



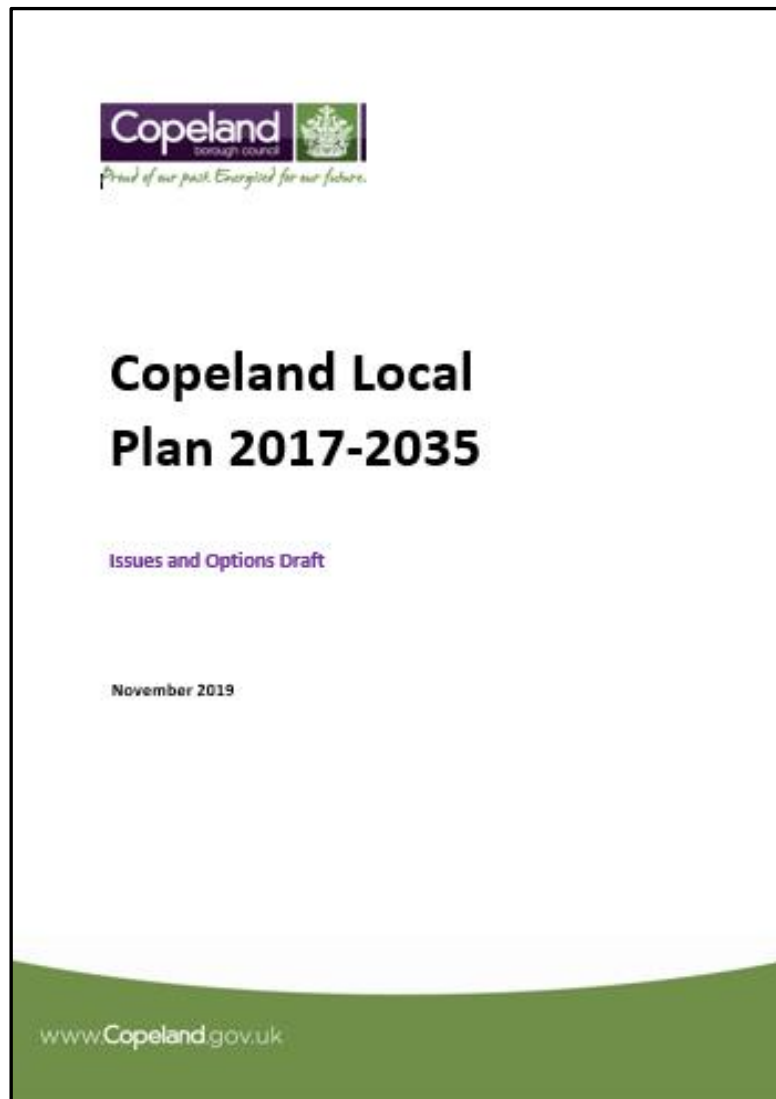
*Proud of our past. Energised for our future.*

# Copeland Local Plan 2017-2035

## Issues and Options Consultation Response

### Report

April 2020



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# 1. Introduction

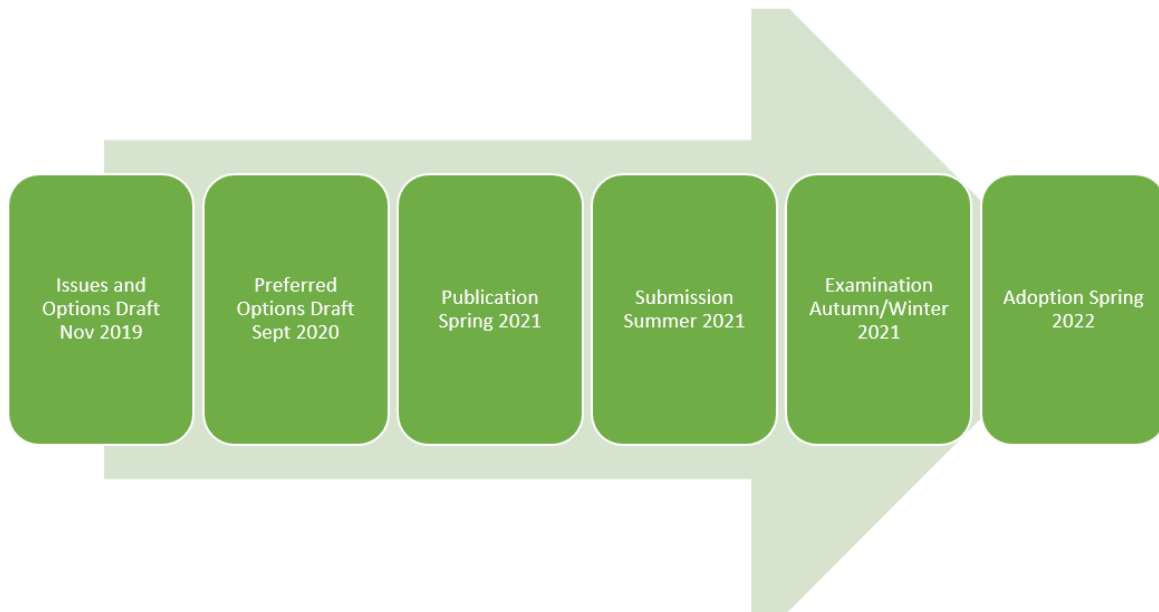
## Purpose of the document

- 1.1. The Issues and Options Response document has been prepared in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It provides a summary of the preparation of the Copeland Borough Council Issues and Options consultation process and the representations received as a result of this. This will provide an understanding of the opinions of the public and key stakeholders surrounding key issues within the borough, which will contribute towards the development of the next stage in the Local Plan process, the Preferred Options.

## New Local Plan

- 1.2. The Copeland Borough Council Local Plan 2017-2035 is currently being produced. This will set out the vision for the future of the Borough and the policies that will contribute towards achieving this. The plan will cover key development topics, including housing, employment, retail, infrastructure and services, transport and community provision. This will be used when determining planning applications in the future. Upon adoption, the Local Plan will replace the Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies DPD. The timetable for the production of the Local Plan can be seen below:

Figure 1: Local Plan Timetable



## Issues and Options Consultation

- 1.3. Copeland Borough Council published a draft Issues and Options report in November 2019 as part of the preparation for the emerging Local Plan 2017-2035. The Issues and Options draft is the first formal stage in preparing for the emerging Local Plan, setting out the key issues being faced within Copeland, and the potential options for improving these.
- 1.4. The Council consulted on the Issues and Options draft between the 25<sup>th</sup> November 2019 and the 20<sup>th</sup> January 2020. This involved inviting residents, business, key stakeholders and the wider community to make representations in line with the Statement of Community Involvement.<sup>1</sup>
- 1.5. The responses gained through the consultation contribute towards and inform the development of the next stage of the Local Plan process, the Preferred Options. This sets out the Council's preferred options for sustainable growth and development within the borough, and how we will address key issues and challenges.
- 1.6. This report sets out the process for carrying out the consultation and the strategies used for meaningful engagement as well as an overview of the responses received for each question within the document.

## 2. Structure of the document

- 2.1. This chapter sets out the structure of the rest of the document.
- 2.2. The following section outlines the methodology taken when carrying out the consultation process and each of the engagement strategies that were utilised.
- 2.3. The final and main part of the report surrounds the responses gained as a result of the consultation. This first outlines the number of respondents, their method of response and the capacity they responded in (e.g. whether they are members of the public, developers, public bodies etc. All names and personal information has been protected for GDPR reasons.
- 2.4. Following this, the report goes into individual detail surrounding every question within the consultation draft. This outlines the number of respondents, the option they selected, an overview of the most popular opinion and any additional comments which may impact on the option selected.
- 2.5. It is important to note that just because an option was favoured by respondents does not necessarily mean it is the route that the council will go down. Other factors will also contribute towards the decision making process, including evidence base documents and the sustainability appraisal, which will look at the impact of the options on a range of economic, environmental and social sustainability indicators. These will all contribute to making an informed decision surrounding the most suitable option to take.

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<sup>1</sup> The Statement of Community Involvement (SCI) sets out how the Council will engage the community in Planning processes. The current version was adopted in 2016, and is currently being rewritten to reflect changes in policy as well as restrictions surrounding the Covid- 19 pandemic. The SCI can be viewed online at <https://www.copeland.gov.uk/content/statement-community-involvement>

- 2.6. Given the length of the document, the full wording of each question has not been replicated. This response document should be read in accordance with the Issues and Options Draft.

### 3. Consultation methodology

- 3.1. The Issues and Options Consultation aimed to allow for a wide audience to engage in the process, particularly where it encouraged participation of under-represented groups. It also encouraged businesses and stakeholders to enrich the Local Plan with their expertise and local insight. The Council produced a questionnaire for respondents to use, which was available to fill in online through the CBC website and as a Survey Monkey form. There were also paper copies available at the deposit locations listed below.
- 3.2. A wide range of engagement methods were used to promote the Issues and Options consultation document in order to engage with as many key stakeholders as possible. These are as follows:

#### **Hard Copies**

- 3.3. All consultation documents were made available to view at the following locations:

- Copeland Borough Council Market Hall, Whitehaven
- Copeland Borough Council Offices, Millom
- The Beacon Museum, Whitehaven
- Whitehaven Library
- Cleator Moor Library
- Egremont Library
- Frizington Library
- Gosforth Library

#### **Website**

- 3.4. The Issues and Options draft and supporting documents were available to view on the Council's website during the consultation period. This included the response questionnaire, evidence base documents and advertising materials such as posters and leaflets. An example of this is the poster seen in Appendix 5.

#### **Social media**

- 3.5. The consultation was publicised through social media platforms, including on Facebook (six posts) and Twitter (four posts). Each post focussed on a different aspect of the consultation, including Housing, Climate Change and Town Centre Regeneration.
- 3.6. The Facebook posts reached a total of 22,719 people. The highest reaching post was the one relating to town centre regeneration, which reached a total of 10,442 people. This can be seen in Appendix 4.

### **Emails and letters**

- 3.7. Emails and letters were sent directly to all contacts on the Local Plan consultation database to inform them of the document and how to get involved.
- 3.8. The database currently contains approximately 560 consultees, including statutory consultees, local businesses, Councillors and members of the public<sup>2</sup>.

### **Press releases and articles**

- 3.9. Two press releases were issued, one at the start of the consultation and another close to the end. This generated three articles in the Whitehaven News and the News and Star, which advertised the consultation and how to get involved. These can be seen at appendices 1,2 and 3.
- 3.10. The consultation was featured in the resident's publication, Copeland Matters, in December and January editions, the Members Update every week during the consultation, and in Copeland Chat in December and January editions.

### **Workshops**

- 3.11. Workshops were organised for members of the Local Development Framework Panel of Councillors to find out more about the options and ask questions prior to the consultation. The Strategic Planning team also gave a presentation at the Copeland Housing Partnership meeting in January 2020, which is attended by developers and partners, including registered providers.

### **Leaflets and Posters**

- 3.12. Leaflets and posters that advertised the consultation and how to get involved were distributed to the Council offices and local libraries, as well as being available to view online. An example of an information poster can be seen at Appendix 5.

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<sup>2</sup> Anybody can request to be added to or removed from the Local Plan Consultee database. If you would like to be kept informed of emerging Local Plan documents, please contact the Strategic Planning team at [ldf@copeland.gov.uk](mailto:ldf@copeland.gov.uk) or 01946598300

## 4. Results of the consultation

### Introduction

4.1. There were 43 respondents to the Issues and Options Consultation. Three of these responded through Survey Monkey, with the remaining 40 either emailing or sending letters with their response. Whilst most people used the questionnaire provided, others submitted their response in their own format that only considered the issues relevant to them. These have been summarised in the comments sections. The number and percentage of each type of respondent is listed in table 1.

Table 1: Respondent types

Type of respondent	Number	Percentage
Public	9	21%
Developers	2	4.70%
Planning consultants	5	11.60%
Government/ public body	13	30.20%
Councillor/ MP	10	23.30%
Business	1	2.30%
Other	3	7%
Total:	43	

## Vision and Objectives

**Question VO1: Is the Vision for Copeland still appropriate? Should this be carried forward into the new Local Plan? Is there anything else which should be included within the Vision?**

### **Summary of responses:**

There were 22 responses to this question. Nine respondents stated that the vision and was still appropriate and did not suggest any changes. The key alterations that were suggested were as follows:

- No mention is made to housebuilding
- Improved reflection of the opportunities faced by the nuclear industry
- The need for an enhanced housing offer and increased delivery, particularly in Millom
- Disappointment at 'environmental responsibility' being at the bottom of the list
- A need to 'mitigate against' as well as 'adapt to' climate change
- Enhancing the importance placed on the Lake District National Park and St Bees Heritage Coast
- More emphasis on improved connectivity in rural settlements
- The protection of greenfield should be more prevalent
- Addition of cultural infrastructure
- The vision currently makes no reference to a range of quality leisure facilities
- Consideration for weighing up housing need with energy innovation and overall viability



**Question VO2: Are these objectives still appropriate? Should they be carried forward into the new Local Plan? Is there anything else which should be included?**

**Summary of responses:**

There were 24 responses to this question. Six respondents expressed support for either some or all of the objectives, with no suggested alterations. The key alterations suggested by other respondents were as follows:

- Upgrade local housing stock and utilise empty homes
- Emphasise the need for growth to be focussed in the four main towns
- The importance of the Lake District National Park and St Bees Heritage Coast need to be emphasised.
- More emphasis for the support of the nuclear mission
- More emphasis on growth in the south of the borough e.g. Millom
- Needs reiterating that the Local Plan does not relate to areas of the borough within the Lake District National Park.
- Suggestions for a policy which states that Intermediate and High Level nuclear waste will stay within Copeland.
- Addition of hydrogen co-generation as an example of low carbon energy
- Emphasis on expansion of the Cleator Moor Industrial site at Leconfield and the Energy Coast Industrial Park
- Improved emphasis on promoting tourism
- Promoting opportunities for Physicians and Nurses
- Enhanced arts, entertainment and quality of life experiences for young people
- Development in lower tier settlements should be encouraged as a demonstration of support for market led residential development
- Reference should be made to supporting high standards of educational attainment
- Recognise the importance of the natural environment within mitigation and adaptation to climate change
- Increased emphasis on green infrastructure provision
- Ambition to provide a nature recovery network
- Importance of safeguarding mineral reserves and infrastructure when determining planning applications
- Enhancing links with neighbouring boroughs
- More focus on rentable properties
- Improved transport links and communications infrastructure in rural areas
- Movement of business focus away from the nuclear sector
- Currently no references to health and wellbeing.

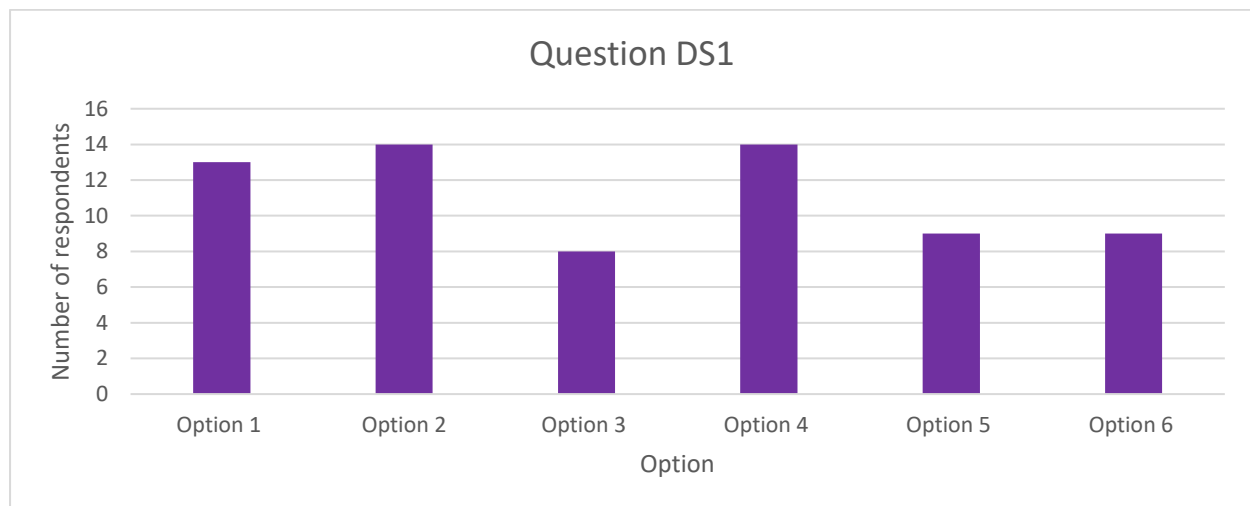
Several responses suggested alterations to the wording of objectives. These have been taken into account within the Preferred Options report.

## Development Strategy

### Question DS1: Which key principles should be included within the Council's Development Strategy?

#### Summary of responses:

Whilst there were 22 respondents for this question, only 16 responded with the options provided. These were as follows:



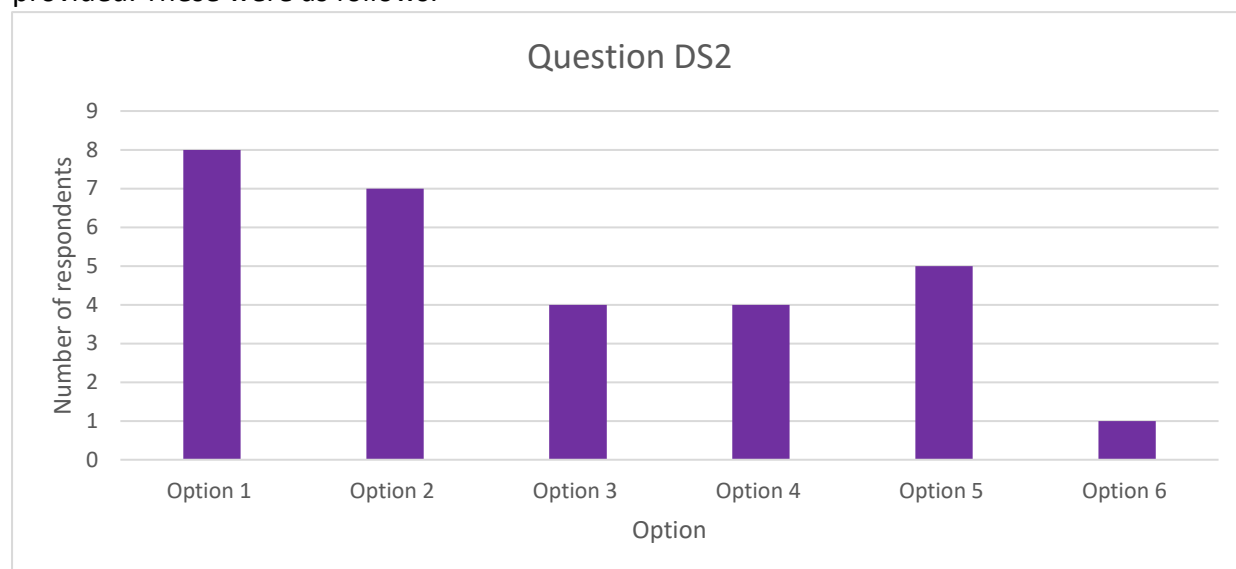
Three respondents stated that they supported the inclusion of all options within the development strategy. The other options which were suggested by respondents included:

- Inclusion of the provision of infrastructure to meet the demands of new development
- Emphasis on cross- boundary partnerships
- Focus growth in the borough's four towns
- Flexibility to encourage future growth in the nuclear industry. Articulate the difference between the Sellafield site boundary and the settlement boundaries
- More reference to the protection of natural, cultural and heritage assets
- Inclusion of hydrogen as a low carbon development
- Improved connectivity to the Sellafield site, particularly by rail
- Reference should be made to the provision of green infrastructure and biodiversity net gain
- Improved reference to communications
- Sustainable rural development
- Economic diversification
- Greater emphasis on regeneration within the borough's four towns
- Promotion of development that enables residents to live healthier lives

**Question DS2: Which methods are likely to be the most effective in enabling the delivery of the Council's strategic regeneration priorities?**

**Summary of responses:**

Whilst there were 15 responses to this question, only 12 responded with the options provided. These were as follows:



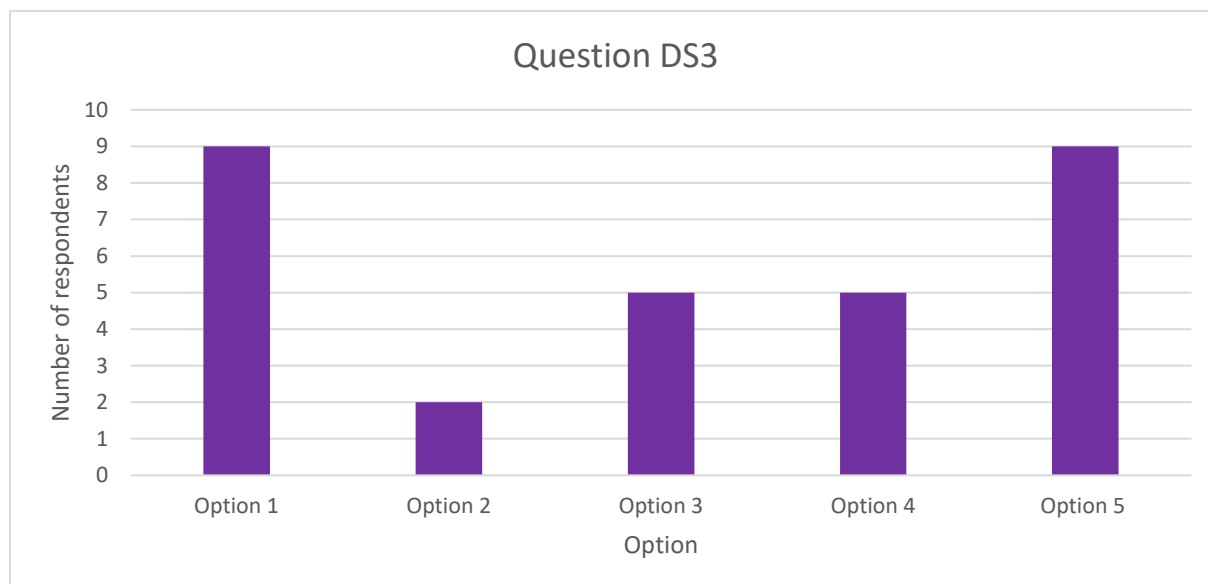
Other suggestions made by the respondents were as follows:

- Markets should not be relied on exclusively
- Market demand should be responded to on strategic sites to prevent policies from becoming too restrictive
- Priorities should be given to areas outside of Whitehaven
- Strategic regeneration policies should be underpinned by the need to mitigate against and adapt to climate change and prevent ecological collapse
- Regeneration policies should be more flexible to reflect changing circumstances and priorities

### Question DS3: What type of settlement hierarchy should the Local Plan contain, if any?

#### Summary of responses:

Whilst there were 20 responses to this question, only 17 responded using the options provided. These were as follows:



6 respondents expressed their preference for Option 1 in the comments. Other suggestions made by the respondents include:

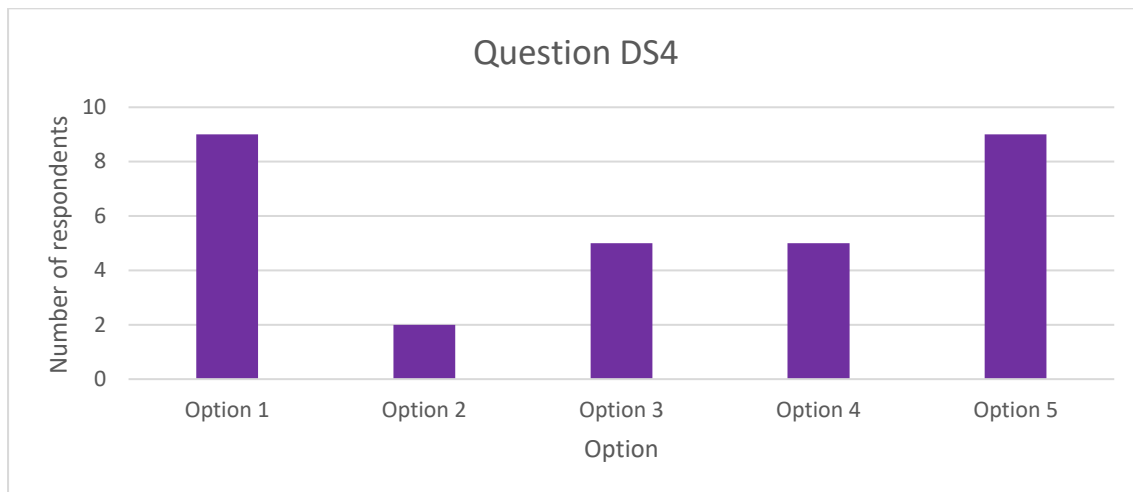
- Options 1,2 and 3 disadvantage Gosforth and similar parishes<sup>3</sup>
- Emphasis on the importance of focussing development in Millom
- Environmental capacity should be taken into consideration when determining the hierarchy
- Sustainable villages may be difficult to sustain. The need for convenience stores and places of worship are changing rapidly
- Option 1 ensures environmental protection
- There should be no Principal Town, all towns are equal

<sup>3</sup> NB: Gosforth is in the Lake District National Park and is therefore outside of the Copeland Local Plan's planning remit

#### Question DS4: How should the Local Plan define Sustainable Villages?

##### Summary of responses:

There were 15 responses to this question, with only 11 using the responses provided. These were as follows:



Other responses made to question DS4 include:

- An assessment of sustainability should not be limited to a service threshold, but also the proximity to services, employment and other settlements
- Individual 'sustainable settlements' ought to be listed within the strategy to ensure clarity surrounding their role and function
- The definition of 'frequent bus service' ought to be stated
- The definition of a sustainable village should be similar to that used by the Lake District National Park Authority
- Consideration of drive time to sustainable villages considering most people drive to reach their needs
- Inclusion of ease of access to sports and leisure facilities

**Question DS5: If Sustainable Villages are identified in the Local Plan what key services they should include?**

**Summary of responses:**

11 people responded to this question. Their responses were as follows:

	Question DS5- option number									
Priority Ranking	1	2	3	4	5	6	7	8	9	10
1	9	0	3	1	0	1	0	0	0	0
2	0	2	3	3	0	0	0	0	0	1
3	0	3	2	2	0	1	0	0	0	1
4	1	0	0	3	2	0	1	0	0	1
5	1	1	0	0	3	2	0	1	0	0
6	0	0	2	1	0	4	0	0	0	0
7	0	0	0	0	1	0	2	2	0	0
8	0	0	0	0	0	0	1	0	2	1
9	0	0	0	0	0	0	1	0	1	1
10	0	0	0	0	2	1	0	0	0	0
Not Ranked	0	5	1	1	3	2	6	8	8	6

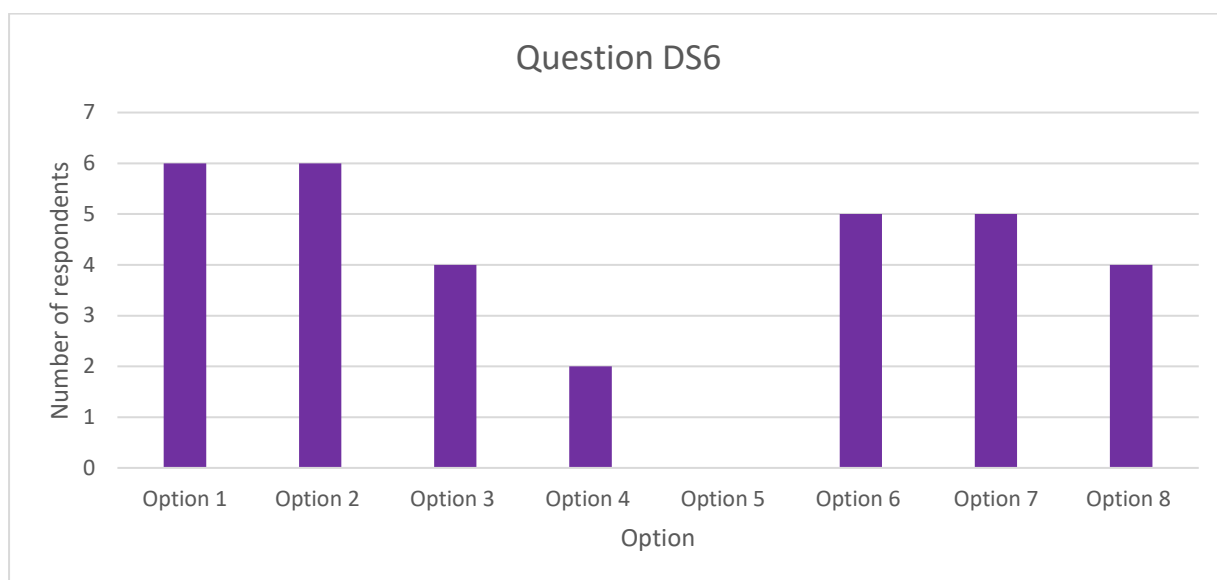
Additional suggestions made as part of this question are shown below:

- Public transport, including rail and bus routes, should be prioritised
- Flexibility needs to be incorporated into this to respond to changing circumstances
- The availability of libraries, nurseries, doctor surgeries and dental practices in every village is not commercially viable.
- Community halls, public houses and places of worship are not usually considered necessary today.
- The Council should consider the contribution that additional homes make towards supporting service provision

### Question DS6: How should Employment, retail and housing development be distributed across the borough?

#### Summary of responses:

There were 17 responses to this question. The following graph shows the frequency that options were selected by respondents:



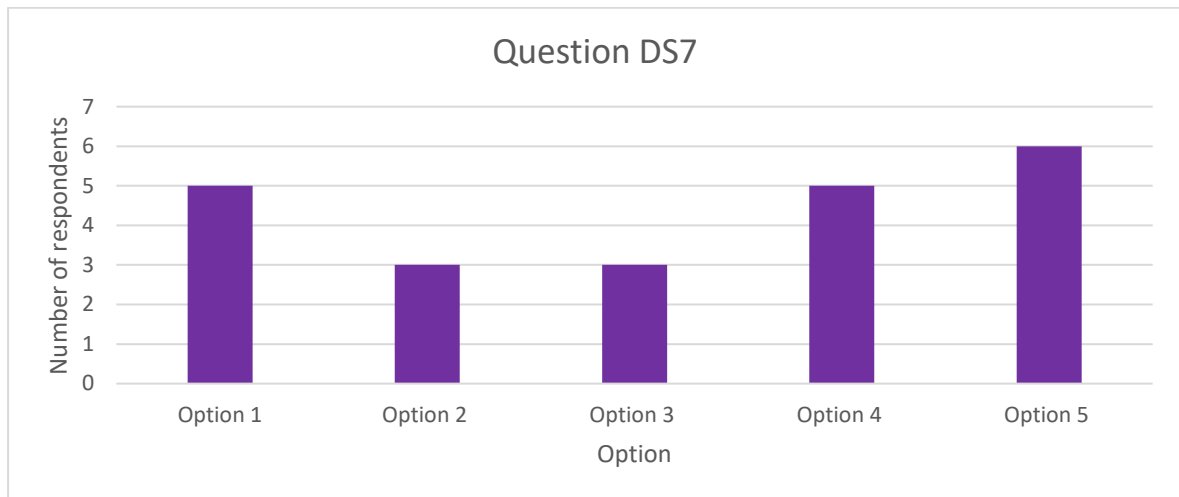
Several additional suggestions were made by the respondents:

- The focus of delivery of new homes in Whitehaven should be retained
- Millom has been overlooked in terms of development and has not fulfilled its potential, resulting in decline- suggests 15% of housing growth is directed to Millom to prevent a divide between the north and south of the borough.
- Approach should reflect the environmental and infrastructure capacity along with existing and expected service and facility availability levels
- No proportions should be predetermined
- Allocation should not be arbitrary or relate to a formula but should be based on a case by case set of needs
- Whichever option is selected, it is imperative that it is demonstrated to be deliverable and viable over the plan period

**Question DS7: Should additional housing development be supported once the housing requirement figures have been met for the lower tiers of the settlement hierarchy?**

**Summary of responses**

19 people responded to this question, with only 13 using the options provided. The responses were as follows:



Other suggestions provided by the respondents were as follows:

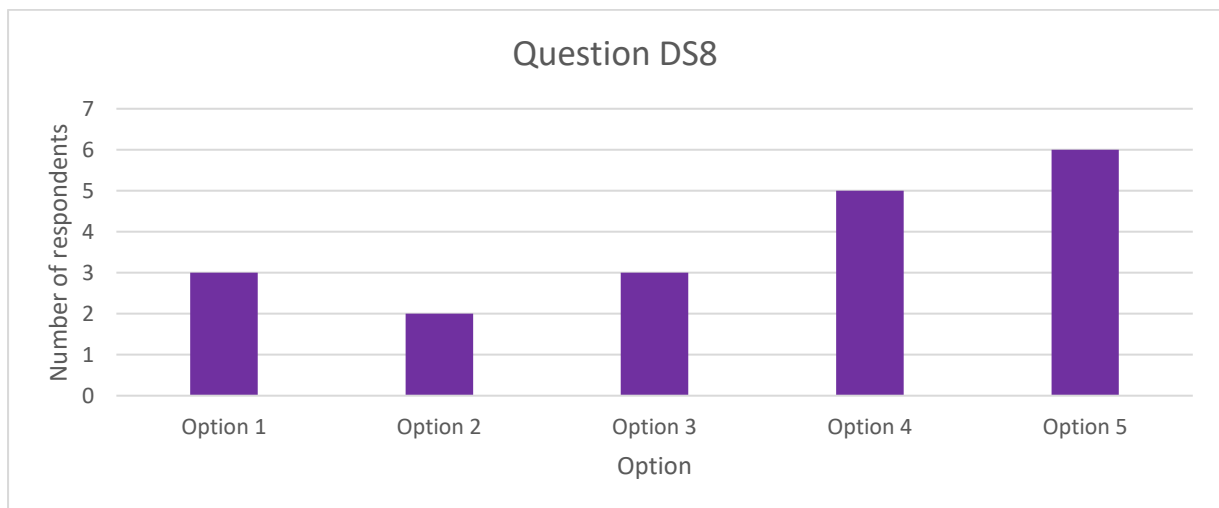
- Additional housing within the lower tiers of the hierarchy should be approved where they meet an identified market, affordable or elderly needs in the Borough.
- The plan should be flexible about additional growth where it is sustainable to do so, particularly for the larger settlements
- Meeting genuine needs, whilst taking environmental and infrastructure capacity into account should be the priority across the hierarchy, particularly in the lower tiers.
- Growth beyond the need can be dangerous. Excessive development can result in recession and property value decline
- Plans must set out a minimum requirement rather than an upper limit on development to ensure that development that accords with the Local Plan is not restricted where there is an identified need.
- Additional housing development as set out in option 6 should only be considered where there are no issues raised in regard to conservation or heritage impacts, and where there is environmental and infrastructure capacity
- Additional housing development should continue to be supported once the housing requirements have been met for the lower tiers of the settlement hierarchy



**Question DS8: Which of the following housing growth options should be supported around Whitehaven?**

**Summary of responses:**

13 people responded to this question, with only 8 using the options provided. These were as follows:



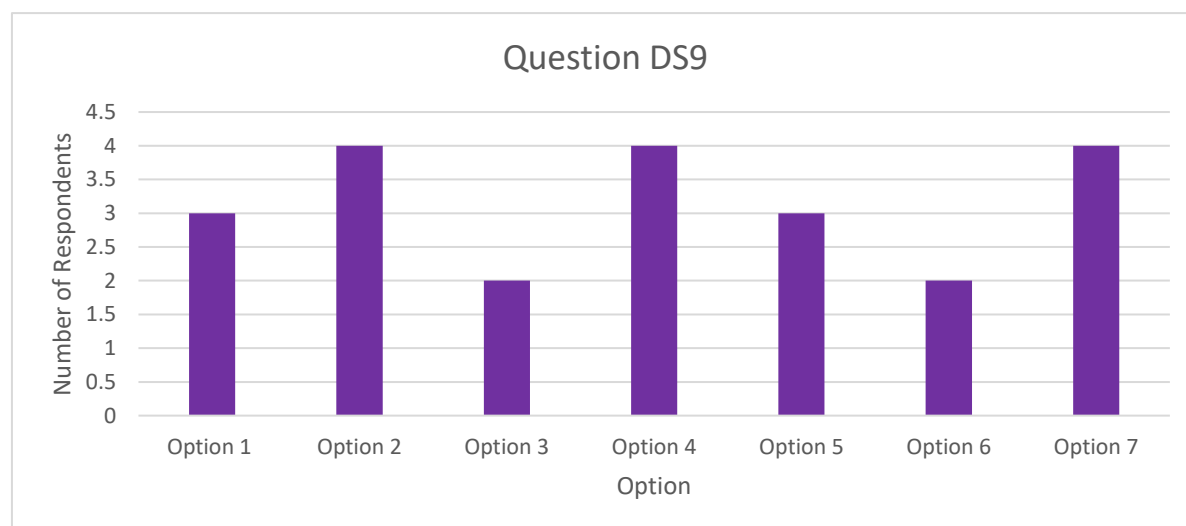
Several other suggestions were made by respondents. These include the following:

- Existing infrastructure provision should be the highest priority
- Option 5 is the least likely option to merge with other settlements whilst providing the most regeneration benefits. It will also require less use of greenfield land than the other options
- Any development outside of the boundaries of the Marchon works in option 5 would have a significant impact on the St Bees and Whitehaven Heritage Coast. Similarly, Option 2 relates to a part of the coast that is largely undeveloped.
- Growth in Whitehaven should be concentrated to the south of the High Street where there remains some brownfield land and existing employment is limited. Other options are likely to increase congestion.
- Growth options should be influenced by ease of access to a range of health and leisure facilities

**Question DS9: Which of the following growth options should be supported around Cleator Moor?**

**Summary of responses:**

There were 8 responses to this question. These were as follows:

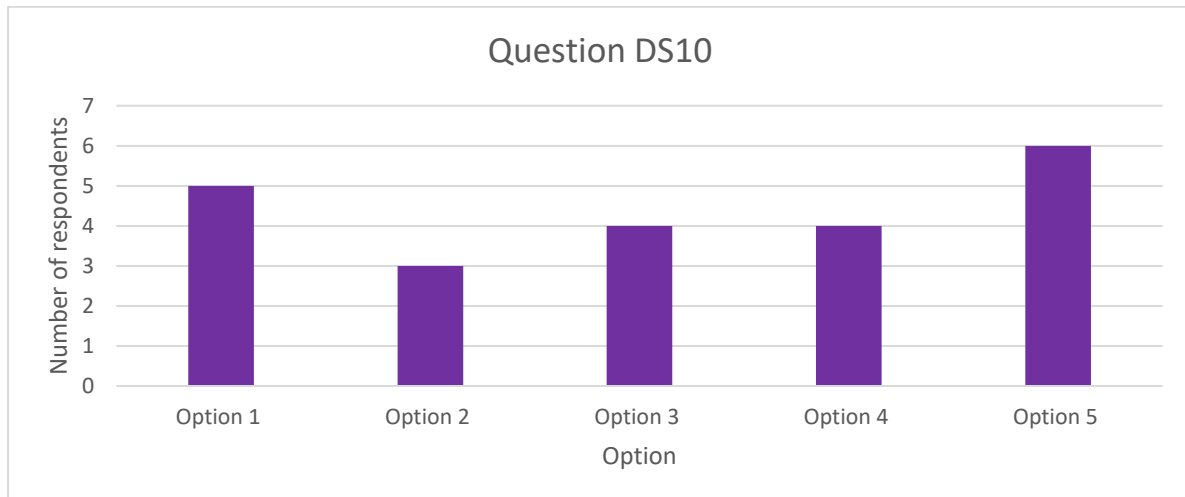


Comments regarding this question reiterated the preferences stated through the selection of options for growth. No other points were raised.

### Question DS10: Which of the following growth options should be supported around Egremont?

#### Summary of responses

There were 7 responses to this question. These are shown below:

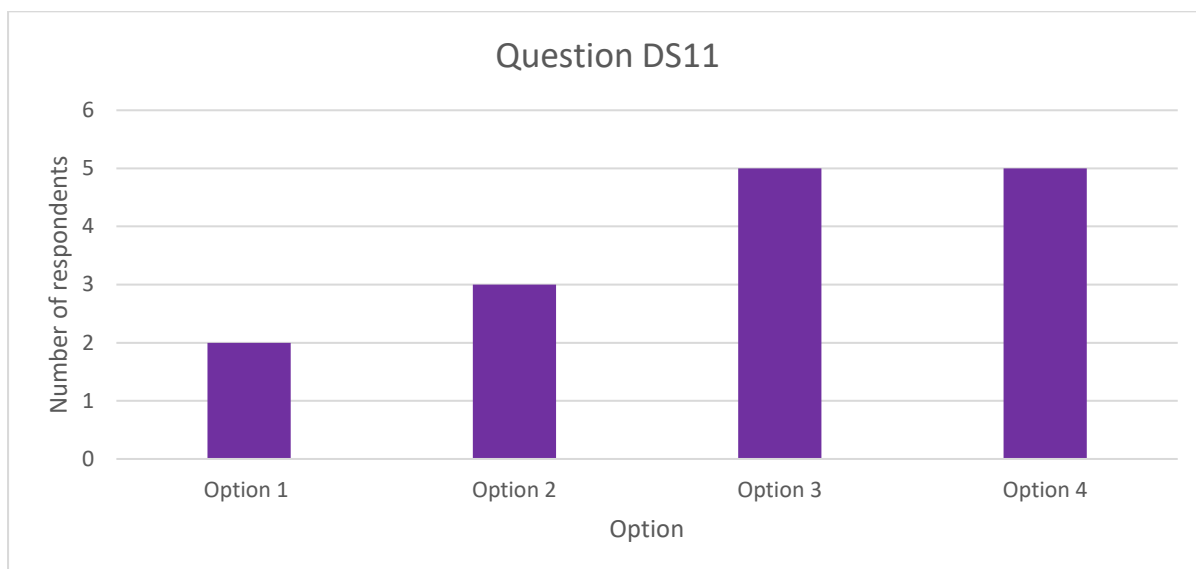


Comments regarding this question reiterated the preferences stated through the selection of options for growth. No other comments were raised.

### Question DS11: Which of the following growth options should be supported around Millom?

#### Summary of Responses

There were seven responses to this question. These are as follows:

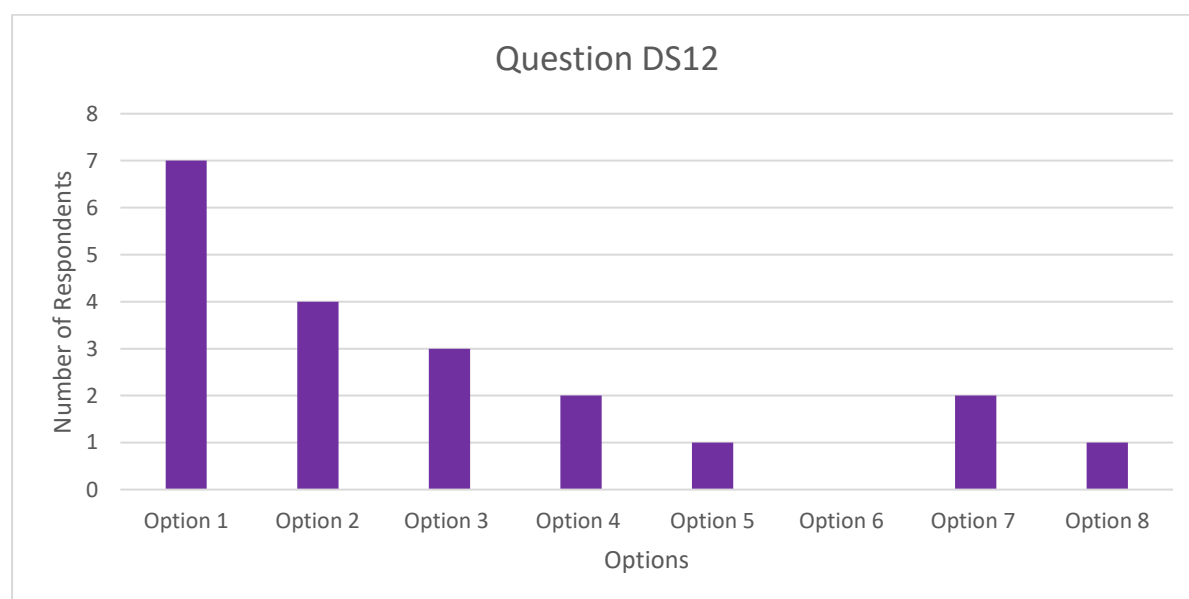


Comments regarding this question reiterated and emphasised the preferences stated through the selection of options for growth. No other comments were raised.

**Question DS12: Which tier of settlements in the hierarchy should have identified development boundaries?**

**Summary of responses:**

16 people responded to this question, with 15 using the options provided. These were as follows:



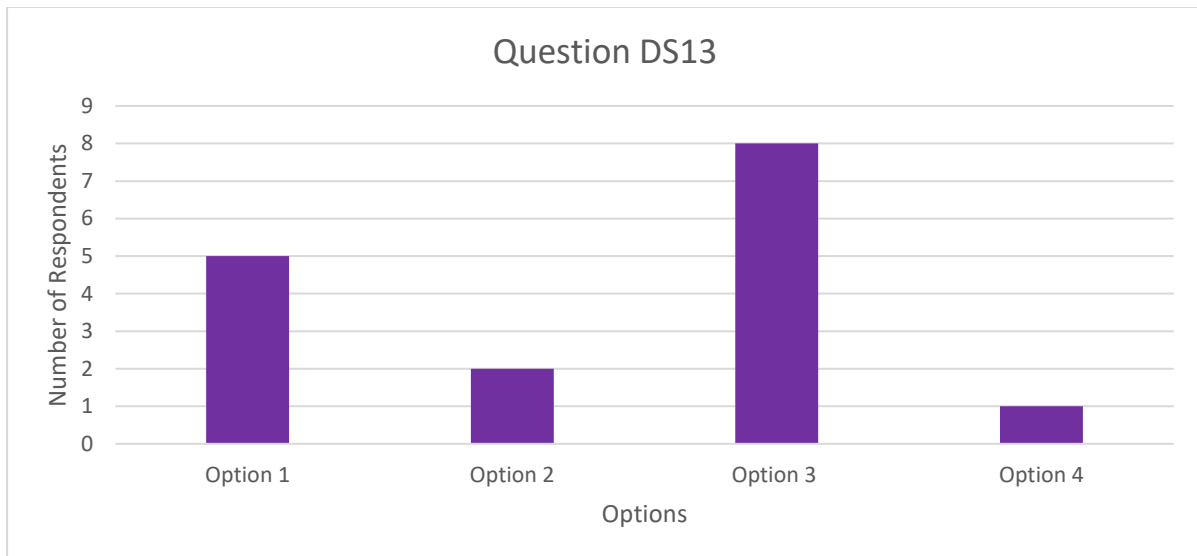
7 respondents stated that they favoured that all settlements should have identified development boundaries. Of the 16 responses, there were 6 comments, raising a number of contrasting points such as:

- Development boundaries provide certainty for all involved in the development process and this also protects the countryside from encroachment.
- Settlement boundaries should be drawn around proposed allocations rather than being drawn arbitrarily with the effect of hindering development.
- A flexible approach should be taken to these boundaries to allow for sustainable development in smaller settlements.
- Boundaries are unnecessary and limit creative thinking and commercial development.
- Settlement boundaries should be considered on a case by case basis

**Question DS13: Should the Local Plan support suitable development directly adjoining the settlement boundary as well as development within it?**

**Summary of responses:**

19 people responded to this question, with only 15 using the options provided. These were as follows:



Option 3 was the most supported option, with the following comments provided:

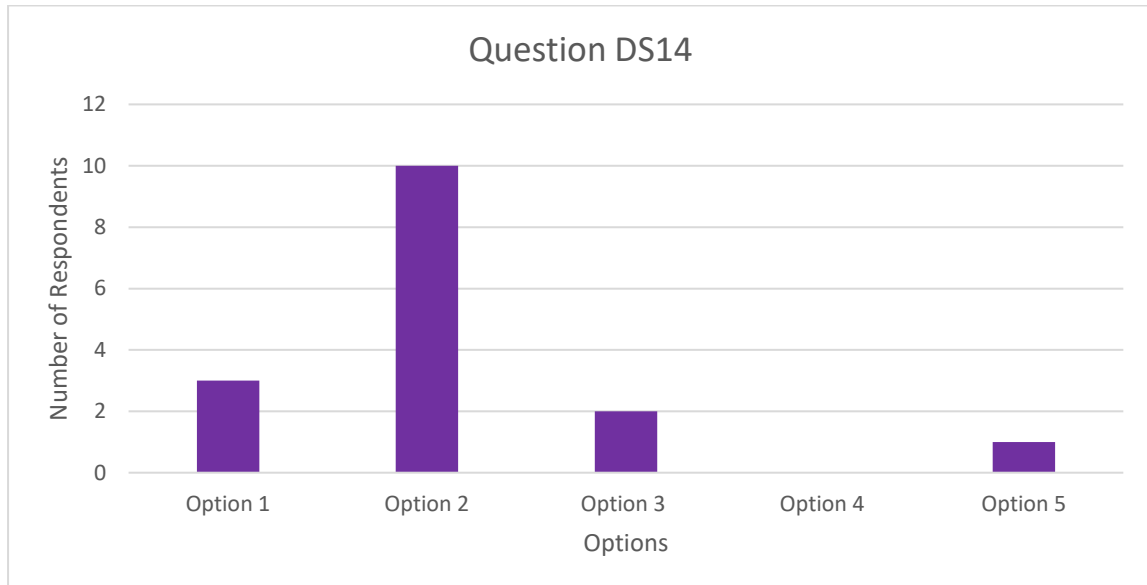
- If the Local Plan provides flexibility, it can be responsive to the development and investment opportunities which cannot currently be anticipated. It would therefore maximise the potential of the Local Plan to facilitate growth for the full plan period.
- Providing the market with flexibility will allow it to deliver viable sites which can deliver in turn affordable or elderly needs housing which otherwise may not be met within the Borough.
- Development outside of boundaries should be allowed where there is appropriate infrastructure provision
- A flexible approach is suitable given the shortage of brownfield sites in the borough
- The Local Plan should acknowledge the presence, history and necessity of the Sellafeld site to avoid policies that conflict with NSIPs and supporting infrastructure

Other respondents supported Option 1 (the second highest supported option), with the rationale that this provides certainty for all involved in the development process and protects the countryside from encroachment.

### Question DS14: Should the Local Plan continue to set a target for the amount of housing development on previously developed sites?

#### Summary of responses

- There were 17 responses to this question with 16 respondents selecting the options provided. These are shown below:



Option 2 proved most popular amongst respondents. The following comments were provided:

- Previously developed/brownfield sites are often challenging to deliver. Setting prescriptive targets, as is suggested within Option 1, could result in under delivery and failure to meet identified needs and failure to deliver housing within more rural locations.
- There are fewer brownfield sites and as economic conditions change – setting goals for using brownfield sites may restrict the production of housing when the borough is in a housing deficit.
- Continuing to promote and enable brownfield development is important amongst the respondents.
- The target should be to secure as high a percentage of possible of new development on brownfield land, including through the reuse of existing buildings. 50% is commendable but should be exceeded if possible.
- The requirement to deliver a specific amount of development on brownfield land may unduly restrict development in settlements with low levels of PDL, such as St Bees.
- The Local Plan needs to ensure that targets are not overly onerous as this might reduce viability and result in under-delivery

**Question DS15: Are there any other issues which should be addressed within this chapter? (Please provide details)**

There were few comments with regards to any other issues which should be addressed within this chapter. These are summarised below:

- It is suggested that the Local Plan for Copeland should include specific policies for the historic environment in order to help inform decisions that affect it and others and should where possible cross-reference heritage related issues.
- It is important to maintain individual local village identities, retaining a green strip between them.

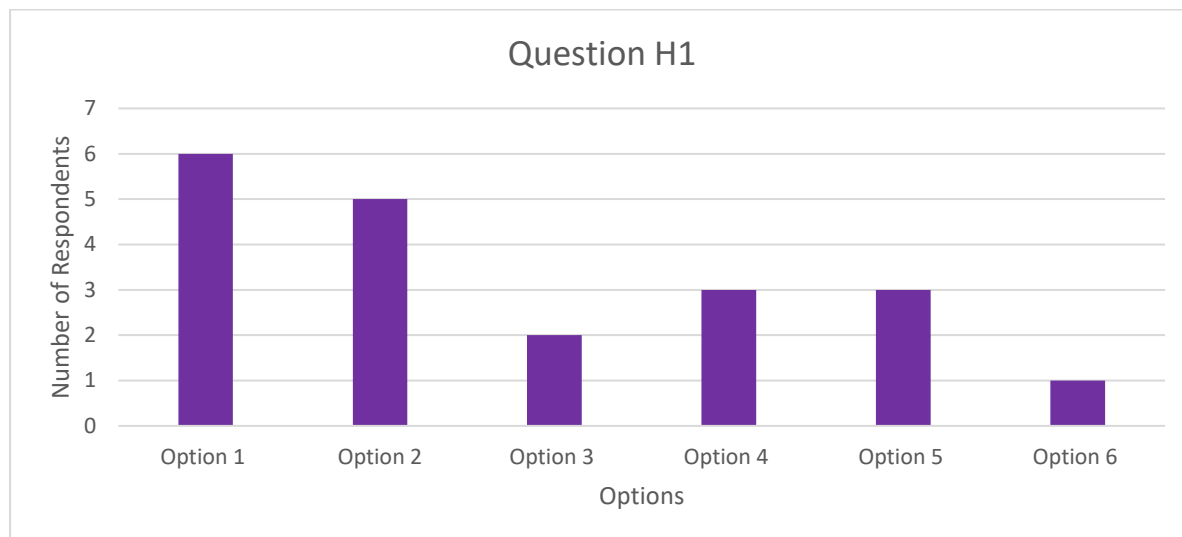


## Housing

### Question H1: How many homes should be built in the borough annually over the plan period 2017-2035?

#### Summary of responses

There were 23 responses to this question with only 17 respondents selecting options. These are shown below:



There was mixed feedback from respondents on this question, with comments including:

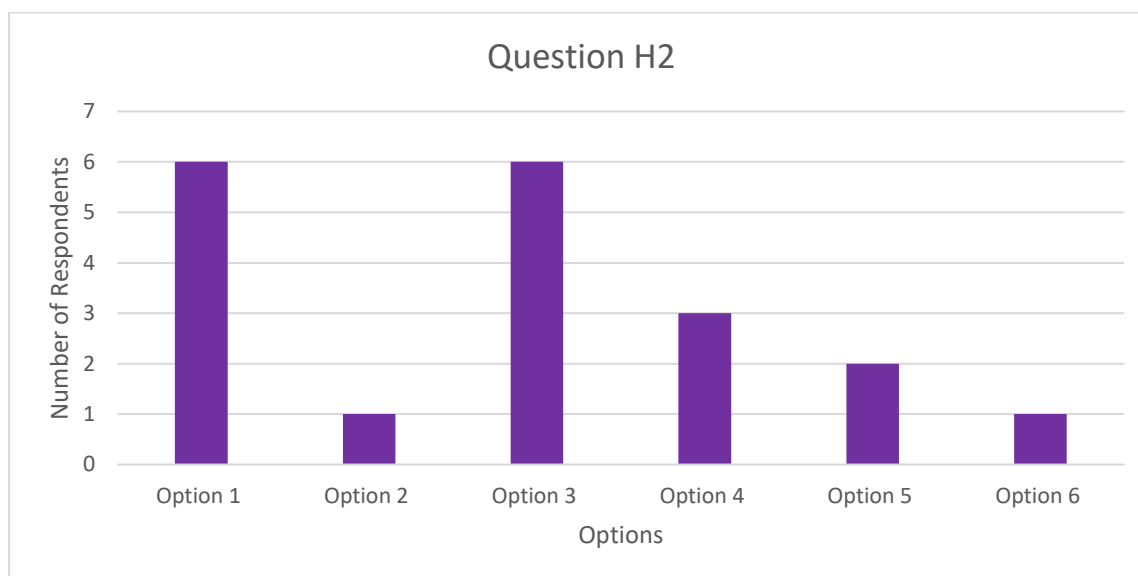
- Copeland needs to focus on the key issues which are important to its people and deliver the necessary sites and housing to support these aspirations.
- Include upgrade of empty housing stock
- We recognise the importance of the availability of a mix of housing types and tenure in the area in attracting and retaining both employees and those in the supply chain - Suitable infrastructure such as transport links should be enabled.
- Option 1 will be insufficient to underpin economic growth and would therefore, not provide the sustainable growth needed within Copeland.
- With regards to Option 3, the use of a mid-point housing need figure is not a legitimate basis upon which to establish a housing requirement. It will also be insufficient to unlock Copeland's full economic growth potential.
- In relation to Option 4, the use of a housing target which matches the Government's standard method comprehensively fails to reflect the needs of this Borough over the plan period. The number of dwellings proposed is not an effective housing requirement figure. It does not reflect, and is not mutually supportive of, the Borough's economic growth potential.
- With reference to Option 5, the identification of a housing requirement figure based solely on the rate of housing completions is not a sound or legitimate growth.
- The option for at least 200 dwellings per annum should be taken forward as a minimum in order to realise the Council's growth ambition

- A comment was made regarding whether or not the SHMA was written in line with the NPPF and the PPG due to initial revision date. It was noted that a caveat in the SHMA states that the Council should undertake a selected updating of the report prior to the submission of the local plan. It was stated that the standard method assessment is inaccurate in Copeland as it is not reflective of its true housing needs. It was also suggested that this unique situation in Copeland amounts to “exceptional circumstances” and this should justify the use of an alternative approach to the standard method set out in the SHMA to allow Copeland to more accurately determine the minimum number of new homes needed.
- Bringing the large amount of empty homes in Copeland back into permanent occupation should be a priority and should be taken into account when determining the housing target.
- Building new homes on Greenfield land cannot be considered the most sustainable option while there are existing resources that could contribute to meeting the OAN.
- Option 2 will allow young people to step onto the housing ladder, give professionals, entrepreneurs and financially secure retirees high quality choice in housing and also keep house prices low.
- Location of growth should be informed by detailed site assessments, the availability of infrastructure and the modelling of potential impacts. Existing planning approvals should also be taken into account.
- The number of homes should be based upon objectively assessed need (OAN). This is the most realistic target and aligns closely with recent completion rates.
- The housing target should be informed by an understanding of environmental capacity.

## Question H2: How much land should the Local Plan allocate for housing?

### Summary of responses

There were 20 responses to this question with only 17 respondents selecting options. These are shown below:



Options 1 and 3 were the preferred options amongst those respondents who picked options, however, there were also a large number of comments on this question, these are summarised below:

- Any option that suppressed the delivery of housing through a lack of choice, buffer or unrealistic density aspirations should be discounted. It was stated that it is important that the chosen housing requirement allocates an additional buffer of sites in order to provide flexibility.
- Additional sites should be allocated over the housing requirements due to sites potentially stalling or some sites not coming forward at all. Again, it was stated that flexibility is key.
- It was suggested that due to a change in housing needs, market conditions, land ownership patterns, availability and constraints across each of the principal settlements in Copeland, it may be difficult and inadvisable to approach housing allocations on a Borough-wide basis.
- Growth should not only meet the demographic need of the borough, but also the economic aspirations of the communities.
- It is unrealistic to expect that every allocated site, either brownfield or greenfield, will be delivered or provide the expected number of homes
- The Council should look to free up land/ sites in urban areas and leave rural 'as is'

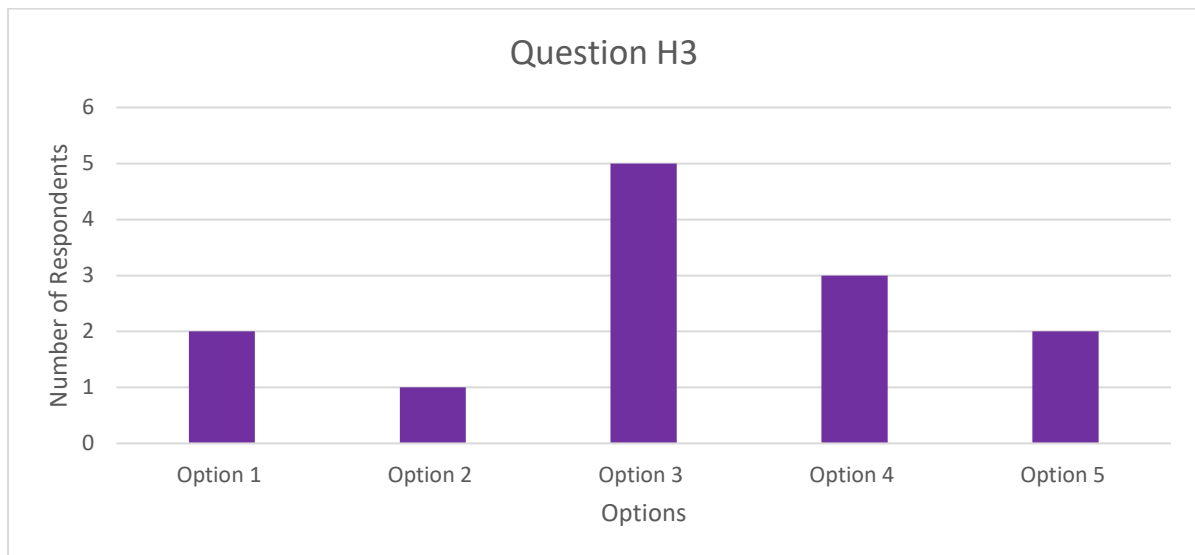
- It is inadvisable to approach housing allocations on a borough- wide basis. It is clear that housing needs will only be met in Millom by enabling sufficient greenfield expansion beyond the settlement boundary.
- It was stated that it was believed the housing densities should be highest in areas that are most sustainable in terms of transport and access to services.
- Option 4 would not provide the security required that a development on unallocated land could be supported and would not encourage house builders to develop in that area.
- A concern was raised that allowance over and above the target set out by the plan will create pressure for the development of unsuitable site settlement boundaries.

Several respondents provided a figure for Option 3. Five suggested a figure of 20% additional land, whilst another suggested 10% would be sufficient.

### Question H3: What density should be applied when estimating the housing yield of potential housing allocations?

#### Summary of responses

There were 16 responses to this question with only 13 respondents selecting options. These are shown below:



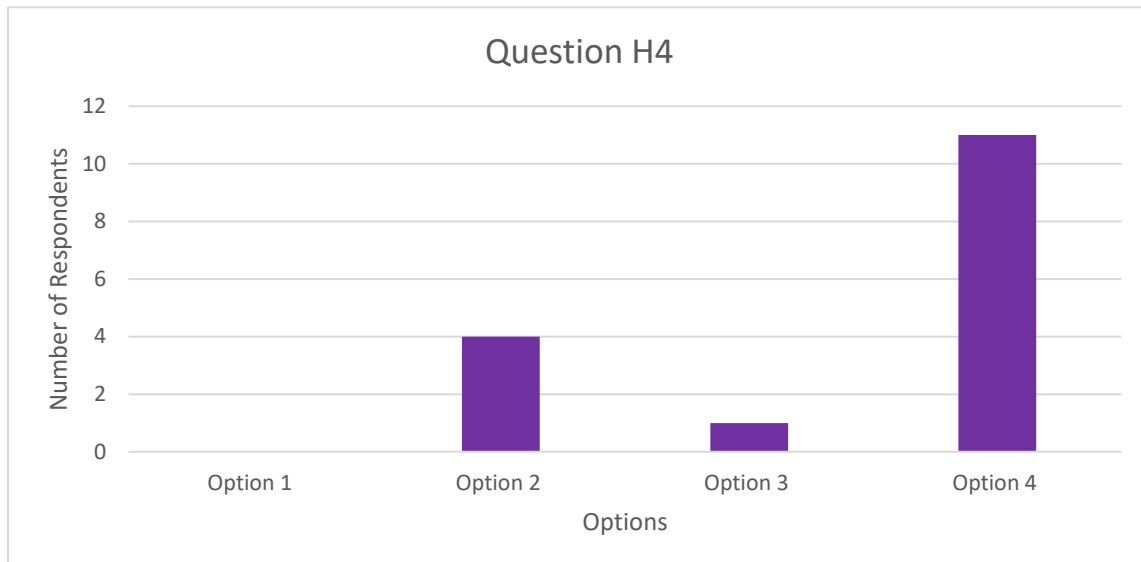
Option 3 was the most popular amongst respondents, although the responses varied. Comments on the options stated:

- A variety of densities and gross to net ratios should be considered dependent upon size and location, ensuring they're realistic against the implications of any emerging or national policy.
- The plan should require that the most efficient use of each site is made, including through delivering housing that is of a size and type appropriate to meeting genuine local needs
- The highest appropriate density should be achieved dependent upon a number of factors including landscape character, visual amenity, topography etc.
- Broad guidance on appropriate development densities would be appropriate, however we would have concern on the implications on overall delivery rates where rigid policies do not incorporate a flexible and site-specific approach to determination.
- We support Option 2, although it is recommended that the policy also include caveats allowing for different densities where appropriate and justified for example to be in line with the character of the area.

#### Question H4: How can the Local Plan ensure that the most efficient use is made of land when determining applications on unallocated sites?

##### Summary of responses

There were 17 responses to this question with only 16 respondents selecting options:



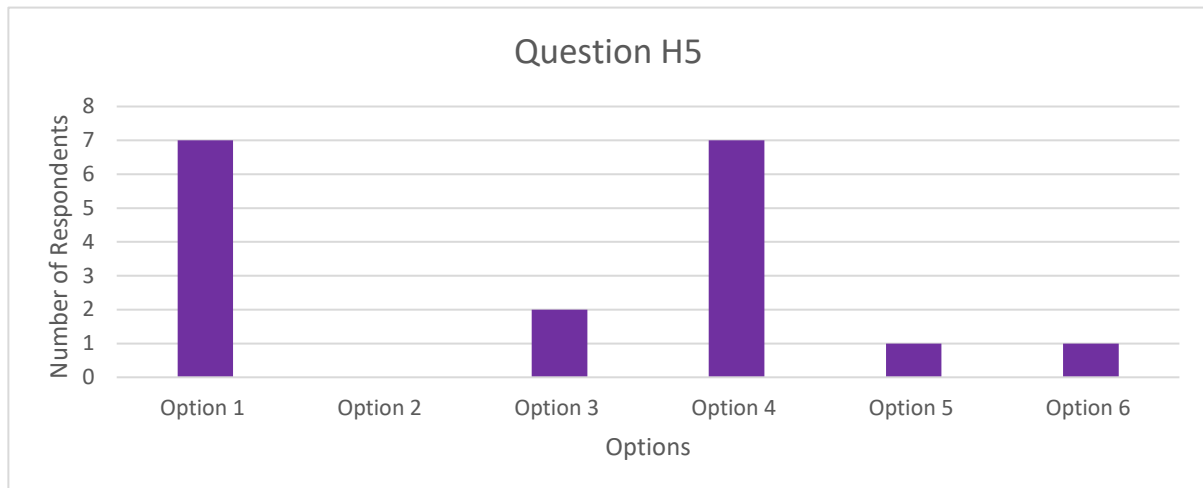
Option 4 proved popular amongst respondents with the majority of comments stating that this allows the most flexibility. Other comments stated that:

- A borough-wide average density target should be set in the plan and policy should require that the most efficient use of each site is made, ensuring the size and type of house meets genuine local need.
- The Council should apply an appropriate density, dependent upon the site specific considerations.

### Question H5: How can the Local Plan help increase the number of affordable homes in Copeland to meet identified needs?

#### Summary of responses

There were 20 responses to this question with only 14 respondents selecting options. These are shown below:



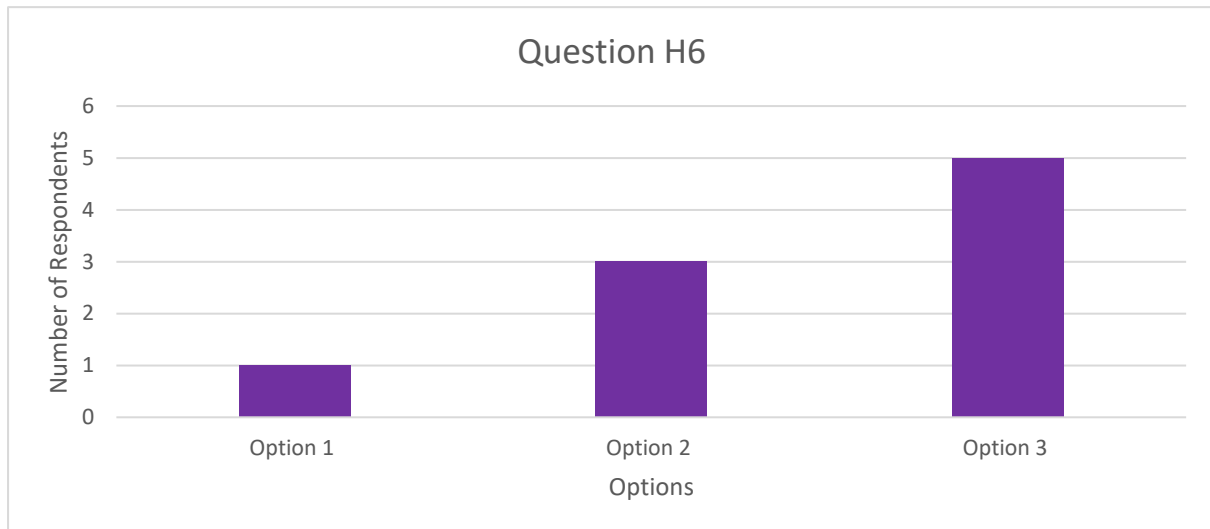
Options 1 and 4 were the most popular choices amongst respondents. A number of comments were raised:

- As the SHMA identifies a minimum affordable housing need above the level of housing that would be delivered through the Government's standard method, it's important that the Local Plan is more ambitious than the standard method.
- Allocating sites in addition to the housing requirements adjacent to settlement boundaries and in rural areas will ensure the delivery of sites which are able to deliver affordable housing in sustainable locations.
- There is a reduced demand for housing in some smaller settlements of the borough.
- Focusing demand on principal towns and key service areas will assist in a higher number of affordable dwellings.
- A higher affordable requirement on smaller sites would be welcomed in rural areas.
- The level of affordable housing should be determined at settlement level, not the entire borough, and based on the Housing Needs Study.
- Land needs to be allocated at appropriate scales to make affordable housing feasible.
- Larger sites should be considered for allocation within or adjacent to the settlements of highest demand to improve the deliverability of the Borough's housing needs.
- If a policy is included in the plan to set a threshold for when and how much affordable housing is provided it should be done based on evidence from the SHMA and the Viability assessment.
- The policy should be similar to the LDNPA particularly in areas of Copeland near to the park boundary or there will be increased pressure to move out of the park if it is easier to create affordable housing in this plan area thus affecting the sustainability of Copeland's park villages.

### Question H6: How can the Local Plan help meet the housing needs of Gypsy and Travellers?

#### Summary of responses

There were 10 responses to this question with only 9 respondents selecting options. These are shown below:



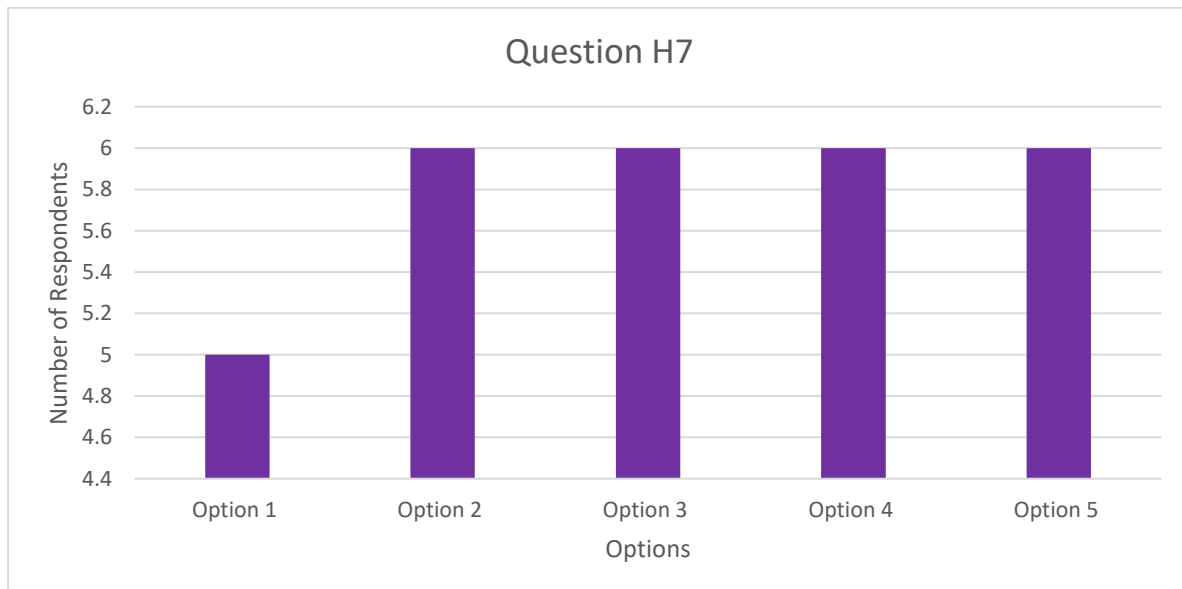
The majority of respondents picked Option 3, with only two additional comments; one which suggested providing a site outside of the Whitehaven boundary and the other suggesting that the Gypsy community are contacted on a proactive basis to elicit their views.



### Question H7: How can the Local Plan help reduce the number of long term empty homes in Copeland?

#### Summary of responses

There were 14 responses to this question with only 12 respondents selecting options. These are shown below:



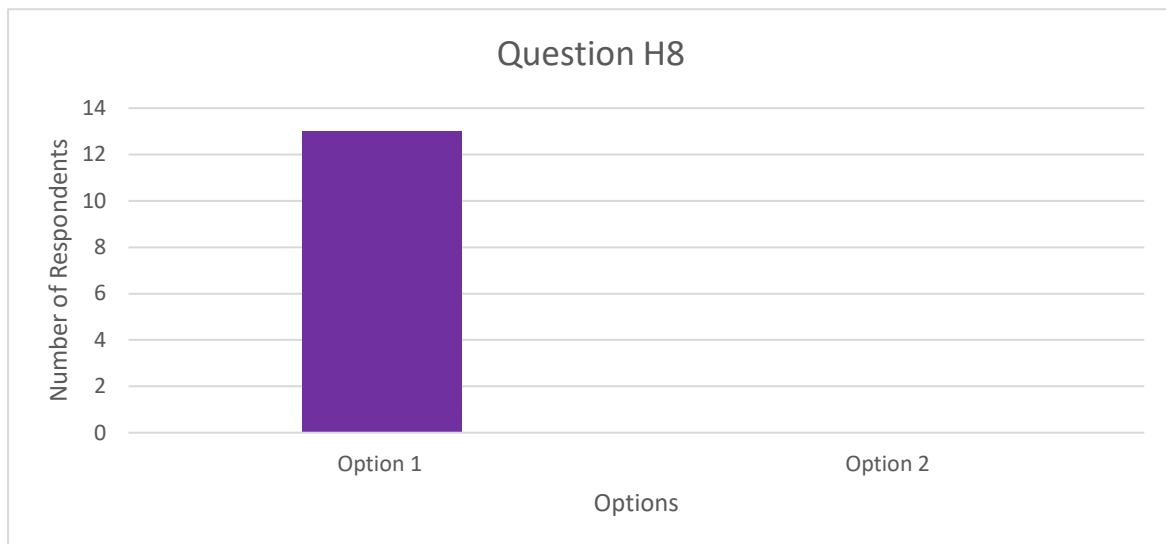
The responses from this question were mixed. Additional comments include:

- We would strongly support all of the suggested options, taking into account that not all options will be appropriate to apply to every case
- Option 5 was commented on as an innovative way to encourage redevelopment but was equally commented upon as a poor approach.
- Other comments suggested, including rate reductions for renovated and reused properties, or by the creation of a community interest company owned by the Council which would borrow money to buy vacant properties and resell them upon renovation.

### Question H8: How can the Local Plan help improve the borough's existing housing stock?

#### Summary of responses

There were 13 responses to this question with all 13 respondents selecting options. These are shown below:

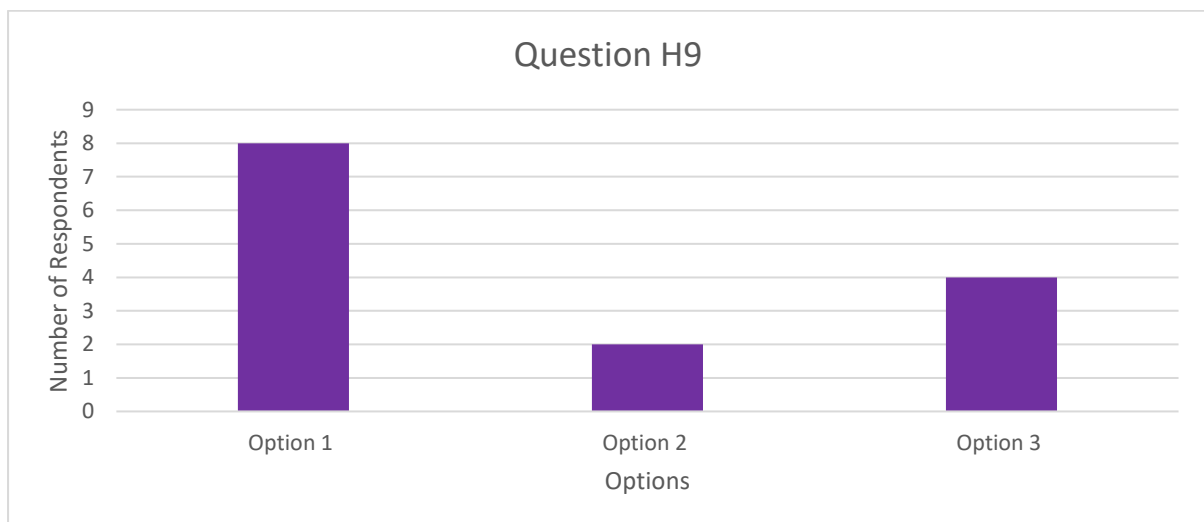


Option 1 was the favoured option, chosen by all respondents. Only one comment was made on this question, which stated that the option with a clear commitment to supporting renovation and regeneration was the most appropriate one.

**Question H9: How can the Council ensure that an appropriate mix of housing is delivered over the plan period?**

**Summary of responses**

There were 17 responses to this question with only 14 respondents selecting options. These are shown below:



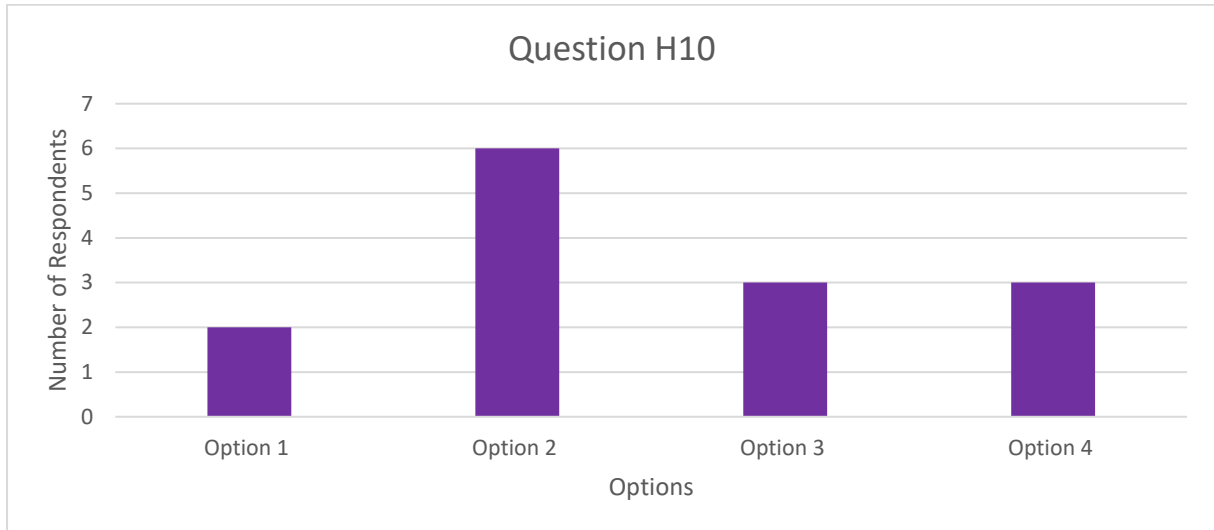
Option 1 was the most preferred option with 8 respondents selecting it. A number of comments suggested:

- It is recommended that any policy in relation to housing mix is flexible and gives consideration to the character of the area and the market demands and aspirations.
- Option 3 would ensure that the right types of housing are delivered where required with delivery being market led rather than a rigid policy across all housing sites within the Borough, particularly where distribution options included for a wide spread of very small allocations on which a mix of housing types and tenures would not be possible.
- Suggestion that Option 1 requiring developers only to demonstrate that they have “considered” the evidence may not provide a strong enough policy basis.

### Question H10: How should the Local Plan ensure the housing needs of older and disabled people are met?

#### Summary of responses

There were 14 responses to this question with all 14 respondents selecting options. These are shown below:

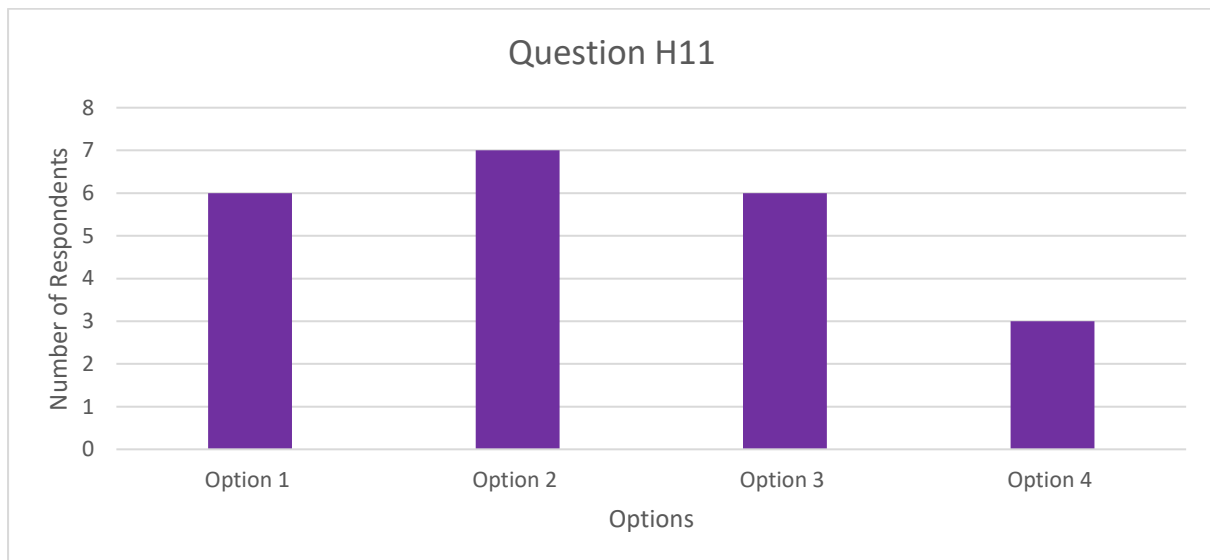


Two further comments were made in response to question 10, one stating that all other options other than Option 2 are arbitrary and could create vacancies. The other comment reminded the council that if they wish to adopt the higher option standards for accessible and adaptable homes, they should only do so by applying the criteria set out in the PPG.

### Question H11: How can the Local Plan help ensure the needs of those requiring extra care housing are met?

#### Summary of responses

There were 15 responses to this question with only 13 respondents selecting options. These are shown below:



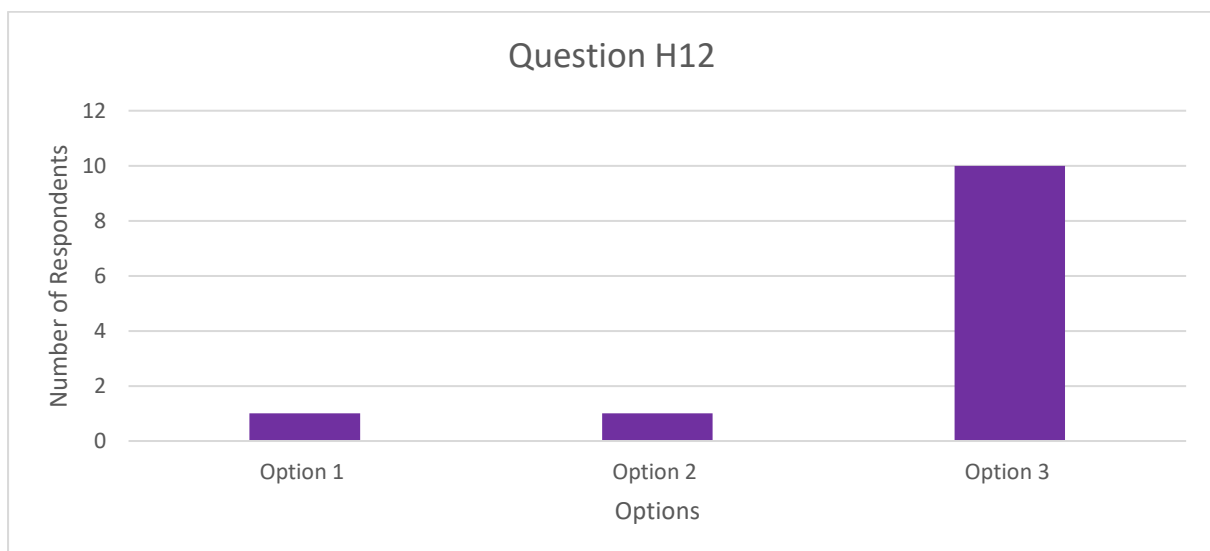
Responses to this question were mixed, with comments including the following:

- Option 2 ensures supply meets demand.
- Sites should be available for extra care housing, delivered as part of new housing developments – there should be strategic alignment with the Cumbria County Council Extra Care Housing Department Programme.
- A policy should be included that supports homes for older people in appropriate locations, and that the Council work with specialist housing providers to ensure that these policies and allocations are appropriate

## Question H12: How can the Local Plan support those wishing to develop self and custom build housing?

### Summary of responses

There were 12 responses to this question with all 12 respondents selecting options. These are shown below:



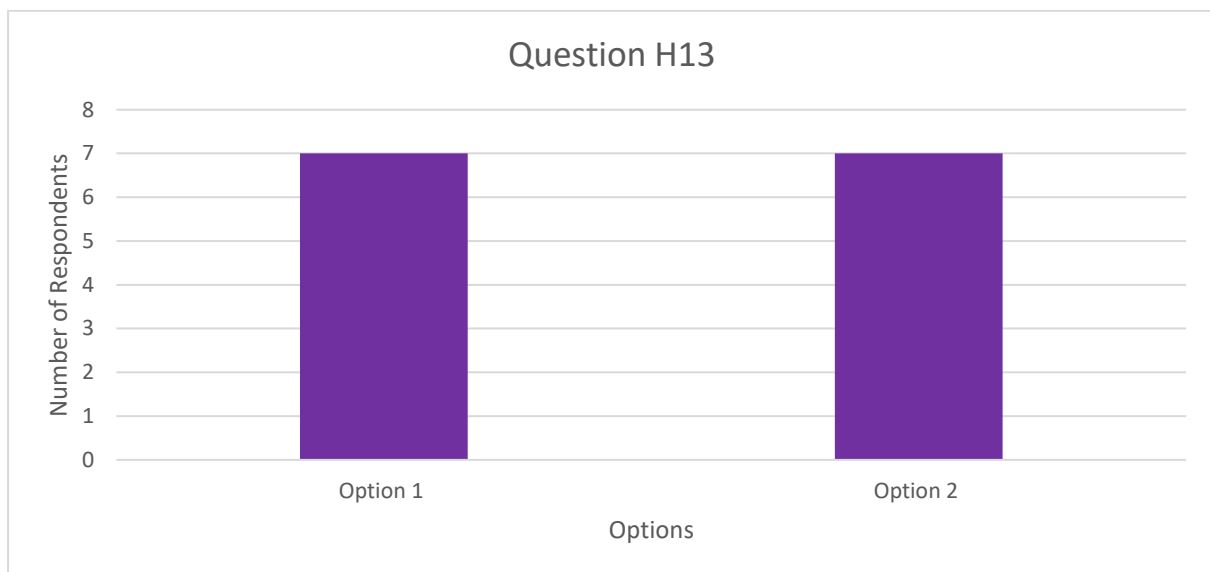
Option 3 was the overwhelming favourite of the available Options. Comments included:

- Support of Option 3 while then leaving site allocation to market forces.
- Option 3 provides the opportunity for freedom of expression, regional diversity, and innovation. A policy should be sufficient to allow the needed freedoms.
- Support for Option 3 for its potential contribution to the overall housing supply

### Question H13: How can the Local Plan support communities who want to deliver community-led housing projects?

#### Summary of responses

There were 13 responses to this question with 12 respondents selecting options. These are shown below:

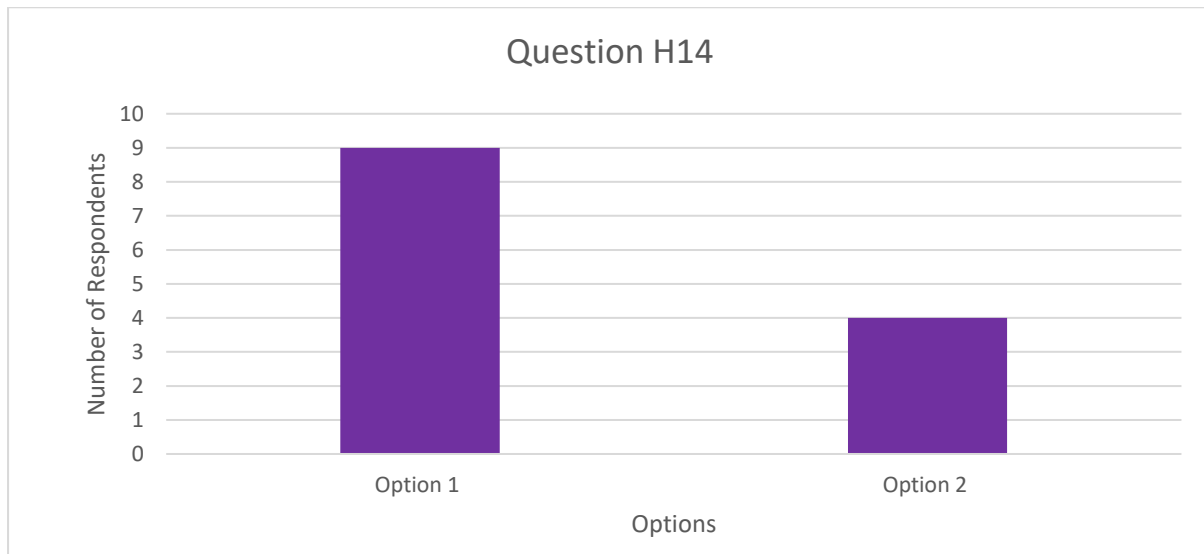


There was an even split between Options 1 and 2, with nobody selecting Option 3. Only one additional comment was made on this question, stating that both Options 1 and 2 are welcomed, however, if Option 2 was chosen, it should be undertaken through close working with local communities and with the Cumbria Community-Led Housing Hub. It was also stated that provision should be made for other appropriate community-led sites to come forward during the plan period, even if not identified during the plan preparation process.

**Question H14: How can the Local Plan minimise any detrimental effects arising from conversion and sub-division of existing properties within settlement boundaries?**

**Summary of responses**

There were 13 responses to this question with all 13 respondents selecting options. These are shown below:



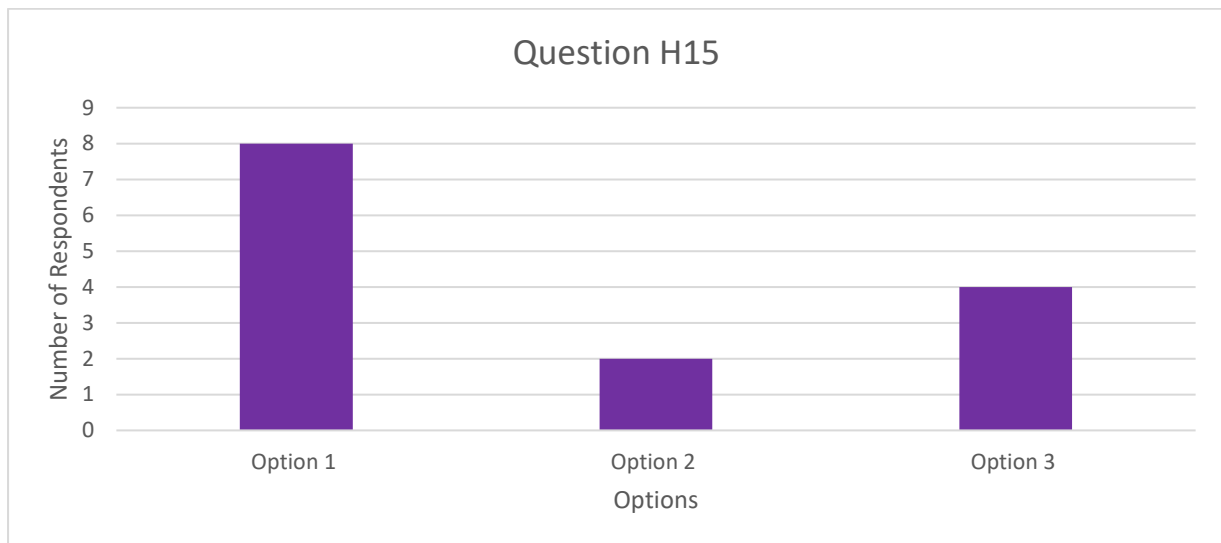
Option 1 was the preferred option by respondents, commenting that there is a need for policy and guidance based on Borough needs.



**Question H15: How can the Local Plan reduce any detrimental impacts arising from the sub-division of properties to create large houses of multiple occupancy?**

**Summary of responses**

There were 10 responses to this question with all 10 respondents selecting options. These are shown below:

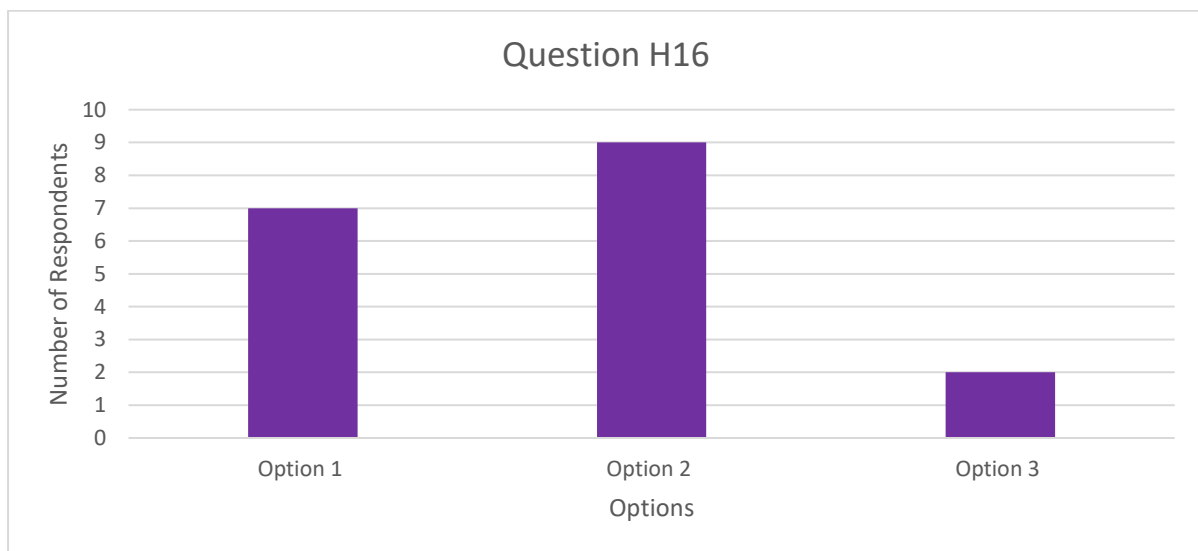


Option 1 was the option preferred by respondents. No further comments were made.

### Question H16: How can the Council reduce any detrimental impacts arising from householder extensions and alterations?

#### Summary of responses

There were 13 responses to this question with all 13 respondents selecting options. These are shown below:

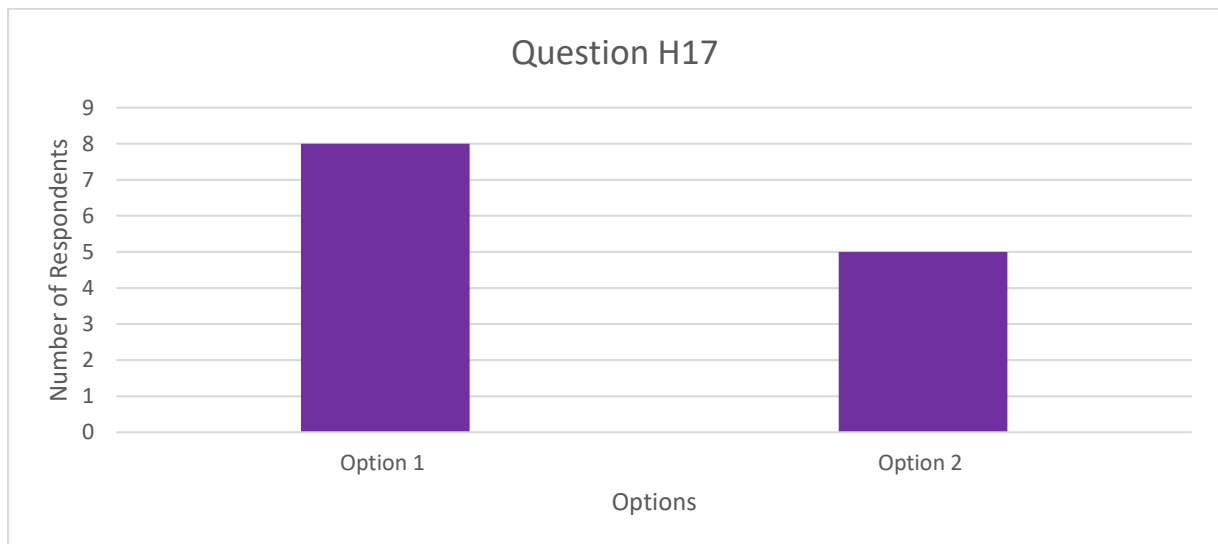


Option 2 was the favoured Option by respondents, with an SPD being named as a “useful option”, although Option 1 was also a popular choice. No further comments were made.

### Question H17: Should the Local Plan set out which types of housing will be supported in the open countryside?

#### Summary of responses

There were 14 responses to this question with 13 respondents selecting options. These are shown below:

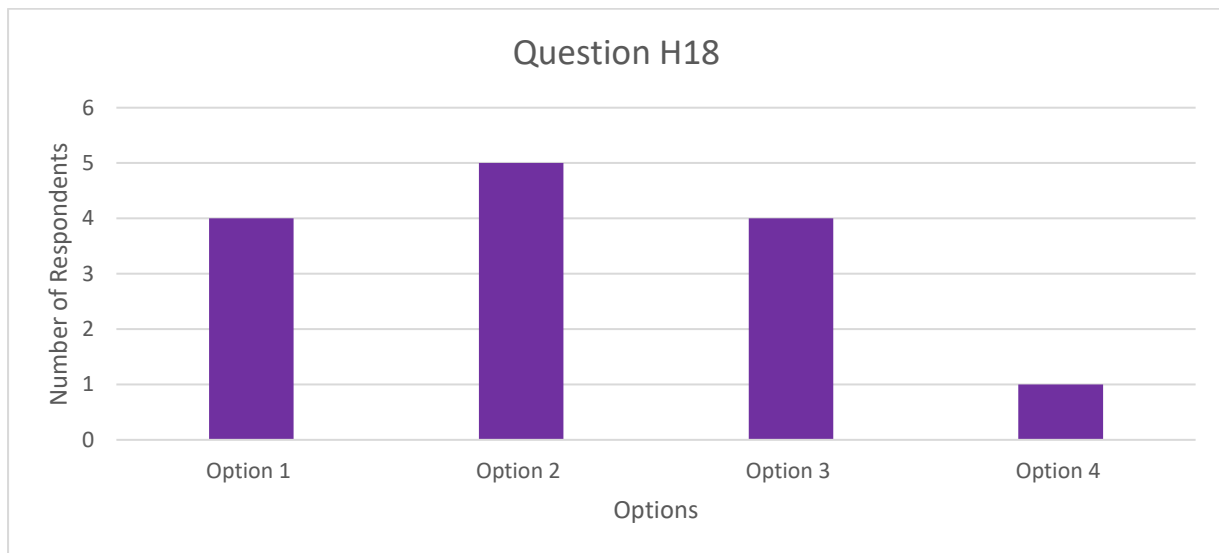


Option 1 was the most frequently selected option. Option 2 was commented on stating that the NPPF does not apply to all new housing in the countryside. It was also stated that “we need a policy which does not unnecessarily restrict design”.

### Question H18: Should the Local Plan contain a policy which supports the development of rural exception sites?

#### Summary of responses

There were 13 responses to this question with all 13 respondents selecting options. These are shown below:



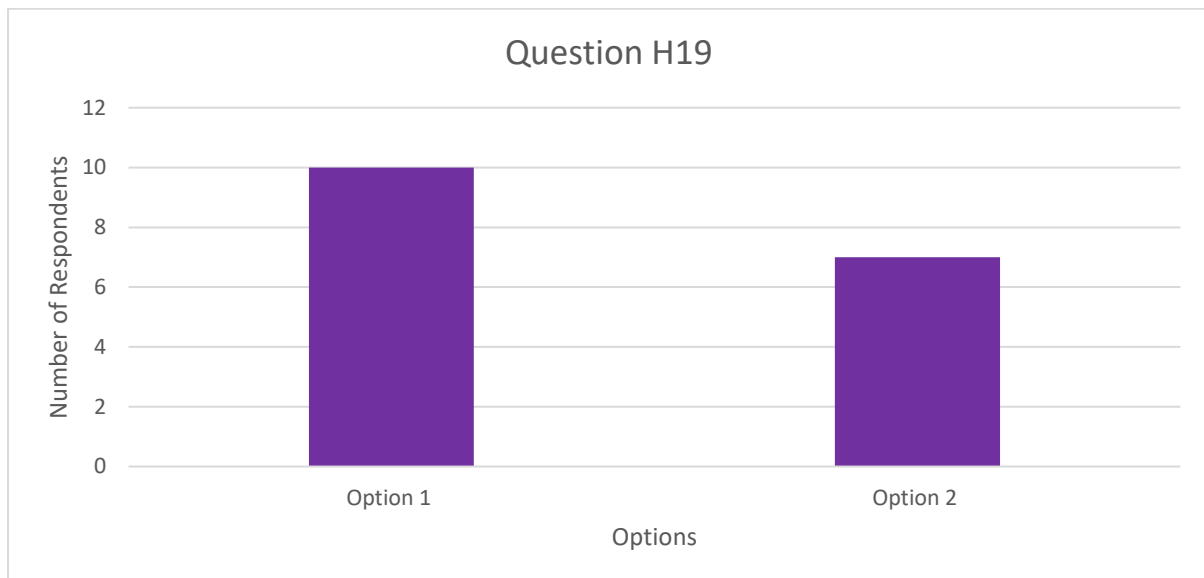
Although Option 2 was the preferred option by respondents, there was a relatively even spread of choices across the options. Only one comment was made, which stated:

- The Local Plan should consider all opportunities to ensure that an appropriate level of market and affordable housing is provided, this is likely to include rural exception sites. Option 2 is the most appropriate of the options suggested, this would include a policy which states that some market housing will be supported on rural exception sites. The number of market homes will be limited to that required to enable viability whilst ensuring a significant proportion of the site is developed for affordable housing.

### Question H19: How can the Local Plan ensure that rural exception sites are available for residents with a local connection?

#### Summary of responses

There were 13 responses to this question with 12 respondents selecting options. These are shown below:

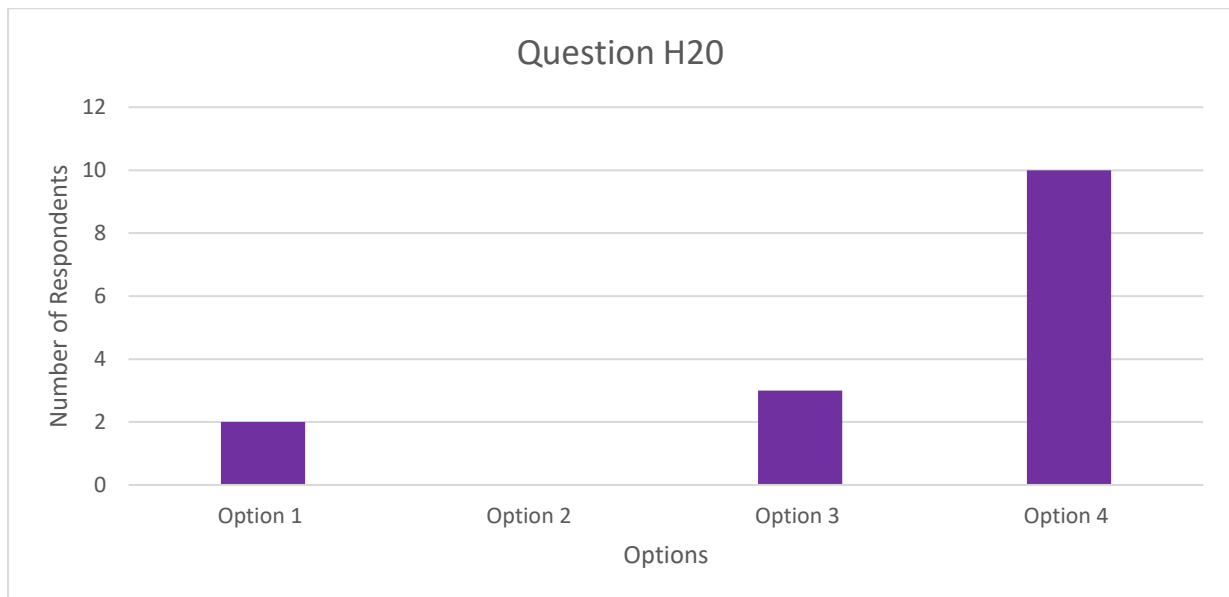


Respondents chose either Option 1 or 2, with nobody electing to state another option. One comment considered that the rural exception sites should not include a local connection policy. No further comments were made.

### Question H20: Should the Local Plan include a policy which limits the size of replacement dwellings in the open countryside?

#### Summary of responses

There were 13 responses to this question with 13 respondents selecting options. These are shown below:

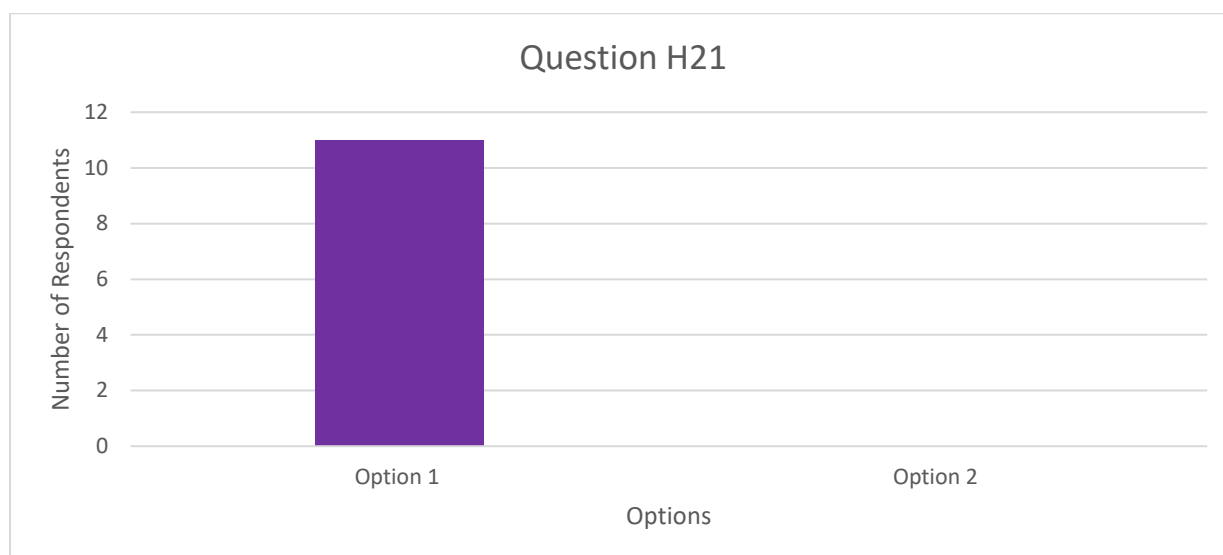


Option 4 was the overall favoured Option. It was commented that although Option 1 was a preferred option, size is not the only consideration when judging the appropriateness of a proposal, and that any policy on replacement dwellings under option 1 should include elements of Option 4 i.e. a requirement for the proposal to respect and complement local character.

**Question H21: How should the Local Plan ensure that traditional rural buildings can be converted to residential dwellings without detriment to the character of the area?**

**Summary of responses**

There were 14 responses to this question with 11 respondents selecting options. These are shown below:



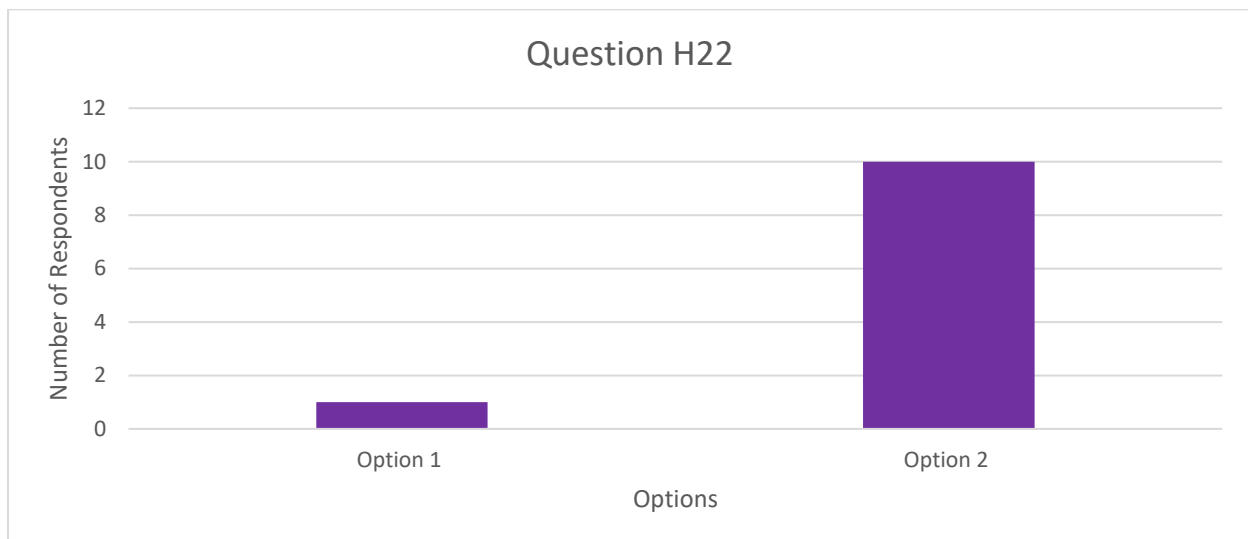
All respondents who picked an Option chose to pick Option 1. Additional comments stated:

- The policy should include additional criteria, including landscape and visual impacts, local character and heritage impacts.
- Policy should be carefully worded to ensure any proposed conversion does not end up as a replacement dwelling.

## Question H22: Should the Council set a limit on the scale of residential extensions within the open countryside?

### Summary of responses

There were 13 responses to this question with 11 respondents selecting options. These are shown below:



Option 2 was the overwhelming favourite of the 3 proposed options

- Additional comments stated that although Option 2 was preferred it should be determined on site and the site planning applications need to demonstrate use of traditional materials and plans in character.
- Furthermore, it was also stated that large residential applications can have similar implications to those stated regardless of the location, and that whilst landscape and visual amenity impacts are more likely to be an issue in rural areas, a key issue resulting from extending properties is modestly sized, modestly priced properties being made into large properties that then lie out of the financial reach of local people whilst also being larger than is required to meet genuine needs. This applies equally in urban and rural areas. On this basis, it was suggested that a stronger policy would be preferred with a lower limit applicable across the borough rather than only to the open countryside.
- If Option 1 were to be used, it was suggested that it require revision as it currently suggests that the allowable extensions themselves could be 50% larger than the footprint of the existing property (which would result in extensions one and a half times the size of the existing footprint), whereas it is presumed that what is actually meant is that the allowable extensions would be no larger than 50% of the footprint of the existing property.



**Question H23: Are there any other issues which should be addressed within this chapter? (Please provide details)**

A number of comments were added which respondents suggested should be addressed.

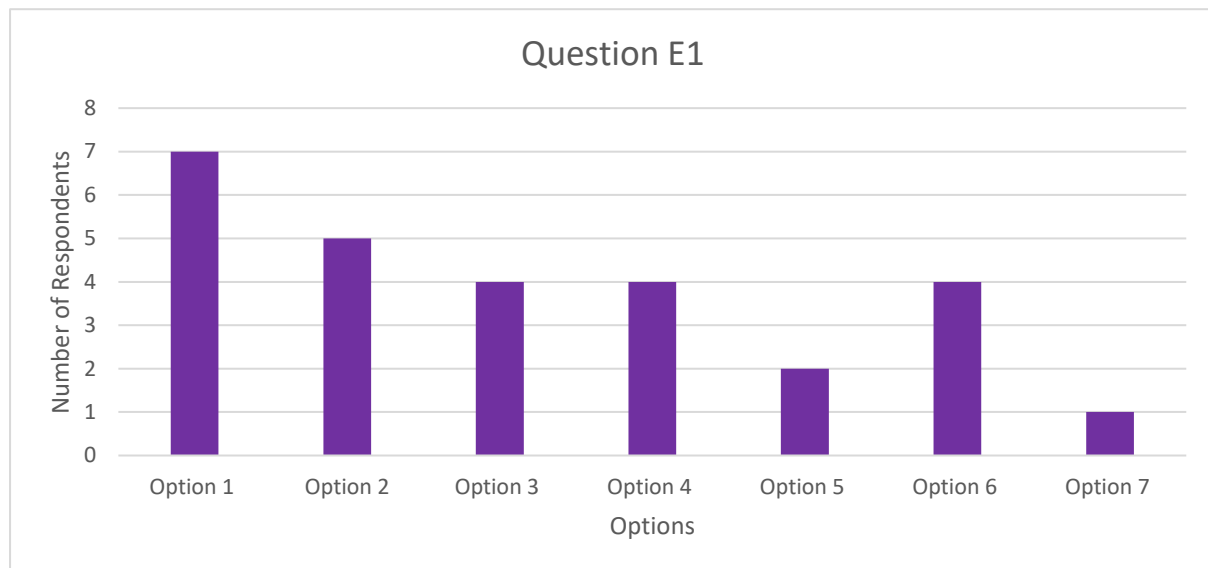
- One stated that there is no reference to any specific proposals to restrict development in areas of important landscape value.
- Another suggested that regarding development focus – Brownfield sites should be addressed first, any adjoining urban developments addressed second, and finally, smaller towns third.
- It was also stated that planning for conversions and extensions should be given to town/parish councils to consider.
- Housing site access was suggested, stating that there is a need for all housing sites to have appropriately designed and safe access to the highway. This should be an essential requirement in determining planning applications for new housing.
- A suggestion was made that the Council supports policies and improvements which promote more sustainable modes of transport. This includes allocation of housing sites in locations that can be readily accessed by foot, cycle or public transport and measures that support sustainable travel between housing areas and town centres and other main destinations.
- Finally, a suggestion was made on developer contributions – the Council considers that preference should be given to developer contributions for education, sustainable transport, road junction improvements and digital connectivity. These are matters that are vital to the successful delivery of new housing and will ensure that essential supporting infrastructure is put in place. The Council would also expect to seek contributions for surface water management/flood alleviation and extra care housing as part of the affordable housing requirement. CBC could consider the introduction of a Community Infrastructure Levy policy.

## Economy & Employment

### Question E1: How can the Local Plan best ensure that sufficient land is available to support the growth aspirations for the borough?

#### Summary of responses

There were 14 responses to this question with 13 respondents selecting options. These are shown below:



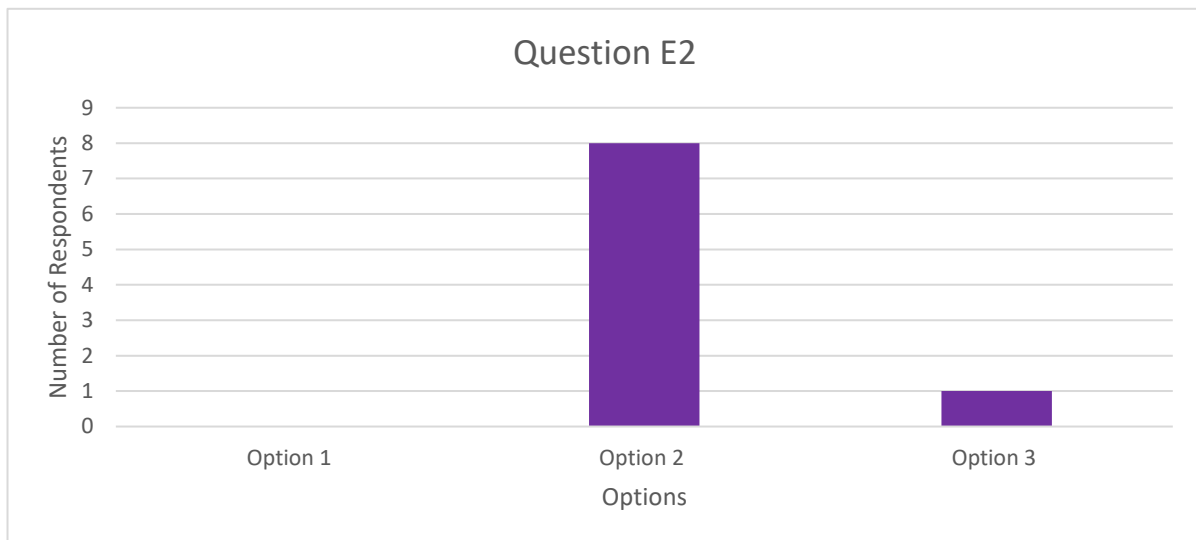
There was a mixed response to this question. However Option 1 was most popular amongst respondents. There were 6 additional comments made by respondents with points such as:

- The existing Copeland Local Plan recognises the Sellafeld site as a significant employer within the District, whilst acknowledging the need to respond at an appropriate level to the gradual decline in employment due to the decommissioning of Sellafeld. It is important to recognise that additional opportunities may arise in the future to make best and most effective use of parts of the Sellafeld site for alternative new land uses, including those associated with new B1-B8 employment uses.
- Sellafeld's role as a significant local employer will continue throughout and beyond the plan period and the decline in employment resulting from the decommissioning process needs to be addressed. Whilst the existing Local Plan Proposals Map defines a settlement boundary for the Sellafeld site, a specific allocation would be more appropriate given the site's unique nature as an employer. The existing Local Plan policy is highly supportive of employment uses at the site.
- It is important that there is a supply of employment land both close to the Sellafeld site and in off-site locations with the necessary infrastructure for a wide range of uses to deliver the Sellafeld Ltd remediation mission.
- A continuation of the existing approach in which sites are allocated for development in the Local Plan, to avoid inappropriate development outside the main settlement boundaries.

## Question E2: Should the Local Plan continue to restrict permitted uses at West Lakes Science Park?

### Summary of responses

There were 9 responses to this question with all 9 respondents selecting options. These are shown below:

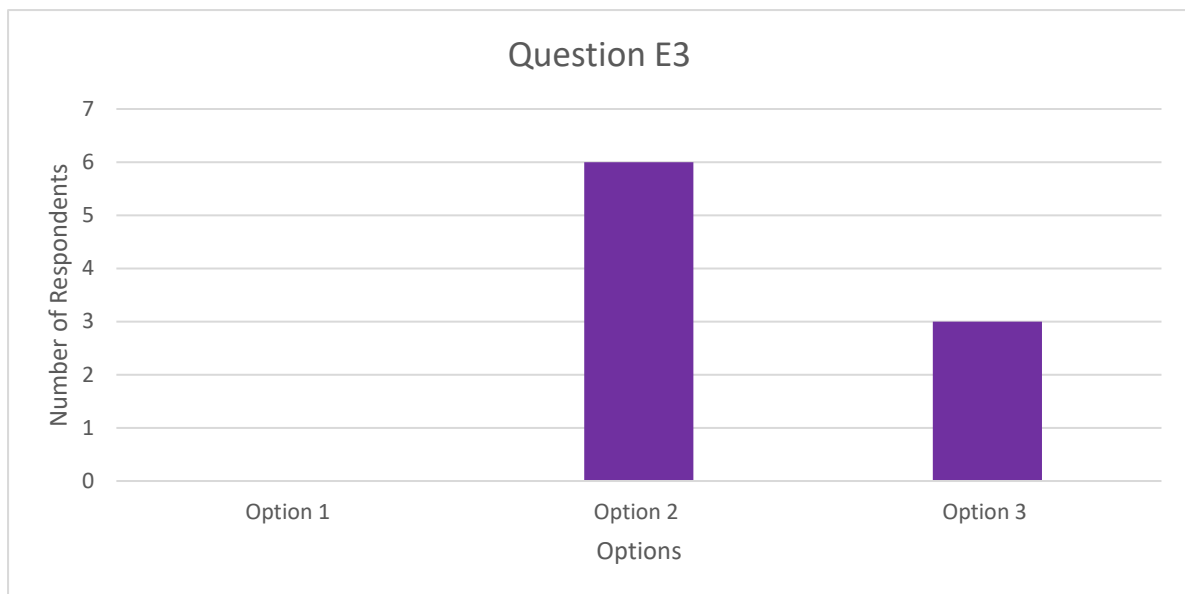


Option 2 was the most heavily favoured option, with 8 out of the 9 respondents selecting this option. There were no further comments made.

**Question E3: Should the Local Plan continue with the same approach for ancillary uses of development at West Lakes Science Park, if not what approach should be taken?**

**Summary of responses**

There were 9 responses to this question with all 9 respondents selecting options. These are shown below:

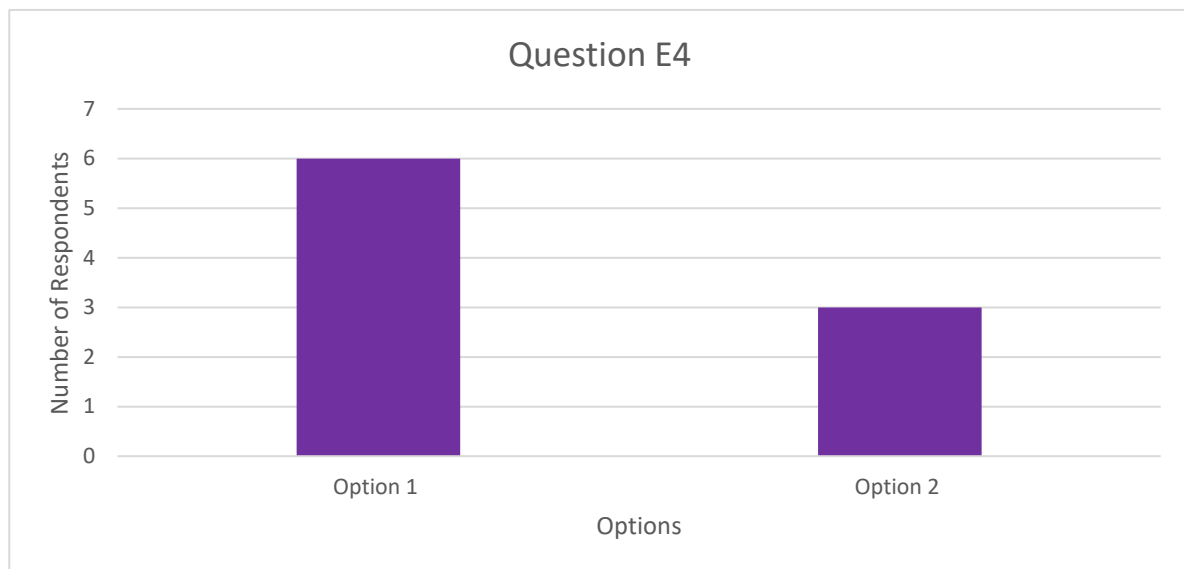


None of the respondents selected Option 1, most of the respondent's favoured Option 2 and 3 out of the 9 respondents picked Option 3. One respondent commented that Option 3 would grant reasonable flexibility which would encourage growth and additional employment.

### Question E4: What option should the Local Plan take to safeguard existing employment areas?

#### Summary of responses

Again there were 9 responses to this question with all 9 respondents selecting options. These are shown below:

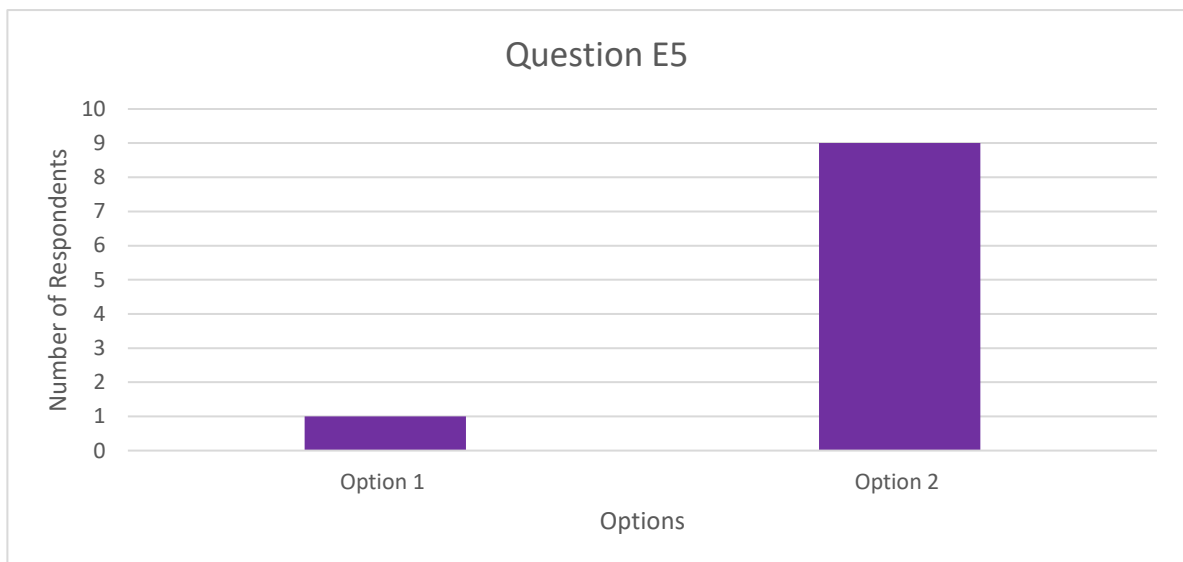


Option 1 was the favoured option with 6 out of the 9 respondents selecting it. No further comments were made.

### Question E5: Should the Local Plan take additional measures to support the rural economy?

#### Summary of responses

There were 10 responses to this question with all 10 respondents selecting the options provided. These are shown below:



Option 2 was the most frequently selected option with 9 out of 10 respondents choosing it. Only one additional comment was made which emphasised the importance of providing additional help and diversification to support rural communities.

**Question E6: Are there any other issues which should be addressed within this chapter? (Please provide details)**

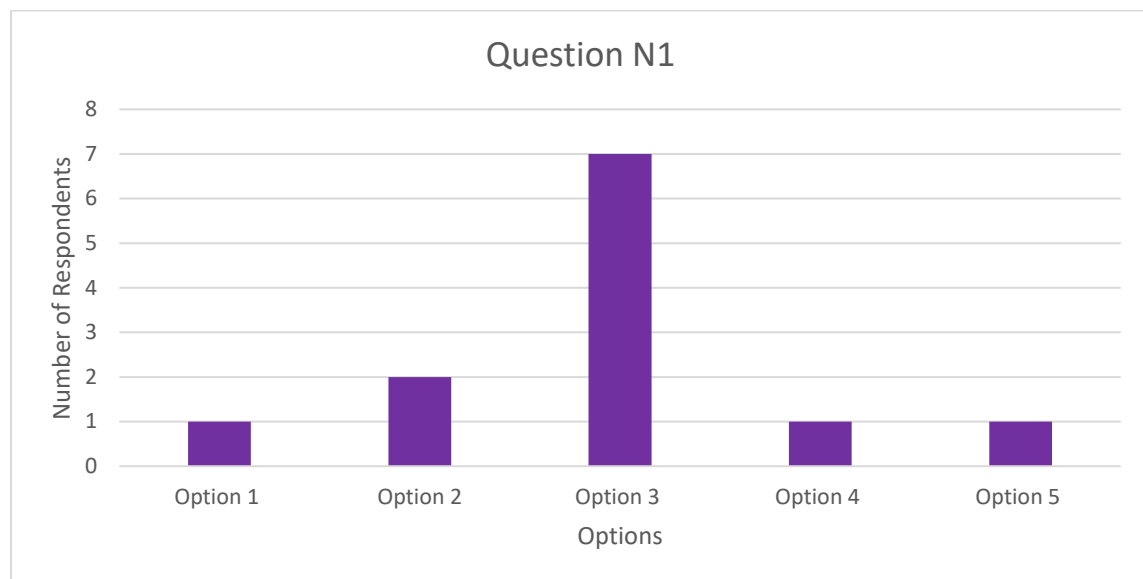
Four comments were made in relation to this question. These are as follows:

- It is essential to ensure that there is sufficient employment land of the right quality and in the right locations to support construction and supply chain opportunities relating to Sellafield and potentially Moorside, and to attract other inward investment.
- Immediate priorities should be Leconfield with its links to the Cleator Moor Town Deal and Westlakes given the opportunities for research and development to support growth in the local economy and diversification of the nuclear sector
- The four key towns should be recognised as a focus for development going forward due to additional government funding
- The approach to allocating land for employment sites should be considered in the context of developing options of the Whitehaven Relief Road

**Question N1: Where should the Local Plan direct workers who are to be relocated from the Sellafield site?**

**Summary of responses**

There were 13 responses to this question with 12 respondents selecting options. These are shown below:



Option 3 was the most frequently selected option with 7 out of 12 respondents selecting it. The following comments were made:

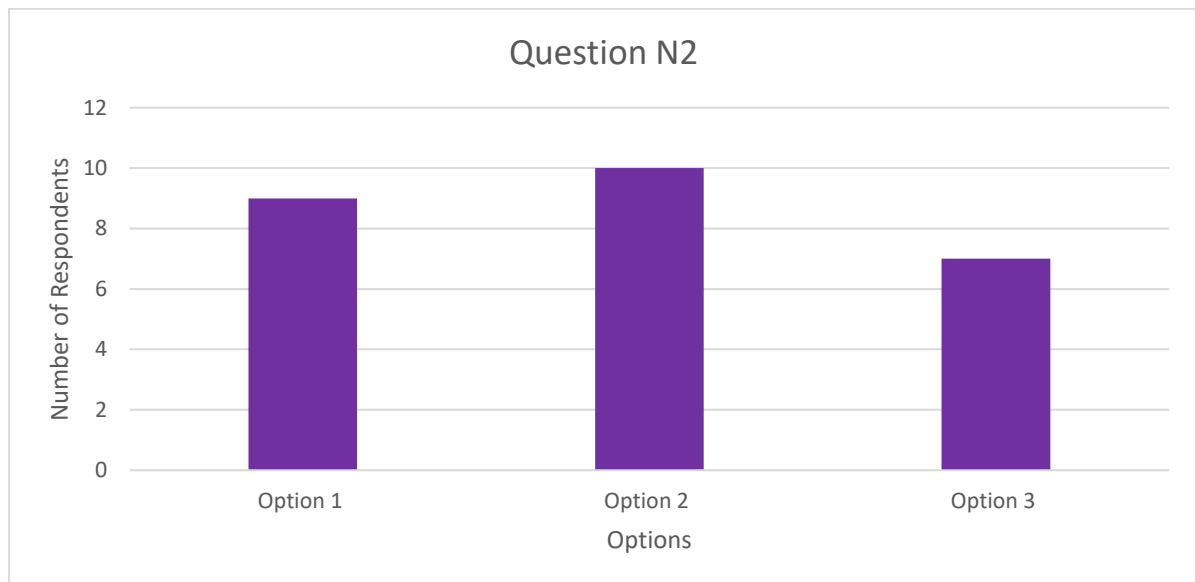
- One comment requested that the Local Plan recognises the opportunities of the Nuclear Sector as a whole, not just on new nuclear energy generation opportunities.
- It was noted that there are currently plans to relocate more personnel away from Sellafield Sites based on the availability of appropriate premises and infrastructure, implemented in line with Cabinet Office property controls, stating that this is a decision made by Sellafield Ltd as the operator of the site. The Local Plan would then enable this decision, rather than direct it.
- We should be helping distribute employment around the Borough to BEC and Leconfield industrial sites and other brown field locations which could be developed for industrial purposes. Broad diversification should be the goal.
- Workers relocated from the Sellafield site should continue be directed to Whitehaven and the key service centre towns, but with greater dispersal in future towards the key service centres in order to avoid further congestion in Whitehaven. These locations are most likely to be sustainable in terms of transport and accessibility and the presence of workers may help to support the local economy.



**Question N2: How can the Local Plan best support new nuclear energy generation in the future to meet the UK's low carbon agenda?**

**Summary of responses**

There were 14 responses to this question with 11 of the respondents selecting options. These are shown below:



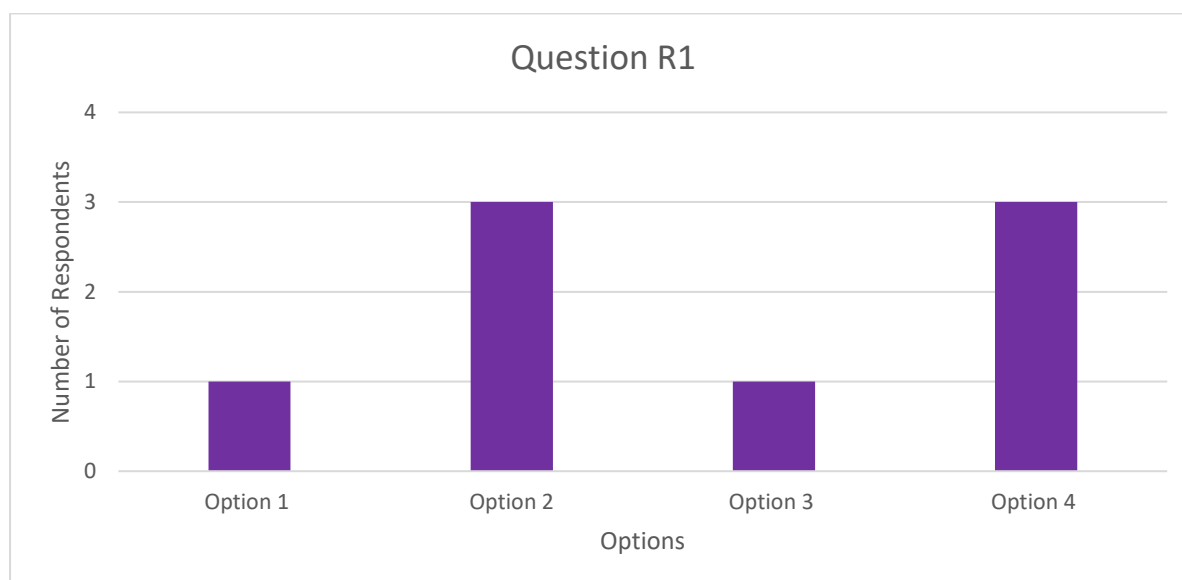
Option 2 was the most frequently selected option here. The following feedback was suggested:

- One comment noted that while Nuclear Energy can contribute significantly to low carbon electricity generation, it must be sustainable through the use of promoting innovation in the nuclear sector and influencing the design of small scale Advanced Nuclear Technologies.
- Another commented suggested the addition of other options relating to mobile maintenance, R&D and start up services; based in Copeland, but delivered on site at other plans and sites.
- We will support investment into large or small scale nuclear projects at Moorside. The exact nature of this would need to consider the Government's emerging energy strategy

**Question R1: Where should Whitehaven's Town Centre boundary be?**

**Summary of responses**

There were 7 responses to this question with all 7 respondents selecting options. These are shown below:



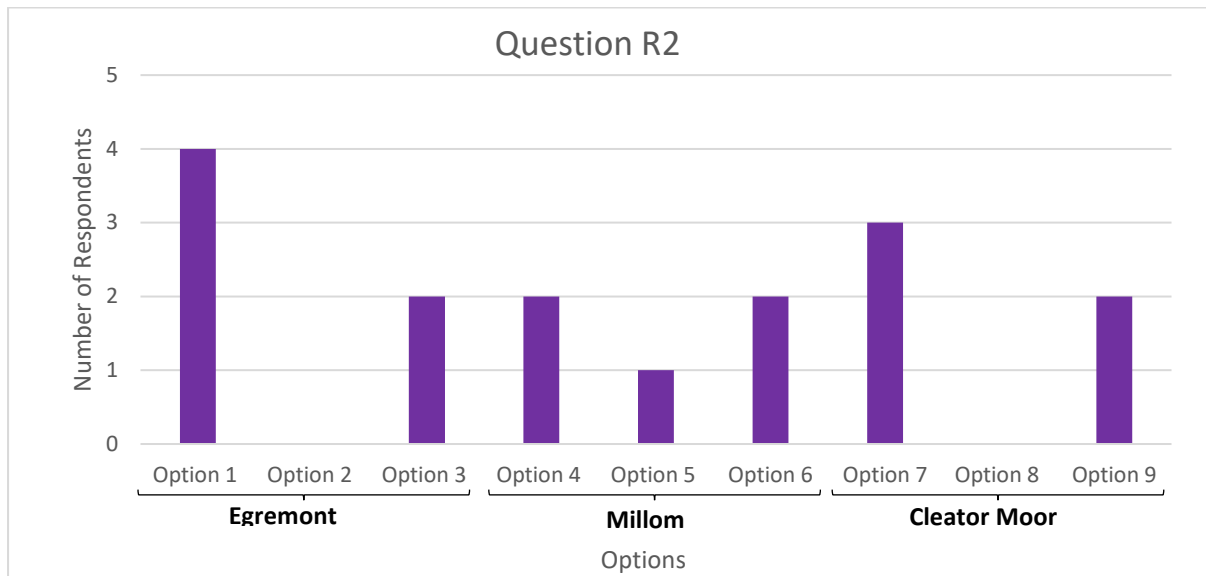
Responses were varied on this question with no respondents choosing to select Option 5 (other option). Two relevant comments were made with regard to this question:

- Reduce to remove the areas to the south-east currently in Flood Zone 2.
- Make the Whitehaven Town Centre as large as possible. The Castle Park should be included along with the Harbour and lands north of Tesco.

## Question R2: Where should the Key Service Centres town centre boundaries be?

### Summary of responses

8 people responded to this question, with only 6 respondents using the options provided. These were as follows:

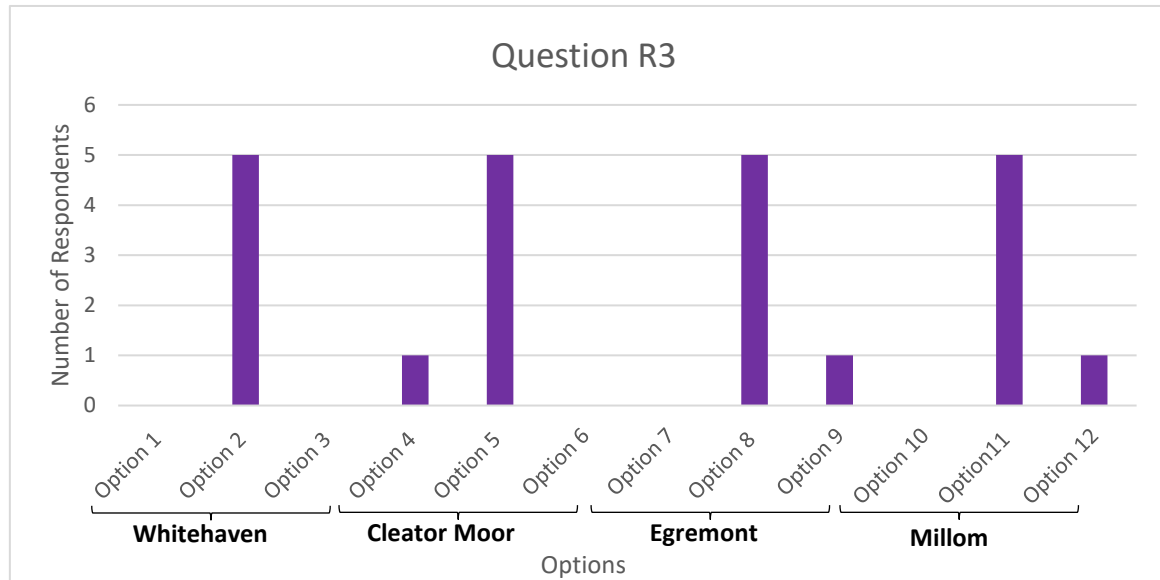


Only 2 further comments were made on this question. One comment was made with regards to Millom, stating that the current town centre boundary includes an eastern portion of Millom Town Centre which extends into Flood Zone 2 – any additional development should not lead to increased risk. Another comment made suggested that making the boundaries as large as possible ensures the most likelihood of success.

### Question R3: Should the borough's towns have defined primary shopping areas?

#### Summary of responses

9 people responded to this question, with only 7 respondents using the options provided. These were as follows:

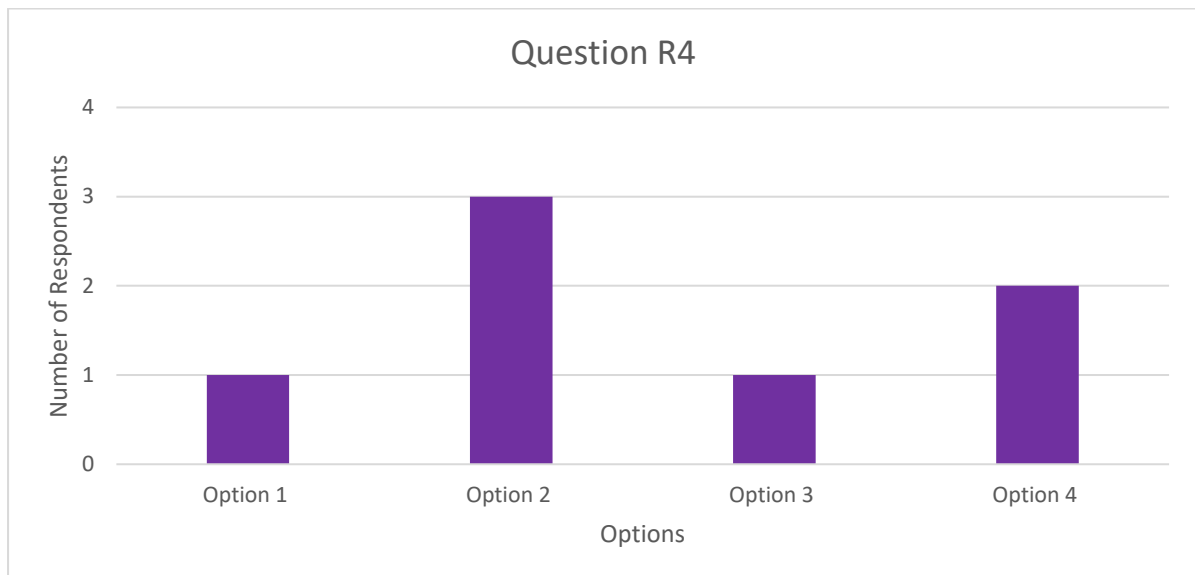


Across all of these areas, the most popular option amongst respondents was that all areas should just have a town centre boundary. Another comment stated that there should be no arbitrary primary shopping areas to avoid unnecessary restrictions. There were no other relevant comments made.

### Question R4: How should the Local Plan set out what uses will be permitted in Primary Shopping Areas (If defined)

#### Summary of responses

8 people responded to this question, with only 7 respondents using the options provided. These were as follows:

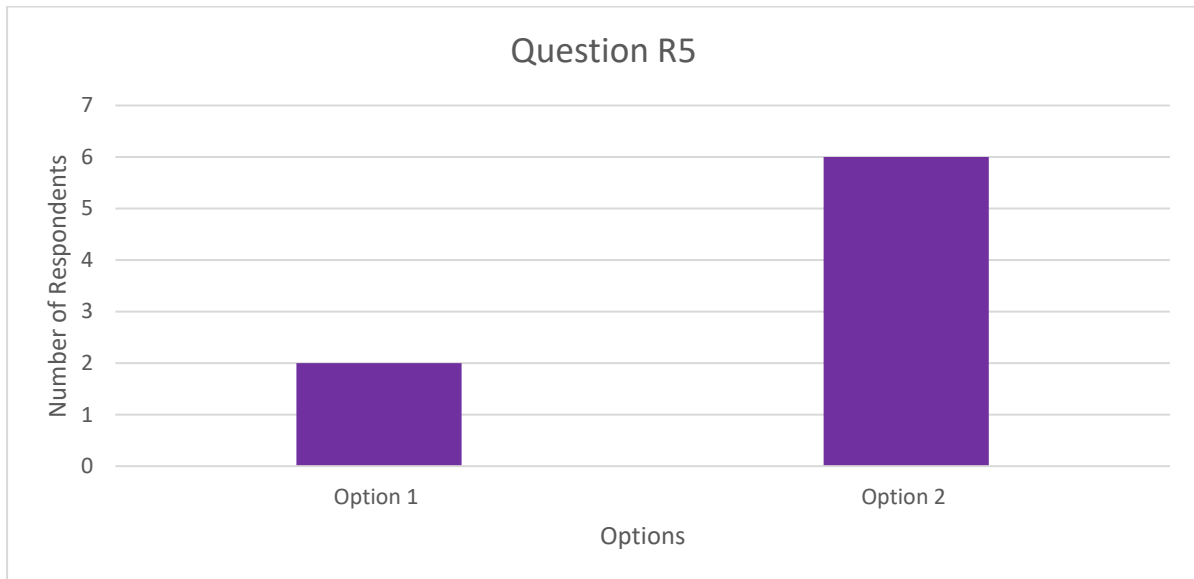


Option 2 was the overall preferred option on this question. One comment suggested not to establish primary shopping areas or otherwise micro-manage high street zoning by type of business. They also stated that it should be left to the market decide but that buildings should not be allowed to be vacant long.

**Question R5: Should the Local Plan include a specific policy requiring developers to undergo a sequential test where existing planning conditions are in place for retail uses to protect the vitality and viability of the Town centres? (Whitehaven, Cleator Moor, Egremont, Millom)**

### Summary of responses

9 people responded to this question, with 8 respondents using the options provided. These were as follows:

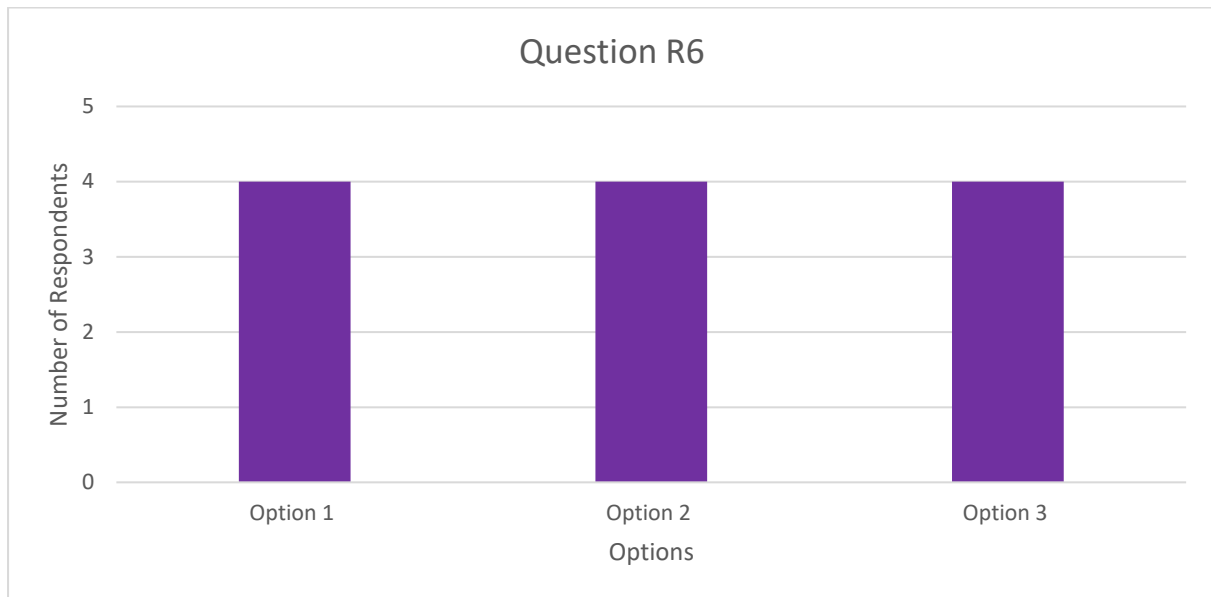


One comment recommend that planning applications on the Sellafeld site for those uses which may traditionally, in planning terms, be defined as 'town centre uses' be excluded from the application of the town centre sequential test. Generally, Sellafeld Ltd planning applications are essential to the operations of the site and cannot be located elsewhere. No other comments were made with regards to question R5.

**Question R6: Should the Local Plan set local (net) thresholds for retail and leisure uses requiring Impact Assessments on units/sites above a certain size in order to protect the vitality and viability of Whitehaven, the Key Service Centres and Local Centres?**

### Summary of responses

There were 8 responses to this question with all 8 respondents selecting options. These are shown below:

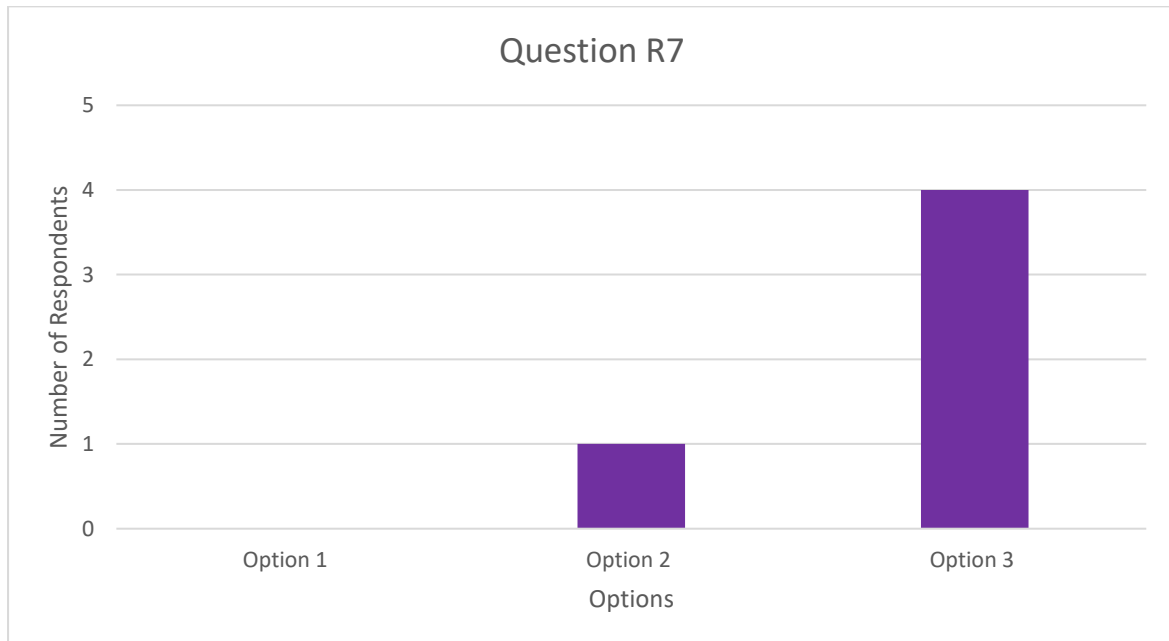


There was an equal response across all options on this question, with 4 out of 8 respondents selecting each option. No further comments were made.

**Question R7: Should the Council consider facilitating edge of centre site(s) in Whitehaven that could provide land for future growth of retail and town centre uses (Refer to NPPF Glossary) that meet the Sequential Test in terms of evidencing that any proposal cannot be accommodated within the town centre boundary?**

### Summary of responses

There were only 4 responses to this question with 5 options selected. These are shown below:



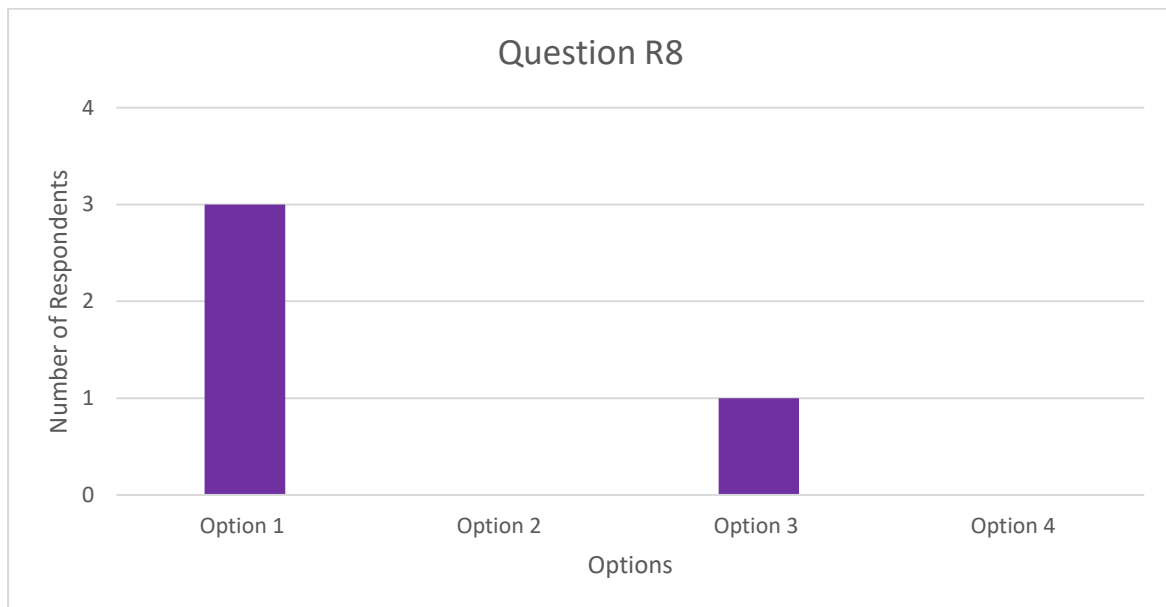
Option 3 was the favoured option as shown above. No additional comments were made on this question.



**Question R8: If edge of centre retail and town centre uses are facilitated in Whitehaven where should the direction of growth be?**

**Summary of responses**

There were 8 responses to this question with all 8 respondents selecting options. These are shown below:

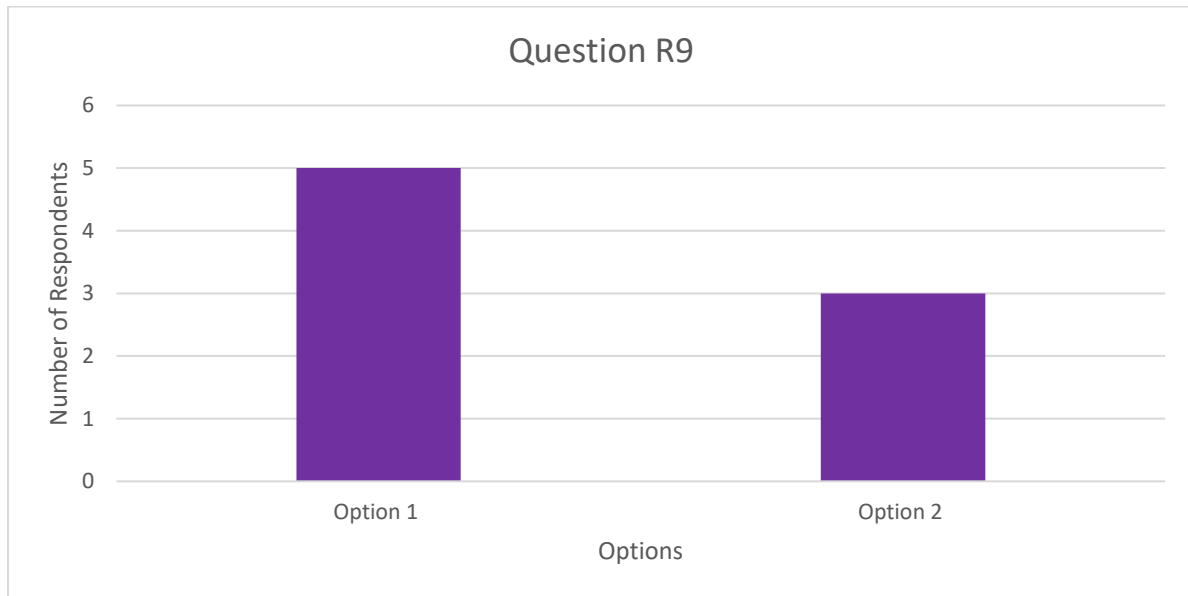


Respondents preferred Option 1 that growth should be along the Preston Street/Ginns area. There were no further comments made by respondents.

**Question R9: What steps should be taken to ensure that alterations to shopping frontages are carried out in a way that is sympathetic to the heritage of Copeland?**

**Summary of responses**

There were 8 responses to this question with all 8 respondents selecting options. These are shown below:

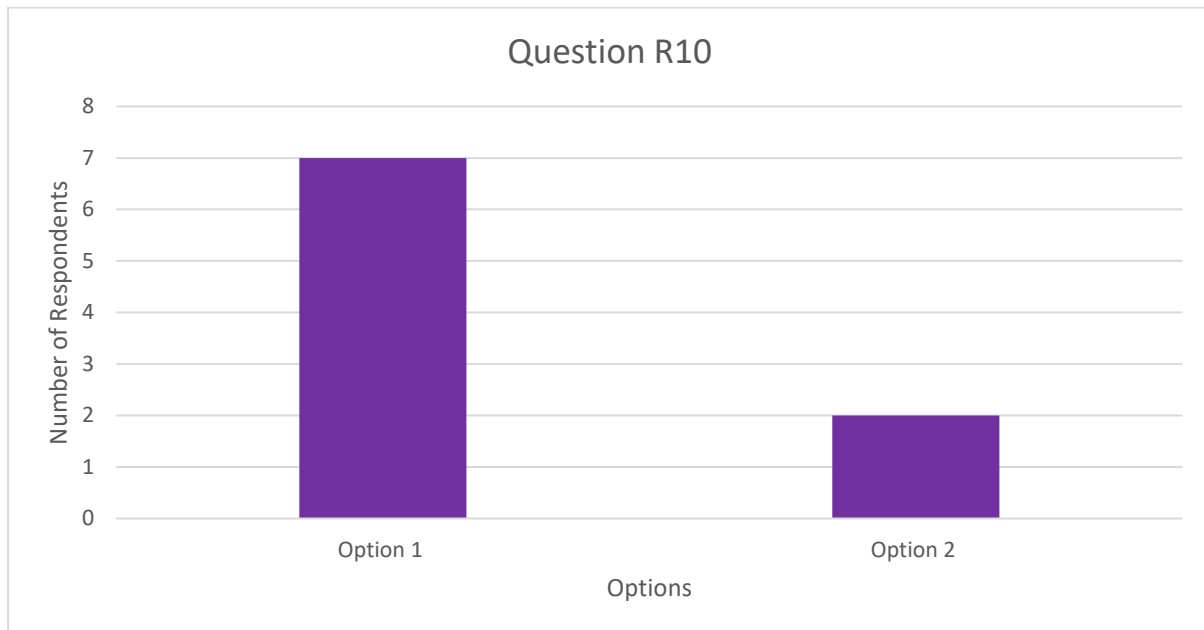


5 out of the 8 respondents selected Option 1. No additional comments were made.

**Question R10: Should the Council introduce a specific policy to improve the aesthetic and environmental quality of town centres?**

**Summary of responses**

There were 9 responses to this question with all 9 respondents selecting options. These are shown below:

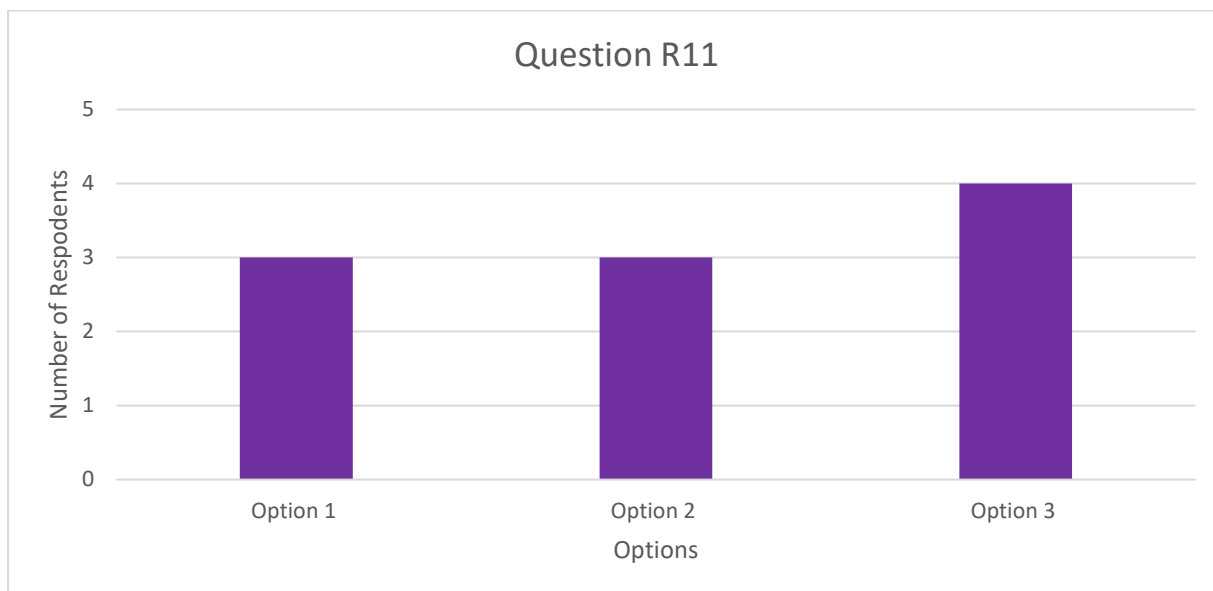


Overall, respondents favoured Option 1, with 7 out of 9 respondents choosing this option. Only one additional comment was made with regards to Option 1 that leadership is needed but it should be advisory.

**Question R11: Should the proposal for a new indoor market/business start- up centre in Whitehaven be explored?**

**Summary of responses**

8 people responded to this question, with 7 using the options provided. These were as follows:

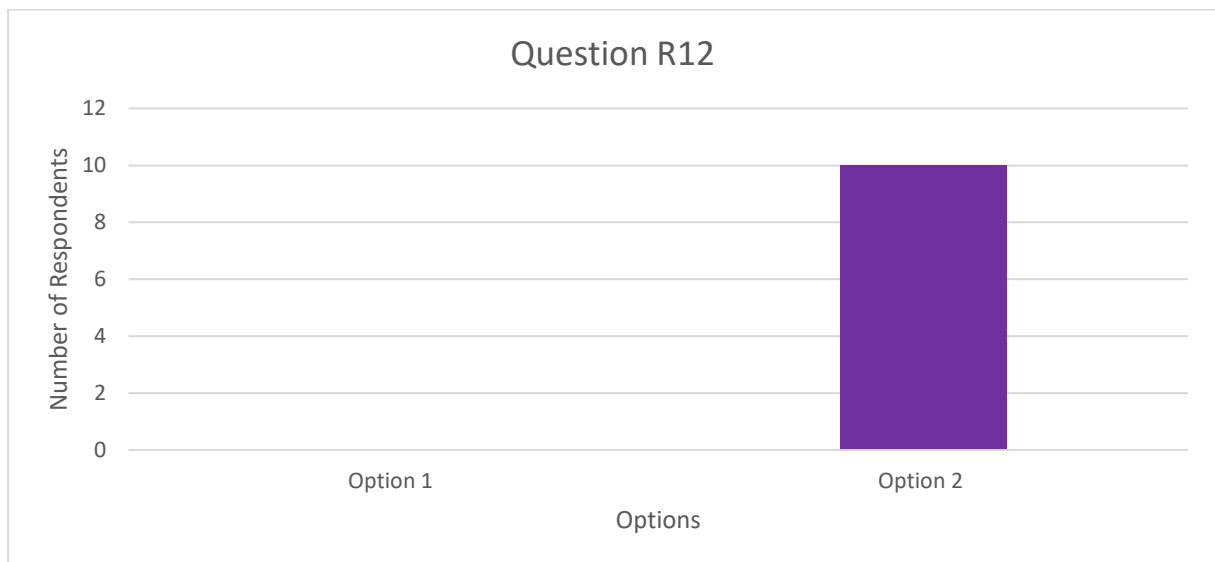


There was almost an equal spread of options selected by the respondents as this table shows. No relevant comments were made.

**Question R12: What steps should be taken to improve digital connectivity across the towns and transmission speeds in key locations to support a cluster approach to draw together creative and high-tech businesses to collate and drive new enterprise?**

### Summary of responses

12 people responded to this question, with 10 using the options provided. These were as follows:



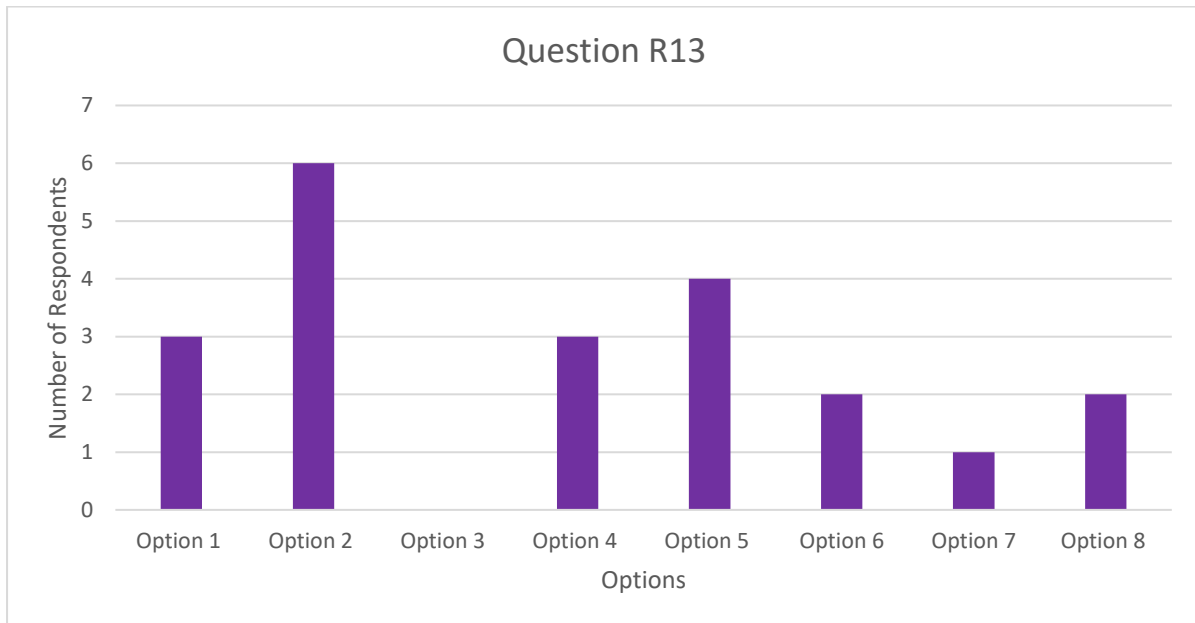
All 10 respondents who selected an option on this question chose to go with option 2. Two further comments were made with regards to this question, these included:

- There is no mention of 5G which will be in this plan's lifetime. Policy should complement Connecting Cumbria and promote development alongside the developments in LDNPA.
- Interconnectivity will be expected throughout the UK. The Council must help obtain funding to ensure Copeland is competitive.

### Question R13: What improvements should be considered to promote sustainable transport in and around Whitehaven Town Centre?

#### Summary of responses

There were 9 responses to this question with all 9 respondents selecting options. These are shown below:



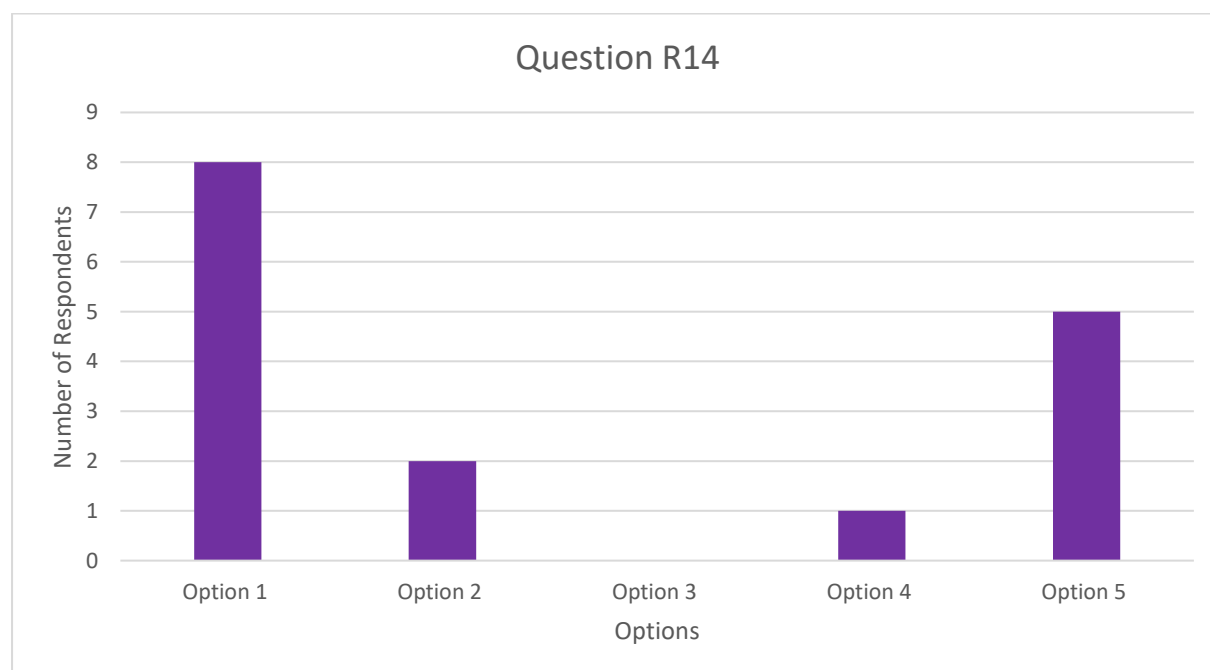
Respondent's selection of options chosen were varied on this question, with Option 2 being the most popular. Comments included:

- Provide more electric car charging points.
- Additional pedestrian areas should be undertaken with care.
- Sport and recreation can be a key use in town centres driving footfall across daytime and evenings. Active Design should be incorporated into town centres. Policy to deliver the concepts of active design in sustainable development would be welcomed to facilitate active lives for the borough's residents, getting people active as part of any daily routine. Making town centres vibrant.

### Question R14: Which parts of the Town Centre should be considered appropriate for residential use?

#### Summary of responses

11 people responded to this question, with 10 using the options provided. These were as follows:



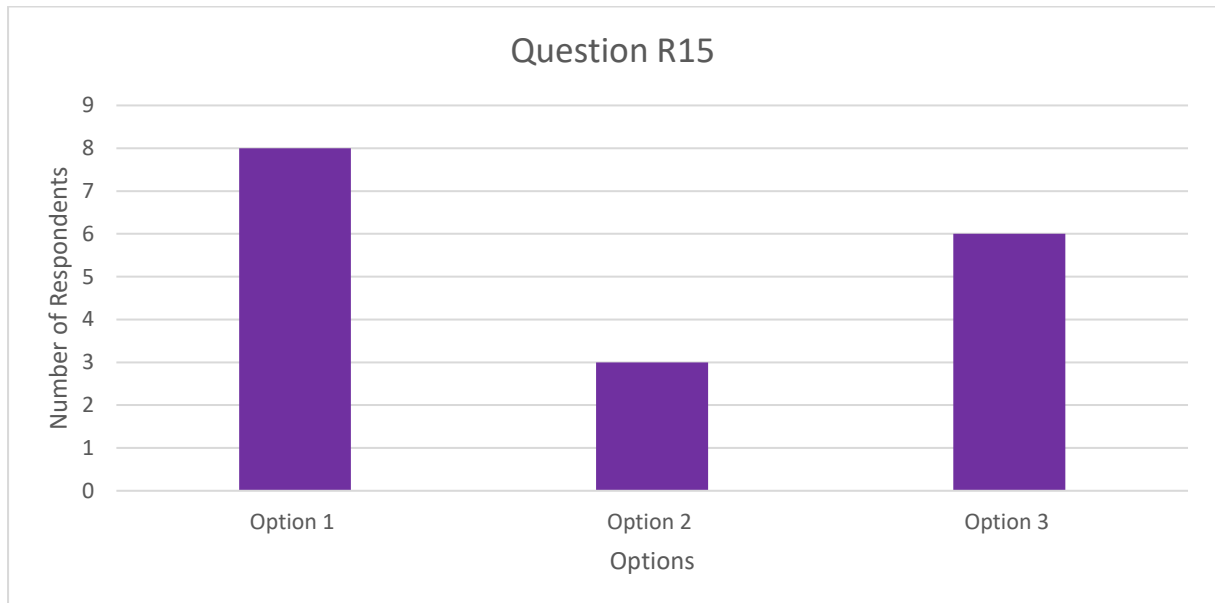
Option one proved most popular amongst respondents. Comments made are as follows:

- Conversion of upper levels above stores into young people's flats, particularly for college students, should be supported, to bring youth and vitality into the town centre and a source of part time labour for the shops and businesses.
- Caution is recommended in promoting residential development in close proximity to noise-generating uses such as pubs and theatres due to the risk of conflict with existing uses.

### Question R15: Should the Local Plan protect rural shops and services?

#### Summary of responses

11 people responded to this question, with 10 using the options provided. These were as follows:



8 out of 10 respondents chose Option 1. Additional comments were made on this question which include the following:

- One comment suggested that any policy seeking to retain provision of services across the borough should include strong support for co-locating new or existing services in order to support their viability.
- It is also suggested that the policy requires clear evidence that local services and facilities are actively marketed as concerns to a reasonable asking price for a set period, rather than just being 'promoted' for that time, which may not be interpreted as intended.
- Rural shops should not be disadvantaged but should align with park protection policies to avoid cross border pressure and business abstraction.
- Rural shops should be protected and encouraged.



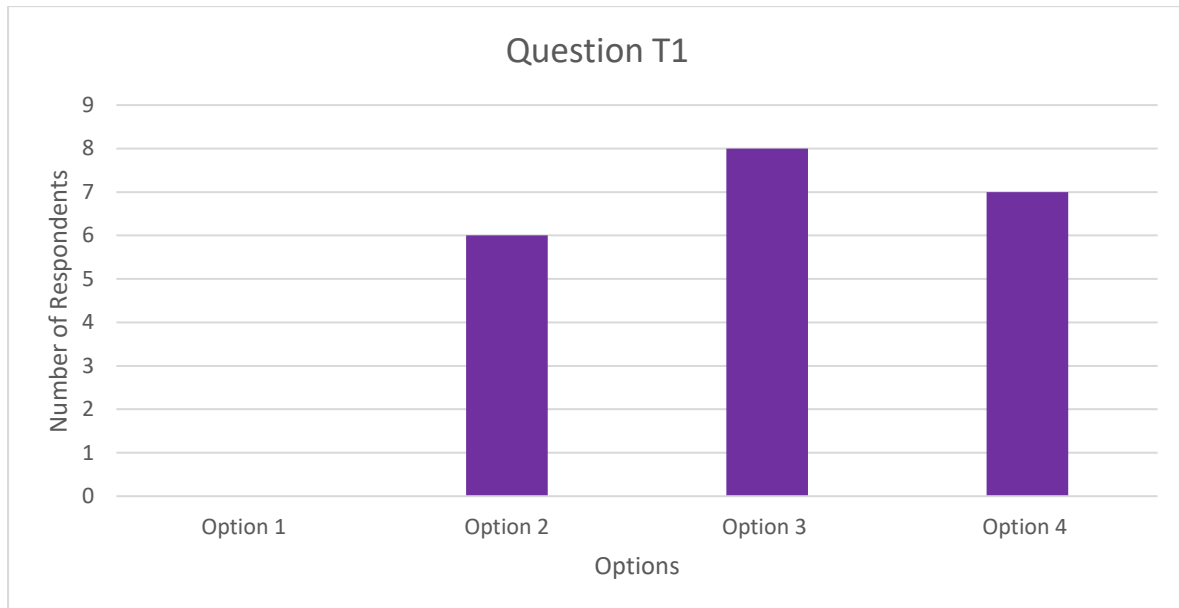
**Question R16: Are there any other issues which should be addressed within this chapter? (Please provide details)**

There was only one further comment made. This was with regards to Copeland Borough Council looking into having a developer build a new swimming pool in Egremont as a health and wellbeing contribution.

### Question T1: Which of the following approaches is the most appropriate in relation to maximising the potential of (non-accommodation) tourism in the borough?

#### Summary of responses

There were 11 responses to this question with all 11 respondents selecting options. These are shown below:



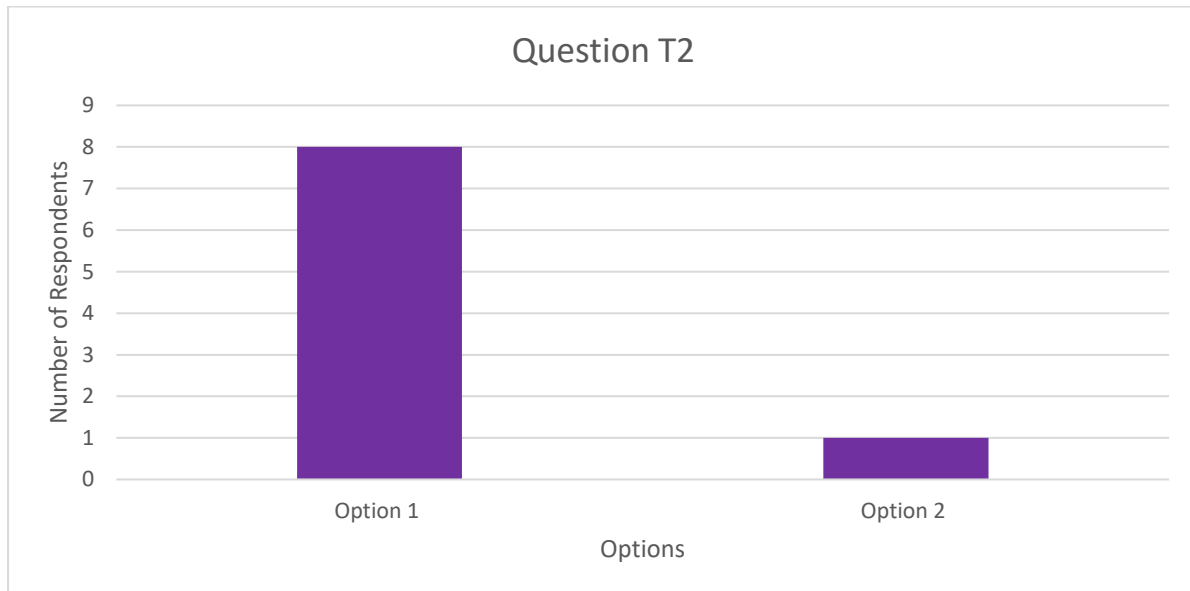
None of the respondents chose to opt for Option 1. Option 3 was the most selected option with 8 out of 11 respondents choosing it. The following feedback was given:

- Rather than being just town centric, the involvement of rural areas where feasible or viable should be investigated.
- One response considered Option 2 the most appropriate option as this approach affords a level protection to valued landscapes and coastline, whilst not being unduly restrictive.

## Question T2: Should the Local Plan continue identifying Tourism Opportunity Sites

### Summary of responses

There were 9 responses to this question with all 9 respondents selecting options. These are shown below:



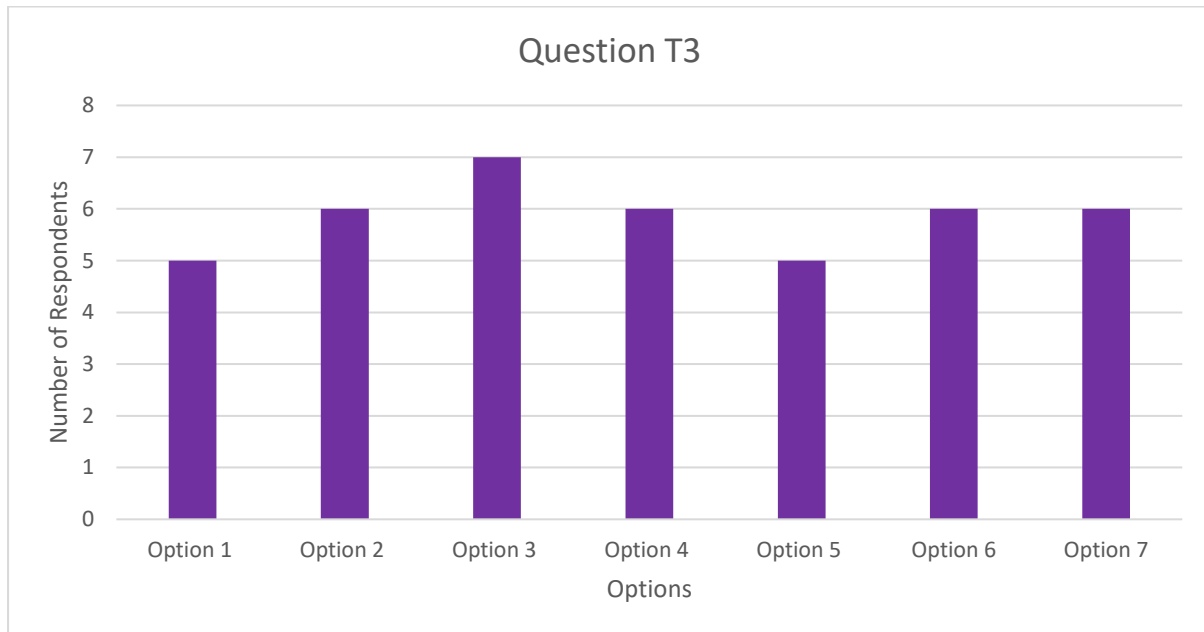
Option 1 was favoured by 8 of the respondents, with only 1 respondent choosing Option 2. Numerous comments were made regarding this question. These are as follows:

- The environmental value of these sites should be recognised and protected through an appropriate policy, including a requirement that tourism activity that takes place within them ensure a mutually beneficial relationship between the tourism activity and the environment. The environment will inevitably inform and shape the type of activity but the activity should also promote and support the conservation and enhancement of these areas.
- The Whitehaven Coastal Fringe Tourism Opportunity Site clearly encompasses an area identified as undeveloped coast in the current Local Plan and the area agreed as an extension to St Bees Head Heritage Coast. These designations should be referred to and protected by any policy developed in relation to Tourism Opportunity Areas. Appropriate safeguards need to be put in place to ensure that any leisure and tourism uses do not prejudice the character of the undeveloped coast or the St Bees and Whitehaven Heritage Coast, as per the requirements of the NPPF.
- There is a need to ensure that appropriate safeguards are put in place to ensure that any leisure and tourism uses do not prejudice the character of the undeveloped coast, as per the requirement of para. 170 of the NPPF
- Whitehaven Coastal Fringe was mentioned several times as an important tourism opportunity site by respondents.

### Question T3: What approaches can be taken to promote tourism in coastal locations?

#### Summary of responses

9 people responded to this question, with 8 using the options provided. These were as follows:



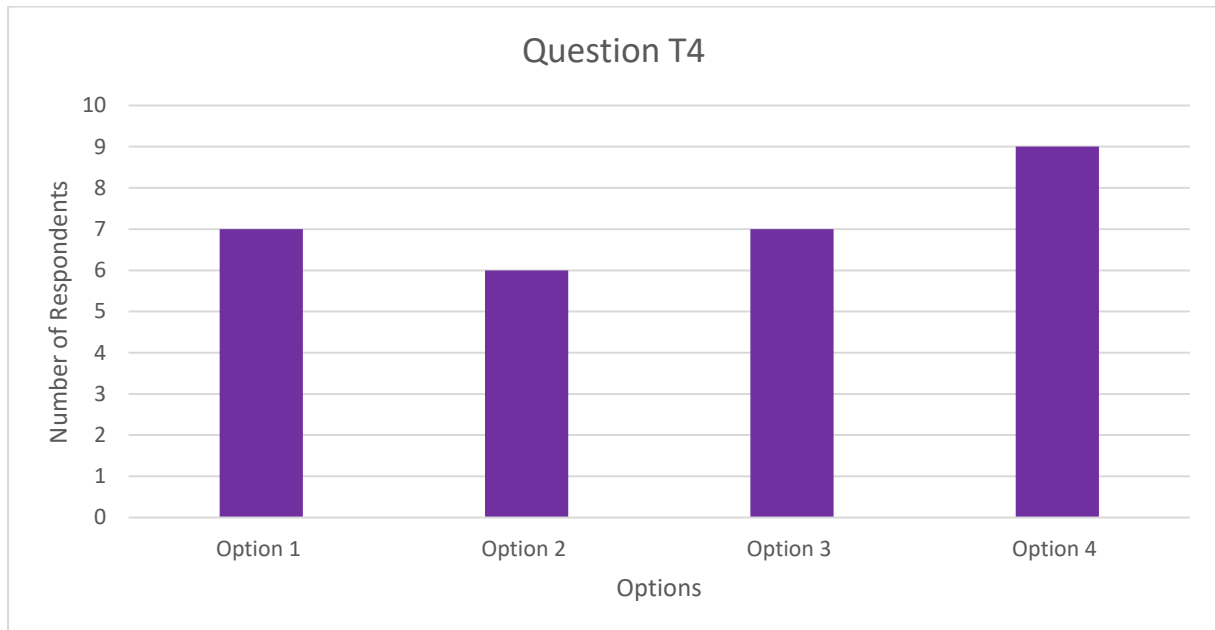
There was almost an equal spread of chosen options amongst respondents, therefore meaning respondents who answered this question supported most of the options given. Some other comments were made, these are as follows:

- The St Bees Head Gateway Site was defined following engagement with stakeholders as part of work relating to the approved extension to the Heritage Coast and remains of relevance. Significant development in areas of undeveloped coast would not be expected, however the nature and extent of tourism activity to promote and support the conservation and enhancement of these areas would be expected.
- The designation of 'gateways' or 'hubs' as a means of promoting coastal tourism are supported.

**Question T4: What options should be taken to improve both the quality and quantity of overnight visitor accommodation in the borough, with preference given to the Spatial Development Strategy with respect to location hierarchy, unless other locations can be robustly justified?**

### Summary of responses

There were 9 responses to this question with all 9 respondents selecting the options provided. These are shown below:

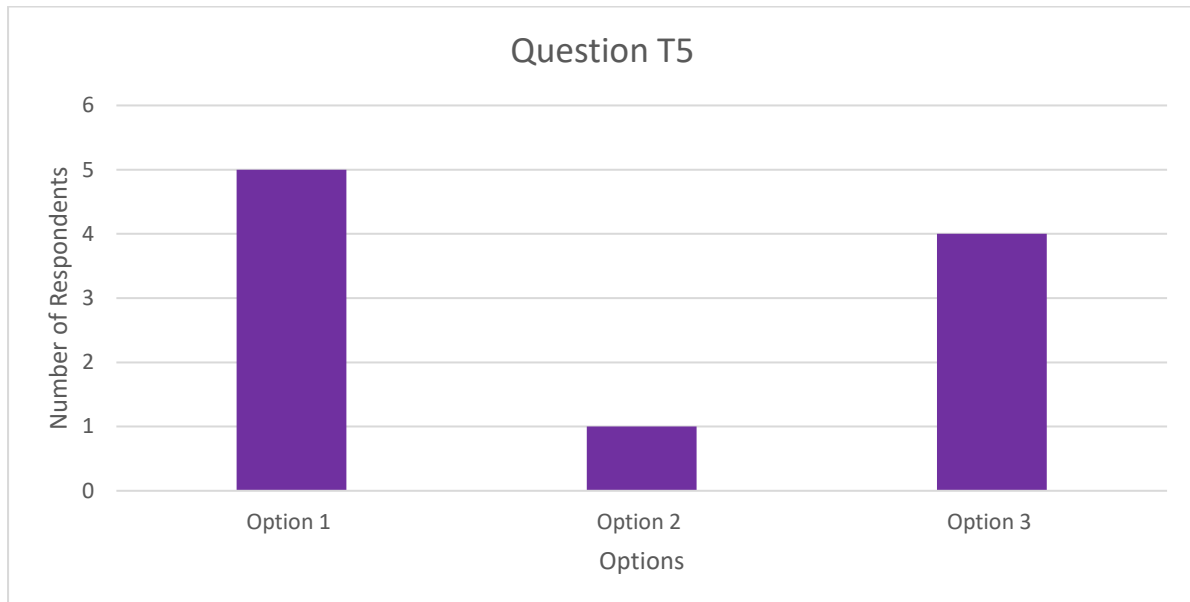


All respondents who answered this question selected Option 4, with the other options also proving popular. No further comments were made on this question.

**Question T5: What option should be taken to safeguard overnight visitor accommodation (Hotels, Guest Houses, Bed and Breakfast, Holiday Cottages)?**

**Summary of responses**

Again, there were 9 responses to this question with all 9 respondents selecting options. These are shown below:

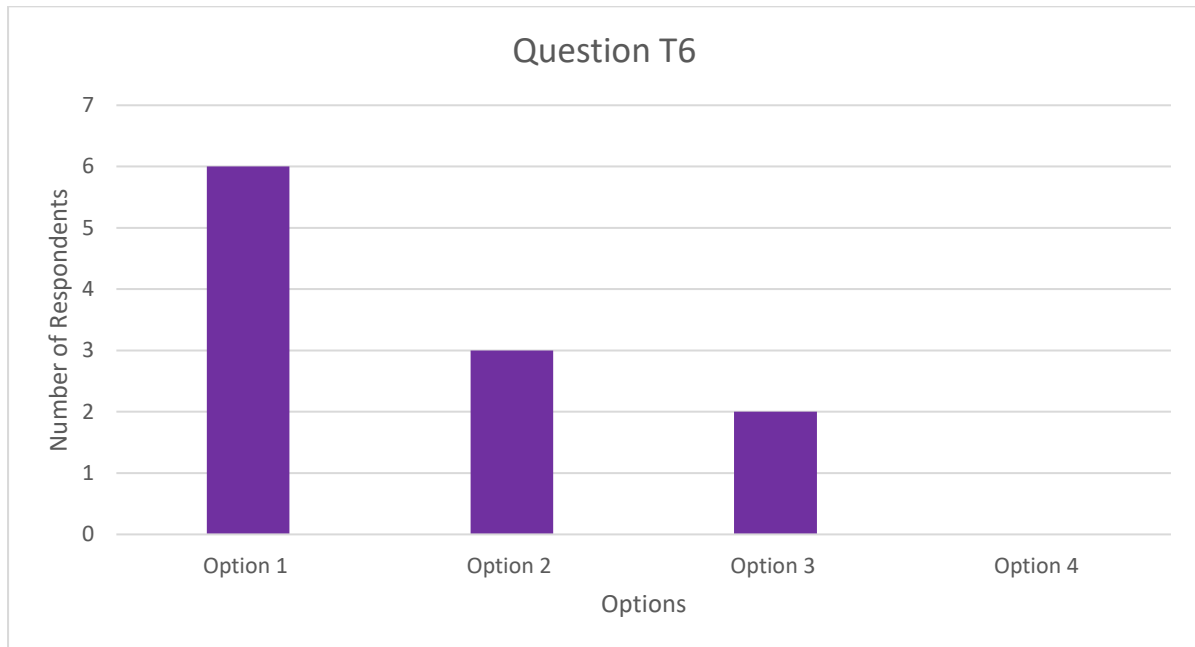


Option 1 was chosen by 5 out of the 9 respondents and was therefore the most popular option. The only additional point that was made was that overnight visitor accommodation should be subject to normal planning regulations.

**Question T6: What option should be taken to ensure Caravans and Lodges (Tourist sites) do not become permanent places of residence?**

**Summary of responses**

10 people responded to this question, with 11 options selected. These were as follows:



Option 1 was the highest selected option, with 6 respondents choosing it. Nobody selected Option 4 and no further comments were given.

**Question T7: Are there any other issues which should be addressed within this chapter? (Please provide details)**

There were a number of other issues raised within comments on this chapter, these are as follows:

- Having more influence over Harbour Commissioners would be beneficial, for example the Wave & Crows Nest not being lit up.
- The critical importance of our landscapes and the quiet nature of most of the rural areas adjacent to the coastline and National Park are a key selling point. The Plan does address the issues regarding the coastline but is largely silent on the importance of protecting other rural areas and in particular those areas adjacent to the National Park and with specific landscape designations.
- Tourism requires strong links with LDNPA to ensure that policies re accommodation and other facilities are complementary and not abstractive to local economies in the park area.
- There is a need for more and/or better allocated parking bays/areas especially for bed & breakfasts as well as tourists.

**Question T8: What additional measures can the Council take to promote Copeland as a tourist destination and achieve its ambitions? (Please provide details)**

Several comments were provided regarding this question, these are summarised below:

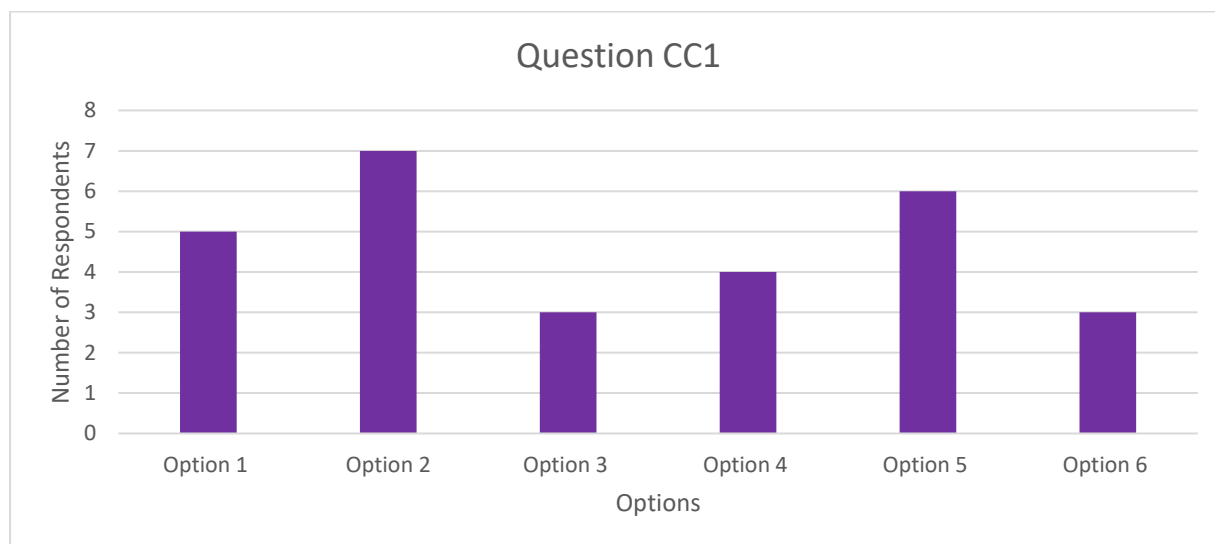
- Could CBC influence Harbour Commissioners to provide a foot path for the disabled & prams from The Beacon to the lock gates? It is very restrictive for most people as surface is uneven.
- Improve rail and bus network - particularly in South Copeland.
- Package deals including accommodation, dining, transportation to and around Cumbria, passes for attractions such as Muncaster, and guided tours.
- Tourist Officer in Millom at least some of the time, preferably in the Discovery Centre.



### Question CC1: How can the Local Plan increase the use of renewable energy within developments in the borough?

#### Summary of responses

11 people responded to this question, with 9 using the options provided. These were as follows:



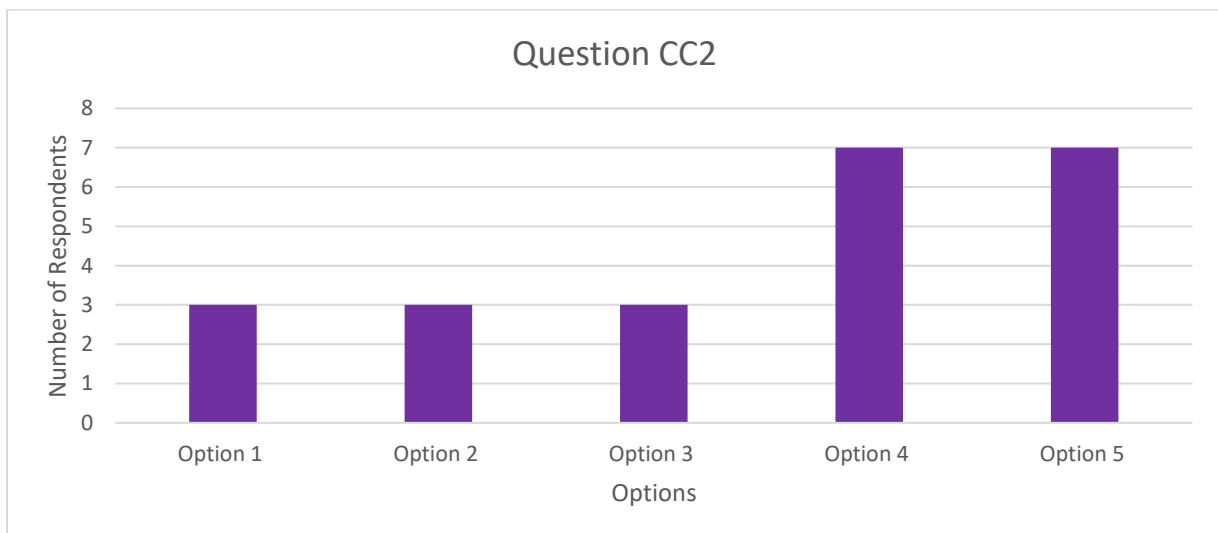
Option 2 was the preferred option amongst respondents. Additional comments are as follows:

- A policy that strongly endorses the need for development to be in sustainable locations with access to sustainable public transport.
- The highest possible percentage of energy should come from renewables in all new developments alongside high levels of energy efficiency and including community-led renewable initiatives. Policies should also require measures to maximise potential for renewable energy use, such as appropriate orientation for solar panels.
- Promote use of hydrogen energy for vehicles and heating.
- We will support inclusion of a policy which encourages the use of renewable energy technologies in new developments, including community- led renewable initiatives.

**Question CC2: What additional measures should be considered as a means of reducing the carbon footprint of new developments, renovations and householder alterations/extensions, where appropriate?**

**Summary of responses**

12 people responded to this question, with 8 using the options provided. These were as follows:



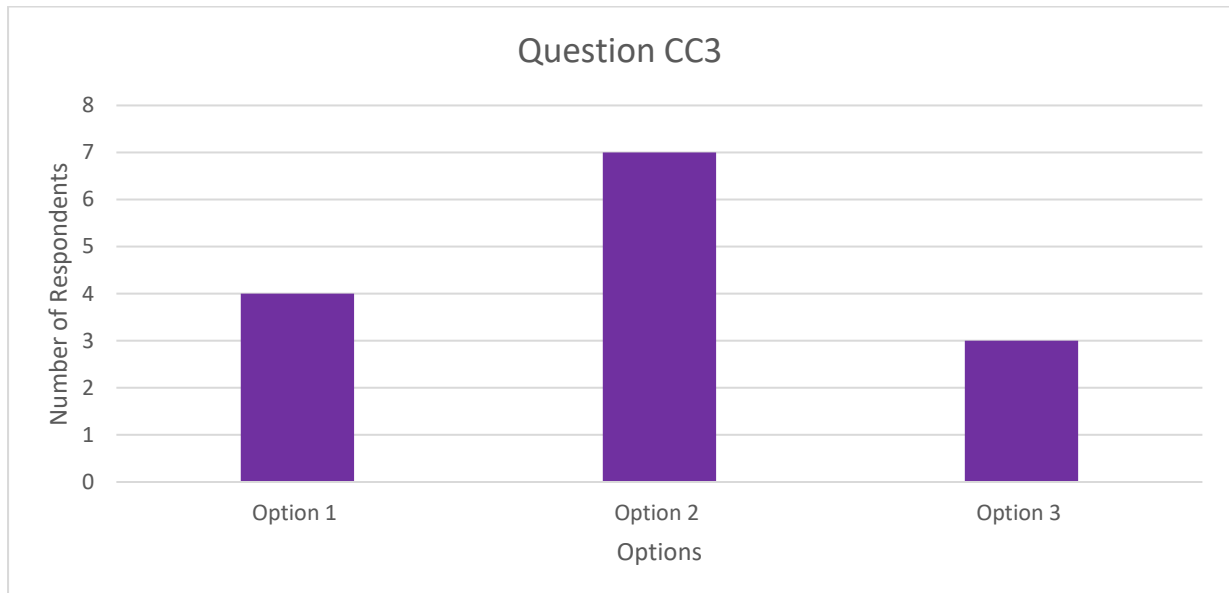
Option 4 and 5 were the most favoured options on this question with 7 out of 8 respondents choosing these options. There were also several additional comments:

- The carbon sequestration ability of the land lost as a result of new development should be taken into account in the assessment of suitability proposed sites for allocation and of the compensation required from individual development proposals in order to ensure a net reduction in carbon /net increase in sequestration overall.
- The potential for a land to serve other essential functions should be taken into account i.e. the benefit or potential benefit from a piece of land for carbon sequestration, tree planting, flood risk management, biodiversity etc. will be lost if the site is developed (or reduced/altered depending on what the development does to make these provisions), so an assessment should be made of which is most needed overall, the proposed development or the existing or potential other functions.
- Nature-based measures such as green infrastructure and habitat restoration should be considered, to support developments in reducing their carbon footprints and adapting to climate change.
- It is recommended that consideration be given to the uniqueness of the Sellafield site and the overarching priority of maintaining safety and security, value for money and functionality. Sellafield Ltd places value on reducing its carbon footprint, but this should not be a determining factor for proposals and conflict between the Local Plan and developments of national significance should be avoided where possible.

### Question CC3: How can the Local Plan support large scale renewable energy developments?

#### Summary of responses

There were 8 responses to this question with all 8 respondents selecting the options provided. These are shown below:

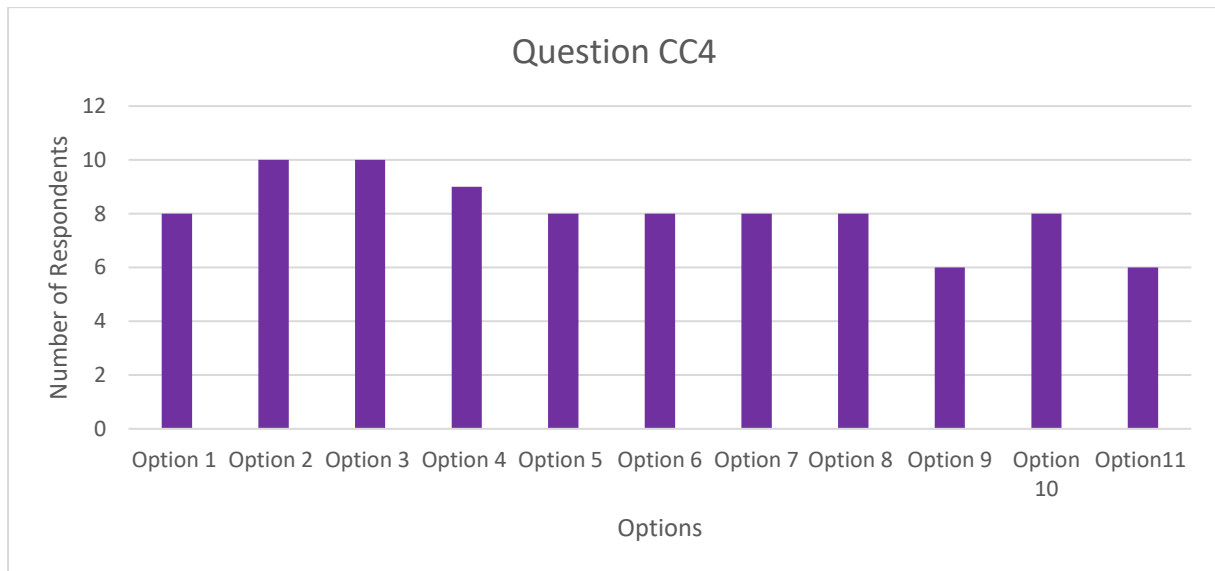


Option 2 was the preferred option, with 7 out of the 8 respondents selecting it. There were no further comments made regarding this question.

### Question CC4: Which parts of the borough should be excluded when identifying land as Suitable Areas for Wind Energy development?

#### Summary of responses

11 people responded to this question, with 10 using the options provided. These were as follows:



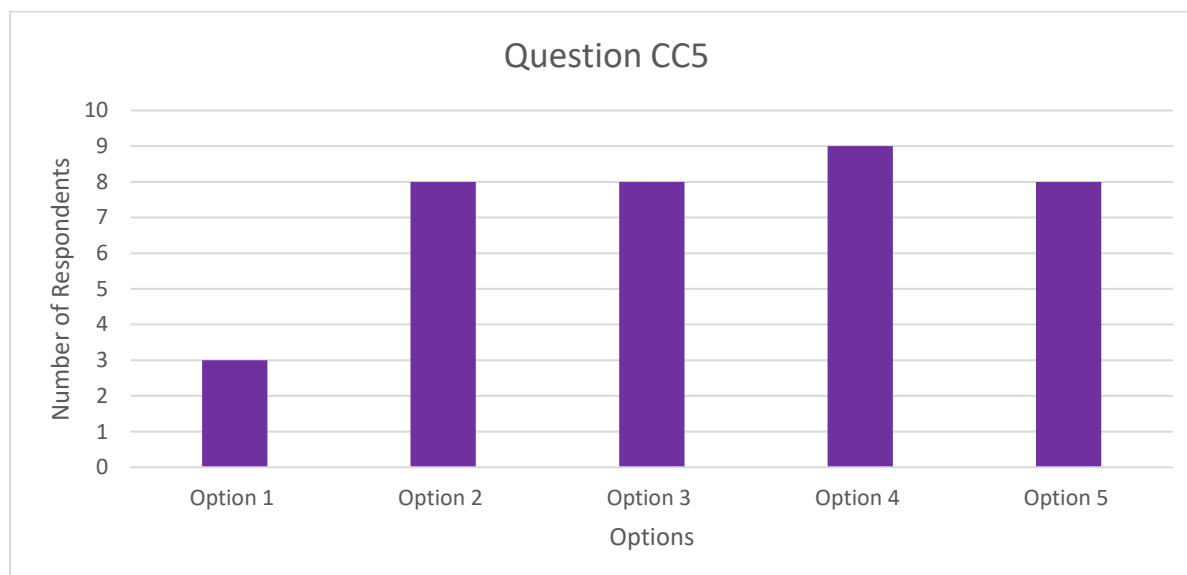
All 10 respondents who chose options all opted for Option 2 and 3. Option 9 and 11 were the least chosen options, with just 6 out of 10 of the respondents choosing these. However, as you can see from the above graph, there was almost an even spread of responses across all chosen options. Some further comments were made:

- Respondents who chose Option 6 were also asked to state what distance should be covered with regards to a specific buffer – **1km** was suggested amongst 3 respondents who answered this question.
- Any sites that have a detrimental impact on the National Park/World Heritage Site should be excluded.
- The identification of buffer zones around sensitive receptors is supported. The St Bees and Whitehaven Heritage Coast and the setting of the Lake District National Park and WHS should also be excluded, with buffer zones also identified for these.
- Further clarity needed surrounding Option 9- it is unclear why an area would be excluded on the basis of size alone and more explanation is needed for this – would it preclude single turbines for example? Which area would be measured?

### Question CC5: How can the Local Plan deliver green infrastructure to mitigate against climate change?

#### Summary of responses

14 people responded to this question, with 10 using the options provided. These were as follows:



Options 2, 3, 4 and 5 were popular amongst the respondents, with only 3 respondents selecting Option 1. Several comments were raised:

- Regarding green roofs and walls, the level of provision what is appropriate would vary case by case, therefore a Borough-wide threshold should not be set. Even a very small area of green roof or wall could assist greatly in terms of enhancing biodiversity depending on the species used and other aspects of the context such as what land cover it is replacing.
- Dry stone walls, as well as being a traditional feature (the retention or building of which in appropriate stone can help conserve and enhance landscape character), are valuable habitats for a range of plant and animal species and should be included alongside hedges as a form of boundary treatment/feature within developments to be encouraged.
- Buffers may be appropriate in some circumstances but this depends very much on context. In and adjacent settlements, integrating new development with the existing community may have benefits over creating a buffer.
- Green Infrastructure has the potential to deliver on the full range of ecosystem services and is not restricted to mitigating climate change. There are many ways in which this can be done but a crucial factor to consider is multi-functionality, as most individual pieces of green infrastructure can deliver several ecosystem service functions, helping to address many environmental, social and economic objectives.

This is important when considering how existing green infrastructure can be enhanced and when creating new green infrastructure.

- Infrastructure directing traffic near schools
- Mapping exercise to identify location and quality of existing green infrastructure and what services it is currently providing. Having established this baseline, opportunities should be identified to enhance and connect this green infrastructure network.
- Establishing principles or standards for high quality green infrastructure, providing clear expectations for development proposals. Existing standards include Accessible Natural Greenspace Standard. A new national green infrastructure standards project is currently in development.
- Creation of a Supplementary Planning Document to guide green infrastructure and development.
- Multifunctional green infrastructure can provide SUDS and other measures to mitigate the impacts of climate change, they can also be places where people can be active, provide sustainable transport opportunities including walking and cycling, and encourage and support healthy lifestyles.

**Question CC6: Are there any additional options for improving air quality which should be considered through the Local Plan process? Please provide further information**

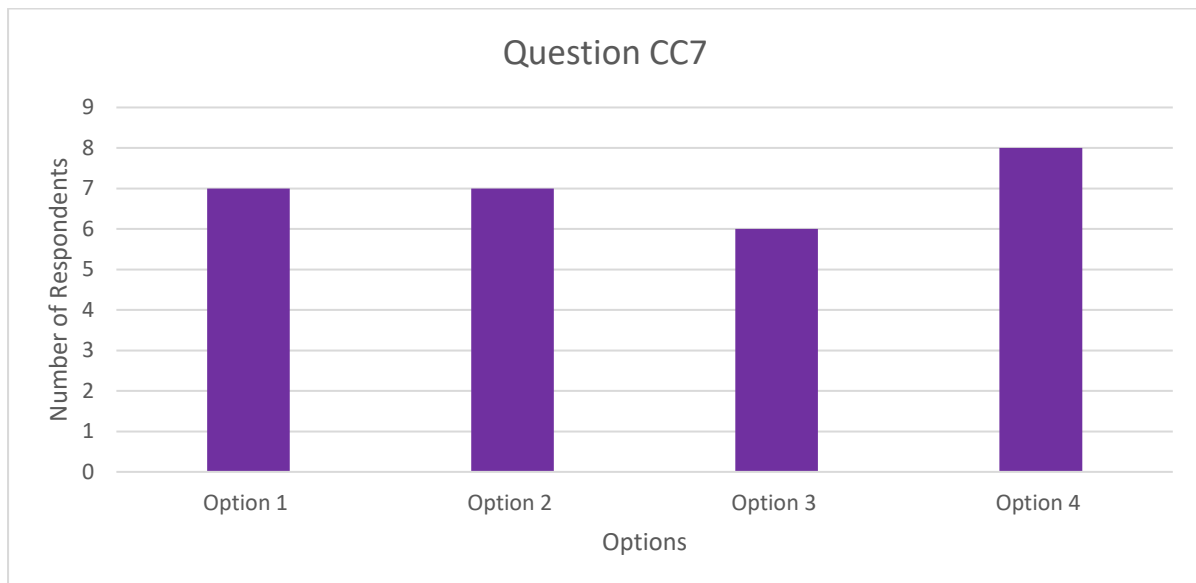
One additional comment was made about improving air quality in the Borough, it is suggested that:

- The Air Quality section of this consultation document has no reference to ammonia emissions from agricultural developments and activities such as livestock housing, slurry stores and spreading of manures. Ammonia impacts upon human health and damages sensitive habitats. Several SSSI's within the Borough are currently over their critical threshold levels for ammonia.
- Potential objectives and actions for the Local Plan could be seeking to support and assist landowners/farmers to implement ammonia reduction measures, improved infrastructure and exploring opportunities for ammonia reduction mitigation measures such as tree screening and green infrastructure.

**Question CC7: How can the Local Plan minimise the risk of flooding in new developments and ensure new development does not increase the risk of flooding elsewhere?**

**Summary of responses**

13 people responded to this question, with 11 using the options provided. These were as follows:



Responses were mixed on this question, although Option 4 was the overall favoured option. Additional comments were as follows:

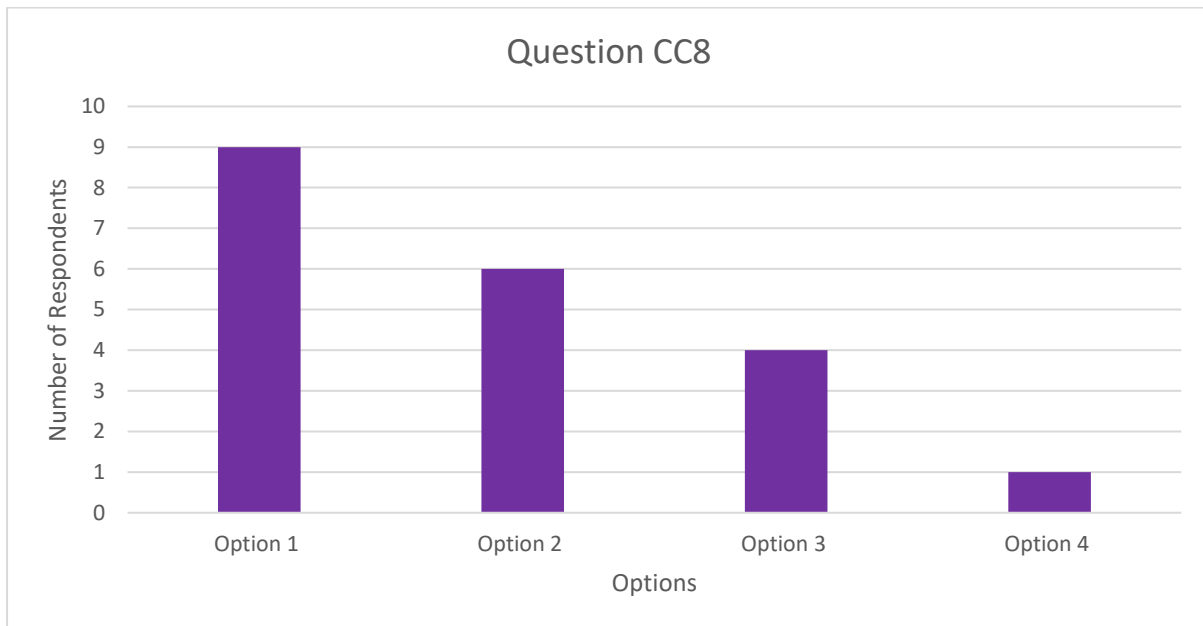
- Recommended addition of a policy within the Local Plan which reiterates the need for Part 2 of the Exception Test - a Site-Specific Flood Risk Assessment is prepared for sites as described in paragraph 103 of the National Planning Policy Framework.
- Option 3 should apply to FZ3 only, not FZ2
- Sellafield Ltd has developed a detailed flood risk model which ought to be used to inform whether proposed development is appropriate. The Local Plan should not conflict with any other Government policy on delivery of the nuclear mission.



### Question CC8: How can the Local Plan promote the use of sustainable drainage systems (SuDS)?

#### Summary of responses

16 people responded to this question, with 11 using the options provided. These were as follows:



Option 1 received the most responses, with 9 out of 11 respondents choosing it. Additional comments were made:

- Include supporting text that emphasises the role of natural SuDS in protecting and improving water quality.
- Include a policy: for major developments SuDS will be required and a drainage strategy should be submitted detailing the following:
  - The types of SuDS and/or measures;
  - Hydraulic design details/calculations;
  - Pollution prevention and water quality treatment measures together with details of pollutant removal capacity; and
  - The proposed management and maintenance regime for the lifetime of the development.
- SuDS are not appropriate for the majority of the Sellafield site due to the need to prevent the infiltration of rain water through contaminated land.
- It is suggested that planning policy should require new developments to avoid or mitigate potential impacts on flooding and incorporate SuDS. A robust approach to flood risk including a policy to reiterate the sequential approach to site selection and to prevent development in areas at risk of coastal erosion would be supported.
- The ambition to promote the use of SuDS as a nature-based method of managing drainage whilst providing additional services and benefits would be welcomed. If the

new Local Plan encourages the use of SuDS when appropriate. This in turn would benefit other policy areas such as green infrastructure measures and biodiversity net gain.

- A policy within the emerging Local Plan that makes reference to the requirement for developments to control surface water in accordance with the surface water drainage hierarchy would be beneficial.

**Question CC9: Are there any additional options for managing water demand which should be considered through the Local Plan process? Please provide details.**

There were a few additional comments made with regards to this question, some points raised are as follows:

- Include a policy that, wherever possible, maximises the use of additional measures that protect water resources by allowing natural groundwater recharge e.g. permeable paving; natural SuDS techniques such as swales.
- Include a policy that development will not be permitted where it would have an adverse effect on the quality or quantity of groundwater or surface water resources.
- Include a policy that protects, and where possible seeks to improve, the quality of both surface and groundwater resources, by requiring measures to prevent the discharge of contaminated runoff (including silts) into receiving surface waters and ground waters, during both the building and operational phase of development.
- Include a policy that protects the quality of surface and groundwater resources by avoiding, wherever possible, the use of non-mains foul drainage and requires following the hierarchy of wastewater disposal as set out in the Planning Practice Guidance.
- Consideration should be given to any measures the Local Plan could take to limit water demand, such as a maximum bathrooms to bedrooms ratio and/or by using the Optional Technical Standards for water efficiency.
- Split the Victorian drains in the Millom area to separate waste and surface water as a matter of urgency.

**Question CC10: Are there any other issues this chapter of the Local Plan should cover?  
Please provide details.**

There were several additional issues raised in this chapter, comments include:

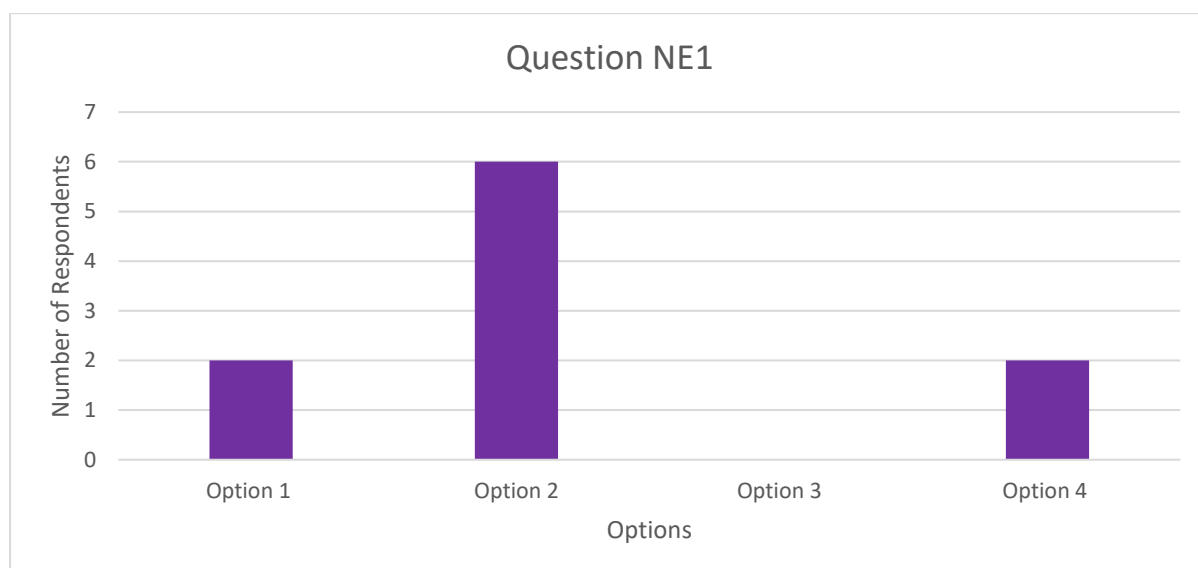
- Where appropriate, development must take account of, and allow space for, potential future measures required to mitigate against increased flood risk due to climate change e.g. allowing space for ponds and open features for flow attenuation and water storage measures upstream of flood risk areas; allowing space for future improvements to existing flood defences.
- Developers should seek to maximise opportunities for using space in a multi-functional way and for enabling SuDS features to form part of the character of the development. Open space and recreation provision in new developments present a clear opportunity to provide much needed SuDS, whilst also contributing to quality neighbourhoods, providing opportunities for wildlife and enhancing the leisure and play on offer, resulting in a significant positive health effect.
- We would be pleased to see any policies on landscaping or green/ blue infrastructure. Please note that surface water drainage schemes on approved development sites will be expected to be supplemented by appropriate maintenance and management regimes.
- UU to be required to ensure they have a back up to the power supply for the King Street pumping station
- Egremont is not included within the flood risk areas noted in the Local Plan. Whilst the flood alleviation works that will be completed by autumn 2020 should prevent future flooding within the housing estates the river Ehen flows through Egremont and bridge at bridge end estate are prone to flooding and water course damage.

## Natural Environment

### Question NE1: Should the Local Plan include a requirement for 10% biodiversity net gain in new developments?

#### Summary of responses

13 people responded to this question, with 10 using the options provided. These were as follows:



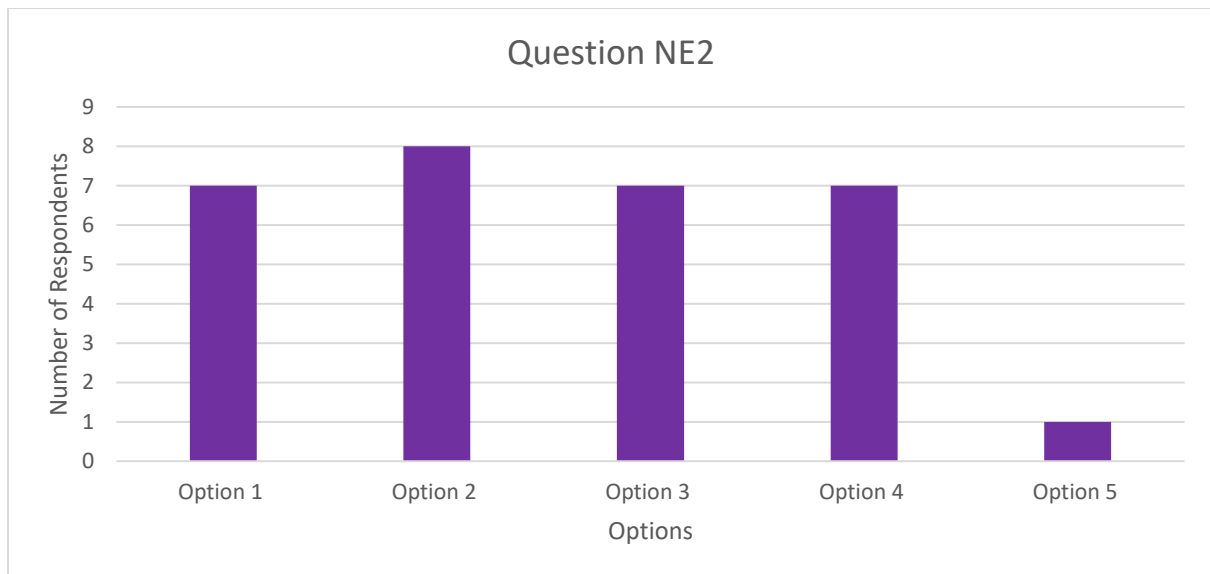
Option 2 was the preferred option amongst the respondents with 6 out of 10 selecting this option. No respondents selected Option 3. The following comments were also made:

- A number of respondents made the point that to ensure the success of biodiversity net-gain, include in the policy the requirement for monitoring and maintenance of new biodiversity provision.
- The biodiversity net gain should not be limited to 10% as many developments will be capable of providing more than 10% but will be unlikely to do so if 10% is set out in policy.
- Even small developments can provide a net gain, including swift bricks, bat boxes, green roofs and walls and small rain gardens.
- The amount of net gain should be the maximum possible in each case and exceptions should be allowed only on a case by case basis, where it is demonstrably not possible. The Plan should signpost users to examples of ways in which different types and scales of development can deliver net gains.
- Care should also be taken not to confuse or conflate net gain and offsetting.
- We strongly encourage Copeland to include a policy requiring net gain, and consider necessary measures to apply this in practice locally.
- It is expected that Nuclear Licensed sites will be exempt on passing of the Environment Bill. The Local Plan should not place itself in conflict with that position, nor restrict proper delivery of the mission (which delivers environmental net gain).

## Question NE2: How can the Local Plan protect areas of Green Infrastructure?

### Summary of responses:

16 people responded to this question, with 14 using the options provided. These were as follows:



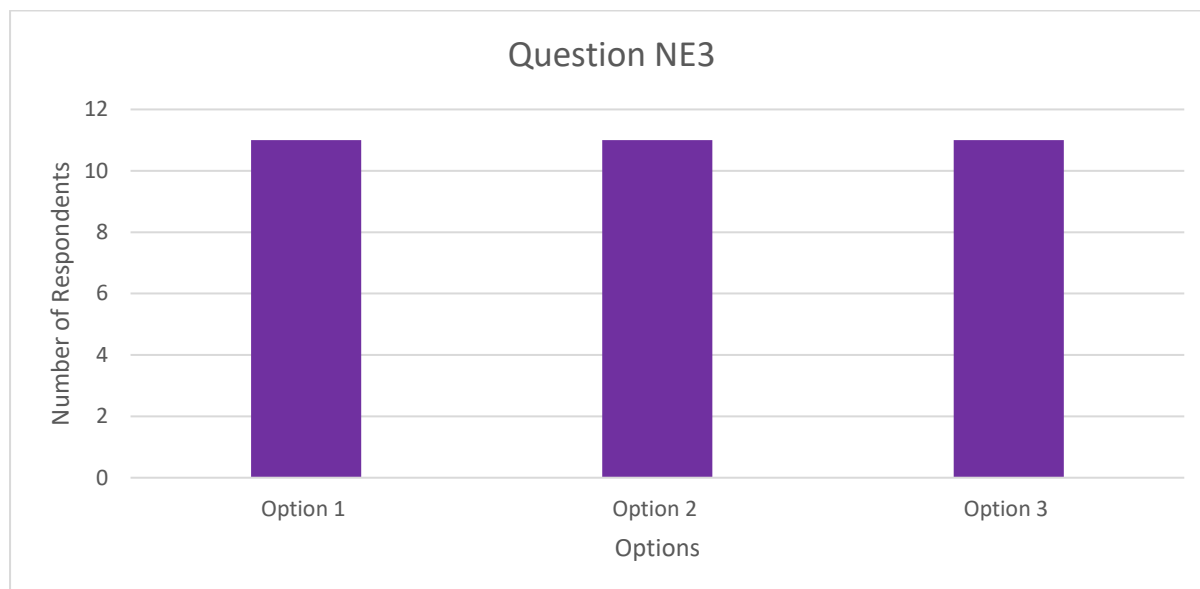
Options 1, 2, 3 and 4 were the favoured options, with Option 2 coming in highest, with 8 out of 14 respondents selecting this option. Option 5 was only chosen by 1 respondent. The following comment were made:

- Any policy in the Local Plan should be clear that the protection afforded only applies to open space complying with the Framework definition of open space, or a similar definition included within the Local Plan. Such protection should not be afforded to areas of open land that form no role as open space.
- The policy will need to allow for the fact that the approach to protection that is most appropriate will depend on the primary function(s) of the piece of green infrastructure.
- Supporting text should include recognition of the role of green infrastructure in natural flood management.
- It should be recognised within the Local Plan that the Borough's green infrastructure network is wider than just Local Green Space designation, also including local nature reserves, woodlands, allotments, verges, SuDS features, street trees and blue features such as rivers and coast. Together this network can provide a range of benefits for recreation and biodiversity.

### Question NE3: How should the Council increase tree cover in the borough?

#### Summary of responses:

15 people responded to this question, with 13 using the options provided. These were as follows:



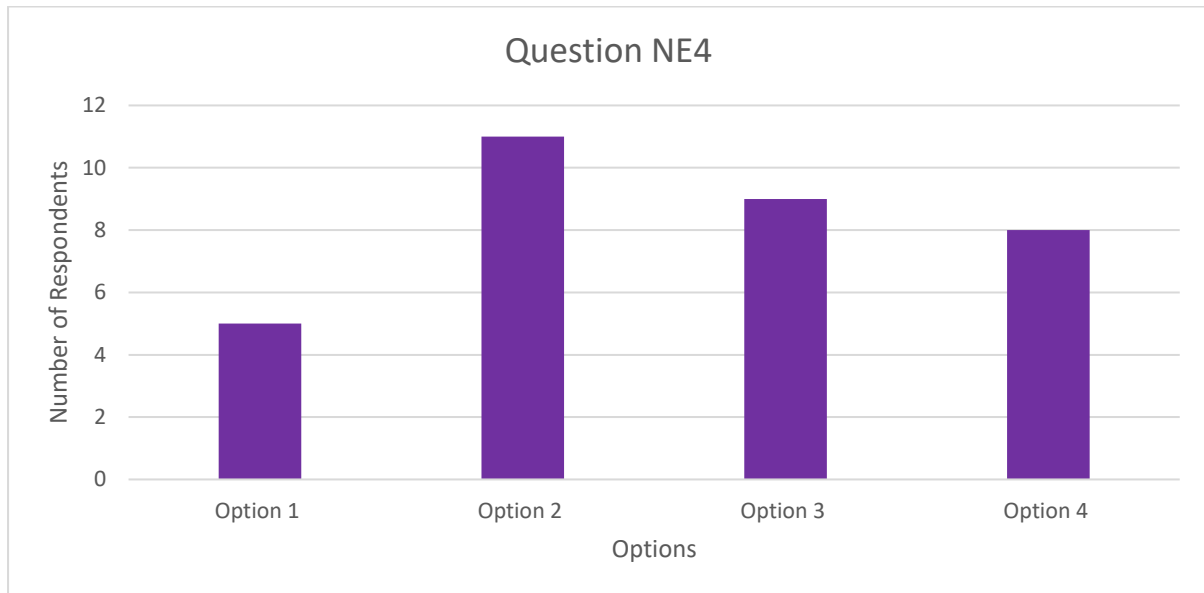
There was an equal response from respondents on this question, with 11 out of 13 selecting each of the options. The comments made are summarised below:

- To ensure the long-term success of any tree-planting policy, ensure that any policy includes requirement for on-going monitoring and maintenance of new planting.
- The ambition to increase tree cover in the borough, which can contribute to the wider green infrastructure network and provide benefits to people, wildlife and climate change mitigation is welcomed.
- We would recommend a higher ratio of replacement under Option 2 and suggest avoiding 'where appropriate' under Option 3, instead requiring offsite provision if it is demonstrably inappropriate for some reason to plant some or all of the required trees on site.
- To maximise opportunities to increase tree cover and secure most benefit, we recommend including a strategy for trees and woodland within a wider green infrastructure review, setting clear objectives, management, monitoring and good practice (based upon the Urban Tree Manual). Alongside other green infrastructure assets, existing tree cover should be assessed and opportunities to increase tree cover identified. This strategy could support a policy seeking to enhance tree provision from developments, helping applicants to understand what and where tree planting would be most appropriate.

#### Question NE4: How can the Local Plan help protect soils from degradation?

##### Summary of responses:

13 people responded to this question, with 11 using the options provided. These were as follows:



All respondents who picked options selected Option 2, with Option 1 being the least favourable option. The following comments were also made:

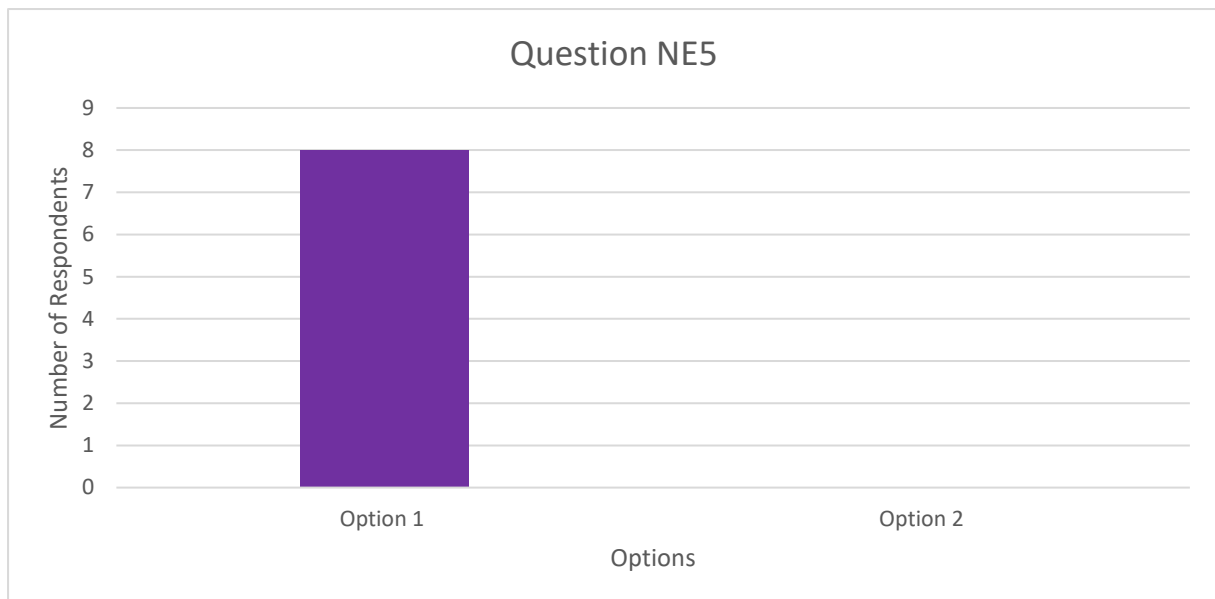
- Focusing development sites on previously developed land and avoiding undeveloped land to ensure the soil is protected and the benefits it provides are secured long term is encouraged.
- It is important to recognise the duration of the Sellafield mission and constraints on land are likely to lead to re-use of plots before reaching the site End State. It would not be practical to remediate those plots for the next use and so the focus should be on the End State.
- We would support soil management measures which avoid, mitigate and compensate, including a soil resource plan and adherence to the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. All developments should seek to achieve pre-development or better levels of surface water drainage and ensure pollution prevention measures are in place for any surface water run-off into watercourses.



**Question NE5: How can the Local Plan help protect the borough's best and most versatile land?**

**Summary of responses:**

11 people responded to this question, with 8 using the options provided. These were as follows:



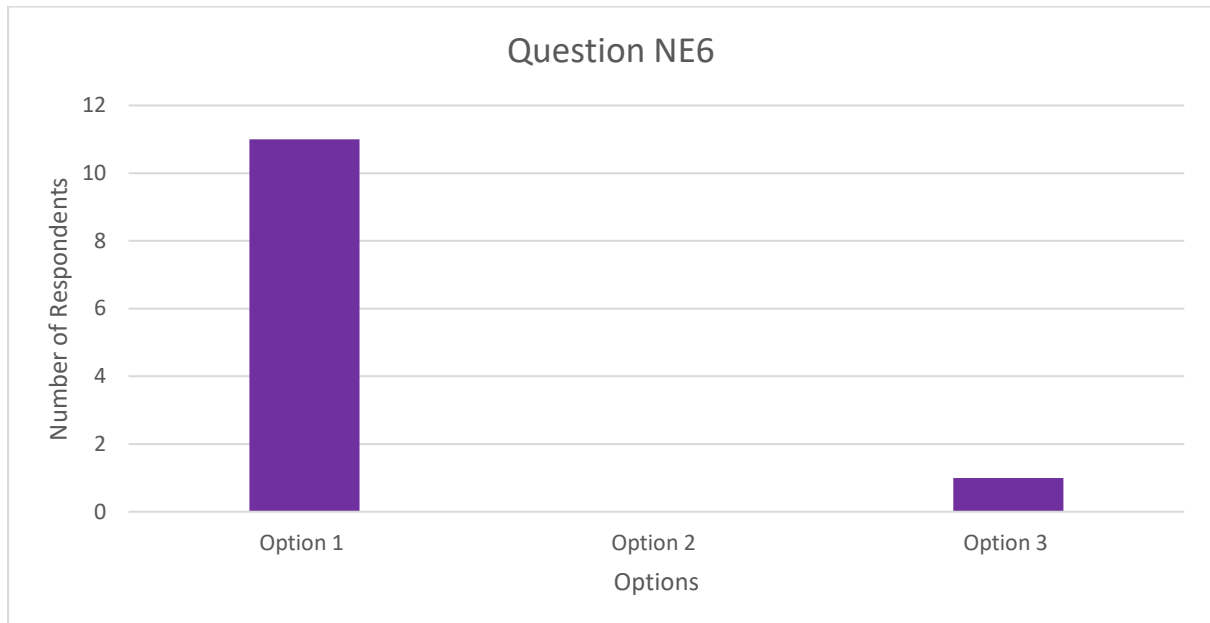
All respondents who chose options for this question, chose Option 1. Other comments were made:

- One respondent suggested that they did not agree with any of the options for this question, although they did not provide an alternative
- It is recommend the Local Authority follows standing advice on assessing development proposals on agricultural land.
- The Sellafield site and the activities that are performed upon it are a national asset and Sellafield Ltd may require adjacent land. The land classification around Sellafield has a high to moderate potential to be "best and most versatile land" so Option 1 could have a detrimental effect on the mission.

### Question NE6: Should the Local Plan continue to support the management of the undeveloped coast for biodiversity?

#### Summary of responses:

13 people responded to this question, with 12 using the options provided. These were as follows:



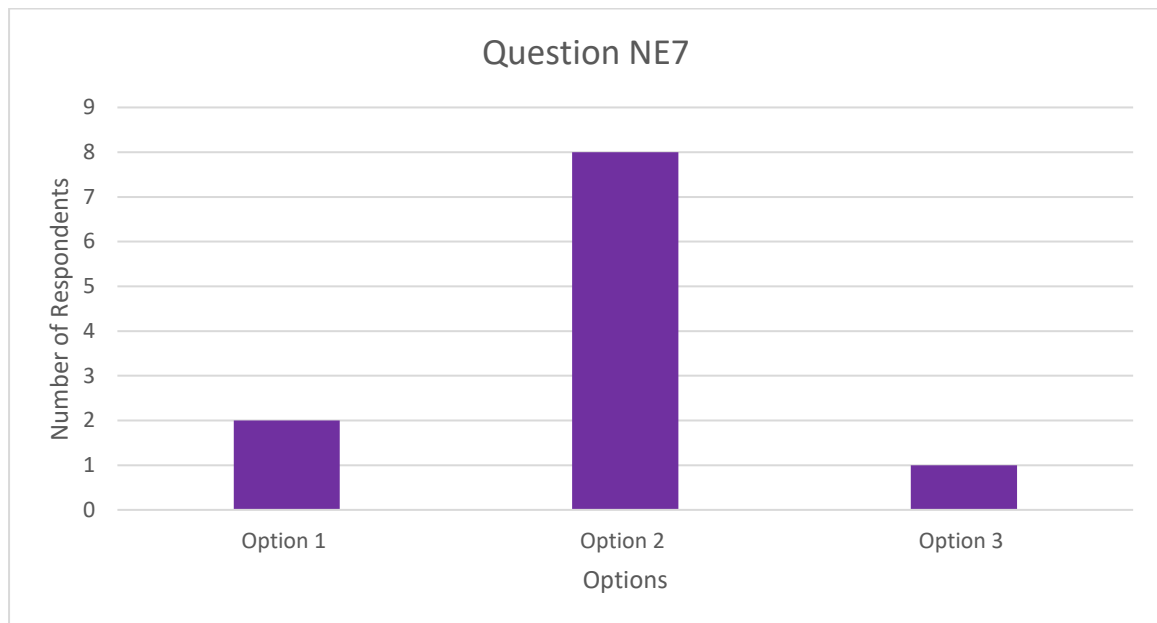
Almost all of the respondents who chose options picked Option 1. Only 1 respondent selected Option 3. The following comments were made by respondents:

- The Local Plan should support the management of the undeveloped coast for biodiversity, alongside management for other objectives including maintaining landscape character, access and heritage. The production of a management plan, a statutory requirement for all defined Heritage Coasts, would be beneficial in this respect to help define features of significance and coordinate opportunities for their future management.
- We also note that the undeveloped coast provides several other benefits to society for which it should also be protected and managed for, including natural and landscape beauty, geology, recreation, access and heritage.

### Question NE7: Should development be permitted within areas identified as undeveloped coastline?

#### Summary of responses:

12 people responded to this question, with 11 using the options provided. These were as follows:



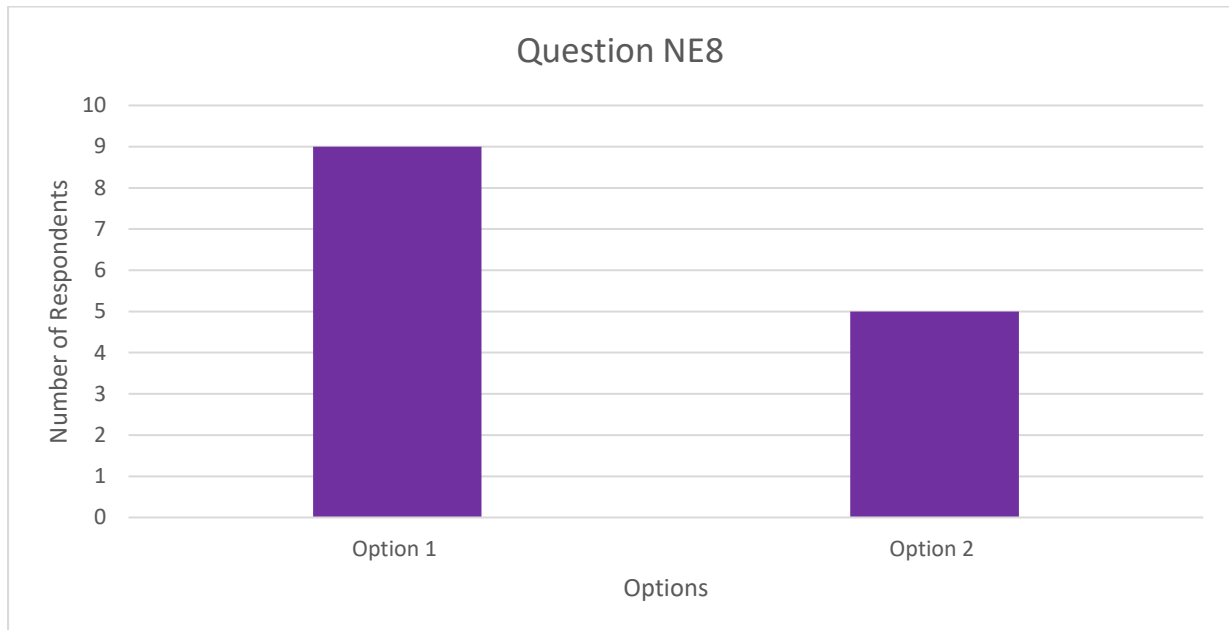
Option 2 was the preferred option amongst respondents with 8 out of 11 respondents choosing it. A further comment was made:

- We would support Option 2 in principle. Criteria should include a requirement to conserve and enhance landscape character and visual amenity of these areas in line with relevant landscape character evidence. We would have strong concerns about any proposals for significant development in the areas defined as undeveloped coast.
- Any development should ensure the local landscape character is maintained, and does not have a detrimental impact within the St Bees Heritage Coast or its surrounding setting, as well as the biodiversity features along the undeveloped coast

### Question NE8: How can the Local Plan ensure a high level of landscaping is provided in new developments?

#### Summary of responses:

13 people responded to this question, with 10 using the options provided. These were as follows:



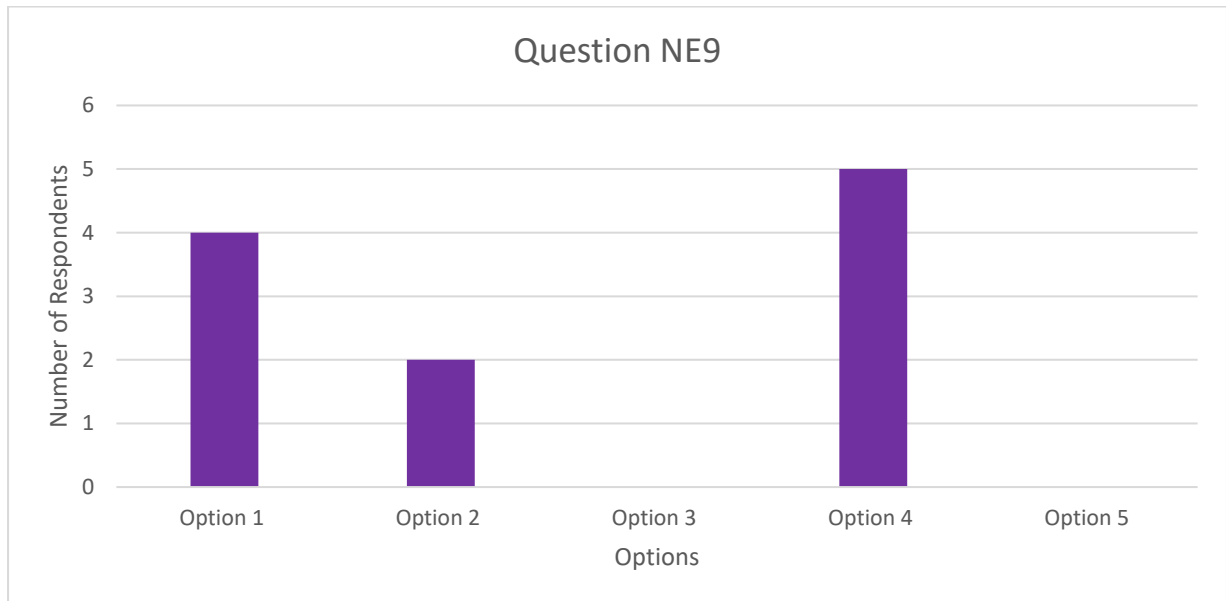
9 out of the 10 respondents who picked options picked Option 1, with 5 choosing Option 2. Some additional comments that were made are as follows:

- Ensure any landscaping scheme is resilient to the future impacts of climate change.
- Landscaping in new developments should be informed by the need and scope for the provision of ecosystem services at each given location. For example, if air quality, flooding or a lack of provision for biodiversity are issues at that location, this should be taken into account in the type, design and extent of landscaping and species used.
- Any significant areas of landscaping, particularly on Greenfield sites and edge of settlement sites, should also be informed by landscape character evidence in order to minimise the impact of new development on landscape and visual amenity and potentially enhance landscape character.
- High level landscaping within new developments is supported and considered crucial in delivering green infrastructure which benefits people and nature.
- It is encouraged that any development seeking to deliver a biodiversity net gain, provide a biodiversity management plan alongside a landscaping scheme, setting out the pre-development biodiversity value of the site, the post-development biodiversity value, and how it will be managed into the future.

**Question NE9: Should the Local Plan continue to require landscaping to be maintained for a minimum of 5 years?**

**Summary of responses:**

13 people responded to this question, with only 11 using the options provided. These were as follows:



Option 4 as the overall favoured option chosen amongst respondents. This additional comment was made:

- Landscaping schemes that seek to deliver biodiversity net gains should ensure habitats are maintained into the future. Whilst national planning policy does not currently set a specific length of time for this, the emerging Environment Bill proposes any gains be maintained for a minimum of 30 years post-development.

### **Question NE10: Are there any other issues which should be considered in this chapter?**

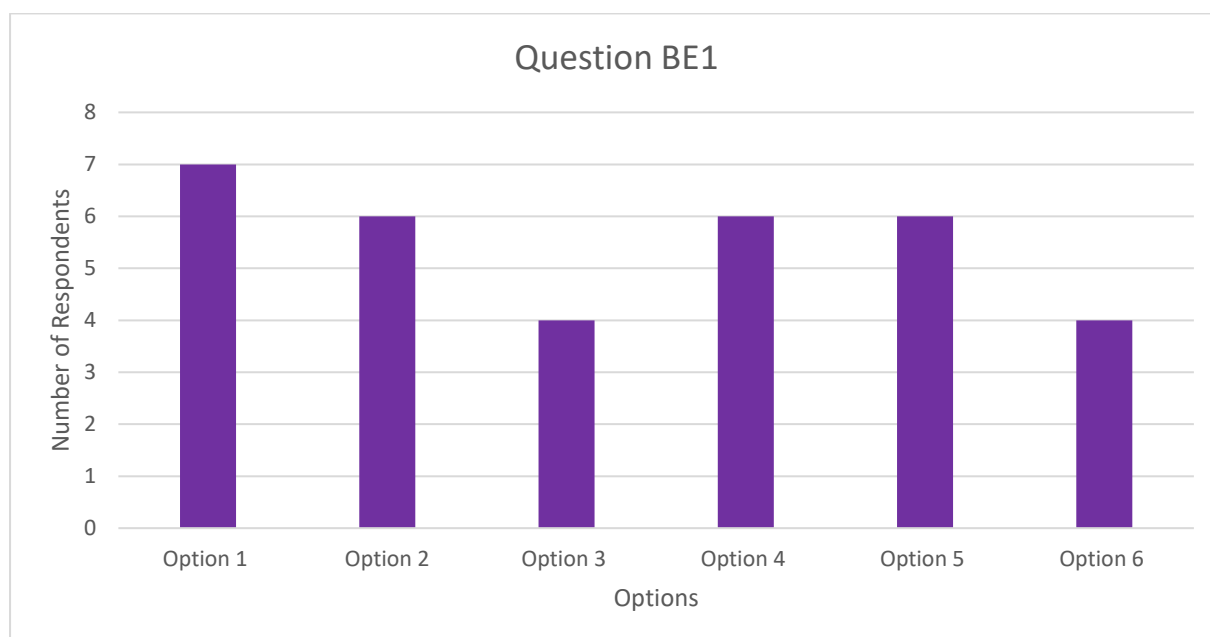
There were a number of additional comments made with regards to this chapter, these are summarised below:

- Consider how the Local Plan can help limit the spread of, and where possible reduce the current distribution of, invasive plant species such as Japanese knotweed and Himalayan Balsam.
- There is a strong focus on the un-developed coast but little consideration of the importance of the landscapes adjacent to or impacting on the setting of the National Park.
- Reference should be made to the LDNPA Landscape Character Assessment which identifies areas outside of the Park boundary that have the same character and quality as landscapes within the Park and which therefore clearly form part of its setting and have significant value.
- The Local Plan should acknowledge the presence, history and necessity of the Sellafield site and avoid policies which conflict with nationally significant development projects and supporting infrastructure.
- It is suggested that the Cumbria Coast Marine Conservation Zone (MCZ) is added in the 'key facts' section (para. 12.1). MCZ's form the UK contribution to an international network of protected sites in the north east Atlantic. They serve to protect typical, rare or declining habitats and species found in our seas. St Bees Head in particular supports the best and most extensive and important examples of intertidal rocky shore habitats and communities in North West England.
- A number of respondents consider there should be explicit recognition of the approved defined area of the St Bees and Whitehaven Heritage Coast.

### Question BE1: How should the Council promote good design in all developments?

#### Summary of responses:

10 people responded to this question, with 9 using the options provided. These were as follows:



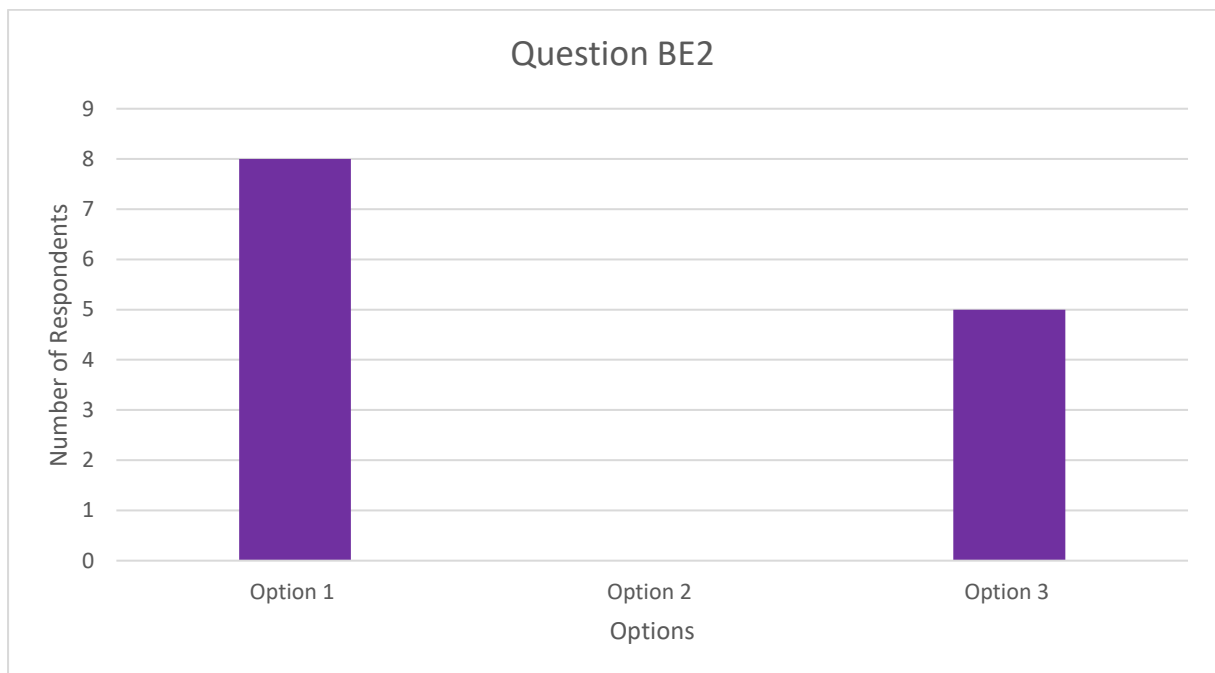
There was a mixed response to the options provided as can be seen on the graph above. Option 1 was the most popular amongst respondents with 7 out of 9 choosing it and option 6 was the least chosen option with 4 out of 9 respondents choosing it. There were no relevant comments made with regards to this question.

- Sellafeld Ltd should not be overly constrained by design requirements in a Local Plan which would not meet our overarching priorities or regulatory requirements and would request that this is taken into account when reviewing applications, in particular design requirements, on the Sellafeld site.

### Question BE2: Should the Council encourage or require dwellings to be built to the BRE Standard?

#### Summary of responses:

9 people responded to this question, with 9 using the options provided. These were as follows:



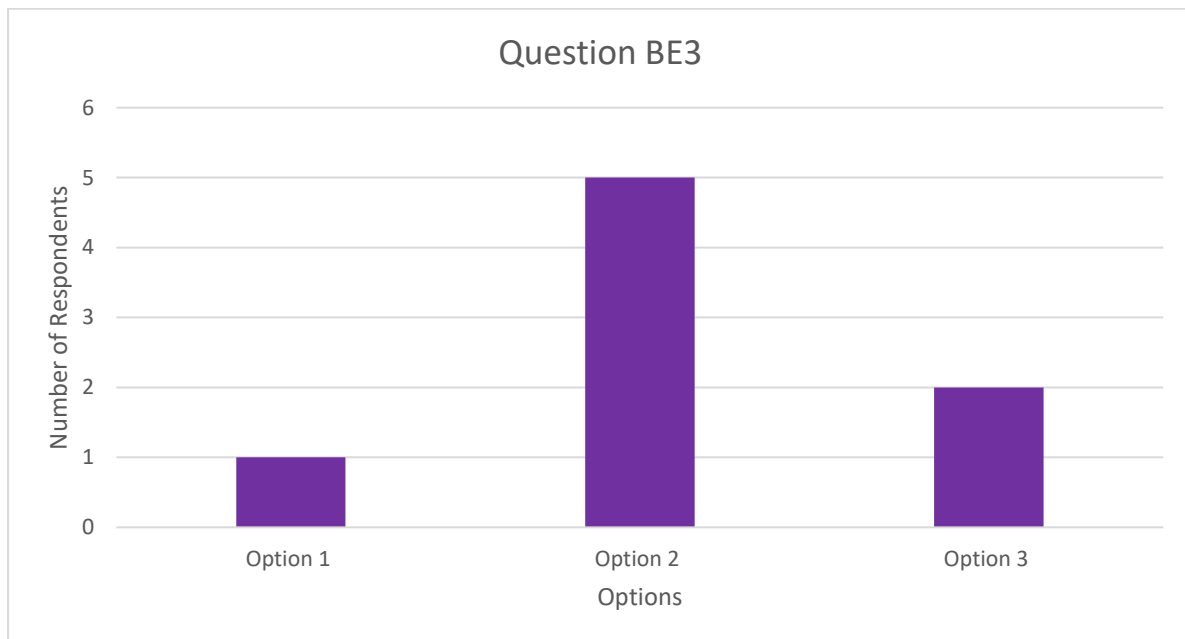
Option 1 was the highest selected option, with nobody opting for Option 2 and 5 out of 9 people choosing Option 3. There were no additional comments made on this question.



**Question BE3: How can the Local Plan ensure advertisements requiring planning permission are not harmful to the streetscene or cause unacceptable levels of light pollution?**

**Summary of responses:**

7 people responded to this question, with 7 using the options provided. These were as follows:

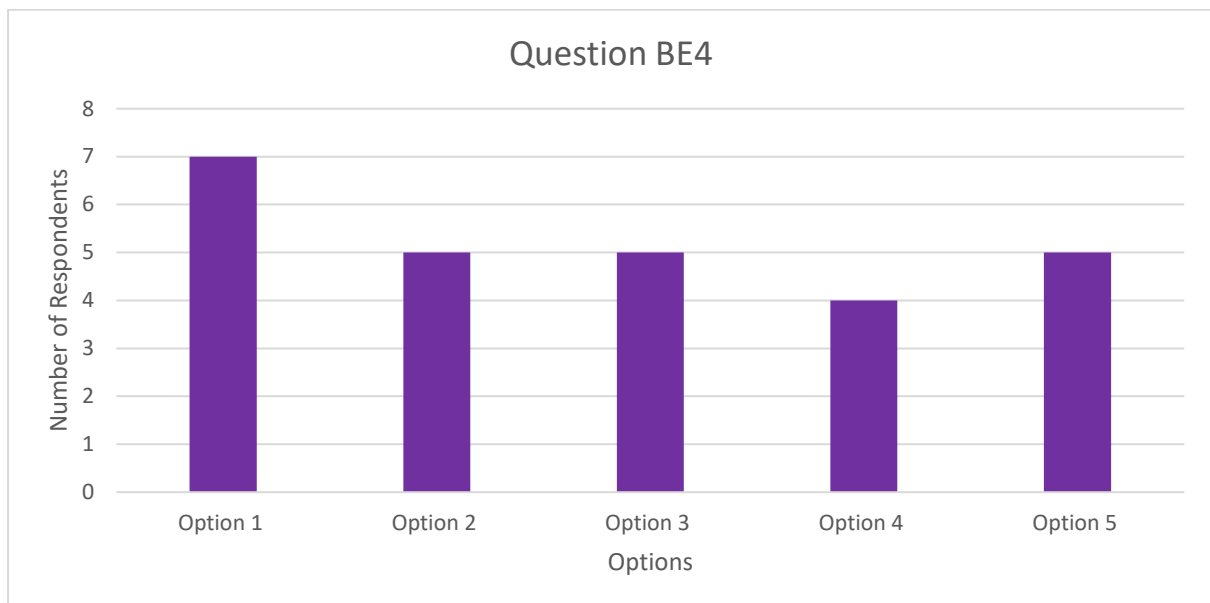


Option 2 was the preferred option with 5 out of 7 people selecting it. There were no comments made with regards to this question.

#### Question BE4: How can the Local Plan preserve and enhance the borough's heritage assets?

##### Summary of responses:

10 people responded to this question, with 9 using the options provided. These were as follows:



Option 1 was chosen by 7 out of 9 respondents, therefore being the most preferred option. Option 2, 3 and 5 were all chosen by 5 out of 9 respondents and Option 4 followed closely behind with 4 out of 9 respondents choosing it, making it the lowest selected option. Additional comments were made, these are summarised below:

- Relevant policies should cover all heritage assets, not just listed buildings and conservation areas as indicated. Policies should also include reference to the significance and the setting of heritage assets.
- It is suggested that this section should set out what is particularly distinctive about the heritage and historic environment of the Copeland borough.
- We suggest that 'conserve and enhance' is used rather than 'preserve and enhance' to better reflect the wording used in the NPPF.

## Contributions

**Question I1: In terms of Section 106 contributions which local infrastructure type(s) should be the priority where there are several infrastructure requirements for new development proposals (that meet the tests set out in Para 56a, b, c NPPF)?**

### Summary of responses:

13 people responded to this question. Their responses were as follows:

	Question I1- option number									
Priority Ranking	1	2	3	4	5	6	7	8	9	10
1	0	2	2	1	2	1	0	0	0	3
2	1	0	0	1	0	2	0	0	0	0
3	0	1	2	0	0	0	1	0	0	0
4	0	0	0	3	0	0	0	1	0	0
5	0	0	0	0	0	1	0	0	0	2
6	1	0	0	0	2	0	0	0	0	0
7	1	1	0	0	0	0	0	0	1	0
8	0	0	0	0	0	1	0	0	0	0
9	0	0	1	0	0	0	1	1	0	0
10	1	0	0	0	0	0	1	0	0	0
Not Ranked	5	5	4	4	5	4	6	7	8	4

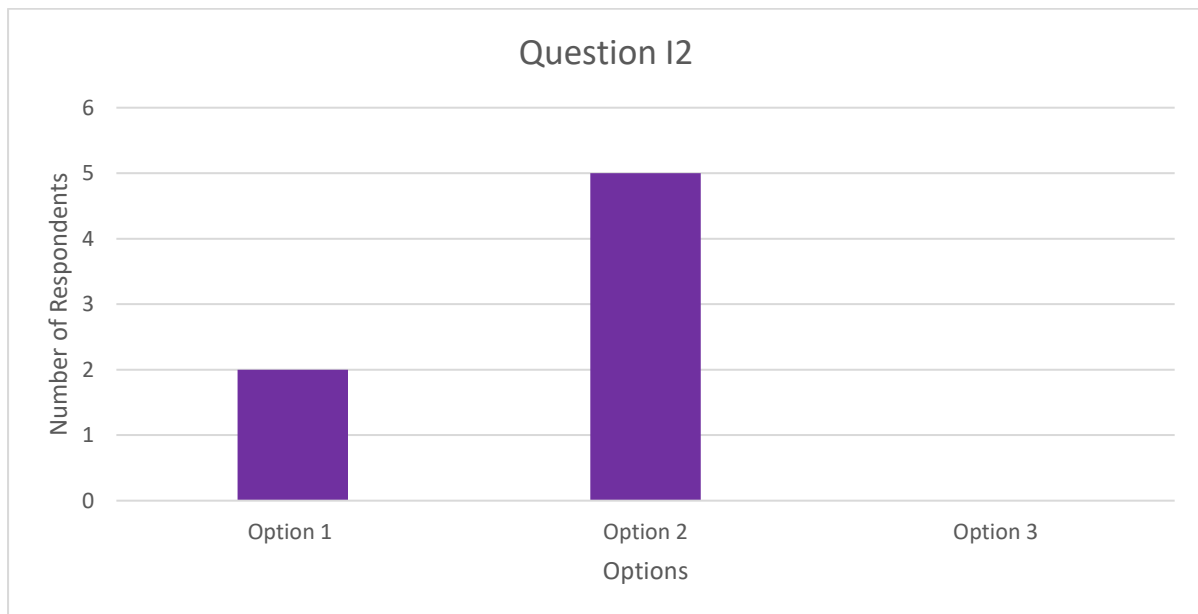
Additional suggestions made as part of this question were as follows:

- The Local Plan's supporting evidence base should assess the need for differing types of infrastructure, the preferred location within the Borough and the most appropriate method of delivery. Therefore, rather than listing types of infrastructure for which there is a priority, the Local Plan should identify specific infrastructure projects for which there is need and identify specific requirements, in terms of location and method of delivery, for such infrastructure.
- Rather than containing a generic policy on infrastructure provision, the Local Plan should consider identifying requirements for specific infrastructure projects within allocations for development sites. This would provide clarity to both developers and future operators on what infrastructure would be necessary, timescales for delivery and the location of such infrastructure.
- It is suggested that green infrastructure should be included on the list.
- We would recommend that developer contributions and obligations follow the guidance set out in paragraphs 34, 56, 57 and 62 of the NPPF. Any requirements set by the Council should be in line with National Planning Policy.
- Planning obligations are also an important mechanism for securing biodiversity net gains and should be considered under this policy.

### Question I2: Should the Council investigate the feasibility of introducing a CIL Charging Schedule?

#### Summary of responses:

10 people responded to this question, with only 7 using the options provided. These were as follows:



5 out of 7 respondents selected Option 2, making this the preferred option overall. The following additional comments were made:

- We do not think CIL should be applicable to NDA assets across the Borough.
- Following on from the response to Question I1 above, if the evidence base for the Local Plan identifies the need for specific infrastructure projects, CBC should consider introducing CIL to finance such infrastructure. This would provide certainty to key partners on infrastructure requirements.

### Question I3: Are there any other issues which should be addressed within this chapter? (Please provide details)

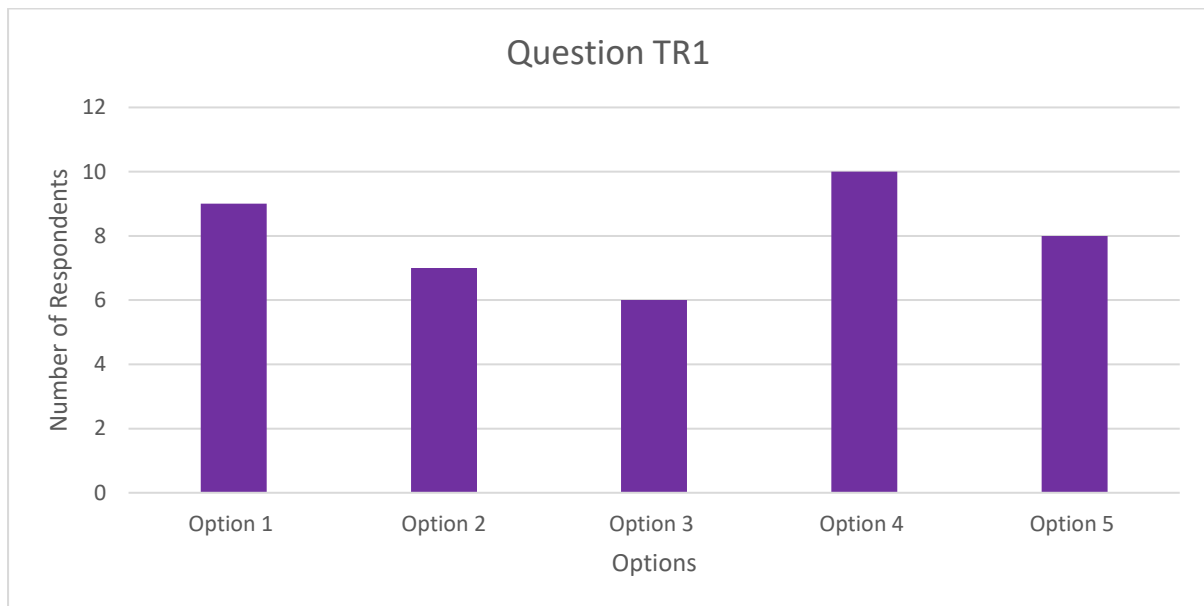
No further comments were given with regards to any other issues that should be addressed in this chapter.

## Transport

### Question TR1: What should be done to improve accessibility and sustainable transport provision across Copeland?

#### Summary of responses:

14 people responded to this question, with only 12 using the options provided. These were as follows:



Option 1 was the preferred option amongst respondents with 10 out of 12 people selecting it. Option 3 was the lowest selected option with 6 respondents choosing it. The following comments were made:

- It is suggested that strategic objectives could be strengthened to include the following (or similar) wording, “support and develop infrastructure that will ensure that all new development can be accessed sustainably by foot, cycle and public transport”.
- Integrate sustainable transport provision with the LDNPA.

**Question TR2: What do you think the Council's priorities should be in terms of promoting investment bids?**

**Summary of responses:**

11 people responded to this question. Their responses were as follows:

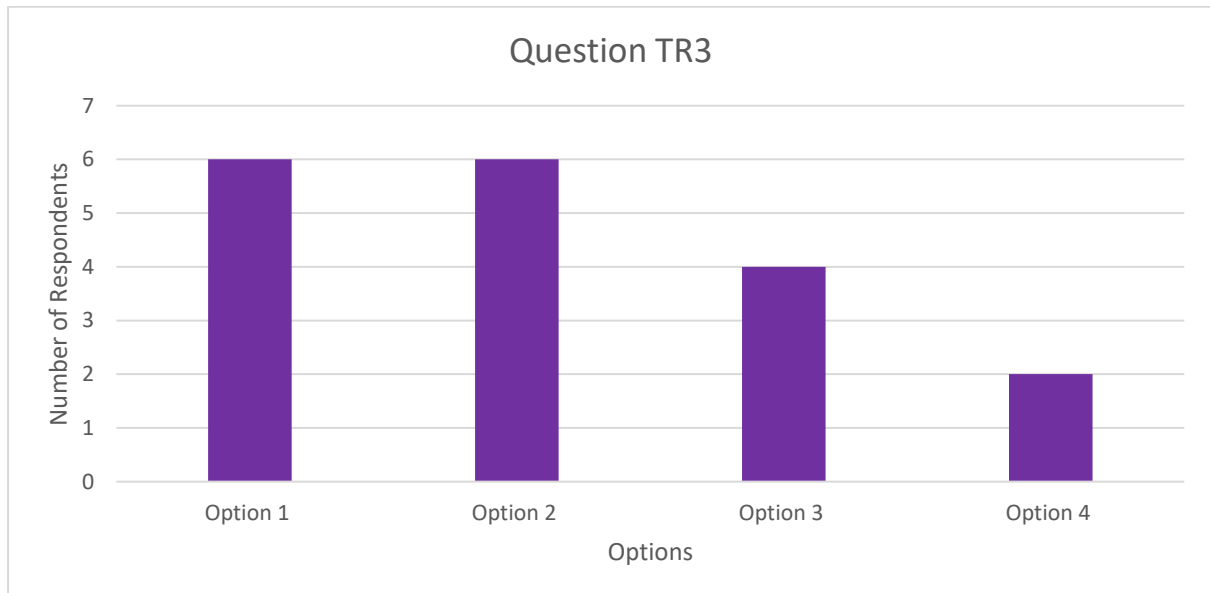
	Question TR2 - option number					
Priority Ranking	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
1	1	4	5	3	5	2
2	1	0	1	2	2	0
3	2	2	1	0	0	0
4	1	1	1	1	1	0
5	1	1	0	1	1	1
6	0	0	0	1	0	3
7	0	0	0	0	0	0
Not Ranked	5	3	3	3	2	4

No relevant additional comments were made with regards to this question. Options 3 and 5 received the highest chosen priority ranking, with Option 2 following closely behind.

### Question TR3: What measures can be taken to support sustainable transport in rural parts of the borough?

#### Summary of responses:

10 people responded to this question, with all 10 using the options provided. These were as follows:

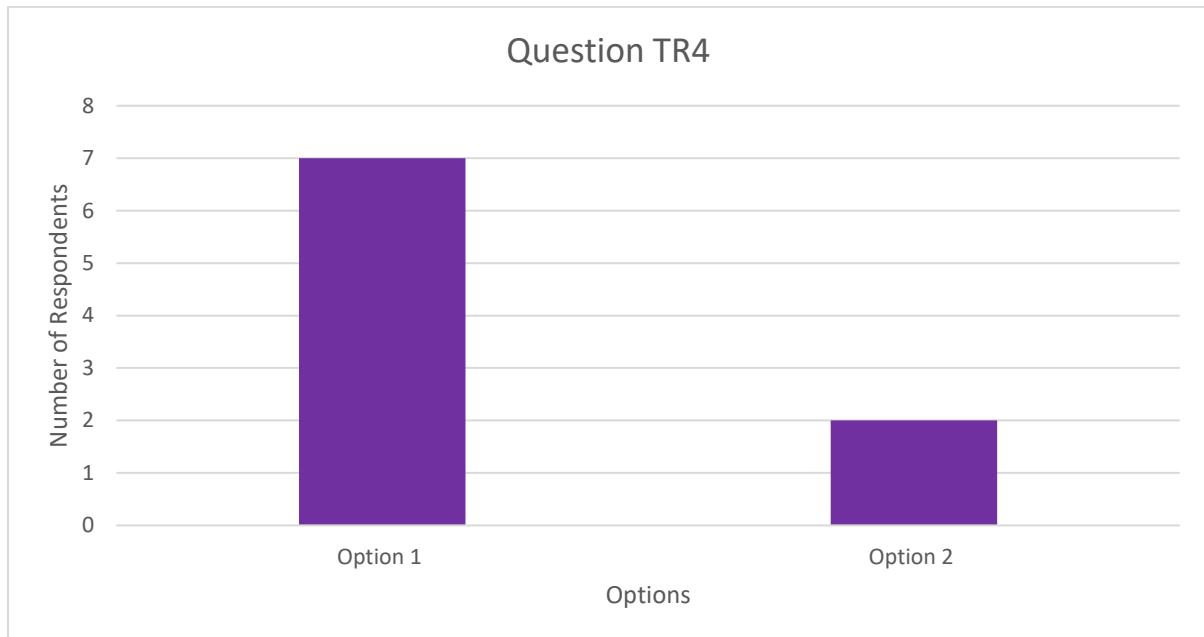


Options 1 and 2 were the preferred options with 6 out of 9 respondents choosing these options. The only additional comment made by respondents was that the Council should incorporate measures to support sustainable rural transport, particularly in Ennerdale.

**Question TR4: Should Copeland BC continue to assess parking standards for relevant planning applications against the Cumbria Design Guide (or any subsequent document)?**

**Summary of responses:**

9 people responded to this question, with all 9 using the options provided. These were as follows:



Option 1 was the most selected option with 7 out of 9 respondents choosing it. No further comments were made with regards to this question.

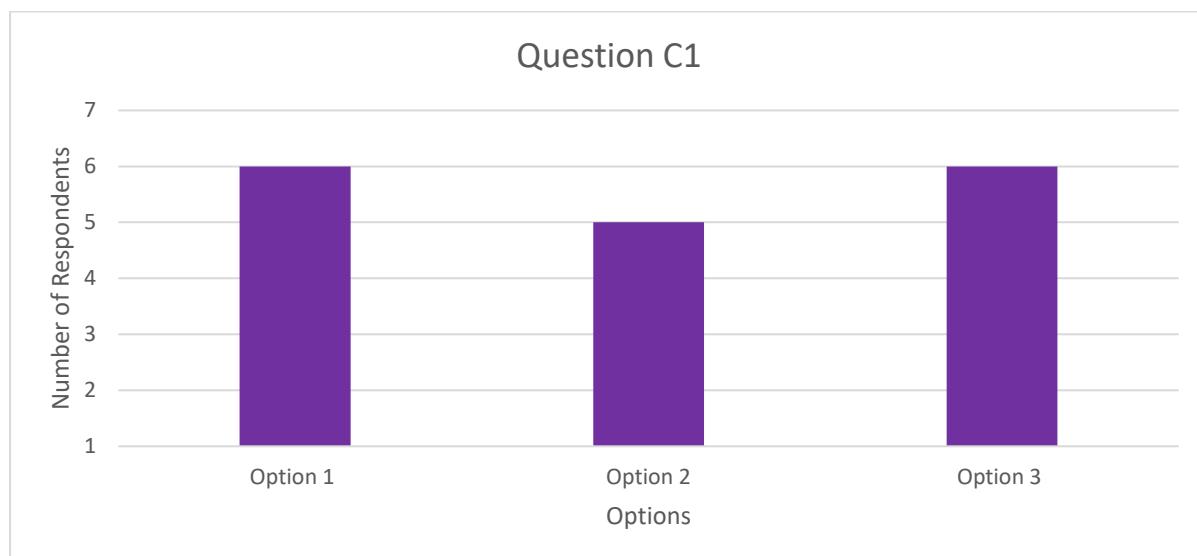


## Communications

### Question C1: How can Copeland optimise the delivery of telecommunications infrastructure?

#### Summary of responses:

9 people responded to this question, with all 9 using the options provided. These were as follows:



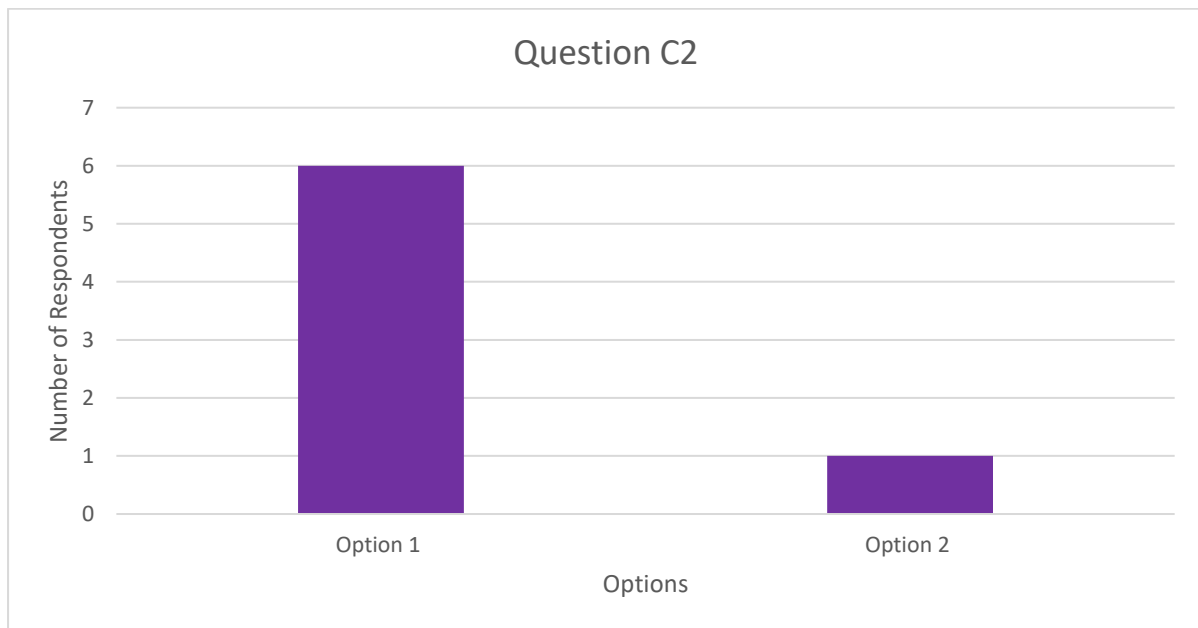
Options 1 and 3 were the highest selected options with 6 out of 9 respondents choosing them. The following comment was made in regards to supporting Option 1:

- Landscape character assessments and cumulative impacts should be taken into account in determining the most appropriate sites for new telecommunications infrastructure. Sharing and rationalising existing infrastructure (including its removal when no longer required) should be prioritised ahead of creating new infrastructure.

**Question C2: How can the borough support proposals for the appropriate installation of electronic communication provisions?**

**Summary of responses:**

7 people responded to this question, with all 7 using the options provided. These were as follows:



6 out of 7 respondents opted for Option 1. No additional comments were made.

**Question C3: Are there any other issues which should be addressed within this chapter? (Please provide details)**

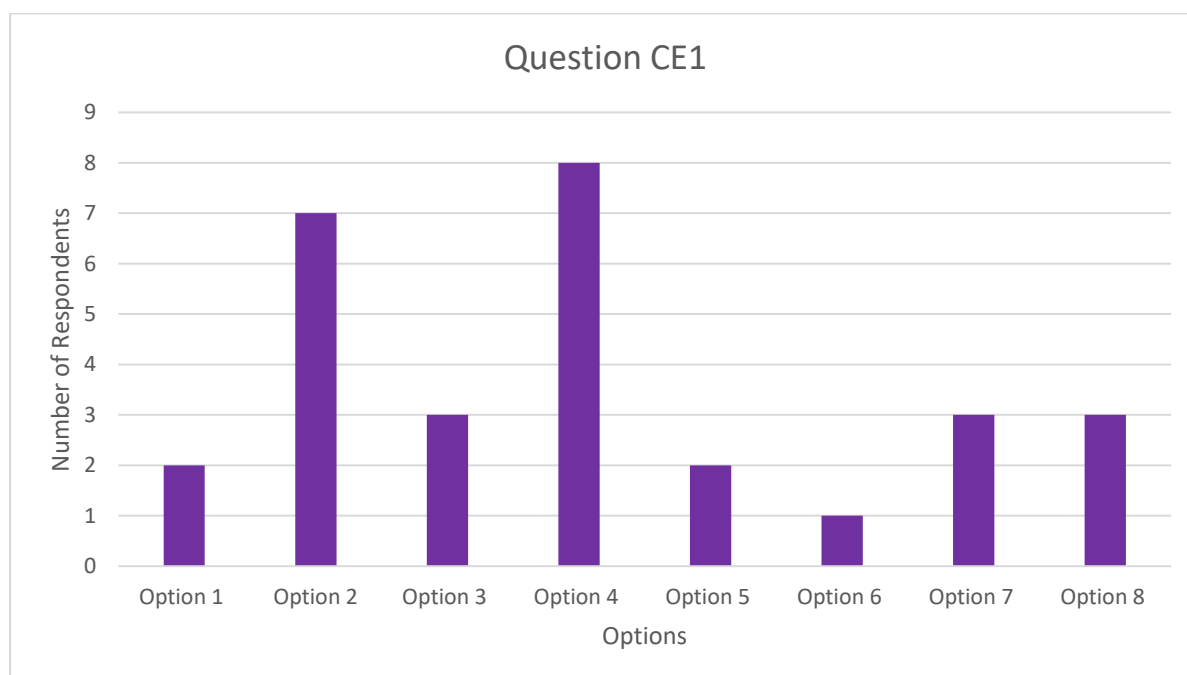
Only one additional comment was made here. This is as follows:

- There needs to be more emphasis on operator sharing of facilities to provide services and there is no mention of 5G provision which will come in the lifetime of this plan.

**Question CE1: Should the Local Plan include minimum open space standards?**

**Summary of responses:**

10 people responded to this question, with 9 using the options provided. These were as follows:



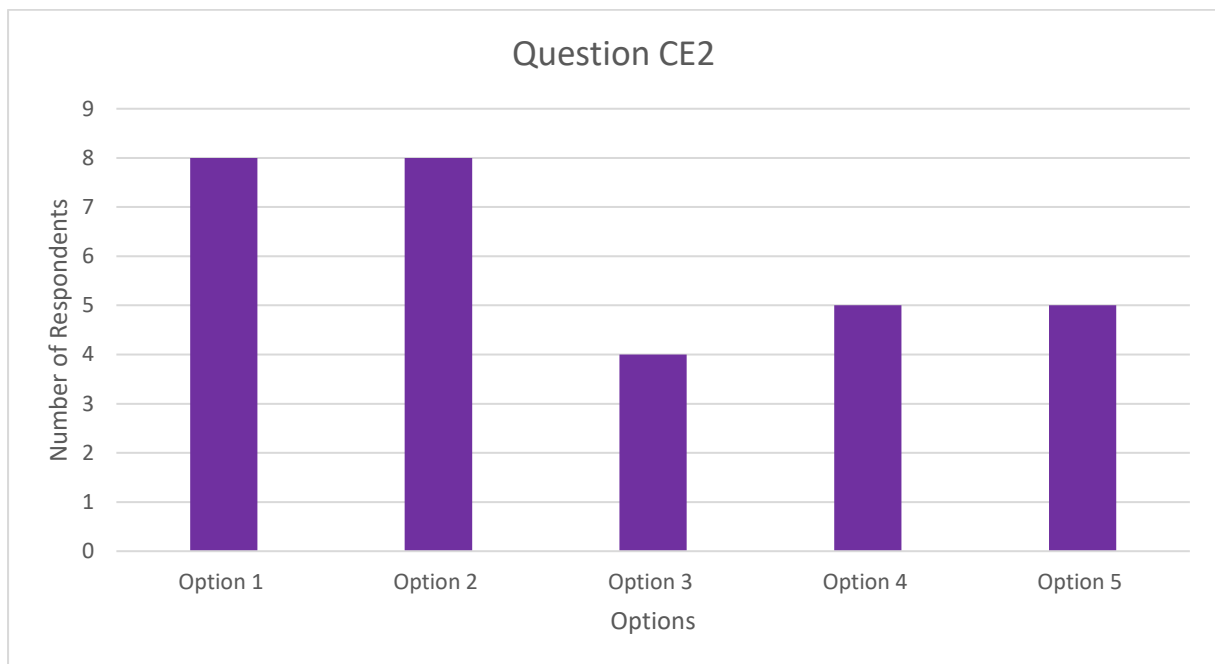
The highest selected option on this question was option 4 with 8 out of 9 respondents choosing it. Option 6 was the lowest selected option with only 1 respondent selecting it. Only one comment was made here, as follows:

- Any policy within the Local Plan requiring the provision of open space should retain flexibility to allow open space to be provided through a range of methods. This could be through the provision of on-site open space or, where it is not feasible to provide on-site open space, or where there is a sufficient quantity of open space within the local area, through commuted sums towards the improvement or provision of off-site open space. Any policy should be supported by sufficient evidence which identifies areas of the Borough with quantitative and / or qualitative deficiencies of open space provision.

**Question CE2: Should the new Local Plan include a policy on Health? If yes, what specific issues should it cover?**

**Summary of responses:**

9 people responded to this question, with 9 using the options provided. These were as follows:

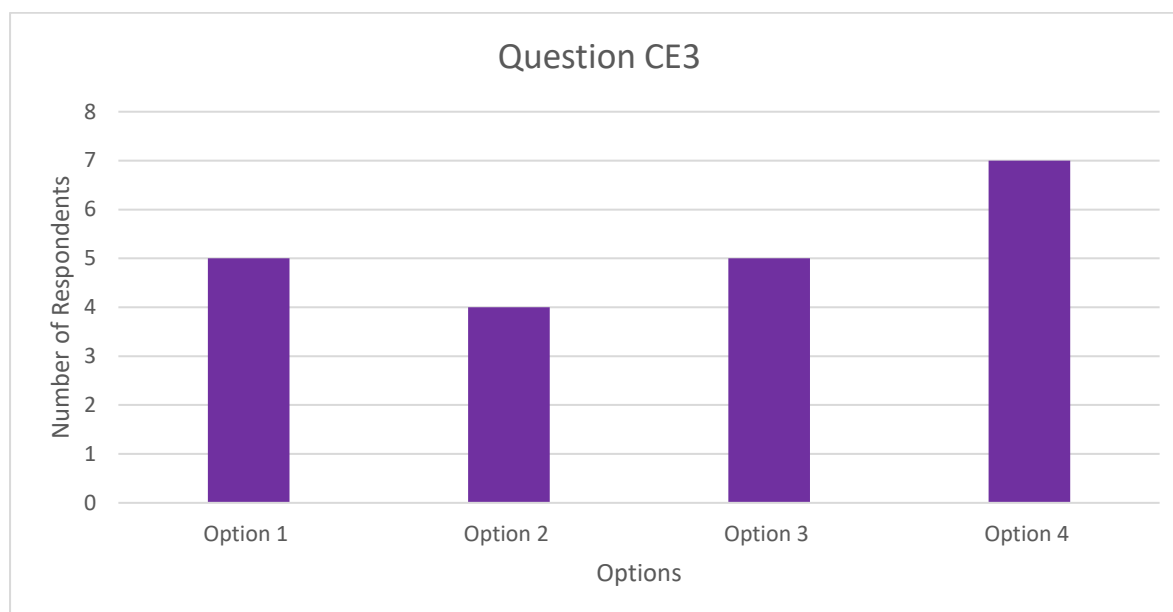


8 out of 9 respondents opted for Options 1 and 2. Respondents did not make any further comments.

**Question CE3: Where should provision of new and enhanced community facilities (Built health and leisure) be located?**

**Summary of responses:**

10 people responded to this question, with all 10 using the options provided. These were as follows:

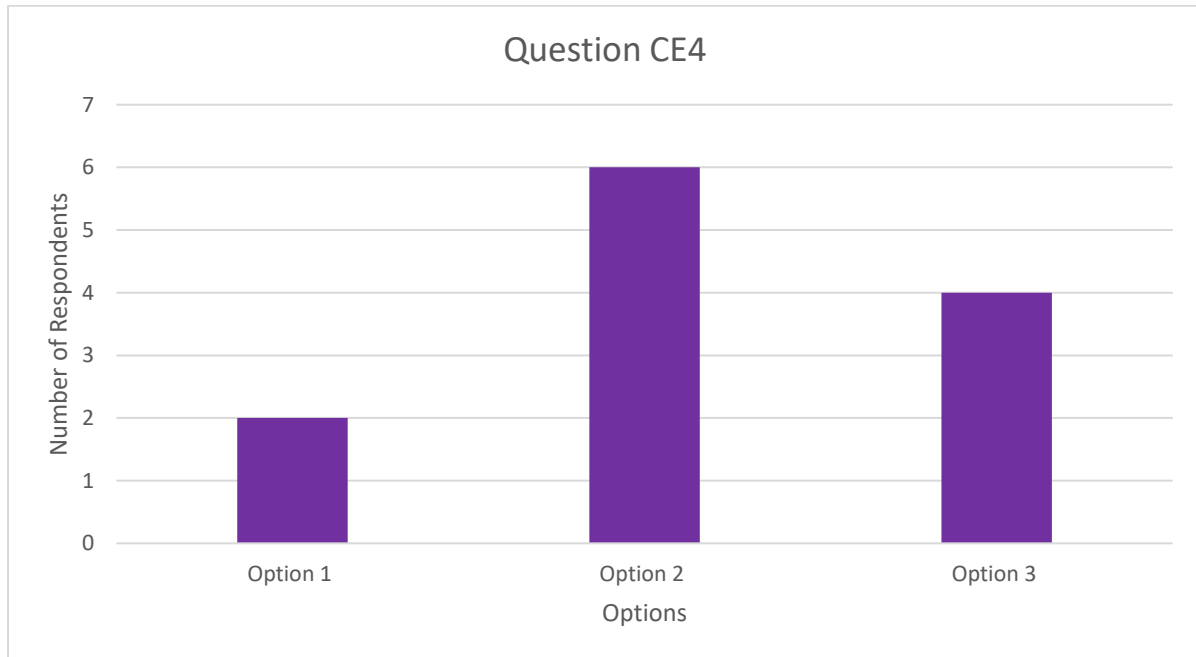


Option 4 was the preferred option, with Option 2 being the lowest selected option. No further comments were made with regards to this question.

**Question CE4: How should the requirements for the provision and amount of health and community facilities on new residential development be agreed?**

**Summary of responses:**

9 people responded to this question, with only 8 using the options provided. These were as follows:



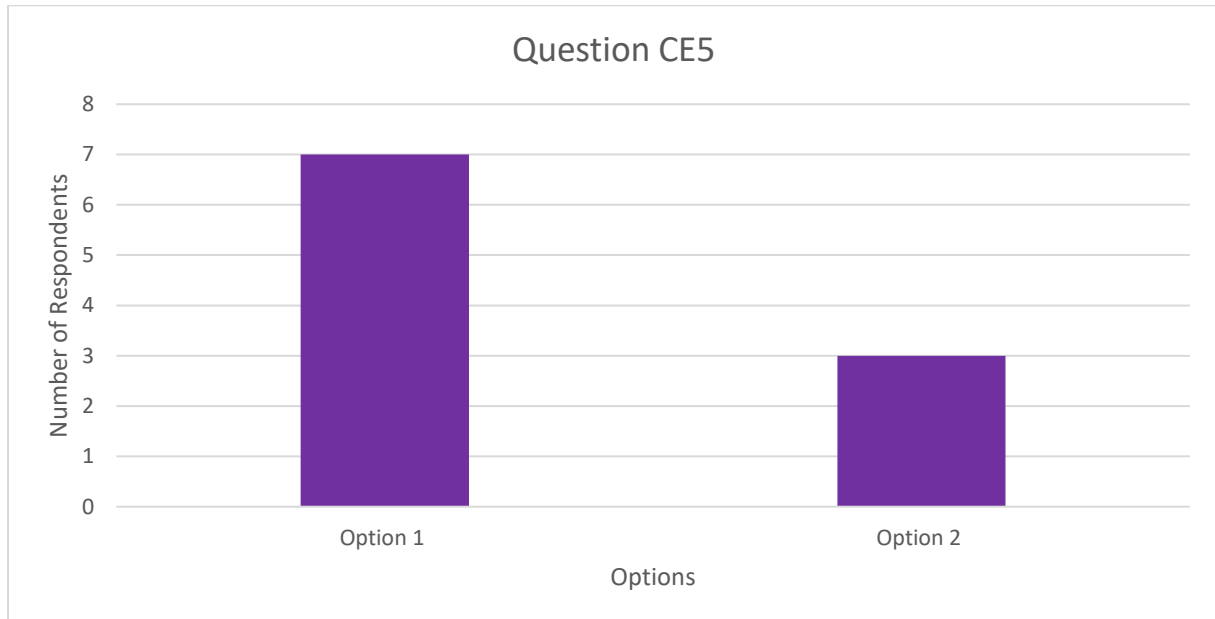
Option 2 was the most selected option amongst respondents with 6 out of 8 people choosing it. 2 out of 8 respondents opted for Option 1, this being the least preferred option. Only one other comment was made by respondents:

- We recommend that developer contributions and obligations follow the guidance set out in paragraphs 34, 56, 57 and 62 of the NPPF. Any requirements set by the Council should be in line with National Planning Policy.

### Question CE5: How should Community Facilities, Health Provision and Public Open Space be protected?

#### Summary of responses:

10 people responded to this question, with all 10 using the options provided. These were as follows:



Option 1 was the preferred option on this question with 7 out of 10 respondents choosing it. One additional comment was made:

- Protection criteria should include submission of evidence showing a facility is no longer required by the community and that it has been actively marketed at a price/rental value appropriate to its condition and existing use without development potential.

**Question CE6: What additional measures can be taken to improve health, well-being and community inclusion in the borough?**

One comment was made in regards to this question:

- There should be policies on conserving and enhancing sports and leisure facilities and such policies should be informed by both an up to date playing pitch strategy and a built facilities strategy.

**Question CE7: Are there any other issues which should be addressed within this chapter? (Please provide details)**

Respondents did not have any additional comments with regards to this chapter.



## Further Comments

There were several further comments made by a number of the respondents. In the main, the comments generally supported the Council's plan and their growth objectives, as well as their aspirations to reinvigorate the housing market. The plan was regarded as clear and easy to understand.

A number of comments highlighted a small number of inaccuracies in the report. These will be reviewed and revised as appropriate.

A number of comments highlighted that certain aspects of the local plan require clarification. These will be reviewed and revised as appropriate.

A number of comments put forward a number of suggestions for additional information or considerations, as well as suggested policy wording, for the next draft of the plan. These will be reviewed and revised as appropriate.

Furthermore:

- A number of respondents put forth their opinion on their preferred type of allocation for any land available.
- A number of respondents commented confirming that they are either submitting details for new site allocation (requesting that these sites are allocated for their appropriate development i.e. Housing, B1-B8 employment uses, nuclear decommissioning and site remediation etc. in the emerging Local Plan), requesting boundaries to be changed, or requesting enhancements to their current infrastructure.
- One comment stated that the Council has not yet published Infrastructure Delivery Plan, Transport Modelling or Transport Improvements Study documents as part of the public consultation. The Local Development Strategy indicates that two further consultations are to occur in Summer 2020 and Winter 2020/21, which indicates that it is imperative that the Council develops a robust and appropriate transport evidence base that ensures that sufficient infrastructure is delivered during the plan period to meet the forecasted demand. It also stated that the council liaises appropriately with Highways England to understand progress where possible.
- It was also suggested that the Local Plan should consider the potential route options for the proposed Whitehaven Relief Road and assess the impact that this may have on the spatial planning management policies, land allocations and highway traffic impacts associated with the emerging Local Plan.
- It was noted that the Interim SHLAA has highlighted a significant amount of land that has been submitted for housing development that is located immediately adjacent or in close proximity to the A595 corridor. This reinforces the need for a robust transport assessment to be undertaken, to calculate the potential cumulative highway impacts and identify mitigation as appropriate.
- It was noted that by expanding the area in the Borough made available for housing, it could potentially reduce the part of the Borough where rural exception sites protection will be available. If Sustainable Village and Other Small Settlement

categories were to be introduced then time and effort would need to be made to define the many new settlement boundaries beforehand. This effort could be localised through Parish Councils but, given the legal nature of planning, professional standards of draughting would most likely be necessary. This would have financial implications and should be borne in mind if it is decided that the proposal for additional categories appears in the next draft.

- A recommendation was made for the Council to review the role of rent-to-buy as one of the 'other affordable routes to home ownership' as envisaged in the NPPF, as part of its preparation of the next draft of the Local Plan as well as reviewing the SHMA to ensure it captures the need for rent-to-buy property.
- It was noted that the potential route of the proposed Whitehaven Relief Road should be safeguarded in the new local plan and site allocations should take account of existing and proposed infrastructure. This new infrastructure should also be addressed in the updated West Cumbria Transport Model, as well as in the emerging parking strategy.
- The impact on pressure on local supply of school places will need to be assessed throughout planning if housing allocations expanded.
- It was noted that any potential site allocations should be checked by CBC to see if they fall within the Minerals Consultation Area (as set out in the Council's Minerals and Waste Local Plan). Any potential sites that do fall within the MCA should be forwarded on to Cumbria County Council for advice.
- A suggestion was made for an "easy read" version of the plan to be produced for those who may not be so literate.
- It was noted that the Local Plan should ensure that it is aligned with the Cumbria Joint Public Health Strategy.
- One comment noted the viability of the Moorside site.
- A suggestion was made to engage conservation, archaeology and urban design colleagues at the Council to ensure that there is an awareness of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the strategic and development management policies, in the allocation of any site and in the preparation of the SEA.
- It was noted that the majority of the plan concentrates on towns and local centres, and that it should be recognised that there is an importance of smaller settlements i.e. Haile, Calderbridge, Drigg, Homerook, Silecroft etc.
- It was submitted that the Local Plan should ensure mineral sites are consistently safeguarded.
- One comment suggested there should be a rejection of trying to attract big brands to Copeland, with a focus on small independent shops and town centre improvements. This also suggested a move of Whitehaven market to the marina to provide a more attractive backdrop than the town centre.
- The importance of promoting Copelands tourism opportunities, particularly in Ennerdale Bridge as the gateway to the Lake District, was reiterated.

## 1. Appendices

### Appendix 1: News and Star 25/11/19

# Residents to have their say on issues

By Helen Thompson

[helen.thompson@newsquest.co.uk](mailto:helen.thompson@newsquest.co.uk)

COPELAND residents have the chance to help shape the future of the borough as part of a newly-launched consultation.

Members of the public are invited to give their views to Copeland Council on a host of issues including housing, employment, retail, energy, tourism and transport.

The council has launched the consultation today as it reviews its Local Plan, that guides its decision-makers over the next 15 years.

Pat Graham, Copeland Council's chief executive, said: "Our strategy is for investment and growth in our borough; the Local Plan will establish what that looks like on the ground and to ultimately facilitate development.

"This is one of the most important documents the council will produce. We are looking forward to developing an effective and robust Local Plan for the borough.

"It's vitally important that businesses and residents get involved at this 'issues and options' stage, by considering our proposals and giving feedback and alternatives.

"It's your chance to have your say on how Copeland will develop over the next decade and beyond."



HAVE A SAY: Pat Graham, chief executive of Copeland Council, is urging residents to give their views

The eight-week consultation will run until January 20, 2020.

Issues include the number of new-build homes the council should be aiming for, locations and boundaries for development and town centre regeneration, the environment, heritage assets and

communications.

The online document and questionnaire are available at <https://www.copeland.gov.uk/content/copeland-local-plan> and hard copies are available in Copeland Council's offices in Whitehaven and Milkm and in all the bor-

ough's libraries.

Copeland Council is also inviting landowners to nominate sites that may be suitable for housing. Go to [www.copeland.gov.uk/content/strategic-housing-land-availability-assessment](https://www.copeland.gov.uk/content/strategic-housing-land-availability-assessment) until January 20.



# Have your say on Copeland's future

THE public will now have their say on an ambitious blueprint for the future of Copeland after councillors voted the emerging plans through to the next stage.

The new Local Plan will seek to establish which parcels of land will be earmarked for housing, regeneration and business use, also setting out the public spaces that should be safeguarded for future generations to enjoy.

The council's chief executive Pat Graham described the draft plan as "one of the most strategically-important documents" the authority will produce, "delivering massive growth for this borough."

At a special meeting of Copeland's full council members formally agreed to launch the first phase of an eight-week public consultation.

The move will give the borough's residents an opportunity to help shape the living document, their views helping to inform the council's "preferred pol-

**By John Connell**

**Local Democracy Reporter**

icy" and "site allocation options."

Mrs Graham said: "This will guide development as we produce it over the next 10 years. It is the vehicle through which we will deliver and achieve many of our growth ambitions.

"We throw all the issues and options out there, and it's our job to listen, but it will end up in allocations, lines on maps, winners and losers."

Chris Hoban, strategic planning manager, and his team were praised for their efforts in the creation of the "comprehensive" document.

However, the meeting also heard from councillor Jackie Bowman that the member turnout to council workshops to develop the Local Plan had been "appalling".

Mrs Graham also confirmed

that failure of councillors to attend some of the sessions had delayed the production of the important plan.

"For those members that haven't been able to engage, please as individuals and community representatives make sure that you take the opportunity to do so," she urged.

The consultation will run from November 25 to January.

Individuals and groups whose details are held on the council's consultation database will be contacted directly by post or email.

Copies of the draft will also be available on the council website, in its offices and in libraries.

Councillor Dave Banks said the plan could include scope for developing land around the £165m mine planned for Whitehaven to support the industry's supply chain.

He also wanted to see the creation of a "long overdue" indoor market to help boost retail and boost trade in town centres.

# Have a say on plan to help shape borough

TIME is running out for Copeland residents to comment on a consultation that will help shape the future of the borough.

The public has until Monday to give views to Copeland Council on a host of issues including housing, employment, retail, energy, tourism and transport.

The council is consulting as it reviews its Local Plan, a document which forms the development framework for the borough

and guides decision-makers over the next 15 years. This 'issues and options' consultation is the first stage and will play a key part in the production of the document.

Issues under consultation include the number of new-build homes the council should be aiming for; the locations and boundaries in which development should take place, and town centre regeneration. Other issues include the environment, heritage assets and


communications.

The council's chief executive Pat Graham said: "Our strategy is for investment and growth in our borough; the Local Plan will establish what that looks like on the ground and to ultimately facilitate development. This is one of the most important documents the council will produce. We are looking forward to developing an effective and robust Local Plan for the borough.

"It's vitally important that businesses and residents get involved at this 'issues and options' stage, by considering our proposals and giving your feedback and alternatives. It's your chance to have your say on how Copeland will develop over the next decade and beyond."

Visit [www.copeland.gov.uk/content/copeland-local-plan](http://www.copeland.gov.uk/content/copeland-local-plan) to see the online document and questionnaire.

Appendix 4: Example of Facebook post advertising the consultation



**Copeland Borough Council**  
8 January at 12:16 · G

Like Page

...

What can we bring to the town centres to attract people and encourage them to stay longer?

Town centre regeneration is just one of the issues we're considering in our Local Plan consultation.

We're inviting you to give us your views on a host of issues including housing, employment, retail, energy and transport.

Our survey is available in hard copy at our offices in Whitehaven and Millom, and in all Copeland's libraries. Please note that you do not have to answer every question - you are welcome to answer only the questions that pertain to your town or area of interest.

The consultation is part of our the review of our Local Plan, a document which forms the development framework for the borough and guides decision-makers over the next 15 years.

Issues under consultation include the number of new-build homes we should be aiming for, the locations and boundaries in which development should take place. Other issues include the environment, heritage assets and communications.

The consultation runs until January 20, 2020. For further details, and to respond, visit <https://www.copeland.gov.uk/content/copeland-local-plan>.

10,442

People reached

2,056

Engagements

Boost Post

Like

Comment

Share

...

48 Comments 17 shares

### Performance for your post

10,442

People Reached

191

Reactions, comments & shares

32	20	12
Like	On post	On shares
1	0	1
Love	On post	On shares
141	74	67
Comments	On Post	On Shares
17	17	0
Shares	On Post	On Shares

1,865

Post Clicks

0	45	1,820
Photo views	Link clicks	Other Clicks

NEGATIVE FEEDBACK

1 Hide post

0 Hide all posts

0 Report as spam

0 Unlike Page

Reported stats may be delayed from what appears on posts



## Appendix 5: Advertisement Poster for the Issues and Options consultation

The poster is set against a green gradient background. At the top, the Copeland Borough Council logo is displayed, featuring the name 'Copeland' in a large, white, sans-serif font above 'borough council' in a smaller font, with a coat of arms to the right. Below the logo is the tagline 'Proud of our past. Energised for our future.' in a cursive script. The main title 'What will Copeland look like in 15 years time? Tell us what you think!' is written in a large, bold, purple font. Below this, a paragraph states that the council is developing a new Local Plan and wants public involvement. Another paragraph explains that the Issues and Options draft document provides an early stage exploration of issues and options, and that the council wants to know which options are preferred or suggested. Three central images are shown: on the left, a graphic of five raised hands in various colors (purple, orange, yellow, blue, red) with the text 'GET INVOLVED' below them; in the center, a thumbnail image of the 'Copeland Local Plan 2017-2035' document; on the right, a graphic of five colorful houses (orange, green, blue, purple, yellow) of different sizes. Below these images, a paragraph asks readers to read and comment on the draft document, which will be available at specific locations. The website 'www.copelandbc.gov.uk' is listed. Further down, it mentions that the document is available at all local libraries, Market Hall, Whitehaven, and the Copeland Offices in Millom. A deadline is set for 20th January 2020. Contact information for Strategic Planning is provided, including an address in Whitehaven and an email address. Finally, a contact number is given for any additional questions.




**Copeland**  
borough council

*Proud of our past. Energised for our future.*

## What will Copeland look like in 15 years time? Tell us what you think!

Copeland Borough Council is in the process of developing a new Local Plan and want you to get involved.

The Issues and Options draft document provides an early stage exploration into the issues facing the Borough and the potential options for addressing these within the Local Plan. If you would like a say on which options you prefer or want to suggest alternative approaches, please complete a Local Plan response questionnaire.



Please read and comment on the Issues and Options draft document. The document, along with the response questionnaire, will be available to view at the following locations:

[www.copelandbc.gov.uk](http://www.copelandbc.gov.uk)

All local libraries within the Borough  
Market Hall, Whitehaven and the Copeland Offices, Millom.

All responses must be returned to the CBC Strategic Planning team by the **20th January 2020**. Responses can be sent to:

Strategic Planning, Copeland Borough Council, The Copeland Centre, Catherine Street, Whitehaven, Cumbria, CA28 7SJ or by email to:

[ldf@copeland.gov.uk](mailto:ldf@copeland.gov.uk)

If you have any additional questions, do not hesitate to contact us at  
01946 598434, 01946 598435 or 01946 598496