport infrastructure to be included in the S106/Planning Obligations SPD.	Agreed in part; this is mentioned in the preamble to ST4, covered in some detail in the Strategy for Infrastructure, and will be taken forward in the SPD.
P196/38	Cumbria County Council	Insisting on planning obligations for smaller scale developments in areas where there is market failure may prevent much needed development taking place. It is proposed that some flexibility is required in these circumstances.	The principle is valid but no change here. The SPD will take viability into account and this is likely to include thresholds in some instances.
P196/38	Cumbria County Council	The supporting text to Policy ST4 refers to nuclear new build as an example where the Borough Council will need to work with the Infrastructure Planning Commission to agree a "Community Offset Package". Whilst this is supported, it is suggested that the short-term housing needs and their location arising from temporary construction workers, for example, should be taken into account at this drafting	Noted - this is an important point which requires a great deal of consideration. Locations for temporary accommodation will be identified at the same time as new housing allocations (in preparation for the Site Allocations DPD).

		stage of the Core Strategy.	
P197/38	Cumbria County Council	The references in paragraph 3.5.2 to Green Infrastructure as part of Policy ST4 is welcomed and supported.	Support noted. In order to make the pre submission draft of the Core Strategy more concise, this paragraph has been removed but green infrastructure is covered in the Infrastructure Deficit report and the Infrastructure Plan, both of which are evidence base documents and available to view on the Councils website.
P198/38	Cumbria County Council	Reference should be made to wildlife rich areas and wildlife corridors in para 3.5.4	Agreed, albeit included in the ST4 preamble under Green Infrastructure.
P355/13	Environment Agency	The Infrastructure Plan should be produced prior to the Core Strategy submission so that it is informed by it (reference is made to UU ability to provide sufficient water supply). It is important that the Core Strategy is deliverable. The West Cumbria Water Resource Zone is forecast to go into deficit from 2014/15 onwards i.e. where demand will be greater than supply in dry weather. United Utilities plan to develop a new suite of boreholes near Egremont, to reduce leakage and to promote water efficiency in West Cumbria in order to restore a healthy supply-demand balance from 2014/15 onwards. This may not have taken into account increased demand from growth and that is why it is important to investigate this through your Infrastructure Plan.	The infrastructure planning process has informed the published Core Strategy and the relevant evidence base document (Strategy for Infrastructure, based on the Infrastructure Deficit Report) has been supplied to the Agency and statutory undertakers for comment.
P371/34	United Utilities	Cleator Moor, The Green and Drigg Waste Water Treatment Works all have performance problems and have caused flooding and pollution. There are also flooding and capacity issues at Cleator Moor. These issues may not be resolved until the AMP 2015-20. This does not necessarily mean that development could not be serviced but surface water should not enter the combined sewer without causing further flood risk and pollution.	No change here, but noted in the Strategy for Infrastructure and will be a consideration in the Site Allocations DPD regarding allocation of sites and, potentially, phasing of their development. United Utilities will be fully involved in that process.
P373/9	Regen North East Copeland	The policy as written will have no bearing on the investment decisions by utility companies and accordingly appears irrelevant	The purpose of the policy is to give a basis for levying or negotiating contributions from developers. The background work (particularly, the Strategy for Infrastructure) will be a factor considered by statutory undertakers (who have been consulted on this) in their asset management planning, as will the Local Development Framework itself. The policy thus serves a legitimate purpose and is valid as it stands.
P447/20	Natural England	Paragraph 3.5.2: We welcome the inclusion of green infrastructure in this paragraph. However, we consider that it should also make reference to biodiversity alongside open space within the green infrastructure bullet point. Biodiversity is an essential component of	Agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.

		green infrastructure and there will be opportunities for creating, connecting and enhancing habitats.	
P448/20	Natural England	We note the intention to prepare a Supplementary Planning Document on Planning Obligations and Agreements. In view of the comments above, the SPD should of course include contributions to the full range of green infrastructure which is needed.	Agreed. The SPD will address this.

Planning for the Energy Coast - Policies - ER1, ER2, ER3, DM1, DM2 and DM5

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P020/11	NWDA	ER1, ER2 and ER3 - The Agency broadly welcomes the inclusion of draft policies on Planning for the Nuclear Sector, Renewable Energy sector and Infrastructure for the Energy Coast.	Support noted
P275/70	RWE npower	ER1 – The Core Strategy should not identify Sellafield as the preferred site for nuclear new build.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P104/32	Cumbria Wildlife Trust	ER1 – Nuclear new build at Kirksanton would cause immense environmental damage to the Duddon and Morecambe Bay Natura 2000 sites.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P199/38	Cumbria County Council	ER1 – Accommodating new processing within the current Sellafield boundaries could require an expansion of the licensed area. The implications of this need to be fully considered as part of the Core Strategy.	It is not accepted that the Core Strategy should allow for expansion of the Sellafield licensed area boundary. At present the Council's view is that reprocessing activities should be accommodated in the existing site and other contingencies are too hypothetical to be accounted for at this stage in the Core Strategy. Any such proposal would be dealt with on its own merits under Nationally Significant Infrastructure planning process, or the Core Strategy as adopted, or considered in a future review or alteration of the strategy.
P199/38	Cumbria County Council	ER1 – There is some duplication between this policy and ST3. The two policies could be merged, making the Core Strategy simpler and clearer.	Not accepted. It is important to have a policy that deals exclusively with nuclear development as this has unique characteristics, as well as being one of the most significant types of development that is likely to take place in the borough during the plan period, with enormous implications for the economic future of Copeland.
P199/38	Cumbria County Council	ER1 – There may be problems with local opinion about the appropriateness of moving waste from the existing site and the effects that this might have on local communities.	There may well be local opinion about waste transfer, but no change is needed here, as such concerns would be properly taken into account at the planning application stage or as part of any other regulatory process involved.

P321/39	National Trust	ER1 – B and C should be deleted from this policy as they do not state an intention in respect of development but rather a need to consider the implications of development. A criteria based policy may be more appropriate.	Not accepted. Criterion C (B has been deleted, being out of date) is considered to be important as marking the Council's policy in negotiating with major infrastructure (nuclear) developers and making representations to the Major Infrastructure Planning Unit. The Council considers that this policy goes as far as is appropriate in expressing a view on matters which will be under the jurisdiction of the MIPU.
P359/13	Environment Agency	ER1 C – should include biodiversity and environment as well as residents, business and image.	Agreed; 'environment' inserted, encompassing biodiversity.
P359/13	Environment Agency	ER1 C – Delete 'full safety case' and replace with 'appropriate safety case'	Agreed in part; phrase deleted but different wording inserted.
P165/51	Sellafield Ltd	ER1 G – Sellafield Ltd may have legitimate reasons for keeping employees working on site and would prefer to have a dialogue with Copeland with a view to agreeing on a practical application of this policy which does not impact on the business.	Agreed. The policy is not intended to suggest that this could be achieved without dialogue, and now makes this more clear.
P199/38	Cumbria County Council	ER1, DM1 – It is recommended that Copeland should reflect the views of the County Council on the nominated sites at Braystones and Kirksanton.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P057/26 P058/26 P069/26 P071/26	Highways Agency	ER1, ER3, DM1, DM5 - Consideration may need to be given to the specific transport issues and challenges associated with delivering growth in the nuclear sector, including potential impact during the construction phases.	No change, but the point is accepted. This will be worked on when the power station Development Consent Order is applied for, during any other such processes, and in work on the Site Allocations DPD.
P441/20 P440/20 P439/20 P438/20	Natural England	ER1-3 and Section 4.2 - In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	No change needed in this section. Production of the Core Strategy has taken place in full awareness of the importance of these natural assets. They are protected by national and transnational legislation which does not need to be repeated here, and their continuing protection has been considered in the Habitats Regulations Assessment. The Core Strategy takes them into account implicitly throughout and explicitly, where the Council has felt the need to make a specific strengthening reference. The criteria within the supporting development management policy (DM2), together with other policies in the Core Strategy should provide sufficient policy protection as requested.
P441/20	Natural England	ER3A should also make reference to avoiding or mitigating potential impacts on biodiversity and geodiversity as well as landscape.	Agreed; 'natural environment' inserted.
P441/20	Natural England	4.2 - In terms of the National Grid upgrades it is too soon (i.e. with no route agreed yet) to be specific about potential impacts. However, we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated	Point noted, no change indicated.

		sites and biodiversity, and opportunities to access and enjoy the countryside.	
P158/48	Ponsonby Parish Council	4.2.5 – Who has identified the borough as a potential host for the geological repository? No consultation is taking place with the parishes surrounding the Sellafield site.	Agreed that the Preferred Options text is potentially misleading. The Council has merely expressed an interest in discussing the proposal, and consultation is taking place under the Managing Radioactive Waste Safely process. The text now reflects this more precisely.
P250/14 P255/67	Moresby Parish Council Parton Parish Council	4.2.5 – The borough has not been identified but has expressed a ‘without commitment interest’ in talking to Government about the potential for hosting a repository.	Agreed that the Preferred Options text is potentially misleading. The Council has merely expressed an interest in discussing the proposal, and consultation is taking place under the Managing Radioactive Waste Safely process. The text now reflects this more precisely.
P364/13	Environment Agency	4.2.5 – At the start of the paragraph delete “storage sites” insert “disposal of higher-activity radioactive wastes”	Agreed; text amended accordingly.
P365/13	Environment Agency	4.2.6 - To represent the British Geological Survey’s work accurately, amend the first sentence to read, “...screening to rule out any area of the Borough that is unsuitable for repository siting, and will publish a final report.” Then delete the second sentence.	Agreed in part; text amended, but reference to consultation retained.
P366/13	Environment Agency	4.2.7 - amend the middle of the second sentence to read, “...locating a facility if a safety case meets the requirements of the relevant regulators and full...”	Agreed; text amended accordingly.
P082/31 P200/38	4NW Cumbria County Council	ER2 – It is recommended that the County’s Renewable Energy Study is recognised in the LDF process and that the Council develops an evidence base and targets for renewable energy. LDFs could set ‘stretch targets’ for renewable energy to demonstrate how regional targets could be exceeded. A renewable energy study will be taking place in 2010/11 which will help to provide an evidence base. Reference should be made to Cumbria County Councils Technical Paper 6 – “Planning for Renewable Energy Development in Cumbria (2004)” which identified the potential for renewable energy in the borough (although now out of date).	Taken on board, although it was felt that a guide for renewable energy capacity by type together with an overall aspiration for delivery was more appropriate than specific targets (explained in paras. 4.3.7 to 4.3.9).
P083/31 P201/38	4NW Cumbria County Council	ER3 – Further work is required to identify the housing needs of the temporary construction workers as well as extra school places etc.	Noted. Existing text has been amended to reflect the Nationally Significant Infrastructure Project process, but retains the guidance that the Council will negotiate for such provision to be made in accordance with the Core Strategy. It has been too early during Core Strategy production to go further in estimating numbers. Much of the planning work would be done under the NSIP process. It is not anticipated that a large proportion of the construction workforce will bring families with them, but more detailed consideration will include that.

P036/25	English Heritage	ER3 A - include 'and heritage assets' after 'landscapes'.	Agreed; text amended.
P322/39	National Trust	ER3 A – There is no specific reference to the impact on designated or locally important assets. Also the wording should be strengthened to ensure that transmission infrastructure is located having regard to such potential impacts.	Agreed in part; reference now made to assets, but further change risks making the policy unnecessarily convoluted when it is already clearly implicit, and supported by other policies locally and nationally, that infrastructure would be expected to have such regard.
P360/13	Environment Agency	ER3 A – this policy should be (at least) minimising the impacts on biodiversity as well as landscapes, health and amenity.	Agreed; text amended.
P265/16	Allerdale Borough Council	ER3 B – It is important to ensure that further education facilities are encouraged that complement existing establishments such as Energus and University of Cumbria.	The point is supported, and the policy encompasses such provision. See also ER11. No change needed here, but there is already considerable joint working on this.
P166/51	Sellafield Ltd	ER3 C – Thought needs to be given to how any temporary housing options will impact on current Sellafield traffic flows and travel plans.	Noted: traffic modelling is, and will remain, an integral part of planning for development.
P105/32	Cumbria Wildlife Trust	Para 4.2.14 – Undergrounding 400kV electricity cables is not a panacea for the landscape impact of pylons. The work disturbs an area of land 30-50m wide and necessitates large transformer stations where the cables enter and exit the ground. This level of disturbance would be very harmful where it intersects designated sites. This damage needs to be factored in when considering lengths of cabling suitable for undergrounding.	No change, but the point is valid. National Grid is preparing to consult stakeholders on the matter of undergrounding cables. The decision will not be taken by Copeland but the Council will be part of the decision making process.
P147/46	GONW	4.2.16 – It is not clear whether the accommodation for temporary construction workers will form part of the overall borough housing requirement that will exist as part of the housing offer after the workers have left the borough.	No change. The mix of permanent and temporary housing to be provided remains to be determined. The Council is satisfied that it can demonstrate enough land supply (SS2 and supporting evidence) to provide a sizeable component of permanent housing which will eventually if not immediately form part of the housing stock, and sites (ER3 – economic development land supply and/or 'opportunity sites') which would be suitable for temporary accommodation.
P264/16	Allerdale Borough Council	4.2.16 – If the temporary workers are to be accommodated in the main towns of Copeland, this needs to be supported by evidence showing that there is sufficient capacity in each of these locations. A greater understanding of the makeup of the workforce is required in terms of numbers, over what period and whether local people, once trained, are likely to make up the workforce. This information would help to clarify whether Allerdale has a supporting role to play and how far that would extend.	The mix of permanent and temporary housing to be provided remains to be determined. The Council is satisfied that it can demonstrate enough land supply (SS2 and supporting evidence) to provide a sizeable component of permanent housing which will eventually if not immediately form part of the housing stock, and sites (ER3 – economic development land supply and/or 'opportunity sites') which would be suitable for temporary accommodation. Allerdale is involved in these discussions. No change to policy needed here as joint working is continuing and will do in response to the Development Consent Order(s)
P027/11	NWDA	DM1 - As drafted, the policy identifies the matters that the Council will ask the IPC to take into account when making decisions on nuclear	No change, except clarification in supporting text. DM1 goes further than Nationally Significant Infrastructure Projects, and in any case has

		new build. Does this need to be set out in a policy; it may be more appropriate to incorporate this in the supporting text to policy ER1.	value as a statement of the Council's planning policy which will support its approach to negotiating with the developer and making representations to the Major Infrastructure Planning Unit.
P368/13	Environment Agency	DM1 - With regard to New Build Nuclear Proposals, we would like to refer to our position on new nuclear power and our existing advice to DECC on the siting of new nuclear power stations.	Comment noted, though the location decision has now been taken and the Development Consent process is not within the Council's jurisdiction.
P113/32	Cumbria Wildlife Trust	DM1 – Nuclear energy generation proposals should be considered against the same environmental criteria that renewable energy generation is in DM2 E.	No change. The requirement for an Environmental Assessment, which would not apply to a lot of projects under DM2, covers this, along with other policies in the LDF.
P233/38	Cumbria County Council	DM1 - The County Council's recent response to the consultation on the Draft National Policy Statement (February 2010) for Nuclear Power Generation supported the nomination of the Sellafield site, but was not convinced of the case for the nominated sites at Braystones and Kirksanton and was minded not to support them. It is recommended that the Borough Council reflects the County Council's position on this matter.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P279/70	RWE npower	DM1 D – The wording in para D that relates to community benefits is ambiguous. This paragraph should be linked to Circular 05/2005.	Whilst it is of course accepted that Circular 05/05 should govern planning obligations, the Borough Council does not accept that the same restrictions need apply to 'community benefits packages', which by their nature would be negotiable as agreements outside the scope of planning legislation, and thus do not need to be bound by the requirements applied to Section 106 agreements.
P043/25	English Heritage	DM1 D - should include environmental alongside economic and social regeneration.	Agreed: text amended.
P459/20	Natural England	DM1, DM2 & DM5 - In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies.
P341/39	National Trust	DM2 – an overt reference to the assessment of the cumulative impacts of multiple developments should be made in the policy statement itself.	Cumulative impacts - taken on board.
P028/11	NWDA	DM2 - The policy's opening sentence should be 'Proposals for renewable energy development in the Borough will be supported where they satisfy the following criteria:'	The support is given in policy ER2.
P005/7	The Coal	DM2 - Large scale wind farm developments can have a significant	Taken on board - this has been incorporated into policy DM11 rather

	Authority	impact on mineral resources. If Copeland wants to promote major wind farm development then the Coal Authority would like to see the policy criteria including an assessment of the effect development might have on minerals. Additional text is suggested.	than DM2 as it can apply to other developments as well as renewables.
P341/39	National Trust	DM2 – PPS22 is pro-renewables and the way that the start of this policy is worded would suggest that Copeland is not particularly positive about it. It is suggested that the introduction is more positively couched.	The support is given in policy ER2.
P341/39	National Trust	DM2 B - the landscape impacts could make specific reference to spatially important considerations in the Copeland context – i.e. “including the St Bees Heritage coast and its setting, and the setting of the Lake District National Park”	The statement as it is includes these areas and is a blanket approach. There are obviously important landscapes in the borough but all landscapes have the potential to be important to the people that live in them.
P266/33	RSPB	DM2 D & E – These criteria need to be underpinned by the importance of the protection of a population of internationally important over wintering Hen Harriers in the Cleator Moor Locality.	Not Accepted. The Borough Council considers that a direct reference to the area's importance for hen harriers should not be included in the text in on the grounds of maintaining security of biodiversity.
P341/39	National Trust	DM2 E - there should be a specific reference to the settings of heritage assets	Not agreed. The Council believes that the criteria B and C deal with this issue adequately, protecting a much larger area than just the settings of heritage assets.
P168/51	Sellafield Ltd	DM5 – An explicit reference in this policy to ‘clean up’ in terms of Copeland’s view regarding potential new development (plants) associated with decommissioning activities would be useful.	E deals with new development within the Sellafield site and A states that there should be no development outside of the licenced site other than that relating to monitoring, maintenance and investigatory work.
P168/51	Sellafield Ltd	DM5 - decommissioning may drive the requirement to use land adjacent to the site for nuclear or non-nuclear support activities. Would be helpful if the policy gave guidance should this scenario arise sometime in the future. Sellafield Ltd would not wish to see options closed off should operational necessities or national nuclear policy issues change over time.	DM5 A has now been changed to state that there should be no development outside of the licenced site other than that relating to monitoring, maintenance and investigatory work. The Preferred Options policy did not allow for any development outside the boundary.
P280/70	RWE npower	DM5 - RWE npower support policy DM5 in terms of its location preference for processing and waste management sites.	Support noted.
P254/14 P259/67	Parton Parish Council Moresby Parish Council	DM5 - It needs to be made clear that the current storage facilities at Sellafield and Drigg would not necessarily be appropriate for long term storage of highly active waste. It would be better if there were two distinct policies.	It is not accepted that this policy needs to be split. These are planning policies and the regulation of nuclear waste is not a matter for the Core Strategy. The Drigg site is licensed for low level waste only. Reference is already made in DM5C to the best practicable environmental option as regards Sellafield, and the long term position on finding a new means of disposing of high level waste.
P367/13	Environment Agency	DM5 A – Drigg LLWR do carry out some activities outside the boundary e.g. sinking boreholes, maintenance works and monitoring	Agreed - text amended.

		etc. This must be recognised as necessary for safety reasons.	
P367/13	Environment Agency	DM5 D – This statement may be unnecessarily restrictive on future waste management options e.g. some sorting or treatment of LLW that is acceptable, safe and the Best Practicable Environmental Option.	Agreed. The Council considers that deletion of the word ‘processing or other’ removes some ambiguity on this.

Space for Economic Development: Policies - ER4, DM3

Ref. No.	Respondent	Preferred Options Consultation Comment	Council' Response
P021/11 P148/46	NWDA GONW	ER4 – This policy is currently unsound as it does not quantify an amount of employment land allocated or the timescale over which it will be provided. This is required to provide a clear framework for (i) the identification of employment sites in the Allocations DPD and (ii) the release of poorer quality sites to alternative uses.	Agreed in part. There is no requirement for a Core Strategy policy to quantify the land supply, which will be done in detail on the Site Allocations DPD. The supporting text and evidence base (research studies and the Economic Development Topic Paper which summarises them) now demonstrate that Copeland will be able to meet forecast demand and provide for growth.
P059/26	Highways Agency	ER4 – Need for employment land should have a robust evidence base and be linked to any infrastructure improvements which may be required to deliver the proposed economic development.	No change needed, but the point is accepted. The evidence base (employment land research and Strategy for Infrastructure) provides the foundation to deal with this via the site allocation process.
P202/38	Cumbria County Council	ER4 – Caution should be exercised when considering the de-allocation of employment sites on the basis of numerical over-allocation. Sites allocated for development must be genuinely available, and the de-allocated sites must be no longer fit for purpose or incapable of being made so.	Agreed. The supporting text now addresses this point, as explained in more depth by the employment land topic paper, and will guide the site allocation process.
P323/39	National Trust	ER4 A – locational considerations need to be explicit in this policy rather than having such an open-ended approach. The simplest way to do this would be by cross-reference to Policies ST2 and ER6.	Agreed. Although the policies of the plan should be read together, the link in this instance is appropriately strengthened by a reference in supporting text.
P106/32	Cumbria Wildlife Trust	ER4 B – Sites at risk of flooding or that are environmentally sensitive should be included in the reasons for de-allocation	No change needed, on grounds of keeping the policy concise. These factors would tend to make an undeveloped site suitable for consideration for de-allocation, and will be considered in the site allocation process.
P179/61	Port Millom Ltd	ER4 B - Strong objection to any proposal that would prevent the continued use of Millom Pier as an industrial facility. (<i>Comment also made in relation to para 8.6.9</i>)	Objection noted. This land has been identified as suitable for tourism-related development (Copeland Local Plan 2006), and the Employment Land and Premises Study recommends that it be de-allocated; this may be debated during the production of the Site Allocation Plan. There is no proposal in the Core Strategy to de-allocate it for industrial use and nothing in the Core Strategy which prevents its continuing in its present

			use.
P009/8	Cumbria Tourism	4.3.5 – It is asked that the Council includes an assessment and suggestions as to which ‘employment’ sites could be appropriate for tourism development.	Agreed, and the text now makes specific reference to tourism; otherwise this will be addressed in the site allocation process.

Quality of Employment Space – ER5

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P060/26 P180/62	Highways Agency Invest in Cumbria	ER5 – Support for high quality office accommodation in the town centres as they have accessible public transport.	Support noted.

Location of Employment: Policies ER6, DM4

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P010/8	Cumbria Tourism	We note a presumption in favour of employment development in the Principle Town and Key Service Centres and those employment proposals elsewhere, other than those involving 10 employees or fewer, will be required to demonstrate why they could not appropriately be so located. We support this qualification, which will assist small-scale rural employment development and encourage entrepreneurs and ‘micro’ enterprises outwith the main settlements, many of which may be tourism related.	Support noted, though please note that this wording has been modified to make it less absolute.
P022/11	NWDA	The Agency welcomes draft policy ER6 on the location of employment, in particular, its reference to the continuing development of the Westlakes Science and Technology Park as a knowledge campus of international significance.	Support noted.
P022/11	NWDA	ER6 - Suggestion to include the following text in the Core Strategy (supporting text): ‘Westlakes is intended to build on and strengthen a nationally important concentration of energy related research and development and manufacturing. The strategic regeneration site will: - Act as a flagship for University research and inward investment; - Attract knowledge based industry, with special emphasis on technology related to nuclear power and decommissioning; and	Agreed; text included in supporting text (para 4.6.6 of Pre Submission Draft)

		- Assist in the creation of a centre of excellence for the energy industry.'	
P061/26	Highways Agency	ER6 – Where employment development is proposed outside of existing centres e.g. Westlakes, consideration should be given to ensuring that the transport impacts are mitigated through provision of sustainable transport and use of travel plans.	Agreed but no policy change needed though supporting text has been modified to make reference to transport impact mitigation; policy DM22 also addresses this.
P061/26	Highways Agency	ER6 - The Highways Agency are unable to assess the impact of proposals until it knows the details of the scale and location of employment development. If such evidence is not available to support the Core Strategy then the document should state that the evidence will be in place to support the Site Allocations DPD.	Noted. The Council is satisfied that the identified supply, compared to current demand, offers enough flexibility for detailed consideration to be dealt with in the site allocation process. In the meantime, emerging knowledge about the implications of nuclear new build, informed by the Strategy for Infrastructure, will be the subject of discussions to which the Highways Authority and the Agency will be party. This will be informed by modelling work to be done by the County Council.
P084/31 P203/38	4NW	ER6 – consideration should be given to giving an indication of the amount of employment land needed, in hectares, for the plan period.	Supporting text and evidence base documents address this but the emphasis is on flexibility in a time of uncertainty. The site allocations DPD will provide a more detailed framework for the management of the land supply..
P276/70	RWE npower	ER6 – objection to the wording of ER6 in that it does not specifically mention that 3 sites have been identified for potential nuclear development outside of the town centres. The policy should state that the 3 proposed NNB sites are amongst the preferred locations for employment related to the nuclear industry.	Not accepted. The Council considers that, read together as they should be, ER1, ER3 and ER6 are clear as they stand.
P324/39	National Trust	ER6 B – There are concerns about the impact of this statement on the landscape character, biodiversity and heritage of areas outside the settlement boundaries. Also how will the impact on residential amenity be assessed?	Agreed. ER6B now includes matters referred to. Residential amenity impact would be assessed as for any other development proposal; the merits of the proposal, along with the applicant's design and access statement judged through the development control process.
P324/39	National Trust	ER6 A & B – The exclusion of developments involving 10 employees or less should be removed and that B should set out a list of criteria that such proposals should be tested against.	Agreed; ER6B amended to make more explicit the criteria for consideration. The yardstick of ten employees is now in supporting text, as guidance rather than strict policy.
P404/27	Richard Mulholland	Fig 4.1 - requires particular attention to increase the existing low base Cleator Moor employment figures, to bring it in line with other centres with a similar or smaller number of residents (comment made in relation to para 8.3.10.)	
P029/11	NWDA	DM4 - is supported on the basis that it is generally consistent with the draft purposes identified for Westlakes.	Support noted. The policy is unchanged in the pre submission draft of the document.
P070/26	Highways Agency	DM4 – The potential impact of individual and cumulative development and the requirement of supporting infrastructure and sustainable	Noted. The Strategy for Infrastructure identifies transportation issues, and further modelling work will be undertaken as the site allocation plan

		transport improvements, particularly at Westlakes, should be determined as part of the evidence base.	proceeds, along with continuing work on the implications of nuclear new build. It should be noted in this context that very little new employment land has been identified during the planning process.
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Developing Town Centres and Other Centres: Policies ER7, DM6, DM7

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P011/8	Cumbria Tourism	Support for the encouragement of evening and night time uses.	Support noted.
P062/26	Highways Agency	ER7 - The Agency is generally supportive of the policy and in particular reinforcing the role of Whitehaven as the Principal Town through the improvement of strategic and local accessibility, and particularly where this relates to sustainable transport improvements.	Support noted.
P085/31 P204/38	4NW Cumbria County Council	ER7 – This policy could be enhanced by reference to Whitehaven's complementary role to Workington and, likewise, defining the distinctive roles of the Borough's Key Service Centres.	Agreed. Additional supporting text has been provided to define the distinctive roles of Whitehaven in relation to Workington, and to support the existing retail hierarchy. Policy ST2 defines the functions of the Key Service Centres and the scale of development that will be permitted.
P234/38 P235/38	Cumbria County Council	DM6 & DM7 - It is considered that many non-retail uses – cafes, bars, restaurants and other leisure uses - bring great vitality to a centre, and improve the night-time economy. In light of these factors, it is felt that in its current state this policy seems to be phrased in negative terms, and it is suggested that they could be rebalanced to recognise the positive benefits of such uses.	Accepted. Policy DM6 and supporting text have been amended to reflect a more positive tone.

Whitehaven Town Centre: ER8

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P037/25	English Heritage	ER8 - The need for additional characterisation and urban design analysis to support and successfully implement this policy should be considered.	A characterisation analysis has already been completed in 2008 by Paul Butler Associates. The publication is available to view on the Council's website.
P063/26	Highways Agency	ER8 - improvements to sustainable connections between Whitehaven, the key service centres and out of centre strategic locations should also be considered, given that future development is to be focused in these locations	Not accepted. Policy T1 B safeguards land for transport priorities within Whitehaven including links to out of centre strategic locations, and Policy T1 C i) promotes sustainable connections between Whitehaven, key employment sites, service centres and transport hubs.
P205/38	Cumbria County Council	ER8 – Some of the policy statements in ER8 might be better placed within the Development Management Policies section. Additional	Partially accepted. DM6 and DM7 provide greater detail on appropriate uses and concentrations of uses acceptable within the Primary

		reference could be made to improving Whitehaven's tourism offer particularly in relation to serviced accommodation, improved visitor facilities and access to the coast.	Frontages Area in Whitehaven and defined town centre areas, whilst ER8 sets out as a broader policy framework for the protection and enhancement of Whitehaven Town Centre as Principal Town. Policy ST2 and the settlement hierarchy in Table 3.1 provide general principles but do not provide the level of guidance and detail set out in ER8 and DM6 and 7. However the text of ER8 has been amended to include a reference to improving Whitehaven's tourism offer, particularly in relation to serviced accommodation, improved visitor facilities and access to coast, under part E.
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The Key Service Centres, Local Centres and other smaller centres: Policies ER9

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P284/71 P295/72	Cleator Moor Town Council Cllr J Hully	ER9 A(i) Amend "appropriate retail and service sector provision will be allowed" to read "actively encouraged". Many residents of the town feel that there is an ongoing decline in both the number and range of the shops and services, particularly in the Town Square area.	Agreed. Text amended as suggested.
P086/31 P206/38	4NW Cumbria County Council	ER9 B - The type of development that is acceptable in the Local centres should be widened out to enable small employment uses to come forward in rural areas.	Not accepted. The Borough Council considers that it is appropriate to protect Local Centres to meet local needs for retailing and services. Policy ER6 supports wider business uses in Key Service Centres and Local Centres and ER6 C advises that smaller scale economic development proposals outside these centres will be considered on their merits and in the light of potential local impact.

Tourism Renaissance: Policies ER10, DM8, DM9

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P012/8	Cumbria Tourism	ER10 - Pleased to see the support given to the tourism sector. Generally support the stance that recognises the potential for further growth and the need to improve the range, quality and integration of facilities with the National Park.	Support noted.
P012/8	Cumbria Tourism	ER10 – It does not appear that the location specific recommendations of the Cumbria West Coast Tourism Study in Millom and Haverigg have been taken on board.	Hodbarrow is the Haverigg Tourism Opportunity Site mentioned in ER10 C(i)
P023/11	NWDA	ER10 is broadly supported. In particular we welcome its reference to the expansion of tourism outside the Lake District National Park in	Support noted

		ways which complement and take pressure off the National Park's busiest locations.	
P064/26	Highways Agency	ER10 - supportive of the approach to ensure that accommodation and attractions are well connected, particularly by public transport, walking and cycling.	Support noted.
P207/38	Cumbria County Council	ER10 – This policy is expressed in negative terms, using words like ‘allow’, ‘permit’, rather than ‘encourage’. The policy would benefit if it were expressed in more positive language.	Accepted. Policy wording modified.
P207/38	Cumbria County Council	ER10 – There is a need to encourage complementary investment in public realm, upgrade attractions and improve food and drink provision. The policy could mention these requirements too.	Accepted. Policy modified with the addition of D.
P285/71 P296/72	Cleator Moor Town Council Cllr J Hully	ER10 – Cleator Moor is ideally placed within the cycle network to be the hub for active tourism and therefore tourism should be promoted here. ‘Accommodating modest scale development’ is not positive enough.	Policy wording modified.
P325/39	National Trust	ER10 – ‘Renaissance through Tourism’ would be better title for this policy – it is actually seeking a significant contribution from tourism to the renaissance of Copeland.	Accepted. Title changed to Renaissance through Tourism.
P374/9 P398/27	Regen North East Copeland Mr R Mulholland	ER10 B – The policy wording should be more supportive of large scale tourism development in Whitehaven and development in the Key Service Centres and Local Centres.	Not accepted, the suggested text allows a more dispersed pattern of development and therefore goes against sustainability principles.
P399/27	Mr R Mulholland	ER10 C – The Ehen Valley TOS2 should be made continuous	Noted - consideration will be given to the designation of parcels of land during the preparation of the Site Allocations DPD.
P325/39	National Trust	ER10 C(iii) – Objection is raised to the possibility of ‘large-scale tourist activities’ on the Whitehaven coastal fringe. 4.9.6 talks about controlling where such activities should generally be located, but it is unclear what these controls will be. They need to be identified at this stage. The current local plan gave a lot of background information on this matter with regards to sustainable design and protecting the qualities and character of the undeveloped coast. This is missing in the Core Strategy. Para 4.9.6 fails to acknowledge the Colourful Coast work that has been done already and the most appropriate forms of tourism activity. Part C should be amended to refer in general to appropriate forms of tourist development, and in respect of site C iii should make specific reference to development here “according with the principles of sustainable development, and not compromising the	ER10 C and 4.10.7 in the Pre-submission draft have been revised to take this into account.

		special qualities and character of the undeveloped coast or public access thereto". More detailed information should be included in the supporting text.	
P342/39	National Trust	9.2.24 – There is no reference to a “Tourism Renaissance” in Policy ST1 – the reference at B i) is to supporting tourism.	We consider 'Tourism Renaissance' to be a commonly used phrase and consider it acceptable to use in this instance.
P343/39	National Trust	DM8 - The approach set out here is supported and appropriate to the circumstances of Copeland. The recognition of the need for a different approach to 'place-bound' assets is especially apt and welcomed.	Support noted.
P236/38	Cumbria County Council	DM9 – the policy could be improved by making it clear about the possibility of granting planning permission for new caravan/chalet sites in rural areas. PPS4 offers greater flexibility for such development in appropriate locations where identified needs are not being met. It is suggested that the Preferred Options Policy DM9 should be consistent with the approach in PPS4 and with Saved JSP Policy EM16 and the SRSpS.	Policy wording modified.
P344/39	National Trust	DM9 - the caveats in the first paragraph are themselves somewhat loose and make no specific reference to issues such as: landscape character assessment work, setting of the National Park, the Heritage Coast, including views to and from it, the undeveloped coast, nature conservation assets and heritage assets and their settings. It is requested that more detailed guidance encompassing these specific features is included, and that it is made clear that it also applies to “rural holiday homes, caravans, chalets, camping sites and beach-chalets”.	Policy wording and text modified to provide greater clarity.

Developing Enterprise and Skills: ER11

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P326/39	National Trust	ER11 - The approach is appropriate and supported. It is noted that recreational initiatives such as the Colourful Coast also play an important role in improving people's life skills both directly and indirectly	Support noted.
P107/32	Cumbria Wildlife Trust	ER11 – The policy should include training in the land management and forestry sector e.g. managing upland bog will ensure that it	Accepted. Wording revised in 4.11.4 to include training for land management / skills relating to the rural environment.

		continues to be a carbon sink, traditional walling and hedging skills to maintain the appearance of the landscape and therefore of benefit for tourism. The policy seems to be very urban based despite Copeland being a rural borough.	
P208/38	Cumbria County Council	ER11 - the criteria should be made more specific to land-use activities and development as they are not currently useful for essentially land-use development management purposes.	Accepted - policy wording modified.
P286/71 P297/72	Cleator Moor Town Council Cllr J Hully	ER11 – Developments like the Phoenix Centre should be promoted in Cleator Moor. An increase in educational opportunities and facilities would help promote the town, support local business and bridge the gap that losing Ehenside school has created.	Noted. Policy ER11 - F, policy wording modified to focus employment training and initiatives in Whitehaven, the 3 Key Service Centres, the Westlakes Science and Technology Park and the Sellafeld site.
P065/26	Highways Agency	ER11 F – The strategic objectives should be carried through to this policy which identify that the most appropriate locations would be within Whitehaven or the key service centres or in locations linked to key employment opportunities.	Areas with good access to the SRN are: Whitehaven, the 3 Key Service Centres, the Sellafeld site and Westlakes Science and Technology Park. These are the areas where employment training facilities will be focussed. Wording revised in F to provide more clarity.
P375/9 P400/27	Regen North East Copeland Mr R Mulholland	ER11 G - Replace: Ensuring that the benefits of regeneration in Whitehaven, provide a catalyst for change in the communities living nearby, by improving connectivity, including transport links and targeting training and employment agreements With: Ensuring that the benefits of regeneration in the Borough, provide a catalyst for change in the communities, by improving connectivity, including transport links and targeting training and employment opportunities	Policy wording modified, however it should be noted that the key regeneration sites, as identified in ST3, are mostly in Whitehaven.

Improving the Housing Offer: Policies - SS1, DM10-20

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P392/74	West Cumbria Land LLP	SS1 – Whilst there is an understandable focus on upgrading and renewing existing stock there should be emphasis on improving choice and quality and contributing to the wider development of the town. This will rely on private sector investment and this emphasis within the policy will provide the confidence needed. (The response names some sites on Low Road Whitehaven that could be developed for executive housing).	Agreed; the policy and accompanying text now present a clearer statement of the need to develop a better qualitative choice.
P116/40	Story Group	SS1 - the implementation of Code for Sustainable Homes is financial and may negatively impact on the viability of schemes. It is	Agreed; SS1 and related DM policies are now more flexible on this.

		suggested that moving in line with Building Regs in terms of CSH would be best.	
P345/39	National Trust	DM11 - The approach to sustainable construction is a key aspect in reducing emissions and addressing the impacts of climate change. It is considered that the requirements advanced in this Preferred Policy are appropriate and they are supported accordingly.	Support noted.
P425/13	Environment Agency	DM11 – With regards to increasing water efficiency within Copeland it is considered that Code Level 4 is the lowest standard we would be willing to accept in Copeland and suggest a policy is added to Section 7 Environmental Protection and Enhancement to achieve this. Policy wording is suggested. – This policy is best placed in DM11 along with the other sustainable development standards.	Agreed in principle, but with detail in supporting text and not reproducing exactly what is requested. In view of the commercial marginality of much developable land in the Borough, the Council will encourage high standards of sustainable design, but does not wish to insist in policy that the evolving standards in Building Regulations are exceeded.
P072/26	Highways Agency	DM11 - generally supportive of focusing higher density housing development within existing centres and in locations that are in close proximity to major transport nodes and along major public transport corridors.	Noted
P237/38	Cumbria County Council	DM11 – This policy should mention that by 2016 it is expected that all new dwellings will be built to Code Level 6; i.e. zero net carbon emissions.	In view of the commercial marginality of much developable land in the Borough, the Council will encourage high standards of sustainable design, but does not wish to insist in policy that the evolving standards in Building Regulations are exceeded. Code for Sustainable Homes targets exist independently of the Copeland LDF and it is not necessary to repeat them.
P282/70	RWE npower	DM11 – The policy should acknowledge that new nuclear power operators will invest significantly in infrastructure which is dedicated to the provision of low carbon energy. Under these circumstances it is unreasonable to expect additional contributions to renewable energy.	No change. It is agreed that nuclear generation is a special contribution that Copeland can make to carbon emissions reduction, but the expansion of renewable generation is a national policy aim which the Council supports (and is, anyway, obliged to follow).
P427/47	Mr G Garrett	DM11 - The council should encourage quality modern projects, new ideas and unusual developments e.g. Green Housing, Factory units with their own wind turbines, or solar gain & heating or even American style developments like housing around golf courses – Marchon Site being the ideal site for such a development should be encouraged and could potentially draw into the area National Construction Firms.	No change, but the point is supported and the supporting text explicitly encourages innovative design. The point about the Marchon site (and, implicitly, other large sites) is noted and this may be taken forward in the more detailed policies of the Site Allocations plan.
P382/9 P407/27	Regen North East Copeland Mr R Mulholland	DM11 C – This policy statement should be replaced with 'Requiring renewable energy generating technology preferably on site with a target of 10% generated on site in developments of 10 or more	Not accepted. The Council sympathises with the intention and will seek inclusion of renewable energy generation, but the policy is intended to be interpreted flexibly, rather than risk imposing requirements which may

		dwellings or 1,000m2 non-residential development	discourage development.
P383/9 P408/27	Regen North East Copeland Mr R Mulholland	DM11 F – roof water recycling should be included in this policy statement.	Agreed; 'rain water re-use', to conform with the terminology of the Environment Agency, inserted.
P461/20	Natural England	DM12 - we recommend that our Accessible Natural Greenspace Standards are taken into account in determining open space policies.	Noted. This is being taken into consideration in the development of an approach towards green infrastructure, is covered in the Strategy for Infrastructure and will be a factor in the Developer Contributions SPD. The Borough is already well favoured in this respect, being predominantly rural and with the assets of the coast and the Lake District National Park close by.
P118/40	Story Group	DM12 – Standard distances between dwellings can result in a poorer development layout. These standards are not appropriate in every case and therefore the policy should be that these standards should be adhered to unless there are appropriate design reasons to vary them.	No change. The point has some validity but the Council prefers to retain a clear standard in policy. The incorporation of a more detailed approach allowing for some flexibility will be a matter for the Design SPD, under production in 2012.
P354/19	Taylor and Hardy	DM12 - Minimum separation distances are inappropriate for a Core Strategy. Similar conclusions were reached by the Carlisle Local Plan Inspector (Policy CP05 pp58/59). The minimum distances are out of step with guidance in "Manual for Streets". Distance between gable walls is subject to separate party wall legislation.	No change. This is a development management policy and although it is contained in the same document as the Core Strategy it forms part of the Development Management Policies DPD. The point about minimum distances has some validity but the Council prefers to retain a clear standard in policy. The incorporation of a more detailed approach allowing for some flexibility will be a matter for the Design SPD, under production in 2012.
P387/9 P410/27 P424/76	Regen North East Copeland Mr R Mulholland Mr B Riley	DM14 – add F: It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities.	No change. The concern is valid but flood risk, as far as new buildings are concerned, is dealt with in policies ENV1 and DM24 (as well as national policy) and the Council wishes to avoid undue duplication in policies. The approach in built-up areas has to be based on improved protection rather than blighting existing properties by banning their re-use or redevelopment.
P046/25	English Heritage	DM14 B – statement should refer to conserving the character of a building rather than retaining it. Annex 2 of PPS5 defines "conservation" as "the process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance" and would seem to be the right term here.	Agreed; text amended.

Sustainable Housing Growth: SS2, DM10 - 20

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P066/26	Highways Agency	SS2 – Housing targets should be based on robust evidence which ensures that the scale of housing provision brought forward is commensurate with an identified level of need and is supported by any required infrastructure. The primary concern for the Highways Agency is that new housing development will not detrimentally impact on the operation or safety of the SRN.	Noted. The Core Strategy's main purpose in this regard is to demonstrate that there is a supply which can meet forecast need. The Strategy for Infrastructure addresses the transport infrastructure needed by the Borough, and this, and any modelling needed, will be key inputs to the site allocation process.
P024/11	NWDA	SS2 - At this stage in the Strategy's development we would expect to see future housing provision expressed as a single figure rather than as a range of alternatives. For monitoring purposes, the policy should also specify the timescale to which the target relates.	Accepted in part. Copeland's circumstances mean that, whilst the base position must be to ensure that forecast need can be met, it is also sensible to incorporate an allowance for the growth which will arise if developments, currently uncertain, proceed. However, it is agreed that the previous range was too vague and the policy, as expressed and explained, is now sharper.
P087/31 P210/38 P149/46	4NW Cumbria County Council GONW	SS2 - it will be necessary to provide a justification for these figures beyond simple reference to RSS policy. It is suggested that there should be greater clarification within the Policy about how the sliding scale of housing provision will be managed. It would be preferable to have a stepped approach from the baseline of 230 units to 300 units per annum identified at specific time period intervals to respond to changing economic and social need. It is considered that an annualised dwelling requirement of 300 units per annum should be the minimum that should be achieved over the long-term. Policy SS2 could therefore set out how the requirement to have a 5-year supply of housing land will be reviewed and managed i.e. allocated sites will have to be reviewed regularly to make sure they are still deliverable and if not further greenfield sites should be allocated to stimulate the market. The Policy could be also improved by reference to monitoring to ensure against either an under- or over-supply. Likewise reference could also be made for the phasing of new development. It would also be helpful to refer to other means of assisting the delivery of new housing (particularly affordable housing) where there is an under-supply.	Agreed. The provision is now justified in itself and clarified on the basis of evidence as summarised in the Housing Topic Paper, and illustrated by a trajectory. The results, as well as being backed by evidence, are within the range of what has been consulted upon during production of the strategy; thus nothing new has been introduced in the published strategy. Monitoring is a 'given' which is dealt with in the Implementation and Monitoring Framework.
P209/38	Cumbria County Council	SS2 – This policy could be improved by making reference to the settlement hierarchy in ST2.	Not accepted. ST2 is implicit throughout the strategy and will also guide the site allocation process. It is not necessary to have a cross reference here.

P313/73	Leconfield Estates	SS2 - a further review of housing growth figures as informed by the SHLAA, SHMA and economic growth is sought. 50% of new housing development on 'brownfield' sites is considered to be excessive.	Agreed. The Core Strategy is now expressed in terms of the completed conclusions of the documents referred to, and the examination undertaken in 'Spatial Implications'.
P313/73	Leconfield Estates	SS2 - 50% of new housing development on 'brownfield' sites is considered to be excessive.	Agreed in part. The Council wishes to retain the target as an aspiration, and in the event of brown field land emerging during the site allocation process or later in the plan period. The text now makes it clearer that the target is not likely to be achieved as things stand.
P449/20	Natural England	SS2 - Sustainable Housing Growth: We support the aim to minimise the development of greenfield land. However, brownfield sites often contain biodiversity interest and where they are developed care should be taken to ensure that biodiversity is protected and, where possible, new habitat created within the site.	Agreed; the text now refers to this.
P149/46	GONW	SS2 A – The Core Strategy should contain a housing trajectory. There is reference to 'residual' requirements without specifying what these are. The Core Strategy will only contain the rules governing the allocation of sites at the submission stage i.e. these will have not previously been consulted upon.	Agreed. The provision is now justified in itself and clarified on the basis of evidence as summarised in the Housing Topic Paper, and illustrated by a trajectory. The results, as well as being backed by evidence, are within the range of what has been consulted upon during production of the strategy; thus nothing new has been introduced in the published strategy.
P376/9 P401/27	Regen North East Copeland Mr R Mulholland	SS2 B – The existing text should be replaced with 'Allocations will be made in accordance with the following housing targets: i) Labour Force No Change (i.e. 598 per annum) para 2.2.9 pg15 supports	Not accepted. The strategy has now been refined to include a 'baseline' and an 'aspirational' target, the latter being as much as the supply is likely to be able to sustain, as well as being in excess of what the Borough has achieved in the past. The scenario referred to is now regarded as unrealistic
P353/19	Taylor and Hardy	SS2 C - adopts a minimum density for housing which is now out of step with the revised PPS3. Alternative text is suggested.	Accepted in part. Revisions to PPS3 mean that the national requirement is lifted, not that the target is invalid. The Council still regards a target of 30 dwellings per hectare as desirable, but the text now gives more explicit guidance on when lower densities might be considered appropriate.
P108/32	Cumbria Wildlife Trust	Para 5.3.5 - Cumbria Wildlife Trust supports the recognition of biodiversity as a constraint on development of brownfield sites.	Support noted. The paragraph (now 5.3.9) however, no longer uses the word 'constraint' but states that where land has acquired biodiversity value the Council will encourage the retention of enough natural habitat to make a viable contribution to local green infrastructure in accordance with policies SS5 and ENV3.
P386/9	Regen North East Copeland	DM13 - Add: "F - It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities"	No change. The concern is valid but flood risk is dealt with in policies ENV1 and DM24 and the Council wishes to avoid undue duplication in policies.
P387/9	Regen North	DM14 - Add: "F - It is not in an area of significant chance of flooding	No change. ENV1 and DM 24 require that regard must be given to flood

P409/27	East Copeland Mr R Mulholland	which may have an adverse effect on residents of the development and other communities"	risk, and it is not necessary to duplicate that here.
P421/76	Mr Bob Riley	DM13 - Proposals for the conversion of suitable non-residential buildings or subdivisions of large houses to provide new residential accommodation should only be permitted if it is not in a high risk flood zone.	No change. The concern is valid but flood risk, as far as new buildings are concerned, is dealt with in policies ENV1 and DM24 (as well as national policy) and the Council wishes to avoid undue duplication in policies. The approach in built-up areas has to be based on improved protection rather than blighting existing properties by banning their re-use or redevelopment.
P462/20	Natural England	DM13 - Rural buildings may provide places for bats or owls or other species. The impact on protected species should therefore be considered in relation to this policy. We recommend the inclusion of a paragraph highlighting the requirements of protected species in the planning process.	No change. The point is of course accepted but policy DM25 covers this and duplication is not needed.
P045/25	English Heritage	DM13 D - should refer to "conservation" not "retain". Annex 2 of PPS5 defines "conservation" as "the process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance" and would seem to be the right term here.	Agreed: policy text amended.
P422/76	Mr B Riley	DM15 - I have close friends that were devastated from the last floods, and building any new form of dwellings will only make matters worse.	The Council is keenly aware of the need to minimise this kind of suffering and policies ENV1 and DM24 are intended to ensure that new homes are not built in places vulnerable to flooding. No change is needed here as policies are read together.
P463/20	Natural England	DM15 - Rural buildings may provide places for bats or owls or other species. The impact on protected species should therefore be considered in relation to this policy. We recommend the inclusion of a paragraph highlighting the requirements of protected species in the planning process.	No change. The point is of course accepted but policy DM25 covers this and duplication is not needed.
P388/9 P411/9	Regen North East Copeland Mr R Mulholland	DM15 - Add: I - It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities	No change. The concern is valid but flood risk is dealt with in policies ENV1 and DM24 and the Council wishes to avoid undue duplication in policies.
P346/39	National Trust	DM15 – It would add clarity if the introductory sentence made it clear if all of the criteria A to H needed to be complied with or if it is an 'either/or' statement.	Agreed; policy amended.
P238/38	Cumbria County Council	DM15 A – This policy does not fully embrace PPS7. It is considered that the policy could be more flexible. There is also no policy to deal	Agreed; the policy has been amended to make clear that its main provisions cover conversion of any rural building to residential use,

		with the conversion of rural buildings to economic or commercial use in accordance with national planning policy contained in PPS4 and PPS7.	whilst also containing a provision for conversion of agricultural and other buildings for commercial or community use.
P047/25	English Heritage	DM15 D - should refer to "conservation" not "retain".	Agreed: policy text amended.
P048/25	English Heritage	DM16 - There are places where buildings in conservation areas do not make a positive contribution and may therefore be appropriate for replacement. In addition there may be non-designated but locally important buildings which should be retained.	No change. The Council prefers to maintain a presumption against demolition in Conservation Areas, with statements as to what might be replaceable left to Conservation Area Appraisals and /or Supplementary Planning Documents.
P384/9	Regen North East Copeland	DM17 – the phrase ‘is not suitable for meeting other housing needs’ should be replaced with ‘is not suitable for meeting special housing needs’.	The point is accepted. Whilst the term ‘special housing needs’ has particular connotations and is not considered to be appropriate here, the policy and supporting text have been amended to be less ambiguous.
P417/75	Copeland Flood and Coastal Defence Engineer	DM19 - This section doesn't mention Beach Bungalows, except in the title. The building of permanent structures should not be permitted under any circumstance as development in these locations is clearly unsustainable.	The policy states that new beach bungalows are unacceptable. The supporting text has now been amended to make it more explicit that their long term retention is undesirable.
P049/25	English Heritage	DM20 B - could refer to designated heritage assets and their settings rather than listing the asset types.	In this context the Council considers it preferable to be explicit as to the locations where caravan sites are unacceptable in principle.

Housing Needs, Mix and Affordability: Policies SS3, DM20

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P117/40	Story Group	SS3 - We support the Council in its aims of providing for a balanced housing market, particularly in the aim of executive and family housing for Whitehaven.	Support noted.
P025/11	NWDA	SS3 - We welcome the Council's intention, as set out in draft policy SS3, to work with partners to deliver a range and choice of good quality and affordable housing including executive and family housing in areas where there is proven need and demand. This is likely to be a key factor if Copeland is to secure economic growth, especially in nuclear and other knowledge based industries.	Support noted.
P088/31 P211/38	4NW Cumbria County Council	SS3 – It would be useful if the Core Strategy made reference to some of the key findings of the three interim Copeland Housing Market Area Assessments (Whitehaven, West Lakes, and Millom).	The Core Strategy will be able to make reference to the forthcoming full Housing Market Assessment, due to be published in the coming months.
P287/71	Cleator Moor	SS3 – assurance is sought that Cleator Moor will not be excluded in	No change needed as these policies refer to the whole of the Borough.

P298/72	Town Council Cllr J Hully	the provision of "executive housing" and that consideration of affordable housing and provision of accommodation for the elderly.	The Town Council can be assured that improving housing choice, including those types referred to, will be pursued in Cleator Moor; the locality strategy refers to this, and the Site Allocation plan may set out requirements as to housing mix on specific sites or in specific localities.
P393/74	West Cumbria Land LLP	SS3 – Whitehaven in particular has an over-supply of affordable housing and an under supply of higher and executive housing. A greater emphasis should be given to the importance of a balanced housing market and planned housing supply that will meet the aspirations for economic growth. Having executive housing as a 'special needs group' significantly understates the importance of this part of the housing market.	Agreed. The policy is now more explicit on this and treats executive housing as a specific objective rather than 'special' need.
P381/9	Regen North East Copeland	SS3 F – This statement should be deleted and replaced with 'The borough has a duty to supply a gypsy and traveller transit site in the most appropriate location.'	Not accepted. The paragraph which considers the implications of Policy SS2 on Cleator Moor has been amended to incorporate the most up to date information on housing numbers. Partially accepted. The text has been updated to include a reference to SS3 (iii) which proposes that the 3 smaller towns may include sites for executive homes which will require attractive locations and high quality building standards. Gypsy and traveller provision: No change needed here. The point is accepted, to the extent that such a statement is now incorporated in the text accompanying development management policy DM20.
P184/63	Mr R Curwen	Section 5.4 - Support the objective of affordable housing being a prime objective as stipulated to reduce the outward migration.	Support noted.
P185/63	Mr R Curwen	5.4.6 - Support all comments associated with rural exception guidelines.	Support noted.
P150/46	GONW	5.4.7 - The Core Strategy should contain a policy on Gypsies and Travellers	Not accepted. As the Core Strategy explains, there is no identified need for the Borough, and therefore no need to allocate a site; development management policy DM20 provides a criteria-based approach to deal with any demand which may emerge in the future. Circular 01/2006 requires that there be a policy in a DPD, not necessarily in the Core Strategy.
P001/4	Friends, Families and Travellers	DM20 B – The Council should identify land through site allocations to meet any identified needs for Gypsies and Travellers. The criteria for judging applications seem to be too tightly drawn and go beyond advice contained in Circular 01/06 which states that local landscape and nature conservation designations in themselves should not be used to refuse planning permission.	Accepted in part. DM20B demonstrates that the Council is willing to countenance providing for gypsies and travellers, but the evidential work done indicates that there is no significant demand in Copeland and West Cumbria. This work will be reviewed, and evidence of emerging demand can be dealt with either in the site allocation process or in a

			<p>future review of the Core Strategy.</p> <p>The criterion relating to landscape reflects the special quality of much of the landscape in the Borough (and thus legitimately reflects to in paragraph 54 of the circular). The intention of the policy is that the same approach would be taken as to any other residential development. However, it is accepted that this criterion is too wide-reaching, and it has been sharpened.</p>
P001/4	Friends, Families and Travellers	DM20 F - given the negative views held by much of the settled population of Gypsies and Travellers as it stands this criterion opens the door to NIMBY objections. Revision is required and we suggest that the word 'unacceptably' is inserted before 'adversely affect..'	Agreed, except that 'significantly detrimental' is less absolute, and probably easier to assess in the development control process, than 'unacceptably'.

Community Facilities and Services: Policies SS4, DM21

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P067/26	Highways Agency	SS4 - generally supportive of this policy, particularly regarding the provision of services and facilities which are accessible by public transport, walking and cycling.	Support noted.
P450/20	Natural England	SS4 - We very much support the provision of greenspace, and making facilities accessible to people by public transport, cycling or on foot. We support the aim in A to maximise the opportunities for people to improve their health and wellbeing. Access to good quality green spaces is an important element in maintaining and improving health and wellbeing.	Support noted. The Council has also added a new policy SS5: Provision and access to Open Space and Green Infrastructure. (The principles of this new policy were previously included in policy ENV6, which now exclusively deals with access to the countryside.
P212/38	Cumbria County Council	SS4 – The policy could be improved by mention of adult social care and education provision and how these might be delivered through S106.	Accepted in part. The preamble to the policy explains what it covers, including a full range of adult social care; the word 'adult' has been added to the education bullet point. The Developer Contributions SPD will explore in more detail how s.106 and/or CIL can be used.
P075/29	The Theatres Trust	SS4 - The title could be amended to make it more precise to 'Community Services and Social Facilities'.	No change. The present title is preferred as being more open, and not vulnerable as to argument over whether a facility is 'social' or commercial.
P212/38	Cumbria County Council	SS4 - The policy would also benefit if it gave recognition to the aging population and the need to have more accessible accommodation.	No change. The policy is based on meeting needs, whatever they are, and however the population evolves. The point relates also to matters which are catered for under policy SS3 and may be taken forward in the site allocation process. Policy DM14 covers the development of residential institutions including

			C2 uses.
P212/38	Cumbria County Council	SS4 - The education needs of the borough should be made more explicit in the document so that new developments are planned hand in hand with educational infrastructure. (Detailed information is provided in the County Council's response.)	This is implicit in the entire strategy and will be a factor in site allocation as well as being covered by the SPD on developer contributions.
P130/45	Sport England	SS4 C - The level of protection offered to sports facilities / playing fields in this section is considerably weaker than that offered by paragraphs 10 and 15 of PPG17. A sports hall could therefore be lost to say a post office or a library. Playing fields appear to be treated in the same way as any other community / sports facility. In PPG17 playing fields are considered separately.	Agreed in part. No change to SS4 - SS4 c(ii) stipulates that lost provision should be compensated for by alternative provision. Support has been strengthened by making it clear that DM21, which resists loss of community facilities, applies to sports facilities. The new policy SS5 applies to open air sports facilities, protecting them additionally as green infrastructure. The Strategy for Infrastructure makes it clear that there are deficiencies in sports provision across the Borough.
P212/38	Cumbria County Council	SS4C - it might be difficult to find alternative uses for some former County Council-owned community facilities, which are either Listed Buildings or those in Conservation Areas.	Noted. The re-use of such facilities would be a consideration in dealing with planning applications. The revised policy DM15 covers conversions in rural areas.
P129/45	Sport England	5.5.2 – This section highlights the fact that sports and recreation facilities can appear under one or more categories or classifications. Would a playing field be protected by policy SS4, or as an open space typology by policy ENV6?	The new policy SS5 sets recreational open space firmly in the context of community facilities whilst recognising that they are a part of the Borough's green infrastructure. This should make it clear that the dual contribution of open space gives them dual policy protection, rather than being a potential source of confusion.
P074/29	The Theatres Trust	5.5.2 - Mention of the borough's one 'unique and charming' theatre in the introduction to Community Facilities and Services (page 66)	Agreed; text amended, though we are sadly unable to accept charm as a material planning consideration
P131/45	Sport England	5.5.6 - A PPG17 compliant study needs to be completed to highlight the need for sports facilities provision before any decision is taken to allocate recreational land for another use. It is expected that the PPG17 study will be underpinned by an up to date Playing Pitch Strategy. Also the paragraph reads as though it pre-judges the outcome of the assessment in that the assessment "... will support the Council's preferred policy".	The study, which was under way at the time, is completed and informs the policy as well as the Strategy for Infrastructure and work on the Developer Contributions SPD.
P239/38	Cumbria County Council	DM21 - it might be difficult to find alternative uses for some former County Council-owned community facilities, which are either Listed Buildings or those in Conservation Areas.	Noted. The question of viability of continued use would be a consideration in dealing with planning applications. Additionally, the revised policy DM15 covers conversions in rural areas.
P076/29	The Theatres Trust	DM21 - for consistency we suggest that the title to this policy should reflect Policy SS4 – Community Services and Facilities or more precisely Community Services and Social Facilities.	Agreed in part; title amended to be the same as the (unamended) title of SS4.
P140/45	Sport England	DM21 - This policy appears to give considerably weaker protection to sports facilities than exists in PPG17. In essence, a sports facility is	The premise is not accepted - a shop is also worthy of protection. However, changes made to SS4, SS5 and DM21 are intended to

		given the same level of protection as say a local shop.	strengthen the specific policy protection given to sports facilities.
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Improving Accessibility and Transport: Policies - T1, DM22

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P451/20	Natural England	T1 - We welcome that the Council's preferred option is to support transport improvements that will maximise accessibility by foot, cycle and public transport as well as by car.	Support noted.
P068/26	Highways Agency	T1 - to ensure sustainable growth is delivered, improvements in sustainable transport provisions and infrastructure will be necessary to support and mitigate the impact of development and the cumulative impact of multiple development proposals, to ensure the efficient and safe operation of infrastructure.	Noted
P068/26	Highways Agency	T1 - With regards to the physical improvements proposed, these should be supported by evidence in accordance with the principles set out in PPS12, including identifying the needs, costs and funding sources to ensure that such infrastructure improvements can be delivered. This is particularly pertinent for infrastructure improvements which are required to enable the delivery of major development proposals or strategic sites.	Noted.
P089/31	4NW	T1 – It may be worthwhile to specifically recognise Sellafield and Westlakes Science Park as the key out of town centre employment sites, to which sustainable transport access should be explicitly encouraged.	Accepted, wording in 6.1.2 and 6.2.3 modified to include reference to Sellafield and Westlakes Science and Technology Park as key out of town centre employment sites.
P167/51	Sellafield Ltd	T1 - It is not clear how developers could deliver improvement to the Cumbrian Coast railway as this is managed by Network Rail. If CIL is proposed then further consultation would be expected. With regards to green travel plans at Sellafield further clarity would be welcome as to how such requirements would apply to any development on the existing Sellafield licensed site.	Noted. No change needed to policy. This and other policies will apply to development at the Sellafield site.
P327/39	National Trust	T1 – Arguably it would be sensible, given the emphasis on sustainable transport, to remove the words 'and car' from the end of the first sentence.	Policy wording modified in 1st paragraph.
P213/38	Cumbria County Council	T1 A – Sustainable transport should be actively promoted at Sellafield and Westlakes as well as Lillyhall through travel planning.	Accepted, wording in 6.1.2 and 6.2.3 modified to include reference to Sellafield and Westlakes Science and Technology Park as the key out of town centre employment sites.

P213/38	Cumbria County Council	T1 B – The Whitehaven Town Centre Enhancements Scheme should be added to the list in B. The Pow Beck Spine Road is not currently envisaged to be an LTP3 identified scheme.	Wording modified. The situation relating to the Pow Beck Spine Road is noted.
P327/39	National Trust	T1 B - The principle proposals under B, with one exception are all road based – a more overt approach to ensuring accessibility on foot, bicycle and by public transport is needed.	Wording modified to give greater emphasis to more sustainable modes of transport in part B.
P327/39	National Trust	T1 C – C(ii) calls for a host of road improvements without regard to social, environmental and economic implications and is silent on how the proposals will be delivered.	
P213/38	Cumbria County Council	T1 D – The terminology ‘Green Travel Plans’ is now superseded by ‘Travel Plans’ – ensuring that all travel is more efficient, less costly and safer.	Noted - wording amended.
P068/26	Highways Agency	T1 D - The Agency is particularly supportive of part D, which seeks developer contributions for improvements to public transport services and walking and cycling routes.	Support noted.
P213/38	Cumbria County Council	T1G - reference should be made to the need to ensure that all major developments are enabled for Next Generation Access (NGA) broadband.	Policy DM23 has been modified to include requirement for all major new developments to be enabled for NGA Broadband.
P214/38	Cumbria County Council	6.2.1 - Policy ST1 is the Spatial Development Principles, whereas Policy ST2 is the Spatial Development Strategy, and not the other way round.	Accepted - amendment made.
P327/39	National Trust	6.2.5 – This paragraph does not provide adequate justification for part C. It is unclear that geographic remoteness would be significantly reduced (let alone removed) and potentially could have as great an impact in terms of the drain of resources away from Copeland.	
P215/38	Cumbria County Council	6.2.6 - The terminology ‘Green Travel Plans’ is now superseded by ‘Travel Plans’	Accepted - amendment made.
P215/38	Cumbria County Council	6.2.6 – It might be useful to define what is meant by ‘major developments’.	Accepted - definition of major development provided.
P216/38	Cumbria County Council	6.2.8 – It is important that the Core Strategy recognises the interaction of the parking Strategy with sustainable transport i.e. over provision of free parking undermining sustainable transport strategy.	Noted.
P217/38	Cumbria County Council	6.2.9 – It is unclear how this paragraph links with policy T1. It could be useful to make reference to technologies reducing the need to travel.	New policies created for Information and Communications Technology (T2 and DM23), reference to reducing the need for travel included in 6.3.1.
P073/26	Highways Agency	DM22 - The Agency is generally supportive of this policy, particularly with regards to development responding positively to existing public	Noted.

		<p>transport and other sustainable modes of transport.</p> <p>In respect of the need for a Transport Assessment and Travel Plan, the Agency would wish to be consulted on any development proposal that has the potential to cause a material impact on the safe and efficient operation of the SRN as defined in the DfT's 'Guidance on Transport Assessment'.</p>	
P240/38	Cumbria County Council	<p>DM22 – it might be useful to define what is meant by accessible from a Development Management point of view. This could be achieved using an accessibility checklist or defined accessibility criteria.</p>	The principles of what is deemed accessible is outlined in Ai, ii) and iii).

Chapter 7 – Environmental Protection and Enhancement

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
356/13	Environment Agency	<p>The North West River Basin Management Plan is not considered within the Preferred Option Core Strategy. The River Basin Management Plans are statutory documents to which local authorities must have regard when developing their plans. They were published by us in December 2009 and are a tool used to implement the Water Framework Directive whose over all objectives are to</p> <p>a. Prevent deterioration of all surface freshwater bodies (including lakes, streams and rivers), groundwater, estuaries and coastal waters</p> <p>b. Ensure all designated water bodies attain good ecological status/potential.</p> <p>The River Basin Management Plans include details of the classification of water bodies; pressures and reasons for failure; and the measures or actions that need to be undertaken to deliver improvements. (Information on these classifications was provided to Copeland to form part of their Infrastructure Plan).</p> <p>The Water Framework Directive is particularly important for Copeland, as it is a requirement to deliver improvements to protected areas, including Bathing Waters. Compliance with the current and revised Bathing Water Directive is a priority for the North West. Much work has already been undertaken to deliver significant improvements under the current directive. Further work will be required to ensure appropriate standards are achieved under the revised Bathing Water Directive, which will be first reported on in 2015.</p> <p>Spatial planning bodies can help to prevent deterioration and help to achieve “good ecological status” by implementing policies that require the following suggested policy wording</p> <p>To ensure that development in the Borough is increasing protection for and enhancing water quality all new developments must assess and suggest appropriate mitigation for:</p> <ul style="list-style-type: none"> • Existing capacity for sewage treatment; and • The potential environmental impacts discharges of treated effluent might have on receiving water bodies. 	<p>Whilst the Core Strategy does not make reference to the Water Framework Directive or the North West River Basin Management Plans, Copeland is mindful of the potential for development to impact on water quality in the Borough. As such the following statements are included in the document:</p> <p>Strategic Objective 19 - Safeguard and where possible enhance the natural resources in the borough and address the impacts of former land uses.</p> <p>ST1 C (vi) - Ensure development minimises air, ground and water pollution.</p> <p>ST4 A - Development that generates demand for physical infrastructure will be permitted if the relevant infrastructure is either already in place or there is a reliable mechanism in place to ensure that it will be provided when and where required.</p> <p>ENV1 - Supporting measures to address the constraints of existing drainage infrastructure capacity and avoiding development in areas where the existing drainage infrastructure is inadequate.</p> <p>DM11 - Ensuring surface water is managed appropriately, with the inclusion of sustainable drainage systems where possible.</p> <p>DM25 - Development will not be permitted where there is an unacceptable risk of flooding or the development would increase the risk of flooding elsewhere.</p>

Flood Risk: Policies – ENV1, DM23 (now DM24)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P288/71 P299/72	Cleator Moor Town Council	ENV1 – The policy should contain assurances that no development should be permitted on flood plains.	No changes have been made - Policy DM24 states that development will not be permitted in areas where there is an unacceptable risk of

	Cllr J Hully		flooding. Flood plains would almost certainly fall into this category.
P413/75	Flood and Coastal Defence Engineer - CBC	ENV1 A – the words ‘without increasing flood risk elsewhere’ should be added to the end of the sentence.	The change has been made.
P328/39	National Trust	ENV1 B – This policy could prevent the change of use of an existing building to a more appropriate use in flood risk terms, or prevent finding a re-use for heritage asset meaning that it became ‘at risk’ and could ultimately be lost altogether. It is suggested that the word “development” is replaced by “new build development”.	The wording of ENV1 B has been revised as suggested.
P414/75	Flood and Coastal Defence Engineer - CBC	ENV1 C – add the following words to the end of the sentence: ‘where sustainable drainage systems are practical, where they are not this should be achieved by other means’.	Additional text has been added but instead of saying ‘this should be achieved by other means’ the policy asks for ‘improvements to drainage capacity’.
P415/75	Flood and Coastal Defence Engineer - CBC	ENV1 D - add the following words to the end of the sentence: ‘and avoiding development in areas where the existing drainage infrastructure is inadequate’.	The additional text has been added.
P132/45	Sport England	ENV1 E - flood defence measures could have implications for any future Playing Pitch Strategy. In other areas where this has been a problem a surplus of pitches is maintained to cope with playing fields being used to store water.	The Playing Pitch Strategy for Copeland (April 2011) identified that there are ‘sufficient pitches to meet existing demand for games at peak times, with a margin to spare.’
P416/75	Flood and Coastal Defence Engineer - CBC	ENV1 E - Support for new flood defence measures to protect against both tidal and fluvial flooding in the Borough Comment: Although this can be grant funded by DEFRA, where there is existing properties at risk from tidal or fluvial flooding, funding is based on national priorities.	Noted
P328/39	National Trust	ENV1 E - It is most unlikely that all possible flood events can be protected against by building new/higher defences. Soft measures, managed re-alignment, taking a catchment-wide approach that includes appropriate land management will all have an important role to play as part of an integrated approach. It is also clear that building new and improved flood defences everywhere under threat will not be deliverable having regard to available resources.	Planting trees helps to create a physical barrier to water, supporting the soil structure and soaking up water. The following text has been added to ENV1E: including appropriate land management as part of a catchment wide approach.’

P154/46	GONW	DM23 - This appears to be inconsistent in both not permitting development which would increase the risk of flooding elsewhere, and also permitting it in certain circumstances.	Swapped some of the text round to make it clear that when a proposal for a site that is likely to be at risk of flooding comes in – it is to be accompanied by a FRA and that if this finds that there is an unacceptable flood risk, that the development will not be permitted.
P419/75	Flood and Coastal Defence Engineer - CBC	DM23 - This section looks ok as it is.	Noted.
P283/70	RWE npower	DM23 – there is a possibility that nuclear new build may lead to loss of access to watercourses and this policy fails to take that into account. Mitigation measures may, however, make development acceptable.	Looking at the site boundary of the nominated site as shown on the Sellafield sub-locality diagram there would not be an issue with loss of access to the River Ehen and the revised site boundary should not take in more of the River Calder than it currently does. (The problem of loss of access relates to the need to carry out essential maintenance works to the watercourse.) Any access arrangements could be made at the planning application stage.
P423/76	Bob Riley (Resident)	DM23 - Where a development is sanctioned in a flood risk area then the developer MUST be held accountable and cover all costs, including upgrading & maintenance for the provision of additional flood defences and mitigation works.	This was already in the text of DM23 (now DM24)
P293/71 P304/72	Cleator Moor Town Council Cllr J Hully	DM23 - In addition to A, B, C and D - "development will not be permitted on designated flood plains" should be included.	Policy DM24 (previously DM23) states that development will not be permitted in areas where there is an unacceptable risk of flooding. Flood plains would almost certainly fall into this category.
P369/13	Environment Agency	DM23 – There needs to be careful consideration of the management of surface water generated through the regeneration of the Rhodia site as this could drain into Pow Beck and Sandwith Beck. If flood storage, conveyance and SUDs can be planned into large regeneration projects, significant flood risk benefits could be achieved. Suggested policy wording is offered – 'All development will be expected to demonstrate that they are reducing flood risk by reducing surface water run-off. Developments should aim to achieve greenfield run off rates or as a minimum no increase from the existing run off rate.'	Sustainable drainage systems are dealt with in DM11. No change has been made.
P218/38	Cumbria County Council	ENV1 - This policy is broadly welcomed and supported but could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	This is dealt with in ENV6.

P389/9 P412/27	Regen North East Copeland, Richard Mulholland	DM23 – The last sentence in the policy statement should be replaced with: “Where a development requires the provision of additional flood defence and mitigation works, any costs, including upgrading & maintenance in perpetuity, will be met by the developer.”	DM24 A & B together provide more protection than the suggested alternative for DM23 A. Therefore no changes have been made to the existing text.
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Coastal Management: Policies ENV2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P013/8	Cumbria Tourism	ENV2 - Welcome the promotion of the coastal assets and maximising opportunities along the undeveloped coast for tourism and outdoor recreation. Concur with the view that the developed coast is where the majority of coast-related tourism should be focussed, particularly in Whitehaven and Millom and that the policy for the undeveloped coast is to enable opportunities for appropriate outdoor recreation and tourism. A management plan for St Bees Head Heritage Coast is very sensible and Cumbria Tourism / West Coast Tourism Partnership would be happy to work with partners on this.	Support noted.
P219/38	Cumbria County Council	ENV2 – could be expanded to recognise the need to manage the undeveloped coast in a way that reflects the landscape character.	ENV2 has been expanded to cover offering some protection to the landscape from energy development but this is also dealt with in DM2 (with particular regard to renewable energy generation). DM1 also states that the Council will seek a package of community benefits that will mitigate the impacts of the development on the environment, amongst other things. Removed reference to allowing energy developments along the coast. This is now in ENV2D instead.
P090/31 P219/38	4NW Cumbria County Council	ENV2 – should make reference to the North West Coastal Trail and should also reflect the need to support Open Coastal Access.	Added a reference to the North West Coastal Trail and the Colourful Coast project.
P277/70	RWE npower	ENV2 and para 7.3.3 – The policy or its supporting text should state that new nuclear development sites will also be supported in coastal locations provided that environmental impacts are acceptable.	The text of 7.3.3 has been altered to include nuclear developments.
P417/75	Flood and Coastal Defence Engineer - CBC	ENV2 – Add another statement: E - Ensuring that development is located outside areas at risk of coastal erosion. Could also include wording: Temporary development can be permitted in areas that are at risk from coastal erosion if the permitted lifetime of the development is less than the expected residual life of the land before being lost to erosion. National Coastal Erosion Information Project (I believe it is called now) is due to be rolled out March 2011.	ENV2F has been altered to include the statement above i.e. that no new development will be allowed in areas at risk of erosion. (Policy DM19 states that new beach bungalows are unacceptable. The supporting text has now been amended to make it more explicit that their long term retention is undesirable.)

P432/77	Ramblers' Association	ENV2 – It is hoped that the LDF will support the English Coastal Route (ECR) and that it will make provision for it to be considered as planning gain when applications are being considered. <i>(This comment is also made under ENV 6 – Access to Open Space and the Countryside)</i>	Policy ENV2 aims to maximise access to the Coast through support for the North West Coastal Trail and Colourful Coast Projects. The Coastal Path is considered to be part of the green infrastructure for the borough. Financial contributions to the creation/maintenance of the coastal path will be dealt with in the Developer Contributions Framework SPD.
P038/25	English Heritage	ENV2 B - refers to historic assets, in order to reflect PPS5 this should be changed to heritage assets.	Comment taken on board – the amendment will be made in the next draft of the document.
P219/38	Cumbria County Council	ENV2 B – Consideration should be given to widening this statement out to include possible tidal energy development at the mouth of estuaries as well as along the coast. Suggested text is offered.	ENV2 B has been changed and the reference to energy generating development moved to ENV2 D.
P329/39	National Trust	ENV2 B – tourism development in this instance needs to be appropriate and necessary to an undeveloped coast location. With regards to renewables the wording here does not reflect the supporting text which is based upon “allowing for renewable energy development which requires a coastal location”. Alternative text is suggested – ‘Maximise opportunities along the undeveloped coast for tourism and outdoor recreation and appropriate tourism development, and exceptionally for energy generating developments that require a coastal location, whilst conserving and enhancing its natural and historic assets.’	Whilst the wording of the policy does not state what kind of tourism will be permitted on the undeveloped coast. Para 7.3.5 states that it will be important to conserve and enhance biodiversity, the landscape and historic assets along the undeveloped coast whilst enabling an appropriate level of outdoor recreation and tourism. It is felt that this will provide the protection needed.
P090/31 P219/38 P220/38	4NW Cumbria County Council	ENV2 B & 7.3.5 - could provide a more positive approach to maximising the opportunities for the natural resources. In particular consideration should be given to potential for managed re-alignment and increasing the area of managed natural habitat.	ENV2 C is a new policy statement aiming to support the management of more of the undeveloped coast for biodiversity. The importance of managing the undeveloped coast for biodiversity is also mentioned in para 7.3.5.
P452/20	Natural England	ENV2 C - The intention to protect the St Bees Head Heritage Coast may be more clearly expressed as ‘protect the character and quality of the St Bees Head Heritage Coast...’	This text has not been altered as the principle is expanded upon in the supporting text and this effectively says the same thing.
P453/20	Natural England	Para 7.3.6 - we welcome the intention that a management plan be prepared for this area of Heritage Coast.	Support noted.
P329/39	National Trust	7.3.6 – There is concern over the text here and its reference to ‘balancing’ protection against encouraging visitor enjoyment – such an approach is not compatible with sustainable development as advanced in PPS1. An integrated approach would ensure not only protection but also enhancement of the Heritage Coast and its wider setting.	The wording of this paragraph has been altered to be more positive about the possibility of coming up with a management plan that will be able to protect the natural assets of the St Bees Heritage Coast and encourage more visitors to the area.

Biodiversity and Geodiversity: Policies ENV3, DM24 (now DM25), DM27

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P091/31	4NW	ENV3 - This policy could be strengthened by a commitment to developing a more detailed representation of the RSS Indicative Biodiversity Resource and Opportunity Diagram and the development of functional ecological frameworks, which address habitat fragmentation and species isolation, identifying and targeting opportunities for habitat expansion and species isolation.	Reference is made to the regional Biodiversity Resource and Opportunity Diagram. A more detailed Cumbria version would be useful. Para 7.4.6 now states that the Council will discuss the possibility of carrying out this work with partners.
P096/32	Cumbria Wildlife Trust	ENV3 – As the RSS has now been revoked, the relevant parts should now be incorporated into the Core Strategy policy, particularly policy EM1(B).	ENV3 and its supporting text is aligned with policy EM1(B) now, seeking to protect, enhance, connect and create areas of biodiversity importance.
P110/32 P454/20	Cumbria Wildlife Trust Natural England	ENV3 – The first sentence should tackle habitat fragmentation and loss of habitat and species and degradation of habitats.	The first sentence has been changed substantially. It does not refer to degradation of habitats but rather aims to contribute to the implementation of the Cumbria BAP which of course deals with loss of habitats and species as well as degradation of habitats.
P110/32 P222/38 P358/13	Cumbria Wildlife Trust Cumbria County Council Environment Agency	ENV3 – Somewhere in the document there needs to be a description of the various designated sites that are present in the borough.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as well as biodiversity sites.
P110/32 P222/38	Cumbria Wildlife Trust Cumbria County Council	ENV3 - County Wildlife Sites and RIGS should be specifically mentioned within the text of the Core Strategy to ensure their protection within the planning process and to prevent confusion over what is meant by “designated site”.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as well as biodiversity sites.
P110/32	Cumbria Wildlife Trust	ENV3 – There should be an extra bullet ‘G’ - “Ensure development supports and strengthens existing ecosystem services to ensure the resilience of the natural environment in the face of climate change and other human pressures.”	The importance of ecosystem services is mentioned in the introduction to the policy. If biodiversity is protected and enhanced and habitats restored and recreated it is felt that this will support and strengthen existing ecosystem services.
P186/63	Mr R Curwen (Resident)	ENV3 – This policy should mention the Bathing Waters Directive (is this applicable to planning matters?)	The overall objective of the Bathing Waters Directive is to protect public health and not biodiversity so this would not be an appropriate place to mention it. Strategic Objective 19 aims to safeguard and where possible enhance the natural resources of the borough. This includes water resources.
P222/38	Cumbria	ENV3 – This policy uses non-standard terminology. It needs to use	The policy now uses the words protect, enhance, extend and restore.

	County Council	the same terminology as that in PPS9.	
P222/38	Cumbria County Council	ENV3 - The Core Strategy should not have specific policies to protect internationally (and arguably nationally) important sites and species, because they have their own legislation, the explanatory text should, however, state that they are material to the assessment of planning applications and decisions. ODPM Circular 6/2005 explains the obligations of planning authorities in this respect.	Para 7.4.4 makes reference to the different sorts of designated biodiversity and geodiversity sites in the borough including international and national sites. Policy DM25 is the more detailed policy giving protection to sites of local importance.
P222/38	Cumbria County Council	ENV3 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities. However it should be acknowledged that some previously developed land can be recognised as being of high biodiversity value.	ENV3 B states that 'development should incorporate measures to protect, enhance and build on any biodiversity interest' and the supporting text to policy SS2 makes reference to the importance of retaining natural habitat on sites where there is biodiversity interest.
P110/32 P222/38 P454/20	Cumbria Wildlife Trust Cumbria County Council Natural England	ENV3 A – This statement needs to identify whether it means statutorily designated or locally designated sites. These sites need to be defined (e.g. Natura 2000 sites, SSSIs, County Wildlife Sites, Local Geological Sites (formerly known as RIGS). In our view, the list should include County Wildlife Sites and Local Geological Sites to ensure their protection within the planning process and to prevent confusion over what is meant by 'designated site'.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as well as biodiversity sites.
P110/32 P222/38 P454/20	Cumbria Wildlife Trust Cumbria County Council Natural England	ENV3 B – as well as protecting, measures should enhance and add to biodiversity.	Agreed - this part of the policy now aims to protect and enhance.
P330/39	National Trust	ENV3 B – This policy statement might be amended to read “Ensure that development incorporates measures to protect, and wherever possible enhance, any biodiversity interest”.	Agreed – ENV3 B now states 'Ensure that development incorporates measures to protect, enhance and build on any biodiversity interest'.
P110/32	Cumbria Wildlife Trust	ENV3 C – the word “improve” has connotations of agricultural improvement which is damaging to biodiversity. This should be replaced by 'enhance and extend priority habitats'.	Agreed. The policy now says 'Enhance, extend and restore' instead of 'Improve and extend'.
P358/13	Environment Agency	7.4 - The legal requirement to ascertain that the integrity of a SAC or SPA will not be adversely affected by a development alone or in combination with other plans or projects can also be very important in planning terms. The impacts on a SAC &/or SPA should be considered in-combination and not in isolation. The Energy coast is an	The requirement to carry out a HRA is referred to in the supporting text to DM25 - the Development Management policy dealing with biodiversity.

		example where there are separate developments and separate policies ER1 and ER3 for different parts of the whole.	
P221/38	Cumbria County Council	7.4.1 – This paragraph should refer to the value of climate change adaptation and other ecosystem services.	Agreed - paragraph 7.4.1 now mentions the importance of ecosystem services.
P109/32 P221/38	Cumbria Wildlife Trust Cumbria County Council	7.4.1 – Ecosystem services remain unacknowledged. The Core Strategy needs to recognise the economic benefits accrued from biodiversity as well as recognising the intrinsic value of habitats and species.	Agreed - the paragraph has been altered to reflect the importance of ecosystem services in providing economic benefit..
P111/32 P222/38 P357/13 P455/20	Cumbria Wildlife Trust Cumbria County Council Environment Agency Natural England	7.4.4 – The Core Strategy should also refer to the UK BAP as this covers more habitats than the Cumbria BAP and habitats of Principal Importance as laid out in the NERC Act (2006).	The response from Cumbria County Council (para 1.116) stated that the CBAP now includes UKBAP species and habitats. Therefore, no change has been made.
P464/20	Natural England	DM24 - the first sentence could be reworded to say 'development affecting ...either directly or indirectly..'	DM24 , now DM25 B states that 'developments that would cause a direct or indirect effect' on local sites will not be permitted unless: etc.
P094/31 P241/38 P464/20	4NW Cumbria County Council Natural England	DM24 - To bring this policy closer to RSS EM1, it could provide additional reference to enhancement, as required by PPS9 paragraph 14, and it should also cover wider features of importance to biodiversity such as wildlife corridors. The Cumbria Waste and Minerals Development Framework does this well.	Agreed - the enhancement and connection of wildlife habitats is now incorporated into the text of DM25 (was DM24)
P114/32	Cumbria Wildlife Trust	DM24 – again types of designated sites need to be set out in the supporting text.	The text of DM24 (now DM25) has been extensively altered and the types of designated sites given protection are named. A list of all the different types of sites has been inserted in the supporting text of ENV3.
P114/32	Cumbria Wildlife Trust	DM24 - Mitigation and compensation measures secured though planning obligations should come with a management plan and with enough funding to provide management in the long term to implement its biodiversity aims.	Management Plans - DM25 B(ii) now states that a 'long-term management plan will be sought' to provide to provide prevention, mitigation and compensation measures as appropriate.
P241/38	Cumbria County Council	DM24 - The Core Strategy should not have specific policies to protect internationally (and arguably nationally) important sites and species, because they have their own legislation	Agreed. Policy DM25 B specifically protects sites of local importance and para 1.5.4 (in DM policies document) makes reference to European and International sites and the importance of carrying out the Habitats Regulations Assessment (HRA).
P464/20	Natural England	DM24 - In our view, to make clear the requirements for the different levels of protection, and avoid repetition of the legal provisions, the policy needs to be comprehensively reframed, and may in fact need to	The text of this policy has been comprehensively changed. DM25 B makes specific reference to sites of local importance DM25 F deals with the requirement for a HRA - for Natura 2000 and

		be reframed in separate policies to bring out the different requirements for, for example, international sites, SSSIs and local sites.	Ramsar sites. The types of designated sites are listed in a table in the supporting text for policy ENV3. (This may later be an appendix to the main Core Strategy document.
P241/38	Cumbria County Council	DM24 – This policy should cover UK BAP as well as CBAP species and habitats.	The response from Cumbria County Council (para 1.116) stated that the CBAP now includes UKBAP species and habitats. Therefore, no change has been made.
P241/38	Cumbria County Council	DM24 - It is suggested that reference should be made to mitigation and/or compensation in the section on protection of sites and habitats. Hence it would appear at the moment that if the tests are satisfied, then damage can occur without mitigation and/or compensation.	Agreed. DM25 B(ii) makes reference to mitigation and compensation.
P241/38	Cumbria County Council	DM24 - the Habitats Directive requires member states to maintain European habitats at 'favourable conservation status' (range, extent, structure, function and conservation status of typical species). This would cover European habitats outside of European Sites, and would provide an argument for identifying those habitats in the Core Strategy, along with the UK priority habitats.	Agreed. DM25 A (iii) makes reference to protecting the European habitats that lie outside European designated sites. The need for an Indicative Opportunity Map is referred to in the supporting text to ENV3.
P241/38	Cumbria County Council	DM24 - There should be reference to the identified need (as required by RSS EM1 (B)) for the development of a more detailed representation of the RSS Indicative Biodiversity Resource and Opportunity Diagram and the development of functional ecological frameworks, which address habitat fragmentation and species isolation, identifying and targeting opportunities for habitat expansion and species isolation.	Agreed. The need for an Indicative Opportunity Map is referred to in the supporting text to ENV3.
P347/39 P361/13	National Trust Environment Agency	DM24 – add another statement – “D: Appropriate mitigation and compensation measures can be provided that would be more than equivalent to the loss that would occur.” It should also be made clear that all the criteria apply – they are not either/or.	Agreed. The text of DM24 (now DM25) has been substantially changed. It is clear that all parts of the policy apply - it is not a case of either/or.
P466/20	Natural England	DM27 - The policy is welcomed.	Support noted.
P350/39	National Trust	DM27 - The approach is considered to be proportionate, appropriate to the circumstances of Copeland and to comply with national guidance – it is welcomed and supported.	Support noted. DM27 has been renumbered DM28. The text of the policy is unchanged from the Preferred Options draft of the document.
P095/31	4NW	DM27 - This could be strengthened by reference to the North West Regional Forestry Framework and to expanding tree and woodland cover – as promoted by RSS policy EM1.	Although no reference is made to the North West Regional Forestry Framework there is emphasis on increasing the tree cover in the borough.

Built Environment and Heritage – Policies ENV4, DM10, DM26, DM27, DM28, DM29

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P224/38	Cumbria County Council	ENV4 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	The potential for improving access to open space through the decontamination and reclamation of derelict land is stated in ENV6.
P039/25 P224/38 P294/72 P331/39	English Heritage Cumbria County Council Cllr Joan Hully National Trust	ENV4 – The policy should refer to PPS5 and not PPG15 (and this should be reflected in the Policy Context box.) There may be a need to review the policy in the light of this.	Agreed – The policy context box now refers to PPS5 and not PPG15.
P039/25	English Heritage	ENV4 - The reference to "other townscape and rural features" would need definition and supporting evidence.	Para 7.5.3 refers to listed structures such as doorways, piers, lighthouses etc.
P039/25	English Heritage	ENV4 - It would help to refer to heritage assets as defined in Annex 2 of PPS5.	Agreed - Heritage assets are referred to in the context of heritage led regeneration.
P039/25	English Heritage	ENV 4 - the document makes no reference to that part of the Hadrian's Wall WHS in the Borough.	Hadrian's Wall World Heritage Site is now mentioned in the introduction to the section and protection is given to this in ENV4A.
P460/20	Natural England	DM10 - We welcome the requirement that existing landscape, topographical and characteristic local styles of buildings and materials should be incorporated in the design of developments. This might be strengthened by requiring that developments conserve and enhance the character and quality of the landscape and retain or provide habitat for biodiversity.	Agreed. This was the intention of the policy which has been reworded slightly to make it clearer. Biodiversity and habitats are catered for by policy DM24.
P006/7	The Coal Authority	DM10 – An additional policy criteria should be included: "...Incorporate appropriate remediation measures to ensure that the development is not at risk from ground instability arising from mining legacy or other former uses;"	Agreed; however, it is felt that this clause sits more appropriately in DM 11, Sustainable Development Standards, rather than DM10 which is about design.
P281/70	RWE npower	DM10 F - There is no justification in policy terms for seeking blanket contributions of this nature for public art. It should be at the Area Action Plan stage that the requirement for works of public art is considered and properly debated. Development contributions of this nature should be assessed against the tests set out in Circular 05/05 on the need for planning obligations.	Agreed as far as the policy text is concerned. 'Per cent for art' is commonly applied across the country; the approach to negotiating such contributions will be governed by the SPD on developer contributions. It is intended that negotiations would be informed by viability considerations and would be applied flexibly - the Council might accept less than 1% in the case of a nuclear power station, for instance. The operative word in the Core Strategy is now 'encouraged', in supporting text.

P044/25	English Heritage	9.3.7 – Reference should be to PPS5 and specifically Policy HE6	The amendment will be made in the next draft.
P349/39	National Trust	DM26 – The policy will need to be supplemented to set out the approach to other heritage assets (i.e. those that, whilst not designated, are locally important). This should include how these will be identified and the approach to be taken to development proposals that impact directly or indirectly upon them.	Para 10.5.11 deals with the matter of locally important heritage features.
P050/25	English Heritage	DM26 is supported.	DM26 is now DM27, although largely unchanged in content. Support noted.
P466/20	Natural England	DM27 – This policy is welcomed.	Support noted.
P351/39	National Trust	DM28 - It is agreed that a policy on advertisements is needed having regard to the adverse impacts of clutter and ill-designed signage, these can significantly detract from rural or urban locations. The policy is welcomed and supported.	DM28 has been renumbered DM29, although the text remains the same as that in the Preferred Options draft.
P243/38	Cumbria County Council	DM28 - should be simplified and made clearer as to what circumstances advertisement consent would be granted in Areas of Special Advertisement Control in the Borough. The current wording is considered ambiguous, and the Policy could be written in plainer English.	Not accepted. The policy is meant to align with national policy and the Borough Council does not consider it to be difficult to understand.

Landscape: Policies ENV5, DM25

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P040/25	English Heritage	ENV5 – The policy should refer to the Cumbria Historic Landscape Characterisation.	Agreed. The supporting text (para 7.6.3) now refers to the Historic Landscape Characterisation.
P092/31 P225/38 P248/66 P332/39 P456/20	4NW Cumbria County Council Friends of the Lake District National Trust Natural England	ENV5 – The policy should be widened to reflect the integrated, character based approach to landscapes set out in RSS policy EM1, along with the European Landscape Convention and Natural England's approach to 'all landscapes matter'. The Core Strategy should move away from 'Landscapes of County Importance' and 'Local landscape' designation	The reference to reviewing designations of landscape importance has been removed. The policy now states that all landscapes will be protected from inappropriate change. Policies ENV5 and DM26 now refer to Landscape Character Assessment (LCA) and this will be fully applied across the Copeland plan area as soon as the more detailed version of the LCA is complete. Pending this, the Council will continue to use Landscapes of County importance in the decision making process.

P225/38	Cumbria County Council	ENV5 – Any detailed landscape character assessment would need to be carried out by Copeland Borough Council.	DM26 states that the Council will continue to use Landscapes of County Importance until a more detailed landscape Character Assessment can be carried out for the borough. This is likely to be completed in 2012.
P225/38	Cumbria County Council	ENV5 – Reference should be made the Cumbria Landscape Classification (1995)	The Cumbria Landscape Character Assessment Guidance and Toolkit is now the most recent document and this is what the Core Strategy and Development Management Policies refers to.
P278/70	RWE npower	ENV5 – The conflict between protecting and enhancing the landscape and nuclear new build (NNB) should be recognised in the policy statement or its supporting text. It should acknowledge that complete mitigation will not be possible when it comes to large structure on NNB sites.	ENV5 B now states that 'where the benefits of the development outweigh the potential harm', the impact on the landscape should be minimised through adequate mitigation, preferably on site. Nuclear new build would likely fall into this category and the impact is only required to be minimised. Mitigation is not required to be complete.
P332/39	National Trust	ENV5 – The title should be changed to 'Protecting, Enhancing and restoring the Borough's Landscapes'.	
P332/39	National Trust	ENV5 A – should be replaced with 'Reviewing designations of all landscapes importance through landscape character assessments'	ENV5 A has been removed so that there is no longer any mention of Landscapes of County Importance in the text of the policy itself. The supporting text refers to the Cumbria Historic Landscape Characterisation and the Cumbria Landscape Character Assessment (LCA) Guidance and Toolkit. Pending a more detailed Copeland plan area LCA the Council will continue to use Landscapes of County importance in the decision making process.
P332/39	National Trust	ENV5 B – should be replaced with 'Protecting, enhancing and where necessary restoring the defined areas of landscape character importance by rejecting inappropriate change, and by ensuring that development does not threaten or detract from their distinctive characteristics but makes a positive contribution that enhances and reinforces landscape character.	Policy DM26 also deals with landscape issues - it states that development proposals will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character and mitigate against any adverse effect.
P242/38 P249/66	Cumbria County Council Friends of the Lake District	DM25 - should be expanded to ensure that new development is designed and sited to be compatible with local landscape character. It should refer to the need to use character assessments or the need for new development to be compatible with landscape character (and the elements that form this) in accordance with saved JSP Policy E37. Text for inclusion in DM25 is suggested – 'Proposals will be assessed in relation to: Locally distinctive natural or built features, visual intrusion or impact, scale in relation to the local landscape and features, the character of the built environment, public access and community value of the landscape, historic patterns and use, biodiversity features, ecological networks, and semi natural habitats,	Policy DM26 (previously DM25) now states that developers should design their particular development to be congruent with the surrounding landscape character. The first paragraph of DM26 asks that developers refer to the Cumbria Landscape Character Assessment (LCA) and the Cumbria Historic Landscape Characterisation and design their development accordingly. The second paragraph mentions that, in time, a more detailed Copeland version of the LCA will be available. Policy DM26 has been expanded to include most of the aspects listed here. Biodiversity and green networks are dealt with in policies ENV3 and DM25.

		and openness, remoteness and tranquillity.	
P141/45	Sport England	DM25 - only appears to relate to landscaping schemes rather than minimum open space standards as suggested in ENV6.	DM12 now states the minimum requirement for open space within residential developments (this was an error in the Preferred Options document). ENV6 in the new draft of the Core Strategy only refers to access to the countryside. New policy SS5 deals with provision of, and access to open space and green infrastructure.
P348/39	National Trust	DM25 - It is suggested that “reinforce” might be a more appropriate word than “reflect”.	DM26 (formerly DM25) now uses the word 'reinforce' rather than 'reflect'.
P465/20	Natural England	DM25 - This policy, which requires schemes to retain existing landscape features and reflect local landscape character, is welcomed. A requirement to conserve and enhance the character and quality of the landscape would be a stronger and welcome requirement.	On the advice of the National Trust the word reflect has been replaced with reinforce so that the statement now reads: 'Development proposals, where necessary, will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character and mitigate against any adverse visual impact.' It is felt that this is a stronger statement.

Countryside Access: Policies ENV6

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P333/39	National Trust	ENV6 - Access is a key consideration, including in ensuring that everyone is able to get to important areas of countryside (and coast) including for refreshment and health benefits.	Noted.
P093/31	4NW	ENV6 – the policy could be enhanced by greater explicit reference to green infrastructure and its benefits. Reference should be made to RSS policy EM3 as regards elements that should be included in the policy. Also see the North West Green Infrastructure Guide	Protecting green infrastructure within settlements is now dealt with in new policy SS5. All the recommendations here have been taken into account in both the new policy and the supporting text.
P121/45	Sport England	ENV6 - PPG17 states that existing open space, sports and recreational buildings and land should not be built upon unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements. Sites which have been identified as having potential to meet employment or housing land requirements might themselves need replacement provision, and that land requirements for such replacement provision should be made explicit.	These issues are now dealt with in policy SS5 - The supporting text to this policy explains that a PPG17 compliant assessment has now been completed and shortfalls have been identified in the Strategy for Infrastructure which will form part of the evidence base for seeking developer contributions in the future. Policy SS5A states that where it is necessary to build on existing green infrastructure sites then equivalent replacement provision should be made.
P133/45	Sport England	ENV6 - Further clarity is needed to fully understand the scope of this policy. Specifically, does open space refer to some or all of the typologies of open space set out in PPG17. As it stands, it is unclear	Open space is dealt with comprehensively now in new policy SS5.

		whether for example a playing field is covered by ENV6, SS4 or both.	
P226/38	Cumbria County Council	ENV6 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	Agreed. ENV6 now includes a statement to this effect.
P457/20	Natural England	ENV6 - we recommend that reference is made to our Access to Natural Greenspace Standards (ANGSt standards). These can be accessed and downloaded from our website at www.naturalengland.org.uk .	Access to Open Space is now dealt with in new policy SS5. Supporting text paragraph 5.6.4 refers to Natural England's ANG Standards.
P457/20	Natural England	ENV6 D - The detailed location and plans for a community forest, including landscape and habitat, will of course need to be carefully considered and we would be pleased to be consulted further on this.	Noted

Key Diagram – Figure 8.1

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P193/38	Cumbria County Council	It is suggested that the Core Strategy would benefit from having a Key Diagram illustrating the spatial development emphasis and infrastructure proposed for the main towns and villages.	The Key Diagram (now Fig 3.1) has been revised, though it would not be appropriate to include the degree of detail implied here.
P151/46	GONW	Fig 8.1 - There is no explanation included within the text for including a site on the above mentioned diagrams (Lillyhall) which is outside the Borough boundary.	The rationale for including Lillyhall in the 2 key diagrams has been set out in the supporting text for ER6 and the text for the Whitehaven Locality Today section has been amended to include a reference to Lillyhall.
P041/25	English Heritage	Fig 8.1 - The Key Diagram should include the World Heritage Site and consideration should be given as to how key heritage assets could be shown on the locality diagrams.	There are a very great number of heritage assets within the Copeland plan area and it would be impossible to show these on the key and locality diagrams. Consideration will be given to including these features on the LDF Proposals Map in due course.
P151/46	GONW	Fig 8.1 – The key diagram and the Whitehaven Locality Key diagram are not detailed enough	All the key diagrams have been amended and updated in consultation with the Localities Team.
P228/38 P334/39	Cumbria County Council National Trust	The Key Diagrams identify specific 'landscape areas', but it is not clear how these areas relate to the main landscape Policy ENV5 which does not identify individual landscape designations outside of the Lake District National Park.	Paragraph 7.6.3 explains that the Council will continue to use Landscape of County Importance designations until a detailed Landscape Character Assessment has been completed for the plan area.
P334/39	National Trust	Fig 8.1 - The extent of the undeveloped coast is poorly represented especially in the context of (recreation and) tourism opportunities south of Whitehaven. The current adopted Local Plan indicates that	This will be stated more clearly on the Proposals Map when revised.

		the extent of the undeveloped coast encompasses virtually the whole of the Whitehaven Coast tourism opportunity site. The Key Diagram suggests that there is no overlap at all.	
P334/39	National Trust	Fig 8.1 – The Government has not yet made a decision to permit the development of a nuclear power station in the borough. It is therefore inappropriate to identify “Proposed Nuclear Sites” on the Key Diagram – which clearly suggests that such sites are being brought forward through the Core Strategy. The sites should be removed from the Key Diagram. (NB the same issue applies to the ‘Sub-Area’ diagrams.)	Noted - however, the issue of NNB locations is a very significant one, having important implications for infrastructure and housing provision in the borough and therefore it is felt that it would be inappropriate not to include them on the key diagram.

The Localities in Copeland – Section 8.1

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P026/11	NWDA	It is not clear what sites the Core Strategy will allocate, if any. PPS12 cautions against the inclusion of sites that are not ‘central to the achievement of the strategy’.	The pre-submission draft of the Core Strategy does not seek to allocate any sites. It merely refers to sites that have been allocated in the current Local Plan.
P227/38	Cumbria County Council	8.1.2 - the defined areas for the localities do not match easily with the defined Housing Market Areas, although it is recognised that they have distinct functions, and therefore the defined boundaries are likely to be different. However, as a consequence this may lead to difficulties in providing adequate policy coverage where there are joint boundaries.	A great deal of evidence base work has been done on the basis of the localities as defined in the Core Strategy. It would be very difficult to redefine these areas at this stage of the plan making process.
P429/46	GONW	Given that policy is not evidently formulated with these localities in mind, this impact seems largely incidental. Given that the localities have been identified as “distinctive functional areas having their own particular issues and needs” there seems to have been a missed opportunity to exploit them as policy drivers in a way which would enable the core strategy to explicitly address the needs of each locality, as well as helping make the document much more place-specific.	No change arising from this comment. The point is understood, but this section is meant to be descriptive of how the strategy will operate in the localities. Locality-driven considerations have informed the way the strategy is written.
P431/8	Cumbria Tourism	Locality Areas – we are pleased to note the generally supportive, positive tone regarding Tourism Opportunity areas.	Support noted.

Whitehaven Locality: Section 8.2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P335/39	National Trust	Fig. 8.2 - The Trust objects to the area defined as the 'undeveloped coast' having regard to the representations made elsewhere regarding Policy ER10 and Figure 8.1.	This detail will be checked and amended if necessary.
P336/39	National Trust	8.2.1-8.2.5 – No reference is made to the significant progress that has been commenced and is continuing with the "Colourful Coast" initiative. This is a major partnership project with which the local population is fully engaged and is adding considerably to the quality of life of Whitehaven residents.	Accepted. The text has been amended to incorporate more detail on the achievements of the "Colourful Coast" initiative.
P260/67	Parton Parish Council	8.2.4 - It is not correct to state that Parton is bypassed by Copeland's first dual carriageway road. Lowca and Distington may be so described but not Parton.	Accepted. The reference to the dual carriageway has been removed from the text.
P151/46	GONW	8.2.8 – The document could provide more clarity as to whether the strategic portfolio of development sites are designated as strategic in the context of PPS12 and if so why they are considered to be central to the achievement of the strategy. There are more and smaller sites included than one would normally expect. In each case the document will need to indicate the site boundary, what will be delivered, when, by whom, and at what cost. The key diagram and the Whitehaven Key diagram are currently not detailed enough. There is no explanation included within the text for including a site on the above mentioned diagrams (Lillyhall) which is outside the Borough boundary.	Accepted. Text amended and sites referred to as a "strategic portfolio of Regeneration Priority Sites". The pre-submission draft of the Core Strategy does not seek to allocate any sites. It merely refers to sites that have already been allocated in the current Local Plan. The rationale for including Lillyhall in the 2 key diagrams has been set out in the supporting text for ER6 and the text for the Whitehaven Locality Today section has been amended to include a reference to Lillyhall. All the key diagrams have been amended and updated in consultation with the Localities Team.
P187/63	Mr R Curwen	8.2.8 – 8.2.15 - Is positive that the Planning Dept have had the conviction to identify various run down sites & dwellings, all of which require improvement.	Support noted.
P161/49	Rhodia UK Ltd	8.2.11 – does not reflect the considerable amount of work already undertaken on the Rhodia site and the relatively small amount of remediation work still to be done as agreed with the EA. Alternative text is suggested – '.....This latter area has also been the subject of regeneration projects already and whilst a small amount of work is still needed at the former Rhodia/ Huntsman chemical complex to comply with part IIA, further remediation would be required to make space available for public participation funded through development to rationalise the balance of uses and built area in West Whitehaven generally.'	Partially accepted. The text has been amended to incorporate reference to the progress made on the regeneration of the Coastal Fringe but the revised text also reflects the Council's understanding that further remediation is required to deal with contamination from previous activities to make areas safe for new development and the provision of public open space.

P377/9 P402/27	Regen North East Copeland, Richard Mulholland	8.2.13 – The use of brownfield and greenfield described in this paragraph should apply to all the key centres.	Accepted. The Council will consider applying the principle to other key centres.
P370/13	Environment Agency	8.2.13-14 - The Ufex and Hutbank landfill sites could not be integrated into any scheme for open space as they are still being regulated under environmental permits. The Marchon tip should be assessed for its impact to human health and from a structural stability perspective.	Noted. The proposed SPD and Site Allocations SPD will provide further detail on constraints and opportunities for a range of appropriate uses.
P162/49	Rhodia UK Ltd	8.2.14 – again does not reflect the remediation work already completed. Alternative text is again suggested – ‘8.2.14 - Remediation measures to deal with contamination from previous chemical and coaling activities at the former Rhodia/ Huntsman or “Marchon” site have been submitted by the landowner and approved by the Environment Agency under part IIA. There is opportunity for mixed use development on site.’ The suggested text also omits the section of the paragraph that talks about the potential layout of any new development on the site.	Partially accepted. The text has been amended to incorporate reference to the progress made on the regeneration of the Coastal Fringe but the revised text also reflects the Council's intention to produce an SPD to guide development of the area for a mix of appropriate uses in accordance with the Core Strategy and Site Allocations DPD.
P229/38	Cumbria County Council	8.2.14 – The type of development sought for the Rhodia site needs to be clarified as part of the Core Strategy. The policy is not currently precise enough and could be enhanced to guide future investment decisions. An SPD could be prepared to assist.	Partially accepted. The Core Strategy sets out a range of appropriate uses for the site, and advises that further detail will be provided in an SPD and the Site Allocations DPD.
P337/39	National Trust	8.2.14 - there needs to be a clearer understanding of the location, extent and scale of the proposals that might be contemplated and how new development will ensure the safeguarding and enhancement of the undeveloped coast. There is particular potential to improve the relationship with the Colourful Coast and ensure that views and habitats are enhanced. Discussions between the National Trust, the Land Trust and the Council are sought.	Accepted. Discussions with the partners from the Colourful Coast initiative have taken place as part of the development of the Core Strategy and are ongoing.
P338/39	National Trust	8.2.16 - The discussion of major energy infrastructure has failed to consider the implications for the intrinsic qualities of landscapes, biodiversity and heritage assets. It is requested that reference to the requirement to do so is included in this reference.	Accepted. The text has been amended to include a reference to the need for all decisions around the provision for major energy infrastructure to consider the implications for the intrinsic qualities of the Locality's landscapes, biodiversity and heritage assets.
P160/49	Rhodia UK Ltd	8.2.18 – Support for the text of paragraph 8.2.18 provides the ability to offer quality employment development at the former “Marchon” site enhancing the potential for wider mixed use development and regeneration to be realised at this location for the benefit of West Whitehaven.	Support noted.

P229/38	Cumbria County Council	8.2.23 – A phasing policy for housing in the settlements would be useful giving the number of unimplemented planning permissions still outstanding at Distington and Moresby Parks.	Not accepted. A phasing policy will be considered in the Site Allocations DPD.
P152/46	GONW	8.2.25 - Policy on housing mix/affordability should be set in the core strategy rather than in a non-statutory development brief.	Core Strategy Policy SS3 and the supporting text set out the Borough Council's requirements and approach to Housing Needs, Mix and Affordability. Development briefs will be guided by Policy SS3 and the Site Allocations DPD and will allow for a flexible approach in response to the constraints imposed and opportunities offered by each site.
P134/45	Sport England	8.2.26 - it is unclear how an improvement in sports provision has been identified as a need given that the Community Infrastructure and Open Space assessment has not been completed.	Not accepted. The need is identified in Chapter 6 of the Playing Pitch Strategy April 2011 and the Leisure Needs Assessment April 2011 – Chapter 1 and also Appendix 4
P261/68	Howgate Distington Partnership	8.2.27 – this paragraph does not specifically mention junction improvement on the A595. The locality board of Howgate and Distington are concerned about this.	Accepted. A595 junction improvements have been added to the list of transport priorities.
P339/39	National Trust	8.2.28 - The approach set out here is supported, and in particular the comments in the third bullet point in respect of the 'Colourful Coast' area. As already offered the National Trust would be pleased to continue its involvement in discussions about this area.	Support noted.
P159/49	Rhodia UK Ltd	8.2.28 – This paragraph potentially restricts development on the Marchon site. Alternative text is offered that defines the area for reclamation to that of the appropriate seaward areas of the Marchon site, rather than the whole Marchon site.	Partially accepted. The text has been amended to incorporate the principle elements of the suggested wording provided.

Cleator Moor Locality – Section 8.3

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P230/38	Cumbria County Council	8.3.3 – This paragraph mentions that Kangol site amongst a number of other employment sites in Cleator Moor. However, the future of the site does not appear to have been dealt with in the document.	The Kangol site has been allocated in the current Local Plan as an employment site. The new draft of the Core Strategy does not mention the site.
P362/13	Environment Agency	8.3.4 - should mention the River Ehen due to the high quality and international importance of this river that flows straight past Cleator Moor.	Accepted. The text of the Cleator Moor Spatial Portrait has been amended to include a reference to the River Ehen. (para 8.4.12)
P378/9 P403/27	Regen North East Copeland, Richard Mulholland	8.3.8 – Delete the following sentence – 'Development outside of these locations will be restricted, and will predominantly be for employment/accommodation related to agriculture or forestry, affordable housing, renewable energy developments that are location	Not accepted. The existing wording is more appropriate given the more rural character of the Cleator Moor area.

		specific (e.g. wind, wave, tidal, hydro).'	
P290/71 P301/72	Cleator Moor Town Council Cllr J Hully	8.3.10 - Paragraph 8.4.9 states "The Bridge End Industrial Estate is regarded as a key employment facility, where expansion and improvements will be encouraged." The Town Council would like to see the same wording applied to Leconfield Industrial Estate at Cleator Moor.	Accepted - the text in the Cleator Moor Locality Chapter referring to Leconfield Industrial Estate has been amended.
P379/9 P404/27	Regen North East Copeland Mr R Mulholland	8.3.10 – The last sentence of this paragraph should be deleted and the paragraph should end with 'Leconfield Street is also a strategic target and key employment facility where expansion and improvement will be encouraged.'	Partially accepted. The wording of the paragraph has been amended to include a reference to the Council regarding Leconfield industrial estate as a key employment facility, where expansion and improvement are encouraged.
P291/71 P302/72	Cleator Moor Town Council Cllr J Hully	8.3.12 – The Council need to make provision for an increase in shopping floorspace in Cleator Moor. There are vacant shop premises at the moment, but should business in the town revival there should not be limitations placed upon any possible increase in requirements in the future.	Not accepted. The 2009 Retail Study suggests that there is unlikely to be justification for an increase in shopping floorspace in Cleator Moor and this text has been retained in the final draft.
P380/9 P405/27	Regen North East Copeland, Richard Mulholland	8.3.12 - This paragraph should start: 'It will be important to enhance and protect the vitality and viability of Cleator Moor Town Centre.....'	Accepted. The text has been amended.
P292/71 P303/72 P381/9 P406/27	Regen North East Copeland, Richard Mulholland Cleator Moor Town Council Cllr J Hully	8.3.13 – There is support for the importance of affordable housing but a balance should be created between affordable and "executive" to encourage a blend of residents to the area.	Partially accepted. The text has been updated to include a reference to SS3 (iii) which proposes that the 3 smaller towns may include sites for executive homes which will require attractive locations and high quality building standards.
P135/45	Sport England	8.3.14 - it is unclear how an improvement in sports provision has been identified as a need given that the Community Infrastructure and Open Space assessment has not been completed	Not accepted. The need is identified in Chapter 6 of the Playing Pitch Strategy April 2011 and the Leisure Needs Assessment April 2011 – Chapter 1 and also Appendix 4.
P266/33	RSPB	8.3.17 – The area described in this chapter supports internationally important numbers of wintering Hen Harriers. The importance of this needs to underpin policy DM2 criteria D and E.	Not Accepted. The Borough Council considers that a direct reference to the area's importance for hen harriers should not be included in the text in on the grounds of maintaining security of biodiversity.

Egremont Locality – Section 8.4

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
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P231/38	Cumbria County Council	8.4.6 - references to 'minor development' for the Local Centres should be changed to reflect the Cumbria SRSpS, which requires 'small-scale' development in these types of locations. The reference to the need to rebalance the overall housing market to allocate sites to enable more executive housing to be built in the Borough to encourage high skilled workers and entrepreneurs to live in the area is supported and welcomed.	It is not clear why the terminology should be changed. No change made.
P314/73	Leconfield Estates	8.4.14 - The Masterplan specifically identifies Egremont as an area of search for new executive housing sites, on the basis that there is a clear need to provide dwellings for higher paid/higher skilled employees and to avoid congestion issues and reduce commuting times. Furthermore, the 2006 HMA recognises that there is high demand for housing in Egremont because of its proximity to Sellafield. Therefore a higher proportion of development should be allocated to Egremont.	No change, although the principle of growth in Egremont is supported. The level of development foreseen by the Core Strategy for Egremont provides for a realistic response given the levels of development over the last ten years. The figures quoted are not a ceiling, and there is sufficient land identified (in the SHLAA) to accommodate significant growth if the demand is there. This will be a matter for the site allocation process. (It should be noted, though, that growth may be constrained by factors such as the adequacy of the road network, the Ehen flood plain and other physical factors.) The Borough Council would welcome discussions with developers and landowners relating to growth and diversification of the housing stock in Egremont and how that could be accommodated within the Local Development Framework. It may be, for example, that phasing could concentrate growth there at certain stages of the Plan period. This can be taken up in the Site Allocation plan, or could be the subject of a Local Development Document for Egremont.
P136/45	Sport England	8.4.14 - does not reference sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	Not accepted. There is a sufficient supply of outdoor sports facilities in the larger settlements of the Locality.
P169/52	Mr Powe	8.4.16 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies, road closures and repairs and improve Cumbrian Coast Railway.	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points and emergency access will be a consideration in the light of nuclear new build.
P014/8	Cumbria Tourism	8.4.19 – Cumbria Tourism would welcome more details on the concept of the Community Forest	The Council will initiate a dialogue when more details are available.

Mid Copeland Locality – Section 8.5

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
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P137/45	Sport England	8.5.8 – There is no reference to sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	This section merely describes the local impact of Core Strategy policy and has no policy status in itself.
P169/52	Mr Powe	8.5.9 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies, road closures and repairs and improve Cumbrian Coast Railway.	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points and emergency access will be a consideration in the light of nuclear new build.

South Copeland Locality – Section 8.6

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P232/38	Cumbria County Council	8.6.3 – It is a matter for Copeland and the County to address jointly regarding what transport improvements are proposed to overcome these disadvantages. Those improvements related to transport infrastructure directly related to large scale energy related projects through the 'community benefits package' should be made more explicit.	No change. As stated, the Locality Plan has identified these shortcomings and their remediation would be pursued through the normal processes. 'Community benefit' will be subject to negotiation and the Core Strategy, along with the Locality Plan and Strategy for Infrastructure, will inform that.
P112/32 P363/13	Environment Agency Cumbria Wildlife Trust	8.6.4 - The status of the ecological designations of the Duddon Estuary needs to be clarified. The Duddon Estuary is a SSSI, Special Protection Area and Ramsar. It is also part of the Morecambe Bay Special Area of Conservation.	This section (which has been extensively redrafted to make it more concise) describes simply how the strategy will operate in South Copeland; it is not necessary to go into exhaustive detail about multiple designations, which are or will be given adequate recognition elsewhere (including the Proposals Map).
P232/38	Cumbria County Council	8.6.7 - References to 'minor development' for Haverigg - a Local Centre - should be amended to reflect the Cumbria SRSpS (see comments above on Policy ST2 (Spatial Development Strategy), which requires a 'small-scale' of development in these types of locations.	The wording of this section has been altered, and the phrase 'reflecting its scale and function' is now used. This is compatible with the sub-regional strategy terminology.
P179/61 P188/64	Port Millom Ltd Cllr D Wilson	8.6.9 – Strong objection to any proposal that would prevent the continued use of Millom Pier as an industrial facility.	Noted. This land has been identified as suitable for tourism-related development (Copeland Local Plan 2006), and the Employment Land and Premises Study recommends that it be de-allocated; this may be debated during the production of the Site Allocation Plan. There is no proposal in the Core Strategy to de-allocate it for industrial use and nothing in the Core Strategy which prevents its continuing in its present use.
P340/39	National Trust	8.6.9 - It is unclear if the statements made here are intended to be 'policy' and in particular what the evidence base is to support specific	This section is descriptive of policy and does not add to it. Text revisions now make this clearer.

		projects. Of particular concern are the environmental implications of potential developments such as a nuclear power station at Kirkstanton and of a barrage across the Duddon Estuary. The potential adverse impacts of the latter on landscape quality, on nature conservation interests, on the setting of the National Park and on the fine coastal areas nearby should be acknowledged, together with the likely knock-on impacts upon the attractiveness to visitors and the tourist economy.	The Kirksanton proposal has now been abandoned. The Duddon barrage proposal has not reached a stage where it is appropriate to give it specific coverage here. If it emerges as a feasible, designed project, policies ER2, ER3 and relevant development management policies would apply, along with other relevant Core Strategy policies on protecting the environment.
P138/45	Sport England	8.6.12 - does not reference sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	Agreed. Although this section merely describes the local impact of Core Strategy policy and has no policy status in itself, there is now a reference to the need to develop sports provision (also covered in the Strategy for Infrastructure). This will be taken forward in implementing the Core Strategy via the Strategy for Infrastructure and developer contributions, as well as being the basis for funding bids.
P169/52	Mr Powe	8.6.14 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies, road closures and repairs and improve Cumbrian Coast Railway.	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points and emergency access will be a consideration in the light of nuclear new build.
P340/39	National Trust	8.6.16-17 – The possibility of a Kirksanton power station and Duddon barrage and their impacts on the environment fail to appear in these paragraphs.	This section is descriptive of policy and does not add to it. Text revisions now make this clearer. The Kirksanton proposal has now been abandoned. The Duddon barrage proposal has not reached a stage where it is appropriate to give it specific coverage here. If it emerges as a feasible, designed project, policies ER2, ER3 and relevant development management policies would apply, along with other relevant Core Strategy policies on protecting the environment.

The Sellafield Sub-Locality Area –Section 8.7

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P139/45	Sport England	8.7.10 - The sustainable settlement section for this section does not reference sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	The Sellafield Locality section has been removed from the document; it is considered more appropriate that Sellafield be dealt with as part of the existing localities.
P169/52	Mr Powe	8.7.12 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies,	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points

		road closures and repairs and improve Cumbrian Coast Railway.	and emergency access will be a consideration in the light of nuclear new build.
P458/20	Natural England	8.7.13 - There will also be a need for Habitats Regulations Assessment screening to determine whether there is likely to be any significant effect on any European Designated ecological conservation site.	DM25F and supporting text(para 10.5.5) covers the need for HRA

Monitoring and Implementation: Section 10

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P115/32	Cumbria Wildlife Trust	Fig 10.1 - An additional indicator which could be used to monitor ENV3 is the NI197 LAA indicator which identifies those Local Sites (County Wildlife Sites and RIGS) in Copeland which are in positive management.	This is a useful suggestion and the redeveloped Monitoring Framework includes that indicator.
P153/46	GONW	Fig 10.1 - Monitoring and Implementation have not thus far been adequately addressed as it appears that the indicators only cover the period leading up to adoption of the core strategy. Adoption is the starting point rather than the end point. All LDF policies require targets and monitoring arrangements.	The Monitoring Framework has been substantially redrafted and is based on indicators suitable to measure achievement of the Core Strategy's objectives.
P244/38 P245/38	Cumbria County Council	Fig 10.1 – The indicators currently are not compatible with the National Indicators. It is suggested that they should be in order to ensure consistency with agreed National Government targets for Cumbria.	The Monitoring Framework has been substantially redrafted and is based on indicators suitable to measure achievement of the Core Strategy's objectives. These include the Core Indicators which will continue to be used for annual reporting. The National Indicators have now been scrapped. The monitoring framework as redrafted, and linked to the annual monitoring process, should serve as a full guide to performance in the fulfilment of the Core Strategy's objectives.

Glossary:

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Initial Response
P030/11	NWDA	The NWDA is identified (incorrectly) as the Regional Planning Body	The correction has been made.
P077/29	Theatres Trust	There should be a glossary entry for the term 'community facilities'. Suggested description: 'community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community.'	Community facilities is defined in paragraph 5.5.2
P247/38	Cumbria	There should be a glossary entry for the term 'green infrastructure'.	Green infrastructure is defined in paragraph 5.6.2

	County Council		
P247/38	Cumbria County Council	The definition of 'habitat' should be revisited.	Where 'habitat' is referred to in the Core Strategy, it is with specific regard to biodiversity and as per the existing definition i.e. the natural environment of a plant or animal etc.
P247/38	Cumbria County Council	Greenspace or open space should be included in the definition of 'Infrastructure'	Accepted.
P247/38	Cumbria County Council	There should be a glossary entry for 'Special Area of Conservation'	Accepted. This has been added to the glossary.
P223/38	Cumbria County Council	There should be a glossary entry for 'designated sites'.	Accepted.

List of Reference Documents:

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Initial Response
P246/38	Cumbria County Council	The link for Cumbria Biodiversity Evidence Base should be http://www.lakelandwildlife.co.uk/biodiversity/index.html	The List of Reference Documents is not included in the Pre submission Draft of the Core Strategy but the link correction has been noted.
P246/38	Cumbria County Council	It would seem appropriate to add the Cumbria Minerals & Waste Development Framework Core Strategy, which was adopted in April 2009 under the sub-regional section.	The List of Reference Documents is not included in the Pre submission Draft of the Core Strategy
P467/20	Natural England	This is a useful appendix for further reference, and if retained we recommend the inclusion of relevant National and European legislation and directives. We can supply a list of those particularly relevant to our interests.	The List of Reference Documents is not included in the Pre submission Draft of the Core Strategy

Local Development Framework (LDF) Consultation Statement

This document outlines the consultation process which was undertaken for the Copeland LDF Issues and Options Consultation.

Stakeholder Consultation Events

Prior to the LDF Issues and Options consultation, we held a Stakeholder Workshop in November 2008. The Workshops were held over two days and were split into external and internal stakeholders. Results from the events were used to inform the LDF Issues and Options Consultation document. A summary of the Stakeholder Consultation Events can be found in Appendix A.

Local Development Framework Issues and Options Consultation

The Copeland LDF Issues and Options Consultation was held from 28 May 2009 to 10 July 2009. The deadline was extended further to the 7 August 2009, this was due to a number of public meetings which were attended took place after the initial deadline.

At the initial consultation stage we asked for views on the issues facing the Copeland borough and the solutions (options).

Deposit copies

The LDF Consultation Document, Sustainability Appraisal Scoping Report, Habitats Regulation Assessment document were placed at the following locations for a period of six weeks:

- Copeland Borough Council offices in Whitehaven and Millom:
The Copeland Centre, Catherine Street, Whitehaven, CA28 7SJ
Millom Council Offices, St George's Road, Millom, LA18
- Libraries in the Copeland Borough (see Appendix A for a list of libraries and addresses).

Press Advert

An advert was placed in the Whitehaven News on Thursday 28 May 2009 (see Appendix B)

Press Release

A Press release was issued, an article was featured in The Whitehaven news on Thursday 4 June 2009 and North West Evening Mail (see Appendix B).

Mailing

We sent a mailing to 469 contacts from our LDF database. 118 contacts were sent the document and letter (see Appendix C for list of contacts) and 351 contacts were sent a letter which informed them the LDF Consultation was underway and where the documents were available to view (see Appendix D for list of contacts).

Website

The LDF Consultation documents were also available to download from the Council's website. See Appendix E for webpages.

Neighbourhood Forums

The Planning Policy Team attended and presented to most Neighbourhood Forum meetings in the Copeland borough during June/July 2009. For those which were not attended information was sent. See Appendix F for list of Neighbourhood Forums.

Representations

44 representations were received in response to the LDF Issues and Options Consultation document.

32 Calls for sites responses were received.

Appendix A - Stakeholder Consultation Events Summary

Copeland Borough Council Local Development Framework

Stakeholder Launch Events- November 2008

In accordance with the Planning and Compulsory Purchase Act 2004, Copeland Borough Council is required to produce a Local Development Framework (LDF) to replace its Local Plan which was adopted in 2006. One of the key principles of the new planning system is an increased focus upon the need to fully engage the local community and other stakeholders in the preparation of the LDF. The concept of 'front loading' is an important element of community engagement. Government guidance emphasises the need to provide the local community with opportunities to influence the early preparation of each document that will form part of the LDF.

In accordance with the updated Local Development Scheme¹ work has commenced on the preparation of the Core Strategy and other LDF documents.

As part of this process, and in line with government and local planning policy, two stakeholder events were held on 26th November 2008, one for internal stakeholders and one for external stakeholders.

These events were the first engagement / consultation events for the LDF and focused on making people aware that the Council had starting work on the LDF, outlining what the LDF is and asking them to help develop a 'vision' for the Borough for the next 15-20 years. The aim of both events was to raise the profile of the LDF and to foster collaborative working in order to ensure future planning policy in the Borough is as inclusive as possible and truly reflects community aspirations.

This report aims to summarise the findings of these events.

Copeland Borough Council Statement of Community Involvement (SCI)

The Council is required to produce a Statement of Community Involvement as part of the new planning system. The Statement of Community Involvement aims to set down how and when the Council will involve the local community in the planning process.

This early community engagement falls within the pre-production stage or stage 1 of development plan document preparation (page 25 of the SCI). The SCI recognises that this stage will focus on community involvement, particularly identifying issues and concerns.

Methodology

Two stakeholder events were held at Copeland Borough Council Offices, the Copeland Centre, on the 26th November, one in the morning and one in the afternoon.

A list of invited internal and external stakeholders and actual attendees is provided in Appendix 1.

Both events started with a presentation describing the LDF and how stakeholders could help to develop the evidence base and help identify the main issues the LDF will need to address.

During the External Stakeholder event, the stakeholders were split up into groups to in order to take part in a 'visioning' exercise. The stakeholders were split up into three groups centred on the themes of Economy, Environment and Community. Where possible, stakeholders had been pre-allocated a group, reflecting the nature of their stakeholder interest in the LDF (i.e. the Environment Agency were in the Environment group).

¹ **The Local Development Scheme (LDS) identifies which LDF documents the Council is preparing and the programme for each. The LDS 2006 has been replaced by the LDS 2008.**

During the Internal Stakeholder event, the stakeholders discussed all of the issues collectively, as this was a much smaller group.

The aim of this session was to have participants think beyond the issues and problems being faced today and imagine what the future may hold for Copeland. Participants discussed the drivers that may affect the Borough in the next 10-20 years, and any changes foreseen.

It was hoped that the visioning exercise would bring stakeholders together to develop a vision that satisfies many perspectives. Clearly, this vision may not suit all stakeholders perfectly, but the aim is to find a vision which combines as many social, economic and environmental goals as feasible, given the diversity of views which exist.

The exercise sought answers to the following questions:

1. Where are we now?
2. Where do we want to be?
3. How are we going to get there?

Summary

The responses from the visioning exercise are shown in the tables below and in Figure 1.

Economy

- Establish an individual identity for Copeland- tourism, employment, retail and cultural offer
- Transport and accessibility- dual carriageway from the north to Sellafield, support Carlisle Airport, small container port, two track railway line
- Realism of transport improvements
- Diversify economic base - build on our expertise in engineering and wider energy sector
- Exploit the coast for leisure, employment and cultural activities - move away from 'West Lakes' tag. 'Joined-up' marketing.
- Improve educational facilities- Academy Schools / Apprenticeship Academy- linked to Sellafield
- University links with schools should be improved
- Nuclear repository / Nuclear New Build
- Focus investment in areas outside of Whitehaven
- Improved health and housing provision
- Expansion of Haverigg prison
- Energy Coast Masterplan provides guidance/ framework
- Quality of local shops and facilities
- Concentrate on the things we can influence within Copeland
- Link between energy production / location and a levy on fuel prices.
- Community-led renewable energy production, including biomass, CHP etc.

Environment

- Promote green infrastructure and require use of SUDs
- Energy efficient buildings regulations / planning guidance
- Minimise water use and separate surface water from foul water
- Concentrate on use of renewables other than wind (visually intrusive) such as tidal, hydro, small CHP plants
- Focus development on brownfield sites not greenfield
- Improve walking, bus routes and cycling routes throughout the borough
- Use planning contributions to achieve environmental improvements – to benefit the whole community
- Consider re-use of nuclear waste
- Address issues of climate change such as coastal erosion, surface water flooding and CO2 emissions
- New development to be allocated away from flood risk areas – re-consider development at Pow Beck
- Preserve biodiversity values present in the local area
- Rural location is our unique selling point
- Focus on the role of Regional Parks
- Enhancement of River Keekle
- River Basin Management Plan for North West (as promoted in at the European level via the Water Framework Directive).

Community

- Town Council for Whitehaven
- Key towns and villages to be linked via one network and integrated plans
- New community hospital / key service centres for each locality
- Section 106 Contributions to be spent in the area of development where they are generated
- Maximise local supply chain into Sellafield
- Closer community cohesion between community and Haverigg prison
- Investment to focus on areas outside of Lillyhall
- Encourage young people to stay in the area via jobs and appropriate housing
- Houses for local people
- Diverse communities- not just one age group living together
- Extra Care facilities
- Renewal policies for private housing sector
- Health and education improvements
- Housing needs survey and understanding
- Address demographic changes in the Borough
- Establish the Borough as a place where people want to work and live- a sustainable community
- Self-sustainability and locality working
- The remoteness of the Borough should be seen as a positive
- Fuel poverty should be addressed
- LDF to fit with Local Health Plan
- Improve cycle track facilities
- Have a broader vision for communities- establish best practice examples across the Borough
- Develop infrastructure links between Millom and M65
- Different governance for different localities
- Greater youth facilities in Cleator Moor
- Offer opportunities for people at each stage of life across Copeland
- Coordinate housing provision with investment in employment and services
- Integrate employment site support into Sec. 106

Stakeholders also had the opportunity to write an individual vision for Copeland or comment on other issues they felt were important in a consultation feedback form. Some of the responses to the feedback form are shown below:

“Copeland should be able to compete with the UK as a whole, recognising its uniqueness. Nuclear role for the UK that we have to exploit.”

“Improved education to increase local aspirations.”

“Strategic approach to development should be based upon an understanding of the environmental capacity of Copeland.”

“With our coastal resource and national park Tourism is a key area to be developed”.

“Maximum employment, this would naturally increase everything needed for the area in terms of education, health and retail.”

“We can build a sustainable economy based on nuclear expertise and our beautiful coastline and mountainous hinterland.”

“Vibrant diverse economy, with improves transport links, improved education – raising aspirations.”

“A sustainable community- where people want to live, work and enjoy their leisure.”

“Strong, diverse economy and the improvements to areas like health, education, housing etc that emerge from this.”

The responses suggest that stakeholders feel strongly about the following issues:

- Establishing a unique identity for Copeland, particularly in relation to Tourism
- Improving transport infrastructure within the Borough

- Diversifying the economic base of the Borough
- Building on the expertise in the energy sector
- Provision of green infrastructure
- Encouragement of young people to stay in the Borough via the provision of jobs and appropriate housing
- Health and education improvements
- Establishment of diverse, sustainable communities

Application of Results

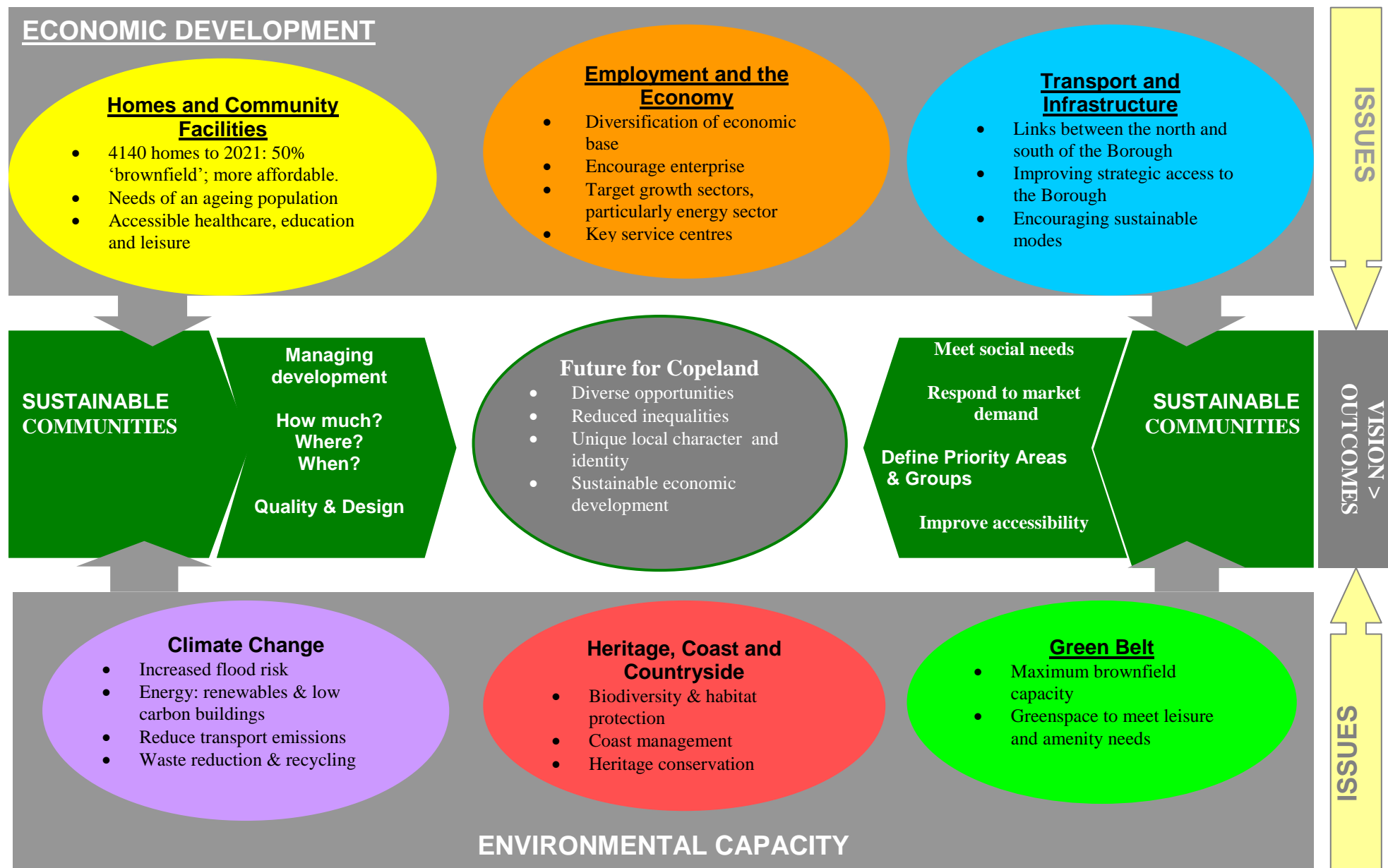
The important issues identified in responses to the early engagement largely coincide with those in the Sustainable Community Strategy. The LDF will be closely linked to the Sustainable Community Strategy so many of the concerns will be addressed. The results of early engagement will be taken into account in the next stage of preparing the Core Strategy– Issues & Options.

The Core Strategy must start from a clear 15-year vision for Copeland and its communities and demonstrate how this can be delivered by the Council and its partners through the preferred spatial strategy and policies.

The first major milestone in the preparation of the Core Strategy will be a wide consultation on Issues and Options. Our current programme is to produce a consultation document early in 2009. It is essential that we make significant progress in partner engagement on the Issues and Options stage by early-mid 2009.

The consultation has provided useful feedback on local priorities and has overall endorsed the aims of the Sustainable Community Strategy. In addition, there are already plenty of pointers to the broad range and scale of the issues we will need to address in our Core Strategy. For example, there is the recently adopted Regional Spatial Strategy and plans and strategies of our partners, all of which set out objectives and priority outcomes. Perhaps the major difference is that the Core Strategy will need to look forward over a longer period (15-20 years) than many of these plans. It is worth noting at this stage that the global challenge of climate change and developing local spatial policies which will minimise Copeland's environmental footprint will be a cross-cutting issue.

Figure 1: Core Strategy – Issues Identified



What Happens Next?

The next step, with the support of our partners, is to develop the spatial vision and objectives for the Core Strategy, to sharpen and prioritise the issues that it will need to address and identify the options available for delivering the desired outcomes. This must include consideration of the evidence base and the deliverability of options.

It is clear that the spatial planning focus of the Core Strategy, and the way its preparation must be embedded in partnership and corporate working, make it a very different animal to the Local Plan that it will replace.

Appendix 1: Levels of Attendance

Invited External Stakeholders

County Cllr Ken Ross
Steve Bradley – West Lakes Scientific Consulting
Alan Hubbard – National Trust
Tim Hirst – West Cumbria Development Fund
Cllr R Calvin
Denise Smalley – Western Lake District tourism Partnership
Cllr Michael Mc Veigh
Cllr Hugh Branney
Christine Harrison - Cumbria PCT
Cllr Norman Williams
Sue Stevenson – Cumbria Strategic Partnership
Jim Robinson, Natural England
4NW
Carol Murdoch, The National Trust
Cllr Southward
Muir Lachlan
Michael Priestley – Connexions
Tiffany Hunt – The National Trust
Jim Robinson – Natural England
Cllr Gleaves
Eileen Eastwood
Carolyn Wilson – Mobile Operators Association
Edward Mills – Cumbria Woodlands
Cllr Cath Giel
Cllr Reg Heathcote
Cllr Peter Connolly
Suzanne Cooper – Cumbria County Council Community Unit
Sarah Mitchell – Regen NE Copeland
Chris Shaw – Moresby & Parton Parish Council & Cumbria Association of Local Councils
Cllr Brian Crawford – Millom Town Council
Peter Smith, Chairman of the St Bees Parish Council
Lynne Rushforth - Age Concern Northwest Cumbria
Peter Johnstone, Older Persons' Forum (West Cumbria)
Cllr Ray Cole
John Cass – Home Group / Copeland Homes
Jacqueline Cordy Young Cumbria
Cllr Robin Pitt
Carol Robertson – Whitehaven Town Centre Task Group
Celia MacKenzie - Whitehaven Harbour Commissioners
Alan Hurton – Regen NE Copeland
Richard Pealing – Cumbria Vision
Cllr John Kane
Cllr M Docherty
Mr R Mulholland – Cleator Moor Chamber of Trade
Cllr Sue Brown
Betty Ryan – Enterprise Whitehaven
Cllr Elaine Woodburn

Cllr W Southward
Michael Harrison – Environment Agency
Ian Walker - Environment Agency
Anne – Marie Willmott – Impact Housing Association
Richard Pearse – Friends of the Lake District
Graham Innes – Cumbria County Council
Cllr Alan Jacob
Cllr Geoff Garrity

David Hardman – United Utilities
Gail Staton – Home North West
Rachel Carol- Development Control CBC
Simon Blacker- Development Control CBC
Tony Nesbit – TUC
Diane Ward- Regeneration CBC
J. Jackson CBC
Diane Ward- Regeneration CBC
Anne Snape – FARP
Gill Baillie – GMB Union

Actual Attendees

Cllr Peter Connolly
Suzanne Cooper – Cumbria County Council Community Unit
Sarah Mitchell – Regen NE Copeland
Chris Shaw – Moresby & Parton Parish Council & Cumbria Association of Local Councils
Cllr Brian Crawford – Millom Town Council
Peter Smith, Chairman of the St Bees Parish Council
Lynne Rushforth - Age Concern Northwest Cumbria
Peter Johnstone, Older Persons' Forum (West Cumbria)
Cllr Ray Cole
John Cass – Home Group / Copeland Homes
Jacqueline Cordy Young Cumbria
Cllr Robin Pitt
Carol Robertson – Whitehaven Town Centre Task Group
Celia MacKenzie - Whitehaven Harbour Commissioners
Alan Hurton – Regen NE Copeland
Richard Pealing – Cumbria Vision
Cllr John Kane
Cllr M Docherty
Mr R Mulholland – Cleator Moor Chamber of Trade
Cllr Sue Brown
Betty Ryan – Enterprise Whitehaven
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Michael Harrison – Environment Agency
Ian Walker - Environment Agency
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Cllr Alan Jacob
Cllr Geoff Garrity
David Hardman – United Utilities
Gail Staton – Home North West
Rachel Carol- Development Control CBC
Simon Blacker- Development Control CBC
Tony Nesbit – TUC
J. Jackson CBC
Diane Ward- Regeneration CBC
Anne Snape – FARP
Gill Baillie – GMB Union

Invited Internal Stakeholders

Joy Bain- Finance
Jane Salt- Customer Services
Tony Pomfret- Development Control

Ian Curwen- Communications
Kate Skillicorn- Housing
Alan Davis- Housing
Laurie Priebe- Housing
Marilyn Robinson- Audit Manager
Mark Key- Building Control Manager
Julie Betteridge

Actual Attendees

Joy Bain- Finance
Jane Salt- Customer Services
Tony Pomfret- Development Control
Ian Curwen- Communications
Kate Skillicorn- Housing
Alan Davis- Housing
Laurie Priebe- Housing
Marilyn Robinson- Audit Manager
Mark Key- Building Control Manager
Julie Betteridge

**Press
Advert
placed
Thursd
ay 28
May
2009**

11

19

Organisation.
"It was harder than I thought, the weather was exceptionally hot and the course was a mixture of Tar-mac, muddy paths, tracks, murrain (heavy clay) roads and two bridges over the river. At times it felt like I was wearing lead boots."
"As there were only seven starters for the marathon the course was rerouted so that most of the off-road was repeated."
"Reaching the finish and then having to start out again was very hard."
At one point on the route, Charn was running along a busy road lined with shops and people milling around. "The Uganda women don't reveal their legs, so there was a



■ **FEELING THE HEAT** Charn Robson, taking part in the Uganda marathon
lot of laughter when I passed by in my undecent running gear."
However, when later I fell over on a rare bit of tarmac, people could not have been kinder," she said.
Charn's husband, Chris, also took part in the first half marathon, and was there to

I had been sponsored, I was determined to finish. So I tottered on, covered in dirt and a certain amount of blood."
"I finished to rapturous applause," Charn said. "Paula Radcliffe wouldn't have received a better reception! It was fantastic."
The cash raised by Charn, who thanks all her sponsors and her husband for their support, will go towards helping the gortillas and the surrounding community.
Despite such a gruelling event, Charn hasn't been deterred from her running. She and Chris will be setting off at this weekend to take part in a Lake District 25km race!

playoffs and others.
Local winners were: Shepley Engineers Ltd, of Moor Row; National Nuclear Laboratory Ltd; Dixie Fellside CHP Plant; Sealdale Ltd; VT Nuclear Services; Stobarts Limited; Impwood Roofing Co; Jordan Nuclear Ltd; BAM Nutall Ltd; qinetiQ MOD at Rokeby; Low Level Waste Repository Ltd; Harvel UK; O'Connor Fencing Ltd.
Tom Mulhoney, Kospa chief executive, said: "Health and safety tends to hit the headlines in the aftermath of major accidents or when it is deemed to have gone too far."
"But the reality is that millions of sensible safety decisions are taken across the country each day which actually prevent countless accidents and the suffering they cause."
"The Kospa Occupational Health and Safety Awards are a way of rewarding and highlighting those whose daily contribution keeps us safe and healthy. We congratulate winners for the commitment they have shown to continuous improvement in this sphere."

worked for Edgar's, which at Calder Park moved to the Residential Home in 2004, passed away. The funeral service the funeral service was held at even cemetery with

Wed!



IL AND BRETT

Views sought on local planning issues

BY GALVAN ELLISON

IF you are interested in local planning issues then Copeland Council wants to hear your views.
It has put together a set of draft documents - called *Issues and Options* - about how the borough should be developed.
The Local Development Framework is a consultation document and will eventually replace the current Local Plan, covering all aspects of

planning and development. The council wants to know what you think about future development in the area as part of a consultation period which starts today.
Whether it is smaller planning issues, such as conservatories and extensions, or major projects such as a new nuclear reactor or combating climate change, the framework will address them all.
Council leader Elaine Woodburn said: "It is important people are able to have

their say on how the borough will develop in the future. There are a number of important forces which will influence the future of this area, including Sealdale and the nuclear industry, the plans for Britain's Energy Coast and climate change and sustainability. All of these will be addressed as part of this consultation."

It will also cover issues like how many houses Copeland needs and where, how much land is needed for work places, the best way to set things out so people can easily travel between home and work, shops and leisure activities, where leisure facilities, shops, services and community facilities should go.
Copeland will also be asking developers and land owners to put forward sites that they consider suitable for a particular development or areas that they feel need protection.
The consultation period

runs until Friday, July 10. Copies of *Issues and Options* and a comments form are available from Copeland Borough Council offices in Whitehaven and Millom and libraries in the borough. Full details are also available on the Copeland Council website, www.copeland.gov.uk. Forms should be sent back to Planning Policy, Copeland Borough Council, The Copeland Centre, Catherine Street, Whitehaven, CA26 7SL.

Garden celebrations

COPELAND MP Jamie Reed has opened a long-awaited community garden in Whitehaven.
Greenbank Community Association marked the opening with a balloon race and arts and crafts.

"The whole community will be able to use it. It is something everyone has wanted for a long time."
The event was one of many organised by Copeland Homes to mark European Neighbours' Day.

They included a fun day in groups £200 each to enable them to hold these celebrations.
The events were designed to bring together people of all generations to share their experiences and enjoy each other's company.
Maria Toham, community regeneration co-ordinator for



Glue theft

A WHITEHAVEN man has admitted stealing a tube of glue from Whitehaven. Stuart Partington, prosecuted by Sean Paul Reid, said he took the £2.69 tube of glue from the Whitehaven store to fix his shoe.
Thompson, 34, of Calder Avenue, said he had a lot of problems recently.
He has been ordered to complete a six-month supervision order.

Table stolen

Appendix C - Libraries in the Copeland Borough

Cleator Moor Library
Market Square
CLEATOR MOOR
CA25 5AP

Distington Library
Community Centre
Church Road
Distington
Workington
CA14 5TE

Egremont Charles Edmonds
Library
Wyndham School
Egremont
CA22 2DH

Frizington Library
Main Street
Frizington
CA26 2DH

Gosforth Library
Public Hall
Gosforth
CA20 1AS

Hensingham Library
Richmond Hill Road
Whitehaven
CA28 8SU

Kells Library
High Road

Whitehaven
CA28 9PQ

Millom Library
St George's Road
Millom
LA18 4DD

Mirehouse Library
Mirehouse
WHITEHAVEN
CA28 8ER

Seascale Library
Gosforth Road
Seascale
CA20 1PN

St Bees Library
St Bees
CA27 0DE

Thornhill Library
Thornhill School
Ehen Road
Thornhill
Egremont
CA22 2SJ

Whitehaven Library
Lowther Street
Whitehaven
CA28 7QZ

Appendix D - List of Contacts sent letter and LDF Consultation Document

Organisation
Arlecdon & Frizington Parish Council
Bootle Parish Council
Cleator Moor Library
Cleator Moor Town Council
Copeland Borough Councillors
Cumbria County Councillors in Copeland
Daniel Hay Library
Distington Library
Distington Parish Council
Drigg & Carleton Parish Council
Egremont Charles Edmonds Library
Egremont Town Council
English Heritage
Ennerdale and Kinniside Parish Council
Environment Agency
Eskdale Parish Council
Frizington Library
Gosforth Library
Gosforth Parish Council
Government Office North West
Haile and Wilton Parish Council
Hensingham Library
Kells Library
Lamplugh Parish Council
Lowca Parish Council
Lowside Quarter Parish Council
Millom Library
Millom Town Council
Millom Without Parish Council
Mirehouse Library
Moresby Parish Council / Parton Parish Council
Muncaster Parish Council
Natural England
Natural England
Natural England - Conservation Office
Parton Parish Council
Ponsonby Parish Council
Seascale Library
Seascale Parish Council
St Bees Library
St Bees Parish Council
St Bridget's Beckermest Parish Council
St John's Beckermest Parish Council
The Planning Inspectorate
Thornhill Library
Ulpha (Parish Meeting)
Waberthwaite Parish Council
Wasdale Parish Meeting
Weddicar Parish Council
Whicham Parish Council
Winscales Parish Council

Appendix E - List of Contacts sent letter only

Organisation	
4NW	Connexions
Acorus Rural Property Services	Co-ordinated Group Publications
Adams Holmes Associates	Copeland Homes
Age Concern Millom & District	CORE
Age Concern Northwest Cumbria	Council for British Archaeology
Aggregate Industries	Country Land & Business Association
Airport Operators Association	Crime & Disorder Reduction Partnership
	Crown Estate Office
Alco Waste Management	Cumbria & Lancashire Strategic Health Authority
	Cumbria Affordable Housing Group
Allerdale Borough Council	Cumbria Association of Local Councils
Amec Civil Engineering Ltd	Cumbria Biodiversity Partnership
Anchor Housing Association	Cumbria Bridleways Society
Ancient Monuments Society	Cumbria Chamber of Commerce & Industry
Andrew Green Chartered Surveyors	Cumbria Chamber of Commerce and Industry
Askam & Ireleth Parish Council	Cumbria Childminding Association
Associated British Ports	Cumbria Constabulary
Atisreal Ltd	Cumbria County Council
Barratt Manchester	Cumbria CVS
Barrow in Furness Borough Council	Cumbria Cycling Club
	Cumbria Federation of Young Farmers
Big Tree Planning	Cumbria Highways
	Cumbria RIGS Group
Borrowdale & St John's Parish Council	Cumbria Rural Enterprise Agency
Briery Homes Ltd	Cumbria Rural Housing Trust
British Chemical Distributors & Traders Association	Cumbria Strategic Partnership
British Council	Cumbria Tourism
British Gas Ltd	Cumbria Village Homes
British Geological Survey	Cumbria Vision
British Telecommunications	
British Toilet Association	Cumbria Waste Management Ltd
British Waterways (NW Region)	Cumbria Wildlife Trust
British Wind Energy Association	Cumbria Woodlands Trust
Broadway Mallon	Cumbria Youth Alliance
BT Group Plc	David Walker Surveyors
BTCV	De Pol Associates
BTCV Cumbria MV	Dean Parish Council
Buttermere Parish Council	
Campaign for Dark Skies	Department for Business, Enterprise and Regulatory Reform
Campaign for Real Ale	Department for Children, Schools & Families
Capita DBS	Department for Culture, Media and Sport
Capital Aluminium Extrusions Ltd	Department for Environment, Food & Rural Affairs
CBI	Department for Innovation, Universities & Skills
Centre for Ecology & Hydrology	Department for Transport
Centre for Ecology and Hydrology	Department of Energy and Climate Change
Chemical Business Association	Department of Health
Church Commissioners	Department of Work & Pensions
Churches Trust for Cumbria	Dev Plan UK
Civil Aviation Authority	Disabled Persons Transport Advisory Committee
Cleator Moor Chamber of Trade	District Valuer
Colin Buchanan & Partners	Dixon Webb
Colliers CRE	Donaldsons
Commission for Architecture & Built Environment	DPDS Consulting Group
Commission for Racial Equality	DPP
Communities and Local Government (DCLG)	Drivers Jonas

Drivers Jonas	Millom and Haverigg Economic Development Group
Duddon Estuary Partnership	Millom Chamber of Trade
Duddon Parish Council	Millom Tourism Group
E.ON Ltd	Millom Without Parish Council
EDF Energy PLC	Millom Without Parish Council
Egremont and Area Regeneration Partnership	Ministry of Defence
Egremont Chamber of Trade	Ministry of Defence - Defence Estates
Egremont Town Council	Ministry of Justice
Electricity North West Limited	MJN Associates
Enterprise Whitehaven	Mobile Operators Association
EON UK Plc	Morrisons
Equality and Human Rights Commission	Mr Chris Davies MEP
Federation of Cumbrian Amenities Societies	Mr J Reed MP
Flora Locale Northern Office	Mr R Mulholland
Forestry Commission	N Power Ltd
Forestry Commission - NW England Forest District	Nathaniel Lichfield & Partners
Freight Transport Association Northern Region	National Air Traffic Services
Friends of the Earth	National Farmers Union NW Region
Friends of the Earth (North West)	National Grid
Friends of the Lake District/CPRE	National Playing Fields Association
Fuller Peiser	National Power Plc
Fusion	National Trust (North West Region)
Government Office North West	NHS Cumbria
Gypsy Council	North Cumbria Community Transport
Halcrow Group Ltd	North Cumbria HAZ
Halcrow Group Ltd	North Cumbria University Hospitals NHS Trust
Health and Safety Executive	North West Development Agency
Help the Aged	North West Development Agency
HFT Gough & Co	Northern Rail Ltd
Highways Agency	NORWEB plc
HM Nuclear Installations Inspectorate	Nuclear Decommissioning Authority
HM Prison Service (North West Area)	O2 Ltd
HMP Haverigg	Office of Government Commerce
Home Builders Federation	Orange Ltd
Home Housing Association	Paul & Company Chartered Surveyors
Home North West	Paul Butler Associates
Home Office	Paul Butler Associates
Homes and Communities Agency	Peacock & Smith
Housing Corporation	Persimmon Homes Lancashire
HOW Planning LLP	Powergen plc
Huntsman	RAC Motoring Services
Hutchison 3G UK Ltd	Radioactive Waste Management Advisory Commission
Impact Housing Association	Regen NE Copeland
Institute of Directors North West	Road Haulage Association
Invest in Cumbria	Romar Workwear Ltd
Irton with Santon PC	Royal Mail Property Group
JMP Consulting	RSPB
Jones Day	RSPB (North West England)
JPL Planning, Transport, Project Consultancy	RSPB (Northern England Region)
JWPC Ltd	Rural Regeneration Company
Kangol Ltd	Rural Women's Unit
King Sturge LLP	RWE npower Renewables
Lake District Estates Co Ltd	S Brannan & Sons
Lake District National Park Authority	Sanderson Weatherall
Lakes Parish Council	Scottish and Southern Energy PLC
Lambert Smith Hampton	Scottish Power Ltd
Land Restoration Trust	Sellafield Ltd
Learning and Skills Council	SERCO
Loweswater Parish Council	Smurfit Composites

Solway Firth Partnership	UK Nirex Ltd
South Lakeland District Council	UKAEA
South Whitehaven Partnership	United Utilities
Sport England - North West Region	United Utilities Property Solutions
Stagecoach North West	Vodafone Ltd
Steven Abbott Associates	Vodafone Ltd
Storeys : SSP	Voluntary Action Cumbria
Story Homes	W3M
Stuart Ross Associates	Walton & Co
Sure Start	Wardell Armstrong
Sustainability North West	West Cumbria & Barrow Sport Action Zone
Sustrans	West Cumbria Crime and Disorder Partnership
T Mobile UK Ltd	West Cumbria Development Agency
Tarmac Northern Ltd	West Cumbria Development Fund
Taylor Wimpey UK Ltd	West Cumbria Federation of Small Businesses
Tesco Stores Ltd	West Cumbria Society for the Blind
The British Horse Society	West Cumbria Strategic Partnership
The Coal Authority	West Cumbria Vision
The Development Planning Partnership	West Lakes Renaissance
The Diocese of Lancaster	Western Lake District Tourism Partnership
The Garden History Society	Westlakes Properties Ltd
The Georgian Group	Westlakes Research Institute
The Lawn Tennis Association	Whitehaven & District Chamber of Trade
The Maritime and Coastguard Agency	Whitehaven Civic Society
The Post Office Property Holdings	Whitehaven Community Trust
The Ramblers Association	Whitehaven Congregation of Jehovah's Witnesses
The Society for the Protection of Ancient Buildings	Whitehaven Harbour Commissioners
The Theatres Trust	Whitehaven Heritage Action Group
The Twentieth Century Society	Whitehaven Regeneration Steering Group
The Victorian Society	Whitehaven Task Group
Tornado Wire	Whitehaven Town Centre Group
Transco	Wm. Morrison Supermarkets Plc
Transport 2000	Women's National Commission
Traveller Law Reform Coalition	Workington Town Council
Traveller Law Reform Project	X-Press Legal Services
Tribal MJP	Young Cumbria
Turley Associates	
Two Castles Housing Association	

Appendix F – Copeland Borough Council web pages

Figure 1: Copeland Borough Council Home Page

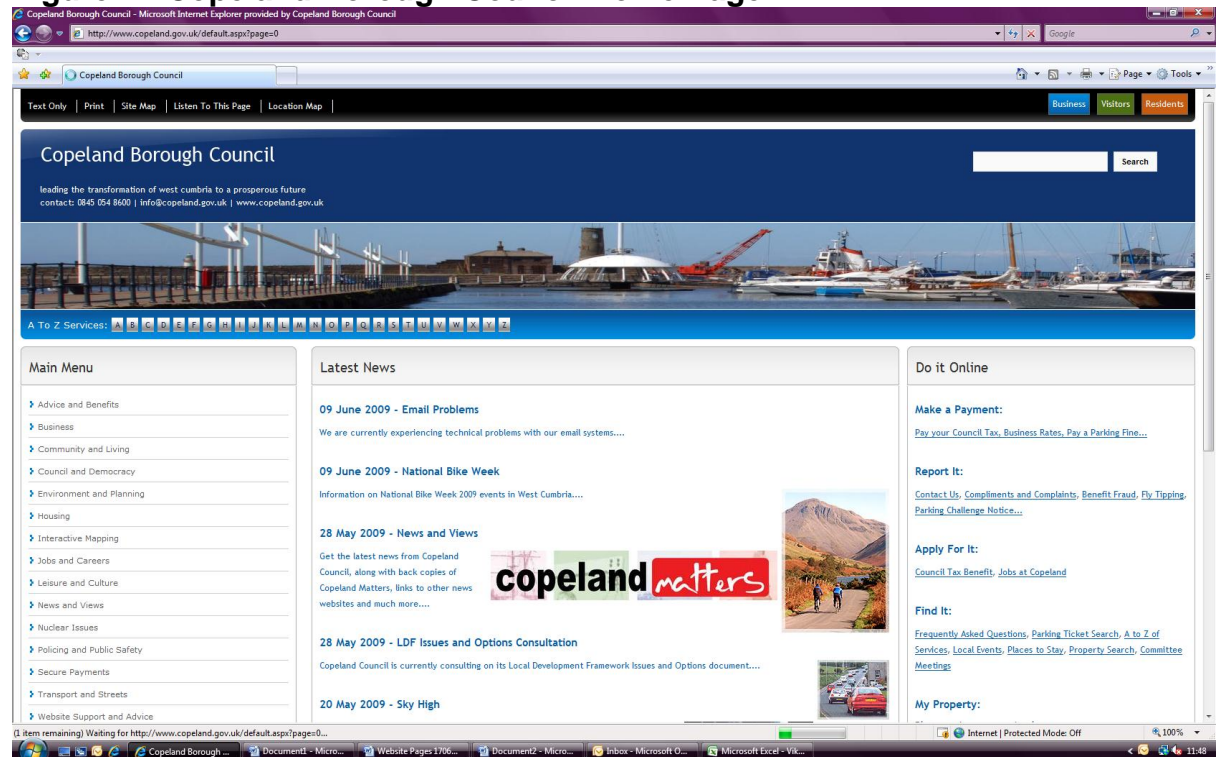


Figure 2: Planning Policy Pages of Copeland Borough Council website

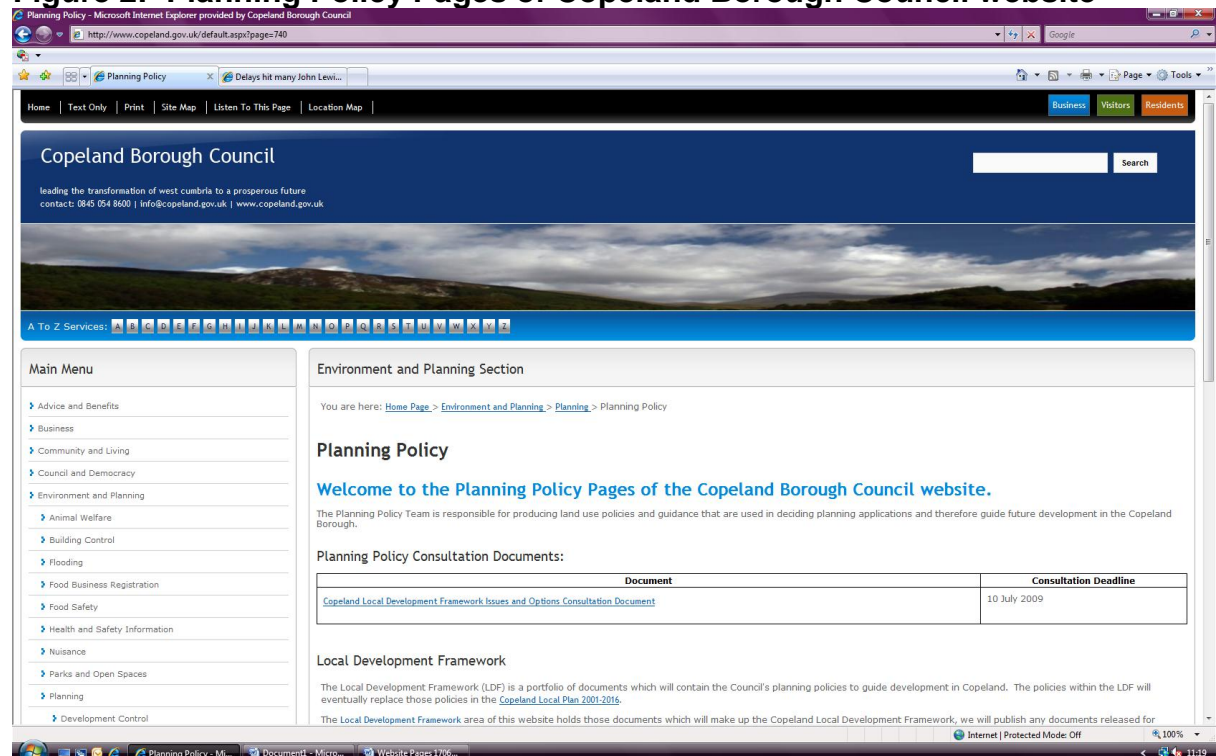
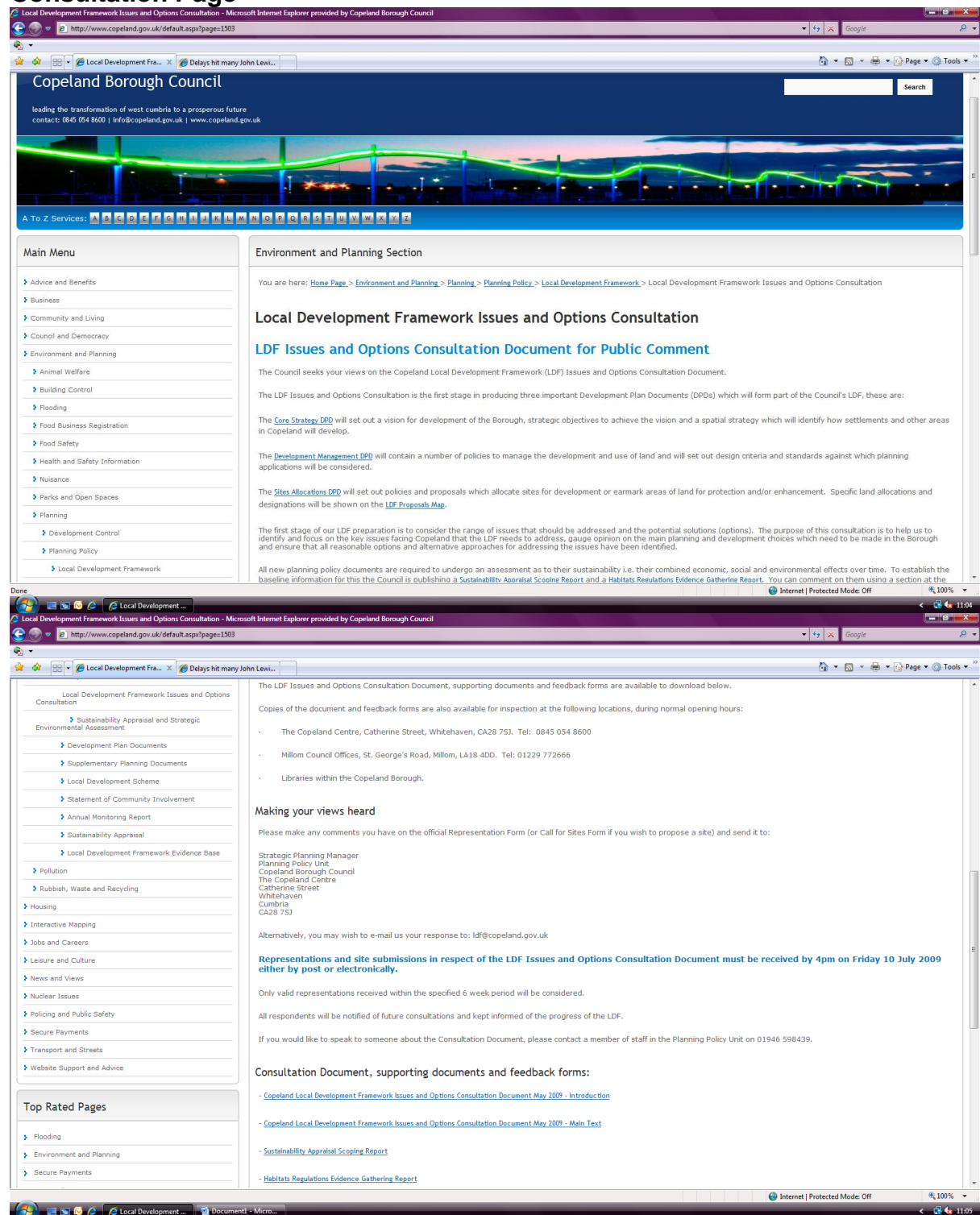


Figure 3: Local Development Framework Issues and Options Consultation Page



Appendix G- Copeland Neighbourhood Forums

The following Copeland Neighbourhood Forums were attended.

FORUM AREA	DATE OF MEETING	TIME
BOOTLE & SEASCALE	Tuesday 16 th June 2009	7.00pm
GOSFORTH & ENNERDALE	Monday 22 nd June 2009	7.00pm
BRANSTY & HARBOUR	Tuesday 23 rd June 2009	7.00pm
ARLECDON & FRIZINGTON	Monday 29 th June 2009	6.30pm
EGREMONT & ST. BEES	Tuesday 7 th July 2009	6.30pm
CLEATOR MOOR	Thursday 9 th July 2009	6.30pm
SOUTH WHITEHAVEN	Wednesday 15 th July 2009	7.00pm
HILLCREST & HENSINGHAM	Thursday 16 th July 2009	6.30pm
MILLOM	Monday 20 th July 2009	7.00pm
NORTH WEST COPELAND	Wednesday 22 nd July 2009	7.00pm

n

FROM THE STATEMENT OF COMMUNITY INVOLVEMENT

Executive Summary**Introduction**

The Planning and Compulsory Purchase Act 2004 introduced many changes to the planning regime operating in England and Wales – the work which in Copeland has previously been delivered under the “Local Plans” banner, will be replaced by the “Local Development Framework” (LDF). The Act’s reforms are intended to make the preparation of development plans and other non-statutory documents quicker and more flexible, with increased community involvement. Each local planning authority is required to produce a Statement of Community Involvement which sets out how and when the local community and stakeholders will be involved in the planning process.

The Local Development Framework consists of a number of development plan documents; at the local level the Council is responsible for the production of Local Development Documents. This document aims to set down how and when the Council will involve the local community and stakeholders in the production of Local Development Documents and also in the consideration of planning applications.

Planning Policy**Who will we consult?**

The Regulations for the Planning and Compulsory Purchase Act 2004 set down specific consultation bodies that must be consulted; these are listed in Section 8 of the SCI. The Council is committed to involving as many organisations, groups and individuals as possible in the planning process.

A database of Local Development Framework contacts has been created; this will be used to consult on the preparation of Local Development Documents where appropriate. The database will be maintained to ensure it is up to date. Anyone can request their details be added to/deleted from the LDF database at any time to receive consultation documents.

The Council is keen to engage those people who belong to traditionally under-represented groups, i.e. single parent families, young people, people from ethnic minority groups, homeless people, people with disabilities, people living in areas of deprivation or low income and people living in remote areas.

The Council will work with the West Cumbria Local Strategic Partnership to ensure close co-ordination of consultation between planning and the West Cumbria Community Strategy. We will endeavour to utilise to maximum effect the *Community Gateway* consultation network which is currently being developed, in particular an older person's forum, disability forum and a young person's network.

How will we consult you?

The Planning and Compulsory Purchase Act 2004 Regulations set down minimum public participation requirements which each local planning authority must comply with in the production of Local Development Documents which make up the Local Development Framework. The Council intends to meet the requirements in the regulations and, where possible, exceed these when both staff time and financial resources allow. The Council as a minimum will meet the following minimum requirements as set out in the regulations:

- Make copies of all documentation available for inspection during normal office hours at the council's principal office and other suitable locations for the duration of the six week consultation period;

- Place all documentation and supporting information on the council's website (www.copeland.gov.uk) with details of where and when the documents are available to be inspected;
- Send copies of relevant material to the Government Office and to each statutory consultee in accordance with the guidance in Planning Policy Statement 12: Local Development Frameworks (PPS12);
- Give notice by advertisement in local newspapers stating where and when documents can be inspected, how copies can be obtained, where to send representations and the closing date for representations.

The Council recognise that consultation methods may need to be tailored, we will identify the most appropriate methods of consultation for the specific Local Development Document by considering the characteristics of each sector of the community that will be involved. The following table identifies consultation techniques to be used for each type of Local Development Document:

	Statement of Community Involvement	Core Strategy	General Development Control Policies and Site Specific Allocations	1 Area 2 Action Plans	3 Supplem entary Planning Documen ts (SPD)
Consultation Drafts	✓	✓	✓	✓	✓
Council Website	✓	✓	✓	✓	✓
Neighbourhood Forums	✗	? (selected)	? (selected)	? (selected)	? (selected)
Presentations to Meetings	✗	?	?	?	?
Topic-based Focus Groups	✗	?	✓	✓	?

Exhibitions	x	?	✓	✓	?
Leaflets, Posters & Letters	?	?	?	?	?
Questionnaire	✓	?	?	?	?
Media	✓	✓	✓	✓	✓
Planning for Real	x	?	?	?	?

✓ - Yes x - No ? – Possible, where relevant, and resources allow

How will we report back to you?

In addition to the formal consideration of Local Development Documents by the Executive, meetings of the Local Development Framework Working Party will be held where necessary to examine issues involved in the preparation of Local Development Documents and advise the Executive accordingly. We will publish on our website and make available copies of all representations received at our main offices and the Council's response and justification.

Representations received will be acknowledged. Consultees who have submitted comments will be informed of the Council's intended response. This information will be made available to view on the Council's website, the Council's offices at Whitehaven and Millom and at libraries in the Copeland Borough.

The Council will notify those who submit representations and those who request to be notified of the submission of a Local Development Document to the Secretary of State and then of its adoption.

**COPELAND CORE STRATEGY AND
DEVELOPMENT MANAGEMENT POLICIES
PUBLIC EXAMINATION**

**SCHEDULE OF
SUGGESTED
MINOR CHANGES**

September 2012

Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
1	n/a	n/a	Pages 6, 13, 30, 37, 178	Replacement of 'Major Infrastructure Planning Unit' by 'National Infrastructure Directorate'	Updating to reflect name change since the Directorate became operational.
2	37/S030	Sainsbury's	Page 14.	<p>New paragraph 3.3.19 Copeland needs development to modernise and diversify the economy and to provide a better range of housing and a better quality of life for our people, whilst respecting and nurturing our exceptional environment. The Borough Council believes in working proactively with applicants to enable development to be approved which will achieve this. This plan is pro-development and should be read as supporting the presumption in favour of sustainable development contained in the National Planning Policy Framework.</p> <p>Delete second sentence from former 3.3.19 (now 3.3.20) to avoid repetition.</p>	<p>Insertion of adaptation of PINS 'model' wording, to clarify explicitly that the plan supports the presumption in favour of sustainable development.</p> <p><i>Although we reviewed the Plan against the NPPF before it was published, and concluded that, as a pro-development plan, it met the NPPF including the 'presumption ins favour of sustainable development', this was before the 'model wording' was published. The suggested changes 2, 3 and 4 represent our adaptation of those words to the format and style of the plan. They refer to adopted national policy and therefore we consider that they can be regarded as minor changes, not material additions in policy terms.</i></p> <p>See also the following two proposed changes.</p>
3	37/S030	Sainsbury's	Policy DP1, page 19	Add at end of policy: Planning applications that accord with these principles and relevant Development Management policies, and do not undermine the	Insertion of adaptation of PINS 'model' wording, to state the obvious.

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Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
				Spatial Development Strategy, will be approved without unnecessary delay, unless material considerations indicate otherwise.	
4	37/S030	Sainsbury's	Page 137	New paragraph 10.1.2 Where there are no policies relevant to an application, or relevant policies are out of date at the time of making the decision, the application will be assessed against national planning policy contained in the National Planning Policy Framework. The Council will grant permission unless the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, or other material considerations indicate that the application should be refused.	Insertion of adaptation of PINS 'model' wording, to clarify explicitly that the NPPF will be used in decision making on matters where the plan is silent.
5	37/S033	Sainsbury's	Page 19 para 3.4.3 Page 35 para 4.3.1 Page 67 para 7.2.3	Removal of relic references to PPSs which were missed when the plan was reviewed against NPPF	Updating.
6	45/S051	Sport England	ST4A page 29	Add: and has the capacity to meet the additional demand,	Clarification <i>Although it could be argued that this is implicit, we agree that the sense of the policy is improved by this addition. As the intent of</i>

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Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
					<i>the policy is not altered, we consider this to be appropriate as a minor change.</i>
7		Cumbria County Council	ST4B page 29	Deletion of 'mitigatory'	Clarification <i>The County Council has correctly pointed out that contributions might legitimately be sought that went beyond being merely 'mitigatory'. The Developer Contributions SPD will take the clarification further.</i>
8	37/S031	Sainsbury's	ER7 page 44	Add to para 4.7.4: However, it may be that there will be proposals for development of retail and other town centre uses not in an existing centre. Such applications will be dealt with in accordance with national planning policy (NPPF paragraphs 24-27); that is, applying the sequential test allowing out-of-centre development only when preferable centre or edge-of-centre sites are not available, and requiring impact assessments on developments over the default threshold of 2,500 m ² .	To clarify explicitly that, the policy being silent on the matter, decisions on out-of-centre proposals will be dealt with according to the 'default' in NPPF. <i>The approach here reflects the local circumstance that there is no perceptible demand for development of a size that could not be accommodated within town centres or anticipated boundary extensions. (The 2006 Local Plan likewise did not incorporate a sequential test in policy, and up to now no representor has suggested that this is an issue.) However, this objection leads us to conclude that it would be sensible to make the position clear, and that this can be done in the text to avoid the policy being made repetitive of national policy. Note that NPPF does not require that there be a local policy on sequential test and impact assessment thresholds. As this is a text reference to adopted national policy, we consider the</i>

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Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
					<i>change is minor and not material in policy terms.</i>
9	37/S034 28/S085 27/S093	Sainsbury's Cleator Moor and District Chamber of Trade RW & E Mulholland	ER9 page 46	Add at end of policy: Appropriately-scaled retail and service development which promotes the vitality and viability of rural settlements will be supported.	Clarification that the intent of the policy is not restrictive. <i>This policy was not intended to be read as being unsupportive of new retail or service development in villages. However, we would also not wish it to be read as allowing development which might be out of scale with those villages or lead to the competitiveness of larger centres being undermined. So, rather than use the simple words 'enhance' or 'improve' as suggested, we propose the additional sentence. This is in our view legitimate as a minor change, as it does not alter the sense of the policy – note that it is consistent with the interpretation of settlement hierarchy in ST2/Fig. 3.2.</i>
10	n/a	n/a	Text box page 47	Add: and Retail Assessment Addendum Report (2011)	Insertion of evidence base document omitted from information on policy background.
11	21/SO58	Tesco Stores	Policy ER9	'meet the needs of local residents' replaced by 'serve local communities'.	To avoid the implication that a 'needs test' is being applied surreptitiously. The change does not alter the intent, and is unlikely to alter the effect, of the policy.
12	39/S013	National Trust	ER10C, page 48	Add: character of allocated Tourism Opportunity Sites, the area surrounding them of the surrounding area or public access thereto,	Amendment to improve the sense of the policy. <i>The Trust correctly points out that the policy as drafted implied that it was concerned about</i>

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Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
				Delete: on allocated Tourism Opportunity Sites	<i>the character of the surroundings of the sites and not the sites themselves, which was not its intention.</i>
13	8/S126	Cumbria Tourism	ER10F, pages 48/49	Change 'Tourist Board' to 'Tourism' in ER10F and add the Tourism Strategy to the evidence box	Updating amendment.
14	29/S100	Theatres Trust	Para 5.5.2 Policy SS4, pp. 58/59; DM21 page 159.	Add 'theatres' to list in 5.5.2 5 th bullet point Add 'and cultural' in two relevant places in SS4 (title and SS4D). Delete 'community' in SS4C (to make the reference comprehensive)	To make it clear that the policy covers cultural facilities. <i>In our view 'community' encompasses 'cultural'. However, we are persuaded that it makes sense to make it explicit that the policy does cover cultural facilities. This reflects NPPF para. 70, and since it makes the policy more consistent with the NPPF and does not add to the policy's intent, we consider it is an appropriate minor change.</i>
15	45/S052	Sport England	Para 5.5.2 page 58	Typographical correction to 7 th bullet point	Typographical correction
16	45/S051	Sport England	Para 5.5.7 page 59	Add: For open space, sports and recreational buildings and land, including school playing fields, the criteria of NPPF paragraph 74 will apply: <ul style="list-style-type: none"> an assessment must be undertaken to show that they are surplus to requirements; or the loss would be replaced by equivalent or better provision in 	To make it clear that there are special criteria to be brought into play when sports facilities might be lost. <i>We are persuaded that this addition is sensible, to make sure that the policy does not intend to dilute the provisions of para. 74. As this addition reflects the NPPF and does not alter the policy's intent, we consider it appropriate as a minor change.</i>

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				a suitable location; or <ul style="list-style-type: none"> the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. 	
17	38/S143	Cumbria County Council	Policy T1B page 63	Alteration to bullet point in T1: A595 capacity improvements to <u>the A595</u>	In the interest of accuracy. <i>The County Council points out that the improvements proposed go beyond capacity improvements</i>
18	16/S063	Allerdale Borough Council	Policy T1C page 63	Refer to Port of Workington. Response: add (to be more precise) 'employment zones in and Port of' before the name of the town.	Agreed that this point should be more specific as referring to employment/infrastructure assets in Workington, rather than the town as a whole.
19	8/S126	Cumbria Tourism	ER10F, pages 48/49	Change 'Tourist Board' to 'Tourism' in ER10F and add the Tourism Strategy to the evidence box	Updating amendment.
20	38/S143	Cumbria County Council	Para 6.2.6 page 65	Delete 'mitigatory', insert 'appropriate'	Clarification <i>The County Council points out that, as Highway Authority, it might legitimately seek contributions for works which are not solely mitigatory. The Developer Contributions SPD will take the clarification further.</i>
21	38/S145	Cumbria County Council	Policy ENV3 page 69	Insert 'UK and' before 'Cumbria' in first sentence; Add 'and stepping stones' to ENV3E.	To express more accurately the intent and coverage of the policy.
22	28/S086	Cleator Moor Chamber	Table 6.1,	Add River Ehen (Ennerdale Water)	Correction of omission

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	27/S094	RW&E Mulholland	page 70	to Keekle confluence to list of SSSIs	
23	38/S145	Cumbria County Council	Table 6.1, page 73	Add reference to Cumbria Biodiversity Evidence Base	To assist the reader in search of fuller information.
24	n/a	Internally generated	Table 6.1, page 70	Delete 'of', insert 'for'	Correction
25	88/S131	Seascale Parish Council	Paras. 8.5.18/8.6.13 pp. 111/117	Move reference to Seascale Community Plan from 8.5.18 to 8.6.13	Correction
26	65/SO01	Haile and Wilton Parish Council	Para. 8.5.18	Correct date of Parish Plan to 2011	Updating
27	88/S136	Seascale Parish Council	Paragraph 8.6.8 page 114	Insert Drigg and Sellafield stations.	Correction
28	79/S047	REG Windpower	Policy DM2 page 140	Insert new first sentence of policy: "Renewable energy development will be encouraged and planning permission granted where ..."	To better align the intent of the policy with NPPF. We accept that the current wording appears negative, which is not the intention.
29	38/S145	Cumbria County Council	Policy DM25 page 163	Alterations to policy to make it clear that it applies to priority as well as statutorily protected species	In the interest of accuracy and clarity.
30	38/S145	Cumbria County Council	Para. 10.5.6 page 164	Delete word 'occasionally'	Accepted that this might be misleading as such occurrences could be frequent in some areas.
31	79/SO48	REG Windpower	Policy DM27 page 165	Insert 'significant' before 'adverse effect'	To better align the policy with NPPF
32	82/SO55	The Woodland Trust	Policy DM28 page 167	Insert reference to protection of ancient woodland and veteran trees	To correct an omission in the policy bringing it more in line with the NPPF (para 118).
33	n/a	Cumbria County Council	Glossary	Insert definition of green infrastructure	Amendment accepted in previous ('preferred options') consultation but omitted in error

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Change ref.	ID/Rep. no.	Representor	Policy/text	Suggested change	Justification
					from published document.
34	38/S145	Cumbria County Council	Glossary pp. 178, 182	Add 'greenspace' to definition of infrastructure and definition of 'stepping stones'	(1) For greater consistency with definitions elsewhere. (2) Reference to term inserted in ENV3.
35	38/S143	Cumbria County Council	Appendix 3 page 185	<p>Delete 'TSP7' and insert 'T1 and DM22'.</p> <p>Various changes to thresholds for development subject to Transport Assessment and Travel Plans.</p> <p>Add to end of Appendix: - And for other types of development in accordance with national guidance.</p> <p>The Borough Council will expect Transport Assessments and Travel Plans to be consistent with national guidance, currently <i>Guidance on Transport Assessment and Good Practice Guidelines: Delivering Travel Plans through the Planning Process</i>.</p>	<p>To update and to be consistent with national guidance thresholds and other advice.</p> <p><i>The County Council has advised that Appendix 3 as it stands, which was taken forward from the Local Plan, is not consistent with the thresholds in national guidance (published in 2007, the year after the Local Plan was adopted). There is no evidential justification for departing from the thresholds. As the purpose of this change is to adjust the appendix to make it compatible with national policy, we do not consider the change to be material.</i></p>