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Committee: Cabinet

Date of meeting: 21 April 2022

Title of Report: Cumbria County Council's Representations to Copeland Borough Council's Local Plan 2021-2038 Publication Draft (January 2022) Consultation

Report by: [REDACTED] Executive Director – Economy and Infrastructure

Cabinet Member: [REDACTED] Cabinet Member for Environment

What is the Report About? (Executive Summary)

1. Copeland Borough Council has issued the Publication Draft of the Copeland Local Plan 2021-2038 for public consultation between 10 January and 18 March 2022. Copeland Borough Council has agreed a further extension for the County Council to respond to the consultation.
2. The purpose of this report is to seek Cabinet approval of Cumbria County Council's representations to Copeland's Local Plan 2021-2038 Publication Draft Consultation as set out in Appendix 1 and 2.
3. A presentation was given to Local Members of Cumbria County Council's Local Committee for Copeland on 14 February 2022 outlining the key points of the County Council's representations. Local Member feedback is attached at Appendix 3.

Recommendation of the Executive Director

4. It is recommended that Cabinet approves Cumbria County Council's representations to the Copeland Local Plan 2021-2038 Publication Draft Consultation as set out in Appendix 1 and 2.

Background to the Proposals

5. The planning system in England is 'plan led', whereby there is a statutory duty for all local planning authorities to prepare a Local Plan for their area.
6. When adopted the Copeland Local Plan (2021-2038), which covers the district of Copeland outside the Lake District National Park (which is covered by its own local plan), will:
 - identify how much development should take place and where it should go
 - provide guidance for high quality development and the infrastructure required to support them
 - allocate sites for housing, regeneration, and employment
 - identify areas which should be protected from development
 - include policies to be used when determining planning applications.

7. Under the 'Duty to Co-operate' the Government requires that district councils work with the County Council during the development of their Local Plan. This is to ensure that Cumbria County Council's interests as a planning authority and infrastructure and service provider are appropriately considered in the development of policy.
8. The co-operation between Cumbria County Council and Copeland Borough Council is captured in a joint 'Statement of Intent', signed by both authorities in July 2015. This reflects the authorities' commitment to work together in relation to the Local Plan and in particular identify, prioritise, and fund the infrastructure necessary to support the development proposed in the Local Plan. A key piece of evidence to support this is the Infrastructure Delivery Plan (IDP). The IDP has a clear role for securing developer contributions and in line with the Statement of Intent, Cumbria County Council and Copeland Borough Council will need to work together to plan and prioritise the delivery of the required infrastructure.
9. How local planning authorities prepare a Local Plan is set out in the Town and Country (Local Planning) (England) Regulations 2012. Cumbria County Council has engaged with Copeland Borough Council throughout the preparation and development of the Local Plan and responses have been made to following consultations:
 - Regulation 18: Copeland Local Plan Issues and Options Consultation – January 2020
 - Regulation 18: Copeland Local Plan Preferred Options Consultation– December 2020
 - Regulation 18: Copeland Local Plan Focused Pre-Publication Draft Changes Consultation - October 2021
10. The consultation on the Publication Draft (Regulation 19) is the final opportunity for representations relating to a Local Plan (Regulation 20) to be made before the Local Plan is submitted to the Secretary of State (Regulation 22), who will appoint an independent inspector whose role is to determine whether the Local Plan is legally compliant and meets the tests of 'soundness' through an Examination in Public (EiP) (Regulation 24).
11. Following Examination, the Inspector may publish modifications to the Copeland Local Plan which would be subject to consultation. Subject to the successful completion of this process, Copeland Borough Council would then be able to adopt the Local Plan. Adoption of the Copeland Local Plan is scheduled for March 2023.
12. The Copeland Local Plan 2021-2038 Publication Draft Consultation can be viewed here:
www.copeland.gov.uk/content/local-plan-2021-2038-publication-draft-consultation
13. Cumbria County Council's representations to the Copeland Local Plan 2021-2038 Publication Draft Consultation builds upon Cumbria County Council's responses to previous consultations outlined above. Cumbria County Council's representations are aligned with the Cumbria Transport Infrastructure Plan (CTIP) which has been adopted by Cumbria County Council as the new Local

Transport Plan for Cumbria. This sets the policy framework for the role of transport in supporting sustainable and inclusive growth in Cumbria for the period 2022-2037.

14. The County Council is aware that Copeland Borough Council intends to submit their Local Plan to the Planning Inspectorate in May 2022, with the intention of adopting the Plan in early 2023. Given that further updates may be required in advance of submission, it suggested that timescales for adoption of the Local Plan are reviewed and that consideration is given to the programme in the context of Local Government Reform, particularly in relation to decision making.
15. On the whole the County Council is supportive of the proposed Local Plan and although some further amendments and updates to the evidence base are suggested, it is considered that, fundamentally, the Local Plan will:
 - support inclusive growth and decarbonisation;
 - support attractive places and town centres,
 - support economic growth including the clean energy sector;
 - create or enhance nature, wildlife and green spaces;
 - promote the Borough as a thriving visitor attraction whilst safeguarding its heritage and landscape.
16. The key issues raised by Cumbria County Council to assist in developing a sound Local Plan are summarised below. The detailed response is provided in Appendix 1 and 2.

IDP Evidence Documents

17. As highlighted in paragraph 8 above, the Infrastructure Delivery Plan (IDP) forms a key part of the evidence base. The IDP Stage 2 Report was made available on 11 February 2022 and Stage 2 Viability Study was made available on 15 February 2022. Both documents are critical to establishing what infrastructure is required to support the delivery of the Local Plan and its broad viability. Cumbria County Council has committed to work with Copeland Borough Council to develop these documents to produce a Local Plan and evidence base that is sound.

IDP – Highway

18. The West Cumbria Transport Model was used to identify where on the local highway network the level and location of development could pose constraints. Building upon the results of this, the Copeland Transport Improvements Study was commissioned jointly by Cumbria County Council and Copeland Borough Council to identify and develop highways and transport improvements that will mitigate the impact of development and support the delivery of the Copeland Local Plan. The identification of improvements followed a defined industry standard methodology (Department for Transport). It is suggested that this assessment process is explained more thoroughly and to specify the improvements required to support the locations and quantum of development allocated in the Copeland Local Plan.

19. The improvements are grouped by transport mode
- Active Travel
 - Public Transport (Bus and Rail)
 - Highway Improvement
 - Travel Demand Management
20. These proposals are not set out within the IDP and it will be important for developer contributions to be secured to support their implementation.

IDP - Education

21. The proposed Local Plan allocates a substantial housing development in the south of Whitehaven, which will impact on the pattern of admission to primary schools in the area. Whilst there are primary school places available elsewhere in the town, some children living in the traditional catchment areas of Kells Infant and Monkway junior schools are unlikely to be able to access a place at those schools in the future and would have to travel to alternative schools. This position would undermine the aspiration to create high quality local educational facilities close to where people live.
22. It is therefore considered that taking into account capacity and the desire to see schools at the heart of communities in creating desirable places to live, a new school should be planned for south Whitehaven. The Council will work with Copeland Borough Council to identify a preferred site for a school and to develop a plan for delivery funding.

IDP - Flood Risk

23. Cumbria County Council reiterates concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water system before a flood alleviation scheme can be secured for the area. It is considered that Phase 1 of the Flood Alleviation scheme will create sufficient capacity for the proposed development in the Local Plan. It is therefore important that the IDP sets out the appropriate sequencing of the proposed development in Millom with the implementation of the Flood Alleviation Scheme and use of developer contributions in supporting delivery. Additional housing prior to the implementation of Phase 1 of the Flood Alleviation Scheme could put too much pressure on an already overburdened system.

Viability Assessment

24. It is noted that the final Viability Assessment has not yet been produced. Historically some sites in Copeland have had viability issues and therefore the Viability Assessment is a vital piece of evidence that is needed to demonstrate the Local Plan is deliverable. The County Council requests to have the opportunity comment on and input to the final Viability Assessments and be involved in any discussion in relation to prioritisation of infrastructure if viability issues emerge.

Whitehaven Relief Road

25. Cumbria County Council recognises that Whitehaven Relief Road has the potential to have a significant economic benefit for Cumbria and Copeland, capable of supporting strategic growth, addressing challenges surrounding capacity on the A595 and reducing traffic through Whitehaven. This is

supported in the Cumbria Transport Infrastructure Plan. It is considered that the Copeland Local Plan should better articulate the case for investment in this scheme, including the improved access it will provide business and communities, its ability to support growth and investment and its capability to support active and sustainable travel including through the reallocation of existing road space within the town.

Housing

26. Cumbria County Council is supportive of the housing target set out within the proposed Local Plan as it is considered it will support inclusive growth and help to tackle the declining working age population and should support the delivery of housing mixes that can meet the needs of communities. In relation to Adult Social Care the Local Plan needs to be amended not to confuse extra care with care homes and to better consider the needs of other vulnerable groups for example younger adults with disabilities.

Highways and Transport

27. The Local Plan contains a number of inconsistent statements within a number of policies in respect of the assessment of a development's impact on the local highway and linkages to sustainable transport and active travel modes. The Local Plan policies and explanatory text need to follow a clear and consistent approach to how this is worded or there needs to be a specific Highways and Transport Development Management Policy, or revisions made to Policy DS6PU: Design and Development Standards.

Strategic Employment Sites

28. Cumbria County Council recognises the strategic importance of West Lakes Science and Technology Park and Cleator Moor Innovation Quarter at Leconfield and how they align with economic development and regeneration priorities for Copeland. However, taking into account the need for land assembly, site preparation, there is a need for greater clarity on the deliverability of proposals.
29. The County Council will continue to work with Copeland Borough Council to ensure the necessary transport and drainage infrastructure requirements are considered to support growth in Cleator Moor.

Options Considered and Risks Identified

Option (a) No Nothing

30. Cumbria County Council could choose not to submit representations to the Copeland Local Plan Publication Draft Consultation.

Option (b) Agree the Representations

31. Agree the representations outlined in the Cabinet Report and Appendix 1 and 2 and issue as Cumbria County Council's representations to the Copeland Local Plan Publication Draft Consultation.

Option (c) Cabinet adds further comments to the Representations

32. Cabinet adds further comments to Cumbria County Council's representations to the Copeland Local Plan Publication Draft Consultation before it is provided to Copeland Borough Council.

Risks

33. The risk to Cumbria County Council of not submitting representations to the Copeland Local Plan Publication Draft Consultation is that it would miss the opportunity to influence the content of the Local Plan and secure the necessary infrastructure to support new development. It would also mean that Cumbria County Council would not fulfil its obligations as a consultee and requirement under the 'Duty to Co-operate'.

Reasons for the recommendation/Key benefits

34. It will help to ensure that Cumbria County Council's interests and priorities are reflected in the Copeland Local Plan. Joint working on the IDP will help ensure the deliverability of the Copeland Local Plan. Importantly, the Copeland Local Plan creates a policy framework to support economic growth opportunities.

Financial – What Resources will be needed and how will it be Funded?

35. There are no immediate or direct financial implications arising from the recommendation contained within this report.
36. However, there are likely to be financial implications for the Council in the future in relation to the transport and infrastructure requirements to support new development.
37. Existing resources in the Infrastructure Planning Team have been used to collate the response to the consultation.

Legal Aspects – What needs to be considered?

Option (a)

38. Pursuant to paragraph 2.1 (m) of the Constitution the functions of Cabinet include agreeing responses to consultation papers. By choosing not to submit representations to the Copeland Local Plan Publication Draft Consultation Cabinet will not be fulfilling its constitutional function. It is also highly likely that choosing not to make any contribution to such an important document that Cabinet would fail to comply with the decision-making principles laid out in the Constitution.

Option (b)

39. By agreeing the response outlined in the Cabinet Report and Appendix 1 and 2 to that report and issuing as Cumbria County Council's Representations to the Copeland Local Plan Publication Draft Consultation Cabinet will fulfil its constitutional function and comply with the decision-making principles laid out in the Constitution.

Option (c)

40. In the event Cabinet adds further comments to Cumbria County Council's Representations to the Copeland Local Plan Publication Draft Consultation, before it is provided to Copeland Borough Council Cabinet will fulfil its constitutional function and most likely comply with the decision-making principles laid out in the Constitution.

Local Government Reorganisation

41. From 1 April 2023, the current six district councils and Cumbria County Council will be replaced with two new unitary councils. Each Council will be the Local Planning Authority, for the areas outside of the National Park Authorities.

Health and Safety Aspects – What needs to be considered?

42. Cumbria County Council has a responsibility under the Health and Safety at Work Act 1974 and associated Management of Health and Safety at Work Regulations to ensure, as far as it reasonably practicable, that there are arrangements in place to ensure that there are arrangements in place to ensure a healthy and safe working environment for all services for which it has responsibilities.
43. Although there are no direct health and safety implications arising from this report which focuses on Cumbria County Council's representations to the Local Plan Publication Draft Consultation, the delivery of future projects as part of the Copeland Local Plan Infrastructure Delivery Plan for example may be subject to Construction & Design Management (CDM 2015) Regulations.
44. Any health and safety obligations for Cumbria County Council and any contractors working on behalf of the Council should follow the commitments outlined in the Annual Corporate Health and Safety Policy Statement last agreed by Cabinet in July 2021.

Council Plan Priority – How do the Proposals Contribute to the Delivery of the Council's Stated Outcomes? (Outcomes - People in Cumbria are Healthy and Safe, Places in Cumbria are well connected and thriving, the Economy in Cumbria is growing and benefits everyone)

45. Supporting the development and preparation of the Copeland Local Plan will contribute the delivery of Cumbria County Council's Council Plan (2018-2022) priorities, by supporting the delivery of economic growth, by ensuring that the infrastructure needed to accommodate the impact of growth is in place and by encouraging sustainable forms of development.

What is the Impact of the Decision on Health Inequalities and Equality and Diversity Issues?

46. The preparation of the Copeland Local Plan follows detailed procedures for public engagement that Copeland Borough Council must adhere to.

Appendices

Appendix 1: Cumbria County Council's Detailed Representations to the Copeland Local Plan Publication Draft Consultation (March 2022).

Appendix 2: Cumbria County Council's Representations to the Copeland Local Plan Publication Draft Consultation – Site Allocations (March 2022).

Appendix 3: Cumbria County Council's Local Committee for Copeland comments on Cumbria County Council's Representations to the Copeland Local Plan 2021-2038 Publication Draft Consultation (March 2022).

Key Facts

Electoral Division(s):

All Electoral Divisions in Copeland, excluding the Lake District National Park.

Executive Decision	Key Decision Included in Forward Plan	Exempt from call-in	Exemption agreed by scrutiny chair	Considered by scrutiny, if so detail below	Environmental or sustainability assessment undertaken?	Equality impact assessment undertaken?
Yes	Yes	No	No	No	N/A	N/A

Approved by the relevant Cabinet Member/s on 31 March 2022

Previous relevant Council or Executive decisions

- Cumbria County Council's Response to the Copeland Local Plan Preferred Options Consultation (Cabinet 17 December 2020).

Consideration by Overview & Scrutiny

Not considered

Background Papers

None

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Appendix 1: Cumbria County Council's Representations to the Copeland Local Plan 2021- 2038 Publication Draft Consultation

Appendix 1 sets out Cumbria County Council's representations to the Copeland Local Plan 2021- 2038 Publication Draft Consultation. The representations should be read in conjunction with Appendix 2 which sets out Cumbria County Council's representations to the Site Allocations contained within the Copeland Local Plan 2021-2038 Publication Draft Consultation.

These representations build upon Cumbria County Council's responses to the :

- Copeland Local Plan Preferred Options Consultation (December 2020).
- Copeland Local Plan Focused Pre-Publication Draft Changes Consultation (October 2021).

Representations are also aligned with the Cumbria Transport Infrastructure Plan (CTIP) which was adopted by Cumbria County Council on the 10 February 2022 and has been developed by Cumbria County Council and Cumbria Local Enterprise Partnership to set the policy framework for the role of transport in supporting sustainable and inclusive growth in Cumbria for the period 2022-2037. It replaces the current Local Transport Plan 2011-2026.

The Transport Vision for Cumbria within the CTIP is that by 2037 Cumbria will be one of the best connected rural geographies in the UK. Clean growth and decarbonised transport networks will be integral to a growing inclusive economy where our communities will be able to access opportunities, services, education and leisure facilities. Cumbria will be a destination of choice; where people choose to live, visit and work.

The development and delivery of accessible, sustainable and connected transport networks is necessary to support communities and economic growth. This needs all modes of transport to be effectively integrated with each other, and with land uses, in a manner that respects Cumbria's world-class environment. To support this the CTIP has three Objectives:

1. Clean and Healthy Cumbria: Promoting active travel and digital infrastructure as enablers of inclusive economic growth and supporting the health and well-being of our communities and the decarbonisation of transport networks.
2. Connected Cumbria: Promoting improved transport networks across and into Cumbria to connect our places and support economic growth and opportunities for businesses and communities.
3. Community Cumbria: Promoting integrated approaches to transport that are affordable, safe and meet the access and mobility needs of all, and which support opportunity and renewal within towns and communities across Cumbria with better transport used to improve social inclusion.

To support the development of the Copeland Local Plan, Cumbria County Council used the West Cumbria Transport Model to assess the impact of the proposed site allocations on the highway network. The results of this were used to prepare the Copeland Transport Improvement Study (CTIS) (commissioned jointly with Copeland Borough Council) to identify and develop transport interventions that will mitigate the impact of the Local Plan and support the delivery of the allocated sites. The CTIS linked improvement schemes to the site-specific allocations and their requirements for delivery are included within the Copeland Local Plan Infrastructure Delivery Plan.

The County Council is aware that Copeland Borough Council intend to submit their plan to the Planning Inspectorate in May 2022, with the intention of adopting the plan early 2023. It is however suggested that taking into account updates that will be required in advance of submission, timescales for the Planning Inspectorate to conduct and Examination in Public (EiP) amendments that may be required during the EiP, that consideration is given to the programme in the context of Local Government Reform, particularly in relation to decisions making.

Cumbria County Council's representations to the explanatory paragraphs and policies align with the format of the Copeland Local Plan 2021-2038 Publication Draft Consultation (reproduced text is shown in italics).

2. *Introduction*

2.1.8 *Table 1: Developments outside of the Local Plan Remit*

Table 1 sets out the several other elements of the planning system are outside of Copeland Borough Council's planning remit and are dealt with at either a county or national level.

The role of Cumbria County Council as planning authority needs to be made clearer in "Education and other County Council development" and the last column saying, "Applications for schools, educational facilities and other County Council developments (e.g. libraries) are determined by Cumbria County Council." The final column of the Minerals and Waste row, needs to be amended to say, 'Minerals and waste matters come under the remit of Cumbria County Council as minerals and waste planning authority. Applications are determined in accordance with the Cumbria Minerals and Waste Local Plan'

In respect of Minerals and Waste Planning, the reference should read: Minerals and Waste Planning (including Low Level Waste Repository at Drigg and radioactive waste matters at Sellafield).

The explanation in respect of NSIPs has an error in the final sentence. It looks like there was an intention to refer to a later paragraph number. Or the word 'in' should be deleted.

2.5 *Evidence Documents*

2.5.2 *Table 3: Local Plan Evidence Base*

The Infrastructure Delivery Plan and Viability Assessment form a key part of the evidence base and are critical to understand what infrastructure is required to support the delivery of the Local Plan and if the Local Plan is viable. Cumbria County Council is responsible for the local highway, education and has an interest in flood prevention infrastructure. Cumbria County Council will commit to work with Copeland Borough Council to develop these documents to ensure that the Local Plan and evidence base is sound.

It is noted that the final viability assessment has not yet been produced, historically some sites in Copeland have had viability issues, the Viability Assessment is a vital piece of evidence that is needed to demonstrate the Local Plan is deliverable. The County Council requests to have the opportunity comment on and input to the final Viability Assessments and be involved in any discussion in relation to prioritisation of infrastructure as a result if viability issues and emerge.

Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure includes reference to the Whitehaven Parking Strategy (March 2020). It is suggested that reference is made to the study in Table 3.

4 *Spatial Portrait*

4.2 *Longer Term Growth Aspirations*

Para 4.2.1 explains that the Key Diagram identifies a number of Broad Locations where growth can be delivered if at the Local Plan review stage it becomes apparent that there are insufficient specific deliverable sites to deliver the Local Plan Strategy. The key for the Key Diagram does not annotate any areas of Broad Location for growth, apart from an undefined annotation at Moorside.

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. It is considered that the Local Plan needs to provide a clear explanation as to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient and undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

Cumbria County Council considers the Whitehaven Eastern Relief Road has the potential to have a significant impact on the economy of Cumbria and Copeland, capable of supporting strategic growth, addressing challenges surrounding capacity on the A595 and reducing traffic through Whitehaven. This is supported in the Cumbria Transport Infrastructure Plan.

Whilst acknowledging that the delivery of the current Local Plan housing and employment allocations is not dependant on the Whitehaven Relief Road the potential of the route to support longer term growth and potential major investments to the south of Whitehaven, including at Moorside, is an important principle and one that needs to be clearly articulated through the Local Plan to further support the preparation of its business case to secure the investment.

The Local Plan needs to be cognisant that to date no funding for the delivery of this route has been confirmed through the Department of Transport Route Investment Strategy (RIS) nor have National Highways confirmed a preferred route. The maps need to be clear that the route is a broad corridor and potential junction locations for the Whitehaven Eastern Relief Road identified are indicative only. The development of appropriate route options for this scheme by National Highways would include extensive design work and further public consultation.

Figure 3: Longer Term Growth Aspirations needs to make clear in the key what are Local Plan Allocations and what are long term growth aspirations e.g. Local Plan Strategic Employment Allocations are conflated with other broad term locations for employment; Well Being village and further housing. Figure 3: Longer Term Growth Aspirations also needs to clearly identify the locations referred to in the explanatory paragraphs.

Reiterating comments made to the Preferred Options Consultation, Figure 3, the Well Being Village, shown as Longer-Term Growth Aspirations is located on a Minerals Safeguarding Area for sand and gravel. Additional sand and gravel resources will be required before the end of the Cumbria Waste and Mineral Plan period (2030), as current permitted reserves are insufficient to maintain the required landbank of at least 7 years supply. It should be noted in the explanatory text that Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences. Both the NPPF and the PPG require district planning authorities to have regard to the minerals safeguarding areas / local minerals plan when identifying suitable areas for non-mineral development in their local plans. In respect of proposed Site Allocations and Opportunity Sites the issue of minerals safeguarding should be identified as part of any Site Assessment so that developers are aware from the outset of the need to

consider the prior extraction of any known mineral resource before any non-minerals development is permitted to take place.

5. Development Strategy

5.2 Presumption in favour of Sustainable Development

Strategic Policy DS1PU: Presumption in favour of Sustainable Development

Strategic Policy DS1PU would be improved by additional criterion which also considers the delivery of appropriate infrastructure necessary to mitigate the impacts of the development.

5.3 Addressing Climate Change

Strategic Policy DS2PU: Reducing the impacts of development on Climate Change

The criterion..... "Increased resilience to the effects of climate change through elements such as avoiding deforestation, providing SuDs and avoiding development in areas with high flood risk" should be amended to read....."providing SuDS for the storage, conveying (where possible) and cleaning of water and avoiding areas of flood risk".

An additional criterion should be included which states developments must ensure that they do not increase traffic congestion that may lead to the reduction in air quality.

5.4 Settlement Hierarchy

Para 5.4.10 – 5.4.17 sets out the methodology to establish the settlement hierarchy and refers to the 2020 Settlement Hierarchy and Development Strategy. Para 5.4.11 refers to 'an update to this document was produced earlier this year'. For clarity it is suggested that reference is made to the month and year in which the update was completed. In addition, in the interests of transparency and consistency, it would be helpful for the Copeland Local Plan 2021-2038 to refer to the Village Services Survey 2021 by its current given name of 'Settlement Hierarchy & Development Strategy Paper Update 2021'.

Strategic Policy DS3PU: Settlement Hierarchy

Strategic Policy DS3PU states that "...delivery will be closely monitored against these figures..." Cumbria County Council request that additional text is added to explain how the Copeland Local Plan will continue to monitor and update the Village Services Survey and the content of policy DS3PU, should the position change once again within the next two years. Without doing so, the policy could quickly become out of date before the Government's suggested five-year Local Plan review takes place.

5.5 Settlement Boundaries

Strategic Policy DS4PU: Settlement Boundaries

Strategic Policy DS4PU advises that development outside of the settlement boundaries will only be accepted in a number of cases. Cumbria County Council request that the policy should make reference to accessibility and include criterion that is clear and consistent in respect of the assessment of a development's impact on the local highway, education and flood risk.

6. Development Standards

The Local Plan Publication Draft contains a number of inconsistent statements within a number of policies in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes. The Local Plan policies and explanatory text need to follow a clear and consistent approach to how this is worded or there needs to be a specific Development Management Policy or revisions made to Policy DS6PU: Design and Development Standards. This would avoid the need to repeat

references throughout a number of policies. A specific policy/or revision should include the following criterion and state that development should:

- not give rise to severe impacts on highway safety and/ or a severe impact on the capacity of the highway network. Should a development create such an impact then mitigation measures will be sought.
- not be in an area of flood risk and will not increase the flood risk on the site or elsewhere.
- encourage the use of sustainable transport (public transport) and active travel (walking and cycling) modes.

Cumbria County Council is happy to discuss the approach and agree appropriate wording.

6.2 *Development and Infrastructure*

Para 6.2.11 makes reference to 'charging'. It is suggested that this is amended to read, "...electric vehicle charging...".

Strategic Policy DS5PU: Planning Obligations

It is suggested that Strategic Policy DS5PU should state that developer contributions will be sought to mitigate the impact of development where it meets the tests.

6.4 *Design and Construction*

Policy DS6PU: Design and Development Standards

It is suggested that reference is made within the supporting text in respect of providing walking and cycling building upon the work of undertaken as part of Copeland Transport Improvements Study.

In addition it is suggested reference should be made in the supporting text to ensure that development supports the outcomes and schemes of Whitehaven's Local Cycling and Walking Infrastructure Plan (LCWIP). The final LWCIP will include a priority pipeline of scheme information including cycling and walking improvements to accompanying the network route maps.

It is also suggested reference should also be made in the supporting text to the adopted Cumbria Development Design Guide (2017) which takes into account national standards and includes guidance in relation to sustainable drainage systems as well as detailed guidance in relation to highways.

6.5 *Landscaping*

Policy DS7PU: Hard and Soft Landscaping

Policy DS7PU should include the provision of SUDs features in landscaping where possible.

6.6 *Reducing Flood Risk*

Para 6.6.4 states that the Cumbria Coastal Strategy (April 2020) sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. This is incorrect. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.

A number of Opportunity Sites within Whitehaven town centre are at risk of flooding. Such sites aren't allocated for a specific use and a site specific Flood Risk Assessment and Drainage Strategy will be required as part of any future planning application.

Strategic Policy DS8PU: Reducing Flood Risk

Criterion a) of Strategic Policy DS8PU should be amended to: "Directing development to allocated sites outside areas of flood risk" deleting ~~where possible~~;

6.6.9 *Sustainable Drainage*

It is suggested that the last sentence is amended to read, "All new development must incorporate sustainable urban drainage in accordance with Policy DS9PU below, unless it is shown that this would not be appropriate in the particular location."

Policy DS9PU: Sustainable Drainage

Policy DS9PU should be amended to: "New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate".

The second sentence should be amended to read, "Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for *landscape*, biodiversity and recreation."

6.8 *Air Quality*

Policy DS11PU: Protecting Air Quality

Policy DS11PU should be amended to include: "Applications for major new development must include details showing that the development will not lead to traffic congestion that would result in unacceptable levels of air pollution"

7. *Copeland's Economy*

Para 7.3.2 states: "Copeland is home to Sellafield Ltd, which has approximately 12,000 people working on the Sellafield site, and many thousands more working in the supply chain. It occupies a prominent position on Britain's Energy Coast' and is the UK's Centre of Nuclear Excellence."

As of July 2021 SL confirmed that there are approximately 6,300 staff (now close to 6,000) who have been relocated. Section 7.5.3. mentions SL off-siting as part of the EDNA and major employment site packages so it should be recognised at 7.3.2 that SL off-siting is already well underway.

Para 7.4.1 suggest omitting the hyperlink (or just include it as a footnote), as this may not always be available during the life of the local plan.

Strategic Policy E1PU: Economic Growth

It is suggested that reference is made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development.

7.5 *Location of Employment*

Para 7.5.2 refers the modelling undertaken as part of the Economic Development Needs Assessment (EDNA) 2021 to assess the likely additional jobs created from a number of major projects and opportunities discussed earlier that could take place by 2038 as growth scenario.

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

7.7 *Cleator Moor Innovation Quarter at Leconfield*
Strategic Policy E4PU: Cleator Moor Innovation Quarter at Leconfield

Cumbria County Council recognises the importance of this site. The site has the potential to support Sellafield Ltd., in its delivery of the Sellafield Travel Plan – which Cumbria County Council is in full support of, and the strategic importance of Leconfield aligns with other economic development regeneration priorities in Cleator Moor, notably its inclusion as a key strategic project within the Cleator Moor Town Investment Plan.

It is however important to note that it is considered due to the scale of the proposed site there will potentially be land assembly and site preparation issues. It is therefore important that clear evidence is provided by Copeland Borough Council to demonstrate that the site is deliverable.

Cumbria County Council will continue to work with Copeland Borough Council in a proactive manner to try and achieve the ambitious goals for this site. The scale and timing of how the site will come forward needs to be investigated in detail once Cumbria County Council is in receipt of a suitably scoped Transport Assessment considering the transport impact, for both vehicles and non-vehicular usage, of the site for this development. Cumbria County Council is currently working with the applicant to agree the scope for this assessment.

The same response applies for drainage proposals for the site. Cumbria County Council will be in a position to comment on these matters once in receipt of a Drainage Strategy and Flood Risk Assessment for the site. Cumbria County Council would expect the site proposals to conform to the best practice sustainable drainage systems principles and recommends the applicant engages in pre-application discussions with the Council to agree the scope of the Flood Risk Assessment.

Copeland Transport Improvements Study (CTIS) 2021 recommends that, where traffic demand is likely to exceed the available road capacity, even after a capacity improvement, travel demand management measures will need to be adopted in order to deliver some of the Local Plan sites and mitigate potentially significant impacts. The Study goes on to further recommend that a wide range of measures could be delivered at sites to manage the timing and volume of vehicles arriving / departing from site. This could be through restricting parking permits to drivers with at least one additional passenger (car share) or by providing dedicated bus services to key origins/destinations (park and ride).

7.8 *Employment Sites and Allocations*
Strategic Policy E5PU: Employment Sites and Allocations

Appendix 2 provides Cumbria County Council Representations in respect of the Employment Sites and Allocations.

7.9 *Opportunity Sites*
Strategic Policy E6PU: Opportunity Sites

Strategic Policy E6PU needs to reference that the Opportunity Sites need to have further assessment undertaken to consider the transport impact, drainage and flood risk assessment and depending on the defined use of the site, an assessment of education provision.

Appendix 2 provides Cumbria County Council Representations in respect of the Opportunity Sites.

8. *Rural Economy*
8.3 *Agricultural Buildings*

Policy RE1PU: Agricultural Buildings

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

There is repetition in criterion a). Suggest deleting the word 'demonstrable'.

There is nothing in the supporting text to explain what the issue is with ammonia emissions (criterion e)) and how these arise from farm buildings.

8.4 *Equestrian Related Development*

Policy RE2PU: Equestrian Related Development

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

8.5 *Conversion of rural buildings to commercial or community use*

Policy RE3PU: Conversion of rural buildings to commercial or community use

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

9. *Low Carbon and Renewable Energy*

9.2 *Large Scale Energy Developments (excluding nuclear and wind energy developments)*

Policy CC1PU: Large Scale Energy Developments (excluding nuclear and wind energy developments)

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Suggest amending the last sentence of the second paragraph of the policy to read, "Impacts on the following, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively: etc". The bullet points are 'receptors', not 'impacts'.

The previous sentence needs an 'and' before 'battery stores' and the energy types should be in lower case.

In the third paragraph, add 'is' after 'harm'.

9.3 *Wind Energy Developments*

Policy CC2PU: Wind Energy Developments

Suggest that the 4th paragraph of the policy is amended to read, "Proposals will only be considered suitable where it can be demonstrated that *relevant* planning impacts identified by local communities during consultation have been fully addressed."

10. *Nuclear Development*

10.1 *Nuclear Development Headlines*

Cumbria County Council suggest the following amends:

Strengths

Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand. Suggest amending to read, "Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the 'Clean Energy Coast'."

Query reference to Drigg as this is purely a waste site and therefore falls within the scope of the Cumbria Mineral & Waste Local Plan.

The availability of land at and adjoining Sellafield for new nuclear development is an opportunity.

Challenges

Ageing population means there is a need to attract additional working age population in to support nuclear sector. Suggest amending to read, "Ageing population means there is a need to attract more people of working age."

Opportunities

Correct spelling of 'produce'. Lower case 's' for 'small'.

Opportunities could be made more general, e.g. "Opportunities for the development of new nuclear development, including small or advanced modular reactors to produce net zero carbon electricity, a demonstration project for nuclear fusion and large new nuclear generation."

10.2 *Copeland's Nuclear Sector*

Reference to the 'Cumbria Nuclear Prospectus' has different titles (see para 10.2.2 and 10.3.1). It would also be useful to state when was it agreed and published.

10.3 *Sellafield*

For clarity it is requested that a sentence be inserted explaining that development at Sellafield is controlled by two planning authorities and that Cumbria County Council is responsible for waste related development at Sellafield. Within para 10.3.6 reference to Cumbria County Council as a partner should be made.

10.4 *Moorside*

Cumbria County Council is supportive of the reference to opportunities that nuclear related development at Moorside will bring and that the Moorside site is fundamental to the delivery of the nation's energy security and Net Zero Carbon target and will bring potentially significant economic benefit to the area, including the generation of significant employment opportunities.

Para 10.4.1 should be amended to read "...identified in the National Policy Statement...". Change second sentence to read, "The NPS is expected to be updated during 2022." This will make the text more meaningful throughout the life of the plan.

Para 10.4.2 is historic and needs rewording. Whilst the original NuGen proposals were for up to 3.8 GW of new electricity generating capacity, they were followed by Kepco's plans for up to 3GW and both proposals were withdrawn. The second sentence could say "Any proposal for a new nuclear power station is likely to require significant infrastructure works, including

railway improvements along the Cumbrian Coast Line, marine loading facility, highway improvements and worker accommodation.”

Para 10.4.3 should be amended to read, “The Council believes that the Moorside site can play a fundamental role in the delivery of.....”. Delete the second sentence as the figures quoted relate specifically to the redundant NuGen proposals.

10.5 *Cumbria Clean Energy Park*

It is suggested that the explanatory paragraph explains that to achieve the vision of the Cumbria Nuclear Prospectus a number of investment proposals are being developed around the concept of a Cumbria Clean Energy Park, primarily at the Moorside site.

10.6 *Industrial Solutions Hub*

Para 10.6.1 should be reworded to “The Industrial Solutions Hub (ISH) – a flagship initiative by Sellafield and its business partners – seeks to.....etc”. As currently written it is unclear.

10.7 *New Nuclear Technologies*

Para 10.7.1 states that the Local Plan supports the deployment of any of the following new nuclear technologies in Copeland in accordance with the criteria set out in the nuclear policies in Table 10: New Nuclear Technologies.

Specific reference also needs to be made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development which will need to be considered as part of any consenting process

10.8 *Other Supporting Developments*

Para 10.8.1 it is recommended that abbreviations like AI and R&D are written in full or added to the list of abbreviations in the plan. Clarification is required by what is meant by first bullet, “integration of RAI projects into local planning as a supporter to new policy”?

10.9 *Supporting Development of the Nuclear Sector*

Para 10.8.1 should be amended to: “Where proposals for large scale nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will be considered by the Planning Inspectorate and decided by the Secretary of State.” Amend second sentence to read, “The Council will be consulted on such applications as a ‘host authority’ under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below:”

Strategic Policy NU1PU: Supporting Development of the Nuclear Sector

Strategic Policy NU1PU should be amended as follows: “The Council will support and encourage the development of the nuclear sector, including new nuclear missions, within Copeland where the following criteria are met:

a) Proposals are ~~will be~~ in accordance with relevant National Policy and Government Guidance;

In relation to criterion b), it is not clear what is meant by ‘where appropriate’. An explanation of when it will or won’t be appropriate is required?

Is the statement relating to Sellafield needed, as there is a separate policy for Sellafield development? This statement also risks implying the proposals will be supported irrespective of other policies in the plan, notably NU4PU.

Suggest explaining somewhere the shared planning responsibilities for the Sellafield site (Copeland Borough Council and Cumbria County Council). This would help to contextualise the need for joint working between the Councils.

Clarification is required as what is meant by "proportionate and meaningful contribution to local economic, social and environmental strategies/priorities."

10.10 Nuclear Decommissioning

Para 10.10.2 should be amended to read: "The safe treatment *and storage* of low level, intermediate level and high-level waste."

10.11 Nuclear Energy Sector Development and Infrastructure

Strategic Policy NU3PU: General Nuclear Energy and associated

Amend criterion a) as follows: "The development is sited on a designated employment site or on a suitable site within settlement boundaries or is justified as an ~~otherwise be accompanied by a justifiable exceptional need case.~~"

Amend criterion b) as follows: "~~Any new energy infrastructure~~ The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;"

Amend criterion c) as follows: "~~Sites must be~~ The proposal is located, developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities."

There is lack of clarity on the circumstances when a positive legacy will be required.

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Specific reference also needs to be made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development.

10.12 Development at Sellafield

Para 10.12.2 is inconclusive and doesn't explain what the Council is trying to ensure. Should be amended as follows: "The Council's approach to dealing with proposals for nuclear development including those related to decommissioning, site remediation and radioactive material management in the borough is to work with operators of the facilities at the Sellafield nuclear licensed site and Cumbria County Council to ensure that, so far as it is possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority."

Policy NU4PU: Nuclear Development at Sellafield

Should be amended to read:

a) All nuclear development (other than monitoring, maintenance and investigatory work necessarily done off-site) shall be sited within the existing Sellafield site boundary unless Criterion b) applies.

b) Where any proposed development is outside the Sellafield site it shall be sited on a designated employment site or on suitable sites within settlement boundaries in accordance with the principles set out in Policies DS3PO and DS4PO, unless ~~or~~ otherwise accompanied by a justifiable exceptional need case.

- e) Proposals include provision for necessary ~~adequate~~ infrastructure to support the new development.
- g) Proposals shall include satisfactory measures for carbon offsetting. ~~via off-site/other agreed compensatory means~~ Where it has been demonstrated that they cannot be achieved on site, they shall be achieved via off-site /other agreed compensatory means.

The policy needs a caveat somewhere explaining that this policy does apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan. Or make it clear that the definition of 'radioactive material' does not include radioactive waste. Criterion c) could otherwise imply that radioactive waste cannot be imported for management, treatment or storage at Sellafield.

Is it not clear whether this policy is intended to cover all aspects of development at Sellafield, or whether other plan policies also apply. As written, criterion g) does not require carbon offsetting on site. The suggested wording corrects this.

10.13 *Nuclear Demolition*
Policy NU5PU: Nuclear Demolition

Should be amended as follows:

- 3) ~~Shall not~~ Not adversely affect any ecological assets unless it can be demonstrated that appropriate mitigation or compensation (on or off site) can be provided; and
- 4) ~~Shall not~~ Not give rise to other adverse impacts, including those relating to the disposal of demolition waste, unless it can be demonstrated that they can be adequately mitigated.

The word, 'shall' does not need to be repeated as it is in the first line of the policy. Cumbria County Council has previously asked for waste arising from demolition to be referenced as the quantities (and impacts) can be significant.

11. *Retail and Leisure*
11.2 *Retail and Leisure in Copeland*

Para 11.2.6 refers to Spatial Frameworks for Whitehaven (draft - not yet adopted) and the Key Service Centres being produced. The paragraph goes onto add, developments which help to achieve the ambitions within these documents will be supported by the Council. The strategy and guidance provided by these Spatial Frameworks needs to be more articulated in policy if they are to be used as a basis for decision making. The draft Spatial Frameworks were produced in 2018. Before they are adopted, Cumbria County Council would like to review the Spatial Frameworks to ensure that any further assessment which has been done to inform the preparation of the Local Plan has been considered.

11.5 *Whitehaven Town Centre*
Strategic Policy R3PU: Whitehaven Town Centre

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.6 *Key Service Centres*
Strategic Policy R4PU: The Key Service Centres

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development

Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.7 *Local Service Centres, Sustainable Villages and Rural Villages*

The explanatory paragraphs could be improved by the addition of a section to emphasise the importance of improving transport infrastructure to access Local Service Centres, Sustainable Villages and Rural Villages.

Policy R5PU: Retail and service provision in rural areas

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.8 *Whitehaven Town Centre – Primary Shopping Area*

Policy R6PU: Whitehaven Town Centre Primary Shopping Area

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.9 *Sequential Test*

Para 11.9.3 refers to Opportunity Sites within and on the edge of Whitehaven which are in need of regeneration. These are identified in policy E6PU. Please refer to Cumbria County Council's representations made in respect of this policy.

Policy R7PU: Sequential Test Policy

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.10 *Retail and Leisure Impact Assessments*

Policy R8PU: Retail and Leisure Impact Assessments

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.11 *Non-Retail Development in Towns*

Policy R9PU: Non-Retail Development in Town Centres Policy

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development

Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.12 *Hot Food Takeaways*
R10PU: Hot Food Takeaways

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

12. *Tourism*
12.2 *Copeland's Tourism Offer*
12.3 *Opportunities and Challenges*
12.4 *Tourism Development*
Strategic Policy T1PU: Tourism Development

It is considered that the supporting text in relation to opportunities should refer to the opportunity for diversification.

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy T2PU: Coastal Development along the Developed Coast

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

The wording of the policy could be simplified if the words, 'The proposal' were removed from each criterion and added to the introductory sentence, as follows, "Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported where the proposal:

a), b), c) etc.

Suggest rewording criterion d) as follows, "The proposal enhances the offer for both onshore and offshore visitors.....etc". This ensures the wording flows with the above revision and avoids repetition of the word 'opportunities'.

The last sentence of the policy could also be reworded as additional policy criteria.

In addition it is suggested that this policy is mindful of the recommendations of the Cumbria Coastal Strategy, (April 2020).

12.5 *Caravans and Camping Sites for Short-Term Letting*
Policy T3PU: Caravan and camping sites for short-term letting

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13. Housing

13.3 Improving the Housing Offer

Strategic Policy H1PU: Improving the Housing Offer

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.4 The Housing Requirement

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

Strategic Policy H2PU: Housing Requirement

Cumbria County Council acknowledge that the Strategic Housing Market Assessment (SHMA) recommends a requirement of 146 dwellings per year and supports a growth figure of 200 dwellings per year. It is considered that that the requirement will help to ensure Copeland is an attractive location for people to live and work in, which is important in the context of a declining working age population across the county.

Strategic Policy H5PU allocates land for 2963 dwellings over the Plan Period. There is an assumption the delivery of windfall development (previous completions and extant permissions) will provide a minimum of 3,400 dwellings (an average of 200 dwellings per annum) over the Plan period.

Housing delivery will be monitored and where development is not coming forward as anticipated, interventions will be sought as set out in policy H3PU.

13.5 Housing Delivery

Strategic Policy H3PU: Housing Delivery

This policy would benefit from a clear articulation of the anticipated phasing of housing allocation in the plan period. This would support the phasing and delivery of key infrastructure.

At the end of part 4 of the policy, suggest rewording as follows, "... in accordance with the NPPF (or other relevant national policy)."

13.6 Distribution of Housing

Strategic Policy H4PU: Distribution of Housing

It is anticipated that in relation to Whitehaven there will be a pressure on school places in the south of the town. A site previously identified for a new school at the Rhodia site by a developer is unsuitable and there is a need to develop a clear plan for the provision of capacity through developer contributions to support the planned level of housing growth. Linked with the IDP, Cumbria County Council will commit to work with Copeland to develop a solution prior to the submission of the Local Plan.

13.7 *Housing Allocations*

Para 3.7.5: Cumbria County Council is the Local Highway Authority and Lead Local Flood Authority. Amend to read as follows, "Specialist advice from key stakeholders, including Cumbria County Council as the local highway authority and Lead Local Flood Authority, and United Utilities was also considered."

Para 13.7.6 states that discounted sites can be considered when the Local Plan is being reviewed if the allocations have not come forward as anticipated. It is important to note that these sites would need to have further assessment undertaken to consider the highways impact, drainage and flood risk assessment and an assessment of any required education provision.

Cumbria County Council reiterates concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and surface water drainage system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme could put too much pressure on an already overburdened system.

A Risk Management Authority (RMA) Outline Business Case (OBC) is being developed to seek approval to deliver a Flood Risk Management Scheme to protect properties in Millom and Haverigg. Progression to detailed design, consents, land agreements etc is expected between May 2022 and May 2023. It is considered that phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until phase 1 has commenced.

Whilst the scheme will be designed to take into account the proposed development in the Local Plan, it is however considered that developer contributions will be required to ensure the scheme is deliverable. The estimated cost of phase 1 will be known by April 2022 and which can find into the updated to the IDP and final viability assessment to conclude what an appropriate contribution from all the developments will be.

Strategic Policy H5PU: Housing Allocations

Appendix 2 provides Cumbria County Council Representations in respect of the Housing Allocations.

13.8 *Broad Locations*

Para 13.8.1 states that the SHLAA has also identified a number of potential Broad Locations, which go beyond individual sites and are large areas of land on the edges of settlements where potential long-term growth (10 years plus) could be considered. These are identified on the Proposals Map. The Broad Locations are shown on Figure 3: Longer Term Growth Aspirations and explains that the Key Diagram identifies a number of Broad Locations that are not identified on the Proposals Map for North or South Copeland.

The paragraph further states that the Broad Locations will only be considered at the Local Plan Review stage if there are insufficient deliverable and undeliverable sites to meet the identified

need. At this time, if required, a full consultation will take place and constraints will be identified to ensure the more appropriate location is taken forward.

As set out in the requirements of the Town and Country (Local Planning) (England) Regulations 2012, a review of the local plan would warrant consultation. It is also important to note that reference needs to be made to the assessment of the highway impact; drainage and flood risk and additional education provision which the development within the areas will create.

The paragraph also states that most of the Broad Locations are linked to a growth corridor on the edge of Whitehaven that would be created by the construction of the Whitehaven Relief Road. There is an opportunity here to better evidence future growth and economic benefit to better articulate the case for investment for the Whitehaven Eastern Relief Road and improve the foundations of the business case.

13.9 *New Housing Development*
Policy H6PU: New Housing Development

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.12 *Gypsy and Traveller Accommodation*

Amend para 13.12.4 to read, "...and is seeking views from Cumbria County Council as the Lead Local Flood Authority and Local Highways Authority.

Strategic Policy H9PU: Allocated site for Gypsies, Travellers and Travelling Showpeople

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy H10PU: Gypsies, Travellers and Travelling Showpeople Windfall Sites

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Amend wording to read, "Planning applications for the development of new or the extension of existing gypsy and traveller sites will be supported where *they accord* with the Development Plan and *meet* the following criteria: etc"

Amend criterion f) so that it reads correctly alongside the other criteria: "Pitch size, type and parking is designed in accordance with national guidance;"

Copeland Borough Council recently announced consultation on the Gypsy and Traveller Site Allocations Publication Draft (21st March and 3rd May 2022). The Gypsy and Traveller Site Allocations will form part of the Copeland Local Plan 2021-2038. The final Assessment

concludes that Copeland has a requirement to make provision for 12 Gypsy and Traveller Pitches in the borough. Two sites have been identified, these are:

1. Land North of Greenbank, Whitehaven (12 pitches)
2. Land at Sneckyeat Industrial Estate, Whitehaven (12 pitches)

One site will be taken forward under proposed policy 'Strategic Policy H9PU: Allocated Site for Gypsies and Travellers'.

Cumbria County Council is considering this consultation and will be respond in due course.

13.13 *Community-led and Self and Custom Housing*
Policy H11PU: Community-led, Self-build and custom build housing

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.14 *Specialist and Older Persons housing*
Policy H12PU: Residential Establishments, including Specialist, older persons housing and purpose-built student and key-worker accommodation

Cumbria County Council request that the policy is amended as follows:

"The Council will work collaboratively with providers and partners to identify sites which may be suitable for specialist or older persons housing, including sheltered accommodation, extra care housing, residential and nursing care home accommodation and purpose-built keyworker and student accommodation, taking into account housing needs evidence including the latest SHMA and Housing Needs Study."

In addition, for clarity it would be beneficial if the policy referred to other Adult Social Care groups, such as young people with disabilities.

13.17 *New Housing in the Open Countryside*
Policy H15PU: Rural Exception Sites

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy H21PU: Residential Caravans

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

14. *Health, Sport & Culture*
14.2 *Health and Well-being*
Strategic Policy SC1PU: Health and Wellbeing

It is acknowledged that that a Health Impact Assessment has been completed as part of an Integrated Assessment which includes the Sustainability Appraisal and Strategic Environmental Assessment. The response is clear that there needs to be a clear explanation of how outcomes will be monitored, for example model shift and active travel.

The County Council supports Strategic Policy SC1PU as it will provide opportunities for a healthy lifestyle and to enable residents to live in their own home for longer. It isn't however clear the policy states that says supports will be provided to new development that produces a Health Impact Assessment. The Health Impact Assessment should be used to shape the policies within the Local Plan and isn't for a new development to provide. It is considered that it should be clear in the Local Plan and should be linked to outcomes that can be monitored, for example model shift and active travel.

It is also considered that the policy could go wider in terms of securing developer contributions beyond the types of facilities listed within the policy, to include seeking developer contributions to health facilities such as surgeries and hospitals where possible.

In addition the policy should cross reference to specialist housing, supporting people within their communities for longer via adaptations and specialist housing etc.

14.6 *Provision of new, and protection of existing, sport and leisure facilities
Policy SC2PU: Sporting, Leisure and cultural Facilities (excluding playing pitches)*

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

14.7 *Community and Cultural Facilities and Policy SC5PU: Community and Cultural Facilities*

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

15. *Natural Environment*

15.12 *Water Resources and Policy*

N5PU: Protection of Water Resources

Cumbria County Council request the inclusion in the policy which explains that new discharge into a watercourse (or work with it) may require consent from Cumbria County Council as the Lead Local Flood Authority or the Environment Agency, depending on whether it is main river or not.

Strategic Policy N7PU: St Bees and Whitehaven Heritage Coast

Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.

15.14 *The Undeveloped Coast and Strategic Policy N8PU: The Undeveloped Coast*

Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.

Reference to the St Bees and Whitehaven Heritage Coast appears to duplicate the policy content of N7PU.

16. *Built and Historic Environment*
16.9 *Advertisements*
Policy BE6PU: Advertisements

Cumbria County Council request that the following additional sentence is added to Policy BE6PU, "They should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority".

Amend to add the word 'the' in the first sentence of the policy after 'where'.

17. *Connectivity*
17.3 *Communications and Strategic Policy CO1PU: Telecommunications and Digital Connectivity*

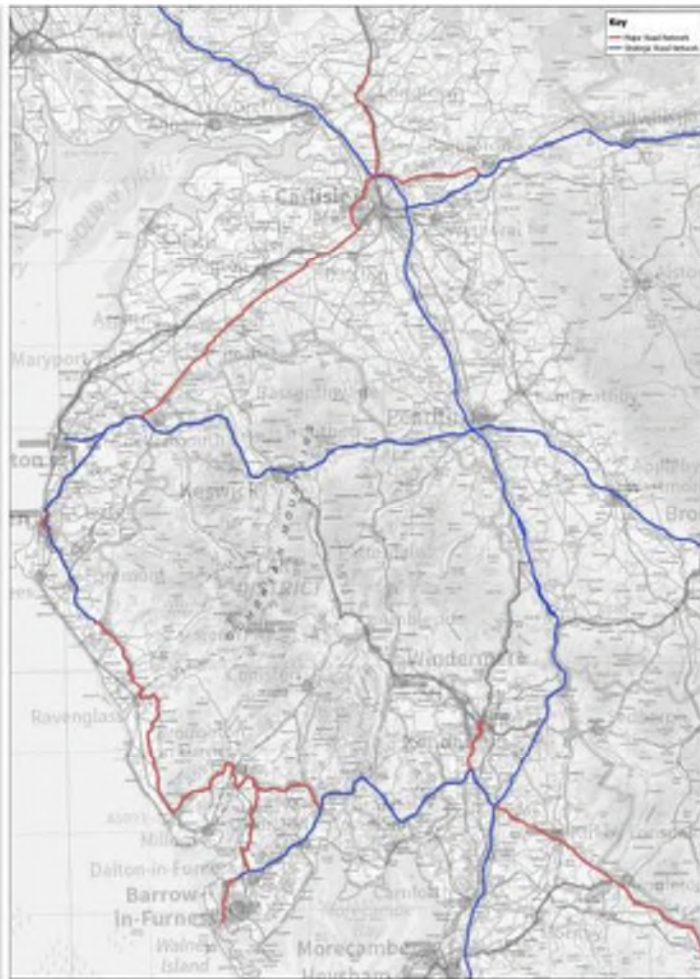
In respect of para 17.3.5, Connecting Cumbria is now about the delivery of the broader Digital Infrastructure Strategy not just the superfast contracts with BT where deployment is now complete. Connecting Cumbria is now working with several fibre broadband providers and as such specific mention of BT should be removed. Amend to read, "...a partnership between Cumbria County Council and broadband providers."

Para 17.3.7 Discussions are ongoing to ascertain if 5G may be an alternative to wi-fi in Whitehaven depending on the content that this project aims to deliver.

Para 17.3.7 Openreach plan to provide full fibre broadband in Egremont commercially and so a subsidy for broadband is unlikely to be compliant with State Aid guidance. To align with the Egremont Place Plan reference should read: "The Egremont Place Plan states that Egremont is well place to attract investment with its digital connectivity."

17.4 *Transport networks within and around Copeland*

It is suggested that Figure 12: Major Road Network in Copeland is improved to show clearer annotation of the road network in Cumbria. The map below provides shows DfT's Major Road Network in Cumbria.



In respect of paragraph 17.4.3 and discussion regarding the Whitehaven Relief Road, please refer to Cumbria County Council’s comments set out above in response to the Longer-Term Growth Aspirations.

Suggest amending third sentence to read, “It is anticipated that the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough.”

Para 17.4.4; suggest amending last sentence to read. “The route of the Cumbrian Coast Line is shown in Figure 13 below”. Figure 13 does not actually show the line of the railway. Cumbria County Council request that the route be shown and a key provided for the stations that are depicted.

17.5 Planning for transport

Para 17.5.4 needs to be more specific about the Cumbria Transport Infrastructure Plan which has now been adopted. The Cumbria Transport Infrastructure Plan (CTIP) sets the policy framework for transport and connectivity in supporting sustainable and inclusive growth in Cumbria for the period 2022–2037. It is the council’s Local Transport Plan . It sets out a vision for improving transport and infrastructure in Cumbria that provides for the needs of residents, businesses and visitors. The CTIP has three broad objectives, which are further split into nine action areas. These action areas detail the ambitions and proposals for improving transport in Cumbria.

The last sentence of the para “It will sit alongside, and support the Cumbria.” should be deleted.

Section 7.5 should include a paragraph about the development of cycling and walking projects (including the LCWIPs), Active travel is also relevant to Planning for transport and this section provides the context for Policy CO2PU.

Suggest rewording the paragraph (to remove the emphasis on road transport) as follows, “It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the transport network and sustainable public transport are delivered across the borough, The Infrastructure Delivery Plan (IDP 2022) identifies the Council’s priorities for transport, including cycling, walking and highway improvements.”

Strategic Policy CO2PU: Priority for improving Transport networks within Copeland

It needs to be clear that Policy CO2PU refers to schemes that are not currently funded or have a defined preferred route (Whitehaven Eastern Relief Road) or to general improvements that have not specifically been identified (A595, A5086, A5093). There is considerable work required to identify routes or the extent of land required for these schemes before land could be allocated or safeguarded in a future update to the Local Plan. However, it is recognised that these improvements, would bring significant benefit to Copeland and potentially unlock development land.

The final criterion ‘Improvements to the local cycle and walking network to encourage active travel’ should also refer to strategic cycle and walking networks.

17.6 Sustainable Transport

17.7 Active Travel

In emphasising the significance of active travel, Cumbria County Council considers it a good opportunity to refer to electric bicycles within the policy or in supporting text, particularly in terms of the easing some of the perceived barriers around the Cumbria topography.

17.8 Transport Assessments and Travel Plans

Strategic Policy CO4PU: Sustainable Travel

Cumbria County Council requests that greater emphasis on active travel within this policy in terms of ‘positively encouraging’ proposals which make provision for greater connectivity to housing and employment sites using cycling and walking modes of transport. This would further strengthen Copeland’s commitment to active travel and modal shift, rather than simply supporting developments which encourage the use of sustainable modes of transport.

Explicit reference should be made in the supporting text to encourage development to support the outcomes and schemes of Whitehaven’s LCWIP.

The LCWIP echoes the adopted Cumbria Transport Plan, which recognises the active travel schemes can play in improving health, access to education, employment and services and supporting the local economy. The CTIP places active travel centrally in the aim to develop a ‘Clean and Healthy Cumbria’.

The final Whitehaven LCWIP will be discussed at Cumbria County Council’s Local Committee for Copeland in May 2022. It will include priority networks which provide the core strategic network of main routes intended to facilitate movement in those corridors of highest usage..

The secondary networks supplement the priority networks and represent key corridors of movement in terms of where people are traveling from and to and are link routes that ensure there is a web of infrastructure designed to connect specific attractors such as education and employment sites to the strategic priority network. The LCWIP aims to prioritise future investment where the most benefits can be realised.

The Active Travel schemes identified in the Copeland Transport Improvements generally align to the objectives of the secondary network. Cumbria County Council's response below to the IDP highlights where consideration should be given to secondary network and how these schemes align with the Active Travel Schemes of the Copeland Transport Improvements Study and the delivery of allocated sites.

Cumbria County Council notes the requirement for Transport Assessments and Travel Plan to support developments that are likely to generate a large amount of movement. Cumbria County Council requests that the policy should include requirements for developers to demonstrate a commitment to travel plans or travel demand management in relation to the development of employment sites which would generate a significant impact on the local and strategic road network. In addition, Cumbria County Council advocates that an additional criterion is added which accounts for the Sellafield Travel Plan and how this should be monitored and revised as significant proposals relating to the Sellafield site arise.

Amend policy CO4PU as follows:

"Proposals must include safe and direct connections to cycling and walking routes where appropriate.

The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:

- a) Proposals that promote active travel, such as walking and cycling, and those that provide access to regular public transport services;
- b) Proposals that enable the sustainable movement of freight;
- c) Proposals that make provision for electric vehicles
- d) Proposals for the integration of electric vehicle charging infrastructure into new developments. This will have different requirements dependent on the scale of development.
- e) Proposals that take opportunities available to use disused railway lines to widen sustainable transport choices, encourage active travel within the borough and provide spaces for biodiversity. New development that would prejudice the future use of disused railway lines that are well connected either to settlements, other sustainable travel routes or key tourist facilities within the open countryside for this purpose will only be considered in exceptional circumstances.

Development proposals that are likely to generate a large amount of traffic movement will be required to be accompanied by an appropriate Travel Plan and be supported by a Transport Assessment in line with the Cumbria Design Guide (or any document that replaces it).

17.9 *Transport Hierarchy*
Policy CO5PU: Transport Hierarchy

Policy CO5PU: Transport Hierarchy

Cumbria County Council considers that the policy needs to have some flexibility based on the criteria listed as the priority will depend on the place and its needs. A prescribed one size fits all approach does not work in Cumbria. Modal choice needs to be encouraged but it needs to be in the right context, for example it may not be appropriate for bikes to be always considered ahead of buses.

17.10 *Countryside Access*
Strategic Policy CO6PU: Countryside Access

Suggested amendments to the policy:

Amend last sentence to read, "Where appropriate, access proposals should make provision for those with limited mobility and comply with the Equality Act 2010".

And

Existing public rights of way are protected by law and therefore do not need policy protection but clarity could be provided which states that their inclusion in the policy would allow for the development of the network to safeguard new public access in Copeland.

17.12 & 17.3 *Parking Standards and Electric Vehicles*

Cumbria County Council suggest that it would be useful to include in the supporting text to the policy that the policy responds directly to the Government's Ten Point Plan for a Green Industrial Revolution and aligns with the priorities of the EV Infrastructure Group comprising Cumbria County Council, Cumbria District Councils, Cumbria Local Enterprise Partnership, NHS, Police and other key stakeholders, for the purpose of creating further visibility of electric vehicle infrastructure priorities.

Para 17.12.1 Suggest amendment; inserting the word 'use' instead of 'promotion'.

There is inconsistency in para 7.12 with EV's being referred to as 'Electric Vehicles' and 'electric vehicles'. Suggest lower case is used.

Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure

Cumbria County Council welcome the inclusion within the policy Whitehaven Parking Study and it is suggested that reference is made to it in Table 3: Local Plan Evidence Base.

Suggest the last line of the policy is amended to read, "... and are situated in appropriate locations". 'Park and Ride Facilities' should be lower case.

Suggest omitting the various abbreviations for different types of electric vehicles as they are not used subsequently.

Copeland Local Plan 2021 – 2038: Infrastructure Delivery Plan Stage 1

Section 8:

Flooding, drainage and coastal change management

Cumbria County Council has previously made comments on Stage 1 of the IDP and would like to reiterate some of those comments.

Para 8.1 – It is important to be clear what the statutory responsibilities of the bodies are, for example the LLFA are responsible for flood investigation, not for flood risk.

8.6 – The Cumbria Surface Water Management Plan was not published, reference should be made to the Local Flood Risk Management Strategy.

Copeland Local Plan 2021 – 2038: Infrastructure Delivery Plan Stage 2

Section 2:

Delivery Mechanisms

It is noted that the Infrastructure Delivery Schedule in Appendix 1 which summarises is the infrastructure projects required to deliver the local plan is incomplete. To improve the effectiveness and consistency of how the information is presented and to support monitoring amendments to its structure are suggested below.

Section3:

Development Quantum

The assumed housing quantum of development for the Local Plan is 146 dwellings per annum which equates to a minimum of 2,482 between 2021 and 2038. The Plan will contain sufficient sites to meet this requirement and also deliver the growth figure if required.

As explained above the Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This is such an important point that clear explanation needs to be provided on how the Growth Scenarios were developed – particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, deliverable, sufficient sites). And this needs to be cross referenced in the IDP to clearly articulate what infrastructure is required

Employment Allocation

It is noted that the quantum of development for Employment Allocations differs in Table 2 of the IDP to what is in the Local Plan. The table below identifies the discrepancies.

Site Ref.	Name	Settlement	Area	Developable Area (approx.)	Area (ref in Local Plan)	Developable Area (approx.) (ref in Local Plan)
ES1a	Westlakes Science Park	Moor Row	61.3	6.4	?	?
ES1b	Westlakes Science Park Rounding Off Allocation	Moor Row	2.7	2.7	?	?
ES1c	Westlakes Science Park	Moor Row	6.3	6.3	?	?

	Southern Growth Area					
ES2a	Leconfield Industrial Estate	Cleator Moor	16.2	13.0	17.6	?
ES2b	Leconfield Eastern Extension	Cleator Moor	1.5	1.5	4	?
ES3	Whitehaven Commercial Park	Whitehaven	16.8	11.2	17.5	11
ES6	Red Lonning	Whitehaven	1.7	0.6	1.8	0.6
ES8	Furnace Row	Distington	3.2	0.9	3.1	3.1

Section 4:

Highways and Transport

Para 4.5 states that *'the Council, working with Cumbria County Council and National Highways, have supported the need to deliver a Whitehaven Eastern Relief Road. A Transport Appraisal Guidance stage 1 study was completed and led to an options appraisal and business case being produced in 2017. It was then considered as a project for Road Investment Strategy 2 (RIS2), but required further confirmation about its position with the Local Plan and future growth opportunities, and the Council now hopes it will be included with the next Road Investment Strategy which cover the period 2025-2030'*.

In respect of support for the scheme in Local Plan policy CO2PU, it is important to note that the scheme is not currently funded or has a defined preferred route. Para 4.5 goes onto to state it would remove traffic from Whitehaven town centre; significantly improve the capacity, resilience and reliability of the A595 corridor and also enable strategic growth and new investment opportunities, especially to the south of Whitehaven. As explained above the Local Plan needs to be clearer regarding future growth particularly in relation to the impact of major nuclear investment and economic benefit to better articulate the case for investment for the Whitehaven Relief Road and improve the foundations of the business case.

Local Plan Impacts

As a general introduction to how the impact of the location and quantum of development was assessed it is suggested that the following text be used:

To understand the impact of the growth identified in the Local Plan, the West Cumbria Transport Model was used to identify where on the local highway network the level and location of development could pose constraints.

Building upon the results of this, the Copeland Transport Improvements Study was commissioned jointly by Cumbria County Council and Copeland Borough Council to identify and develop transport interventions that will mitigate the impact of development and support the delivery of the Copeland Local Plan. There is a particular emphasis on identifying improvements that are sustainable and promote health and access for all where possible.

The identification of improvements followed a defined industry standard methodology (Department of Transport).

Indicative cost estimates for improvements have been developed based on the information provided in the scheme proformas (included in the CTIS) . The costs are

provided in 2021 Q2 prices, with no allowance for future inflation and thus they will need to be adjusted for inflation in line with the PRIX when the schemes are to be delivered, regular updates will be required to align with market conditions. They also include assumptions and exclusions.

The improvements were grouped by transport mode:

- Active Travel: Walking and Cycling Improvements that connect Local Plan sites to existing infrastructure, and where required, upgrade existing infrastructure to improve connectivity between sites and key destinations such as public transport interchanges.
- Public Transport (Bus and Rail): Bus service routing improvements, including enhanced frequencies, new services, demand responsive services and bus shelters. Improved rail station facilities and active mode connections.
- Highway Improvements: Schemes that improve the capacity and/or safety of a junction that would otherwise be a constraint to the road network with the additional traffic that is forecasted to be generated by new Local Plan sites.
- Travel Demand Management: Plans and policies that seek to reduce the amount of vehicular traffic during the normal peak periods in order to limit the potential increase in traffic congestion at key pinch points as a result of Local Plan Sites.

It is considered that the information in Appendix 1: Infrastructure Delivery Schedule is incomplete. The delivery schedule needs to link schemes to the Local Plan site allocations and be mindful of the sites phasing and when the infrastructure will be required to be delivered by. It also needs to be mindful of when the costs were derived and their stage of design. An alternative format is suggested.

Appendix 2: Cumbria County Council's Representations to the Copeland Local Plan 2021-2038 Publication Draft Consultation Comments on Housing and Employment Sites Allocations cross references the CTIS projects with the Local Plan Sites.

It should be noted that the following sites were assessed in the CTIS but are not allocated in the Publication Draft therefore consideration needs to be given as to whether the improvement is still required or if more than one site is required to deliver it how the funding requirement is reapportioned.

- HB13 Land adjacent to Springfield Court
- HDH1 Land north Meadowbank, Drigg
- HSE1 Land west of Stanton Way
- HFR1 Land at Griffin Close- shown as planning approved on site allocation map
- ELA1 Hensingham Common

It is also important that an appropriate monitoring system is established to ensure the recording of when funding contributions are received to aid the comprehensive delivery of schemes

The Infrastructure Delivery Schedule also needs to be clear when schemes are not directly related to a development site but are required to support the 'making of the place'. There are a number of the rail projects would fall into this category and reference to Town Deal Fund projects.

Bus

The Infrastructure Delivery Schedule identifies public transport improvements including bus service routing improvements, including enhanced frequencies, new services, demand

responsive services and bus shelters. The future maintenance of these facilities needs to be carefully considered.

Rail

Para 27 states that Local Plan allocations provide an opportunity for developers to promote rail travel to new house purchasers; this could include providing service timetables and maps of safe access routes from the development to the nearest station in new home welcome packs. Contributions may be required towards infrastructure to make access to the station easier and rail travel more attractive; this could include way finding signage, installation of dropped kerbs, provision of discounted tickets and additional parking where the nearest rail station is not within walking distance. The mechanism by which this infrastructure could be provided by developers needs to be explained.

Walking and Cycling

As explained above, the final Whitehaven LCWIP will be discussed at Cumbria County Council's Local Committee for Copeland in May 2022. It will include priority networks which provide the core strategic network of main routes intended to facilitate movement in those corridors of highest usage. The secondary networks supplement the priority networks and represent key corridors of movement in terms of where people are traveling from and to and are link routes that ensure there is a web of infrastructure designed to connect specific attractors such as education and employment sites to the strategic priority network. The LCWIP aims to prioritise future investment where the most benefits can be realised.

The Active Travel schemes identified in the Copeland Transport Improvements generally align to the objectives of the network. It would be constructive if the routes and improvements within LCWIP priority list were included in the next iteration of the IDP.

The table below shows outlines how the LCWIP schemes align with the Active Travel Schemes of the Copeland Transport Improvements Study and the allocated sites. It should be noted that costs will need to be reviewed regularly subject to changes in the market.

Given the shared principles of the LCWIP and CTIS and the synergies of the LCWIP schemes and CTIS Active Travels Schemes, there is merit in including these within the next iteration of the IDP to support the request for a match contribution.

Scheme No / ID on Priority Plan	Scheme name and location	Scheme description	Importance of improvement/ what it connects and how it fits with the priority network	km	Existing provision	Allocation	Direct Indirect Link to IDP / TIS
1 71	NCN72 Northern Spur	Segregated cycleway where width allows. Possible improvements to New Road / Brantsy Road / Brantsy Row junctions.	Widen where possible. Significant changes to junction of New Road / Brantsy Road / Brantsy Row.	1.66	Off road greenway, on road within highway extents.	HL01	Indirect link - NCN Route from Whitehaven to Lowca
2	Thornton Road to Corkickle	Traffic calming to create a quiet street approach on Thornton Road. Segregated cycleway on Loop Road / A595. Improvements to the Midgey Gill bridleway to create an off road cycleway. Likely includes improvements to Coach Road/Corkickle junction to accommodate cyclists and provide pedestrian crossings.	Low Traffic Neighbourhood and Quiet Streets potentially possible in Thornton Road Estate. New infrastructure in Midgey Gill and on Loop Road.	1.81	None apart from Bridleway in Midgey Gill.	n/a	Indirect link Route connects IDP improvement on Moresby Road to Corkickle

3	Esk Avenue to Richmond Hill Road via Hensingham and West Cumberland Hospital	<p>A new traffic free link between Whinlatter Road and the A595, if possible. Improved crossing points at A595/Homewood Road roundabout. Traffic calming measures on Homewood Road. The Hensingham Bypass/Homewood Road roundabout will require alterations to accommodate a segregated cycle track and new cycle (and pedestrian) crossings.</p>	<p>New greenway between Whinlatter Road and A595. Shared use routes alongside A595 and improved crossing points at Roundabout Junction with homewood road. LTN on homewood road between sports academy and hospital. Use automatic bollards for emergency vehicle access.</p>	2.75	No provision at all along length of corridor.	ES4 HWH1 HWH1	<p>Direct overlap with improvements identified IDP, short section of shared use on Homewood Road £373,900 & Improved crossing points at A595/Homewood Road roundabout £13,600</p>
4	Western Orbital Route	<p>An opportunity to create segregated infrastructure alongside new development on Woodville Way and Wilson Pit Road. Traffic calming schemes are likely to be required on High Road and Harbour View. The Mirehouse Road/St Bees</p>	<p>Opportunity to create segregated infrastructure alongside new development on Woodville Way and Wilson Pit Road. Traffic calming schemes on</p>	5.05	None.	ES5 HWH3 HWH4 HWH5 HWH6	<p>Direct overlap with ES5 HWH3 HWH4 HWH5 HWH6 £116,200</p>

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		Road/Wilson Pit Road junction will require alteration to provide segregated cycle infrastructure, potentially including controlled crossings.	High Road and Harbour View.				
5	NCN72 Alternative Route	New off road cycleway providing a more direct route for NCN72, running parallel to the railway line.	New scheme that offers a more direct route for NCN72 parallel to the railway line as opposed to the existing route through housing.	0.83	None.		No detail in Copeland TIS. Key north south route connecting the Westlakes Science Park to Whitehaven Town Centre
6	Urban NCN72	Realign sections of the current NCN72 to follow quiet streets, providing suitable on-road facilities with new crossing points where necessary.	Realign sections of route to follow quiet streets providing suitable on-road facilities with new crossing points where necessary	2.01	Some off-road (greenway / marina), some on-road.	OWH01 OWH02 OWH03 OWH04	Indirect pedestrian access to OWH01 and Direct overlap with OWH02 OWH03 with higher than

							desirable speed and traffic flow results requiring intervention and indirect link to OWH04 all £68,600
7 74	Coach Road to Oakbank Road	Traffic calming and junction improvements on Station Road /The Gardens to create good mixed traffic cycling conditions. Provide and off road cycleway link through Castle Park. Scheme is likely to include improvements to the Station Road/Coach Road junction, likely linked to the Coach Road / Flatt Walks junction.	Improve existing streets around train station, Junction around Corkickle, Flatt Walks. Largely off-road greenway.	1.61	None.	OWH05	No listed improvements in IDF or Copeland TIS. Providing northward link from site OWH05
8	Main Street and Red Lonning	Shared use cycle and footpath along Red Lonning, with the option of a possible bi-directional cycleway. Traffic calming on Main	Shared Use Path along Red Lonning. Possible bi-directional. Main Street - Traffic	2.25	None.	HWH2	Direct link to HWH2 Provision of shared use path utilising

75		<p>Street to be considered. Traffic free link between Egremont Road and Whinlatter Road where practicable. Improvements are likely required at the Red Lonning/Red Lonning junction north of St Benedict's Catholic High School, as well as significant changes to the Cleator Moor Rd/Moresby Rd roundabout and the B5295/Main St roundabout to ensure cyclists can safely navigate the junctions.</p>	<p>calming. New Greenway through Snebra Beck</p>				<p>wide verges on Red Lonning. Northern end. £573,400</p>
9	Harras Road	<p>Light segregated cycleway connecting Red Lonning in the east to Hillton Terrace in the west. The Harras Road/Red Lonning junction will likely require changes to incorporate cyclists and ensure continuity between schemes.</p>	<p>Connects Red Lonning in east to Hillton Terrace in west. New provision required along length of the route.</p>	1.25	None.	HWH2	<p>Direct overlap with IDP/TIS, Traffic calming measures on Harras Road £10,300 & Provision of shared use path using</p>

							existing verges on Harras Road £656,500
10	New Road and Aikbank Road	Segregated cycleway on New Road, where possible, with a new crossing over the A595. Traffic calming on Aikbank Road leading onto a traffic free link. The New Road/Loop Road North junction will require alterations to accommodate cyclists and onward connectivity in multiple directions.	Segregated facilities on New Road, with new crossing over A595, quiet streets provision on Aikbank Road and new greenway link.	1.92	None.	n/a	Review Rationale
76							
11	Northern Orbital Route	Shared use path on Red Lonning with traffic calming and quiet street approach on Victoria Road.	Shared use path on Red Lonning with Quiet Street Interventions on Victoria Road.	2.53	None.	HWH2	Indirect link - From Harras road improvement. Link route also connects north to Moresby Park allocated site REF?

12	Highlands	Shared use path on the A595 (subject to approval with National Highways) and traffic calming to promote a quiet streets approach on Highlands.	Shared use path on A595 and Quiet Street Interventions on Highlands	0.86	None.	HWH2	Indirect link - From Harray road improvement.
13	NCN72 Rural South	South Whitehaven to Moor Row along NCN72. Targeted upgrades to lighting, accesses, signage etc to comply with guidance.	South Whitehaven to Moor Row along NCN72. Targeted upgrades to lighting, accesses, signage etc to comply with guidance.	2.95	Existing surfaced route part of NCN72.	ES1a	No detail in Copeland TIS. Key north south route connecting the Westlakes Science Park to Whitehaven Town Centre
14	NCN 72 Urban South	NCN72 through south Whitehaven. Various targeted upgrades such as, vegetation clearance, resurfacing and street scape improvements.	NCN72 through south Whitehaven. Various targeted upgrades.	2.37	Existing surfaced route part of NCN72.		No detail in Copeland TIS. Key north south route connecting the Westlakes Science

							Park to Whitehaven Town Centre
15	NCN72 Northern Section Parton to Lowca	NCN72 to the north of Whitehaven. Various targeted upgrades such as, resurfacing and street scape improvements.		2.14	On road within highway extents part of NCN72.	HL01	Direct overlap with IDP at Lowca, Existing NCN 72 to be subject to surfacing improvement £85,200
16 ⁷⁸	St Bees to Whitehaven	Proposed new traffic free route from Mirehouse to St. Bees.		4.43	None.	n/a	Review Rationale
17 & 18	Cycle links from the West Lakes Science Park to the West Cumberland Hospital	Longer term aspirational routes that could provide a traffic-free cycle route between the West Lakes Science Park to the West Cumberland Hospital, further feasibility studies would be required to determine if either route would be possible.		1.59	None.	ES4 ES1a	Indirect link from ES4 onto Homewood road / No ref to Westlakes Science Park in TIS schemes list - Direct connectio

							n between employe nt sites
Secondary link ID 12	Red Lonning	Red Lonning secondary route. Wide verges which could be used for a segregated cycle route	Off-road cycle infrastructure connecting Local Plan sites	0.50		ES6	Direct link to employe nt site Provision of sharec use path utilising wide verges or Red Lonning £573,400
79							
Secondary link ID 13	Red Lonning and Moresby Road	Secondary routes on Red Lonning and Moresby Road proposed shared use path utilising wide verges	Off-road cycle infrastructure connecting Local Plan sites	0.70		ES6	Direct link to employe nt site Provision of sharec use path utilising wide verges or Moresby Road £581,700

Secondary link ID 14	Moresby Parks Road	Widen footway on Moresby Parks Road Secondary cycle route on Moresby Parks Road require segregation to the south	Off-road cycle infrastructure connecting Local Plan sites	1.50		ES3	Direct link to employment site Provision of shared use path on Moresby Parks Road £664,800
Note *	A	Schemes which directly match the improvements identified in the IDP / Copeland TIS.					
08	B	Schemes providing indirect or part links to improvements identified in the IDP / Copeland TIS					
Note **		All Preliminary Design, Build Costs including Diversions and Traffic Management, Risk Contingency and Assumed Construction Inflation					

**Section 5:
Broadband**

Below are points of clarification for this section.

Para 5.14: Wireless local loop is more commonly known as Fixed Wireless Access or FWA.

Para 5.15: Clarification of superfast Broadband - 'superfast above 30Mbps download'. It is suggested that the thinkbroadband 'fibre' figure is not quoted as this could be any speed and isn't necessarily fibre. Instead of 'the expansion of fibre based broadband' say 'the expansion of broadband to the majority of properties...'

Para 5.17: It's the 'UK Gigabit Programme'. The UK Government target is 85% by 2025 not 80%, albeit the expectation is that 80% of that will be delivered commercially. Instead of 'the remaining 20% are the hardest to reach premises' say 'the remaining *harder* to reach premises will need public subsidy..' as the current wording could be confused with the UK Government term 'Very Hard To Reach Premises' which is 0.3% of premises across the UK. Copeland will require subsidy through the UK Gigabit Programme. Planning and survey will start in 2022, but deployment in terms of the build won't start until 2023.

Para 5.18: Copeland Borough Council is also exploring the creation of a digital grid for Whitehaven which would provide access to secure and free wifi to support businesses. In future this could be replaced by 5G and as such this para may want to refer to 5G as well as public wi-fi.

Para 5.19: It is considered that there will be consumer demand for 5G services in rural areas as well.

In addition the UK Gigabit Programme budget for Cumbria is now £109m.

**Section 7:
Flooding, drainage and coastal change management**

As outlined above Millom is a high flood risk area. The LLFA are progressing a comprehensive flood mitigation scheme that should benefit both Millom and Haverigg. Need to align with comments

A Risk Management Authority (RMA) Outline Business Case (OBC) is being developed to seek approval to deliver a Flood Risk Management Scheme to protect properties in Millom and Haverigg. Progression to detailed design, consents, land agreements etc is expected between May 2022 and May 2023. It is considered that phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until phase 1 has commenced.

Whilst the scheme will be designed to take into account the proposed development in the Local Plan, it is however considered that developer contributions will be required to ensure the scheme is deliverable. The estimated cost of phase 1 will be known by April 2022 and which can find into the updated to the IDP and final viability assessment to conclude what an appropriate contribution from all the developments will be.

Section 8: Health

The section Care Homes refers to Extra Care Housing. Extra Care Housing services/units are not care homes. A care home is a specifically regulated service and should not be confused with extra care.

Amends to Para 8.8. The Stage 1 Infrastructure Delivery Plan identified a need for an additional 349 350 Extra Care Housing Units in Copeland by 2025 in line with the Extra Care Housing and Supported Living Strategy 2016-2025.

Amends to Para 8.12. To further support the development of Extra Care housing and Supported Living accommodation, in 2017 ~~a capital fund was established to facilitate the development of the 'social housing' element of extra care housing. There are currently £3.684 million in the Capiti Programme from the original £6.624 million allocation~~ Cumbria County Council established an Extra Care Housing and Supported Living Development Programme, supported by £4.240million of capital funding.

Section 9: Education

Primary

The IDP references the need to identify how the required additional places can be provided in response to Local Plan proposals. This work includes commissioning a study to assess the suitability of sites for a new build education facility as well as assessing which currently operating schools have the ability to be extended.

The IDP goes on to state that once the results of this work have been completed, Copeland Borough Council intend to release a follow up iteration document to this Infrastructure Delivery Plan which will set out the joint position of Copeland Borough Council and the "Local Education Authority" as to how the required school places could be delivered across the period of the Local Plan. It should be noted that the terminology "Local Education Authority" does not exist anymore in legislation, the County Council has statutory responsibilities in relation to education and would advise it is replaced with "Cumbria County Council". The County Council is supportive of the reference to working together to agree a joint approach.

We note that within the IDP reference is made to the potential delivery of a new school at the Rhodia site. It is important to note that a site previously identified at Rhodia by a developer to accommodate a school is considered to be unsuitable by Cumbria County Council due to an historic mineshaft. It should also be noted that for that development agreed between Copeland Borough Council and the developer is insufficient to deliver a new school.

Whilst development of the former Marchon site may well generate a further contribution it is unclear whether that would be sufficient to cover the outstanding balance of the cost of a new school and there is considered to be limited alternative funding opportunities available.

There have been a number of discussions between the County Council and Copeland Borough Council in relation to education provision in South Whitehaven where it has been explained that the site provided at Rhodia is unsuitable. Cumbria County Council has commissioned an independent feasibility study to confirm the unsuitability of the site identified at Rhodia. However, owing to the placement of 4m of earth on the area that the survey needs to take place, until removed mounds are too unstable for the drilling rigs delaying this work.

With respect to capacity, the local schools of Kells Infant and Monkway Junior have insufficient capacity to accommodate the pupil requirements of the proposed growth in the Local Plan growth. Previously the intention was to seek to amalgamate Kells and Monkway, relocating them to the Rhodia site, and this concept was included in Copeland Borough

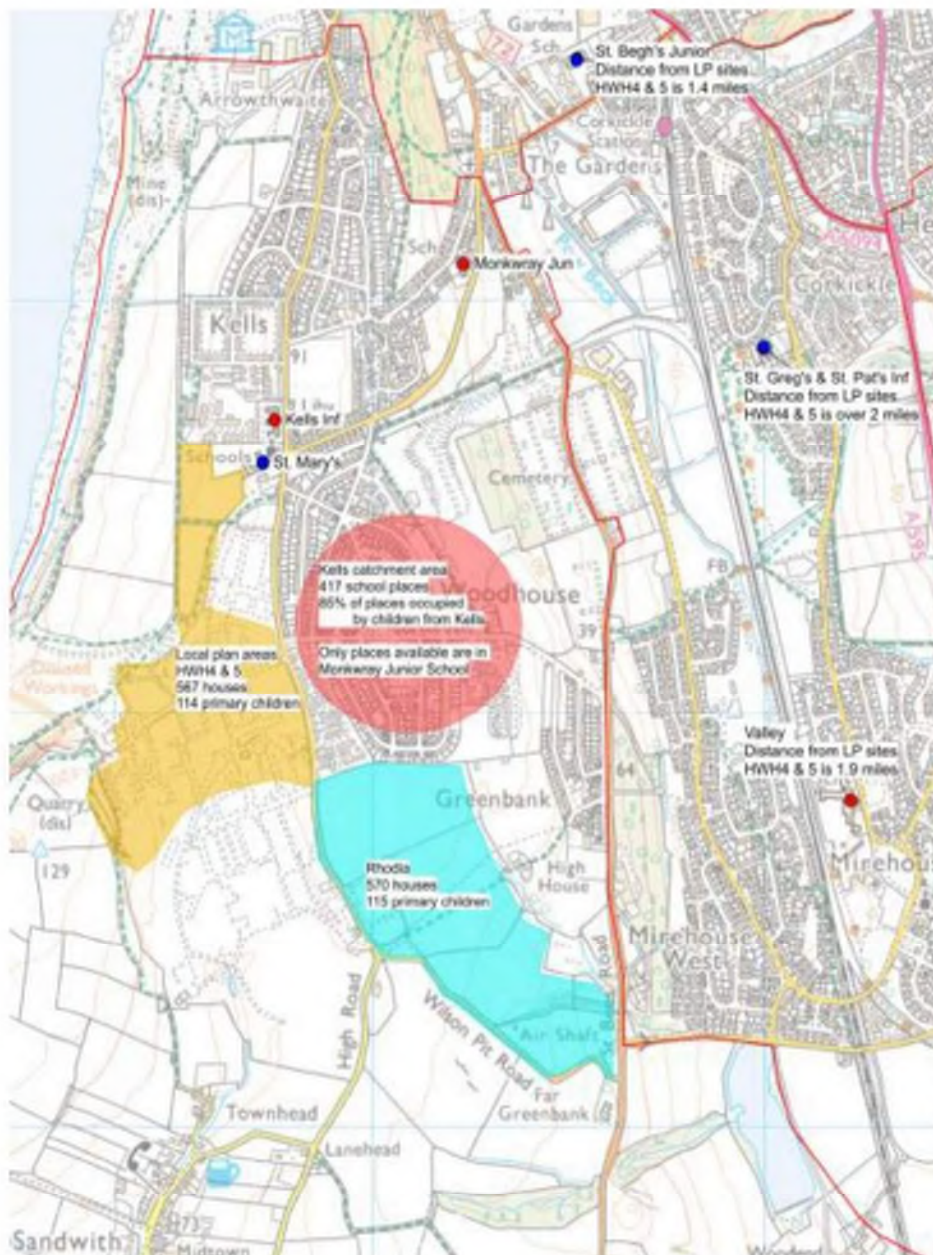
Council's South Whitehaven SPD (2013) produced to support the regeneration of the area and was seen as a vehicle for integrating the new and existing communities.

The SPD states that "*Developers will be expected to contribute towards the provision of local early years and primary education through the establishment of a new school in the area. Overall the aim should be to create high quality local educational facilities which benefit existing as well as new communities and which maximise opportunities for the integration of children from different backgrounds*". The County Council has also carried out some feasibility work which has shown that Kells and Monkway sites are constrained and do not offer scope for expansion.

The proposed Local Plan allocates a substantial housing development in the south of Whitehaven, which will impact on the pattern of admission to primary schools in the area. Whilst there are primary school places available elsewhere in the town, some children living in the traditional catchment areas of Kells Infant and Monkway Junior schools are unlikely to be able to access a place at those schools in the future.

They will be forced to seek places outside of south Whitehaven unless additional provision is put in place. This position is not considered sustainable and would undermine Copeland Borough Council's aspiration to create high quality local educational facilities which benefit existing as well as new communities and which maximise opportunities for the integration of children from different backgrounds.

The plan below helps to demonstrate the position.



*Schools marked blue are faith schools

The Department for Education guidance, Securing developer contributions for Education (November 2019). Paragraph 3 of this guidance advises that it is important that the impacts of development are adequately mitigated, requiring an understanding of:

- The education needs arising from development, based on an up-to-date pupil yield factor;
- The capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries;
- Available sources of funding to increase capacity where required; and

- The extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time.

In relation to accessibility Paragraph 106 of the National Planning Policy Framework also states that planning polices should “support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Paragraph 20 highlights that strategic policies should make sufficient provision for community facilities such as education. The Planning Practice Guidance states that “Plans should support the efficient and timely creation, expansion and alteration of high-quality schools. Plans should set out the contributions expected from development. This should include contributions needed for education, based on known pupil yields from all homes where children live, along with other types of infrastructure including affordable housing”.

It is therefore considered that taking into account capacity and the local schools, NPPF, the Planning Practice Guidance and Copeland Borough Councils SPD for South Whitehaven a new school is required in south Whitehaven. The last estimated cost of a 1FE school on a full serviced site is £7m however these costs are now undergoing review in light of building cost inflation seen nationally. The Council is happy to work with Copeland Borough Council to identify a preferred site for a school and to develop a plan for further delivery funding.

Secondary

There are 4 secondary schools within Copeland. There are currently places for those wishing to attend Millom School, but there has been a high demand for a number of years for places in West Lakes Academy and St Benedict’s Catholic High School (the latter on the new Campus Whitehaven).

Whitehaven Academy has had places available during this time, but the school is not attracting the pupil cohort it could accommodate. Whitehaven Academy is now part of the Cumbria Education Trust (a multi academy trust) and has benefitted from a total rebuild by the Department for Education (DfE). The original school was built at a time when there were many more secondary aged pupils in the area and the new build reflects the reduced birth rates as determined by the DfE.

Mayfield Special School is located at the new Campus Whitehaven, alongside St Benedict’s Catholic High School. Demand for Special Needs places has increased in recent years across the whole of Cumbria and, even since the move to the new purpose built campus site, the number of places available at the site has been increased to cover this growth trend. Based on current application trends it’s unlikely that additional places will be required at Whitehaven Academy.

There will however be a requirement for contributions from developments that are within the catchment West Lakes Academy catchment. The estimated impact and cost of these are summarised below:

Additional places needed: -

167 x £25,189 (current secondary multiplier) = £4,206,563

The pupil multiplier of £18,188 has been indexed linked to present day costs, there will be a need to continue to update costs in line with inflation.

It should be noted that there is an increasing demand for special educational needs and disability places (SEND) and there may be a requirement within the Local Plan period for developer contributions to provide additional capacity.

It is important to also be noted that trends in parental preference for school places can alter significantly over time and pupil projections will change to reflect this, thereby affecting the projected availability of places in any particular area. In-depth consideration of individual planning applications will be made at the point of their submission. It should also be noted that during the plan period, there may be changes in school capacities outside the control of Cumbria County Council (e.g. at academies) which may alter the availability of school places.

CBC IDP Infrastructure Delivery Schedule

The delivery schedule needs to link schemes to the Local Plan site allocations and be mindful of the sites phasing be required to be delivered by. It also needs to be mindful of when the costs were derived and their stage of design. Below are suggestions for a revised format and examples of how the information could be provided:

Type	Infrastructure	Project ID & Source	Estimated Cost £	Year Cost Derived	Site Ref	Site Name	Phasing	Infra Required to be delivered by	Design stage	Fund Source
Active Travel 87	Traffic Calming along Arlecdon Road	e.g CTIS	5,100	2021	HA R1	Garage Site Arlecdon	0-5 years		Concept	Dev Con
Active Travel	Footway Surfacing on Arlecdon Road	e.g CTIS	54,000	2021	HA R1	Garage Site Arlecdon	0-5 years		Concept	Dev Con
Highway Capacity	Installation of a splitter island for the A595 southbound Adjustment of the northern kerb line between Inkerman Terrace and the A595 Widening of the A595 either side of the Ribton Moorside junction southbound movement Changing the left-	ID 26 CTIS	1,497,800	2021	OW H01	Old Dawnfresh Factory Site			Concept	Dev Con
						Westlakes Science Park				Dev Con
					OW H12	Former Bus Station Bransty Row				Dev Con
					OW H11	Mark House and				Dev Con

	turn lane on Ribton Moorside					Park Nightclub				
Rail	New shelter					Nethertown Station				
Rail	New shelter					Braystones Station				
Rail	New shelter					Bootle Station				
Rail	Resurfaced/ marked area at the front of the railway station for drop off/pick up and a small number of bays allocated for rail users (includes disabled parking)					Sellafield Station				
Rail	Develop the station as a 'hub' This is the wrong terminology – this project relates to station gateway enhancements e.g accessibility improvements and public realm.	Millom Town Investment Plan	£1.2m Unknown	2022		Millom Station	0-5 years	2026	GRIP Stage 2: Preliminary / Option appraisal	Tow Net
Rail	Additional car parking facilities					St. Bees Station				
Rail Capacity	Cumbrian Coastal Railway to include re signalling; site access	Cumbrian Coast Line. OBC	TBC via OBC	2021		Cumbrian Coast Rail Line	0-5 years	2026	OBC/ GRIP Stage 2: preliminary	Dep Tran Cun

	improvements and capacity improvements									
Comments on other projects identified by Copeland Borough Council in Appendix 1										
Improved wayfinding information to town centre						It is assumed that this refers to ID56 Improve wayfinding and Whitehaven identified in the Whitehaven Parking Study (March 2019) Package 5: Improved accessibility for visitors. The WPS identified the need for improved wayfinding and electronic information signs and their most effective position. Would query why other WSP improvement schemes are not included in some of the rail projects – they are about creating a sense of place.				
Delivery of second platform at Whitehaven Station						Part of Cumbrian Coastal Railway				
Indoor waiting room refurbishment Green Road Station						Not aware that this is a confirmed project check with Northern Rail				
Parton Station - More accessible platforms						Not aware that this is a confirmed project check with Network Rail				
68	Delivery of Whitehaven Eastern Relief Road to form SRN	Whitehaven Major Transport Scheme (2017)	Unknown	N/A				In order to support strategic growth aspirations beyond the Local Plan allocations, there is a need for additional highway capacity on the A595 corridor	National Highways PCF Stage 0 (2019)	Road Investment Strategy
Flood and Drainage	Millom & Haverigg Flood Alleviation Construction of new flood revetment or seawall. Improvements to Surface Water Flood Risk which is combined with		circa 13million	to be defined 2022	HM l1	Land west of Grammers croft		In line with Phase 1 of the scheme.	Option Appraisal/ Outline Business Case	Environment Agency Local Unit EA

	the public sewer system.								
	Need to refer to App 2				HM I2	Moor Farm			
					ES 10	Devonshire Road			
					ES 12	Mainsgate Road			
					OM I01	Millom Pier			

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale		Design Stage	Fund Source
Flood and Drainage	Ravenglass LLFA	Upgrade to existing drainage system	N/A	N/A	Walls Drive Main St Jun/ Croftlands Drive	22/23		Preliminary Scheme Design	Env Age
Flood and Drainage	Seascale.	Watercourse attenuation will be provided within a housing development (Persimmon Homes) to the north of the Fairways estate to reduce flood risk from the culvert carrying the watercourse through this area	N/A	PA ref: 4/02 /088 9	Fairways, Seascale	21/22		Scheme Being Delivered	Env Age Loc High Dev Con
Flood and Drainage	Norbeck Park, Cleator Moor	Some work has been undertaken by the EA however recent surface water flooding to carriageway at "The Crescent" may indicate issues, further investigations required	N/A		Norbeck Park incl The Crescent, Coniston Park & some of Bowthorn Rd	22/23		Options Appraisal	Env Age Loc Unit EA
Flood and Drainage	Orchard Place Cleator Moor	Issues with ground water and surface water run off during weather events, low lying properties next to the carriageway suffer from flooding and water running from high ground enters the rear properties on the frontage of the B5295.	N/A	N/A	Orchard Place incl William Morris Ave & a section on Ennerdale Rd)	22/23		Options Appraisal	Env Age

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale		Design Stage	Fun Sou
Flood and Drainage	Greenmoor Road, Egremont	This site is not part of the scope of the EA's Skirting Beck Scheme. Surface water flood risk associated with the combined sewer systems results in frequent flooding. Need to work with United Utilities to resolve issues	N/A		Greenmoor Road	23/24		Pre - option Appraisal	Env Age
Flood and Drainage	Kirkland Road Ennerdale Bridge	Properties suffer flooding due to close proximity to water course, which when runs with high volumes surcharges back up surface water system causing carriageway flooding which then effects properties nearby.	N/A		Ennerdale Bridge	23/24		Pre - option Appraisal	Env Age
Flood and Drainage	Parton	Historic flooding issues in past. Tidal flooding, fluvial & pluvial, Potential for culvert improvements and need to deal with high water levels in the drainage network as a result of high tides and storm events.	N/A		Parton Village	23/24		Pre - option Appraisal	Env Age
Flood and Drainage	Bootle	Surface water run off from the lake district fells in significant rainfall events travels to the River Annas via overland flow. The river in circa a 1 in 20 year event breaches it's banks near to Hinninghouse Bridge flood farmland and properties. There is a need to consider NFM solutions to attenuate peak flow in	N/A		Bootle Village (A595)	25/26		Pre - option Appraisal	Env Age WC

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale		Design Stage	Fur Sou
		order to avoid property flooding							
Flood and Drainage	Sandwith	Surface water run-off from farm land above village is impacting local water course causing flooding to local properties and impacting the local highway network.	N/A		Sandwith Village, Whitehaven	22/23		Early Modelling	Env Age HA

Stage 2 Local Plan Viability Study (Financial Viability Assessment) (February 2022)

The Stage 2 Local Plan Viability Study has been published in draft to allow stakeholders a further opportunity to feed into the viability process. This further consultation will enable stakeholders to review the detailed evidence base supporting the study. This will provide a more in depth understanding of how the assumptions and inputs adopted in the viability testing have been formulated and the judgements that have been made. It is expected that consultation responses from stakeholders will include full supporting evidence and information in support of any changes that they believe are justified. This will then be considered and as appropriate adjustments made to the final version of the Stage 2 Local Plan Viability Study.

Section 1: Introduction

No mention of the Focused Pre-Publication consultation which took place between September and October 2021 (p1, para 1.1.3) (although it is mentioned further in the report at 3.1.3).

Would suggest including the date of the NPPF as there have been a couple of iterations over recent years and may well be more in the future (p2, para 1.1.6). Although the date does is mentioned further in the report at 4.1.2, it would be usefully to have it earlier in the document.

Section 3: LP Policies

It is no longer the case that 12,000 workers are on the site at Sellafield. SL advised in a Travel Plan meeting July 2020 that approximately 6,300 people have been relocated to other sites including Albion Square and Leconfield (p14 para 3.2.9)

Section 4: Methodology

Clarification is sought as to why the following Strategic Policies:

- CO1PU: Telecommunications and Digital Connectivity.
- CO2PU: Priority for improving Transport networks within Copeland
- CO3PU: Priorities for improving transport links to and from the Borough
- CO4PU: Sustainable Travel

Were not considered relevant to the study.

Table 4.9: Implications of Development Policies, there is no mention of highways and transport schemes identified in the Copeland Transport Improvement Study, prepared to inform the development of the Local Plan. Appendix 12 only seems to identify Active Travel and Bus Improvements. None of the Highway Capacity and Safety measure on both the local network and A595 (National Highway's SRN).

Section 6: Financial Appraisal Assumptions

Following comments received to the draft IDP and VA there may be a need to undertake further modelling to assess the validity of the assumptions and approach to prioritisation. For example if education provision isn't prioritised this may create difficulties for the delivery of future housing sites.

Alternatively there may be a need to review the surpluses generated from the site(s) in question and be satisfied that viability is sufficient to facilitate delivery of critical infrastructure.

In reality where the affordable housing ask is only a maximum of 10% the actual site value paid (as opposed to the theoretical 'EUV+' figure of the plan-wide viability testing regime) should be the by-product of a reasonable s106 on-site and off-site 'ask', along with any site-specific abnormal costs. However, there is obviously the risk (particularly in the context of the updated PPG on 'viability') that an applicant will refer back to the plan-wide FVA (and potentially the wider Local Plan evidence base) and attempt to argue that any costs not contained therein should not be taken into account when considering site-specific viability.

The Keppie Massie approach for the pool of money available for s106 Planning Obligations to be treated as a surplus sum is not unusual within plan-wide FVAs. However comment is raised in respect of the assumptions which have been adopted in relation to build costs, particularly when compared to those used in other FVAs round the north-west.

This FVA is supported by a comprehensive QS-produced 'construction costs' report (included at Appendix 11). Almost uniquely amongst viability consultants, Keppie Massie have opted to use their own construction costs assumptions, rather than BCIS.

The Keppie Massie construction rates are based on their 'database...from approximately 250 schemes in the North of England coupled with bespoke Cost Plans of typical house types that have been measured and rated.' For reasons of commercial confidentiality none of this information has been included in Appendix 11, so it is not possible to sense-check. Despite the thoroughness of the QS report the ultimate output is that assumed base build costs are typically higher than BCIS median rates (although this should be caveated by the fact that at Appendix B of the Appendix 11 report, Keppie Massie appear to have used BCIS costs, in error, for Blackburn with Darwen Borough instead of Copeland, so the specific BCIS cost comparison is likely to be flawed).

Also, only a relatively small 'economy of scale' discount has been applied for sites larger than 100 units (3 to 5% discount). For sites below 25 units the base cost has been inflated above the base assumption. These build cost assumptions are higher than for any other FVA, however it is appreciated that there may be more the challenging issues of attempting to develop within Copeland which could result in higher costs than the overall average for north-west England.

There is uncertainty that the surplus sums that are generated for each site within the viability process are likely to be sufficient to fund the likely 'ask' for items that haven't been specifically modelled in the testing. See viability results for housing allocations and generic sites at pages 118 to 144 of the linked FVA pdf: [Bloor Homes \(copeland.gov.uk\)](#). Where the affordable target is 10% all sites are either unviable or marginally viable. None have any significant surplus remaining for additional s106 contributions.

Section 7: Viability Results and Policy Impacts

The report suggests that the viability results for some sites may be initially unviable (e.g. HWH5) but start to become viable with an increase in sales prices and reduction in construction costs however, this does not reflect other contributions sites would need to deliver. There doesn't appear to be much indication here that there will be a surplus to fund the requisite level of education contribution. However, this site is an example of where the theoretical EUV+ land value of plan-wide viability is unlikely to accord with what the market will pay. KM assume that all sites (greenfield & brownfield) will have a benchmark land value of £150k per net acre, with the level of assumed abnormal costs for this site circa £400k per acre. The 'pain' of abnormal costs is reflected in a reduction in land value, along with a reduction in the level of planning obligations (particularly on-site affordable housing). KM perhaps should be making some degree of downward adjustment to assumed land value for sites with the highest abnormal costs.

Section 8: Plan Making and Delivery

The Local Plan does not include minimum density standards. Density assumptions can make a big difference to viability. By reducing the site density assumed residential values should increase, as plot sizes would be bigger. However at overly low densities the GDV would be lower and therefore viability would be worse.

Para 8.2.8 states that Copeland is seeking clarification from Cumbria County Council regarding education contributions. This is incorrect. There have been a number of discussions in relation to education provision in South Whitehaven where it has been explained that the site provided at Rhodia is unsuitable. Cumbria County Council has commissioned an independent feasibility study to confirm the unsuitability of the site identified at Rhodia.

The local schools of Kells Infant and Monkway Junior have insufficient capacity to accommodate the pupil requirements of the proposed growth in the Local Plan growth. Previously the intention was to seek to amalgamate Kells and Monkway, relocating them to the Rhodia site, and this concept was included in Copeland Borough Council's South Whitehaven SPD (2013) produced to support the regeneration of the area and was seen as a vehicle for integrating the new and existing communities.

The proposed Local Plan allocates a substantial housing development in the south of Whitehaven, which will impact on the pattern of admission to primary schools in the area. Whilst there are primary school places available elsewhere in the town, and within 2 miles walking distance, some children living in the traditional catchment areas of Kells Infant and Monkway Junior schools are unlikely to be able to access a place at those schools in the future. They will be forced to seek places elsewhere, being 'displaced' in priority order for places by those occupying the proposed new housing, unless additional primary school provision is constructed in the immediate south Whitehaven area.

Para 8.2.8 states "The results of the viability testing do however identify the surplus that is available to fund these additional contributions should they be required." Where the affordable target is 10% all sites are either unviable or marginally viable. None have any significant surplus remaining for additional s106 contributions.

In terms of achieving a balance between affordable housing and other s106 contributions it is queried how obligations are prioritised e.g. which contributions may need to be considered less critical to secure than others? In particular certain infrastructure will be essential to the delivery of some of the sites.

In addition the following comments were made in respect of the EDNA and which may be relevant in the context of the Viability Assessment.

Concerns was expressed about the baseline growth forecasts (2021 as the start year) which could be misleading. 2021 is itself a projection year which in more normal economic times might not be a major issue but the 2021 figures are heavily influenced by early estimates of the Covid impact on jobs which were highly speculative. It means that most of the projected baseline growth referenced in the report (and particularly that for accommodation & food services) is actually recovery bounce rather than genuine expansion growth so the consequent impact on demand for sites and premises could be overstated. In fact even the scale of recovery bounce is much lower in more recent projections because the impact on jobs has transpired to be less than originally anticipated.

It may have been more appropriate to select 2019 as the base year for calculating change in order to avoid the pandemic dip/bounce effect or to have made manual adjustments to reflect the degree to which the growth referred to is not all expansion growth which will result in sites and premises demand.

Greenfield	HWH4	Land south and west of St Marys School	Whitehaven	Housing	2.39	60	0-5 yrs	No c subje Devel consi
Brownfield	HWH5	Former Marchon Site North*	Whitehaven	Housing	20.9 5	532	0-5 yrs	No c subje Devel consi
Brownfield	HWH6	Land South of Waters Edge Close	Whitehaven	Housing	1.41	35	0-5 yrs	No c subje Devel consi
Greenfield	HCM1	Land at Jacktrees Road	Cleator Moor	Housing	5.07	127	0-5 yrs	No c subje Devel consi
Greenfield 6 8	HCM2	Land North of Dent Road	Cleator Moor	Housing	4.75	96	6 + yrs	No c subje Devel consi
Brownfield	HCM3	Former Ehenside School	Cleator Moor	Housing	1.11	40	7 + yrs	No c subje Devel consi
Mixed	HCM4	Land at Mill Hill	Cleator Moor	Housing	3.3	81	0-5 yrs	No c subje Devel consi

Greenfield	HEG1	Land North of Ashlea Road	Egremont	Housing	5.2	108	0-5 yrs	No c subje Devel consi
Greenfield	HEG2	Land at Gulley Flats	Egremont	Housing	6.88	170	0-5 yrs	No c subje Devel consi
Greenfield 66	HEG3	Land to south Daleview Gardens	Egremont	Housing	7.69	141	0-5 yrs	Safe possi subm site demo possi
Greenfield	HMI1	Land west of Grammers croft	Millom	Housing	4.29	107	0-5 yrs	Reiter have devel Millor any fu have water allevi secur Addit the i allevi put to

								<p>already system It is c of th suffic propo the Lo that appro comp Local that Millor Phase</p>
Greenfield	HMI2	Moor Farm	Millom	Housing	7.84	195	6 + yrs	<p>Reiter have devel Millor any fu have water allevi secur Addit the i allevi could on an system It is c of th suffic propo the Lo that appro comp Local that</p>
100								

									Millor Phase
Mixed	HAR01	Land East of Arlecdon Road	Arlecdon & Rowrah	Housing	1.73	37	0-5 yrs	No c subje Devel consi	
Greenfield	HD11	Land south of Prospect Works	Distington	Housing	1.21	30	0-5 yrs	No c subje Devel consi	
Brownfield	HD12	Land South West of Rectory Place	Distington	Housing	2.56	30 (This figure is based on HD12 being recommende d as a Local Green Space through the Open Space Assessment. As a result, CBC would expect 50% of the site to be retained as open space)	6 + yrs	No c subje Devel consi Site c annot Map.	
Greenfield	HSB1	Land adjacent Abbots Court	St Bees	Housing	2.33	58	0-5 yrs	No c subje Devel consi	
Greenfield	HSB3	Land adjacent Fairladies	St Bees	Housing	1.16	30	No phasing provided	No c subje Devel consi	
Greenfield	HSE2	Fairways Extension	Seascale	Housing	0.88	22	0-5 yrs	No c subje Devel consi	

101

Greenfield	HSE3	Town End Farm East	Seascale	Housing	1.28	32	No phasing provided	No c subje Devel consi
Greenfield	HTH1	Land to South of Thornhill	Thornhill	Housing	2.59	20	0-5 yrs	Provi Highw only a A595 Netwo accep
Greenfield	HBE1	Land North of Crofthouse Farm	Beckermet	Housing	1.97	46	0-5yrs	No c subje Devel consi
Greenfield	HBE2	Land adjacent to Mill Fields	Beckermet	Housing	1.66	27	0-5 yrs	No c subje Devel consi
Greenfield 102	HBI1	Land North of Springfield Gardens	Bigrigg	Housing	2.6	65	0-5 yrs	No c subje Devel consi Acces Strate which Nation
Mixed	HBI2	Land West of Jubilee Gardens	Bigrigg	Housing	1.45	35	0-5 yrs	No c subje Devel consi Acces Strate which Nation
Greenfield	HDH2	Wray Head, Station Road	Drigg	Housing	0.87	22	0-5 yrs	No c subje Devel consi

Brownfield	HDH3	Hill Farm, Holmrook	Holmrook	Housing	1.60	20	6 + yrs	Safe possi subm site demo possi CCC at Pr (Dec refere Holm
Greenfield	HMR1	Land to North of Social Club	Moor Row	Housing	1.51	37	0-5 yrs	No c subje Devel consi
Greenfield	HMR2	Land to South of Scalegill Road	Moor Row	Housing	1.8	41	No phasing provided	No c subje Devel consi
Greenfield	HLO1	Solway Road	Lowca	Housing	0.9	22	0-5 yrs	Solwa the ar in a Housi this s subje agree No c subje Devel consi
Greenfield	HSU1	Land to South West of Summergrove	Summergrove	Housing	8.52	80	0-5 yrs	No c suitab Mana consi Refer applic and 20.01.

OPPORTUNITY SITES

	OWH01	Old Dawnfresh Factory	Whitehaven	Opportunity (employment preferred)	1.23	n/a		No c subje Devel consi
	OWH02	Jacksons Timber Yard	Whitehaven	Opportunity (employment preferred)	0.47	n/a		No c subje Devel consi
104	OWH03	Preston St Garage	Whitehaven	Opportunity (employment preferred)	0.45	n/a		No c subje Devel consi Site is Plan : not in Dec 2
	OWH04	BT Depot	Whitehaven	Opportunity (employment preferred)	0.92	n/a		No c subje Devel consi Site is Plan : not in for th
	OWH05	Land at Ginns	Whitehaven	Opportunity (town centre and employment)	2.98	n/a		The includ CCC of t bound and d highw

	OWH06	Land at Coach Road (former Jewsons)	Whitehaven	Opportunity (town centre uses)	0.63	n/a		No c subje Devel consi Site is Plan not in for the
	OWH07	Marlborou gh Street	Whitehaven	Opportunity (town centre uses)	0.08	n/a		No c subje Devel consi Site is Plan not in for the
105	OWH08	Pow Beck	Whitehaven	Opportunity (commercial and employment preferred)	11.9 7	n/a		The includ CCC of t bound and d highw
	OWH09	Car Park Quay Street East	Whitehaven	Opportunity (town centre uses)	0.15	n/a		No c subje Devel consi Redev needs of the provis town needs recon White Site is Plan not in for the

	OWH10	Quay Street West	Whitehaven	Opportunity (town centre uses)	0.35	n/a		No c subje Devel consi Site is Plan not in for th
	OWH11	Mark House & Park Nightclub	Whitehaven	Opportunity (town centre uses)	0.25	n/a		No c subje Devel consi
	OWH12	Former Bus Garage, Bransty Row	Whitehaven	Opportunity (town centre uses)	0.18	n/a		No c subje Devel consi Site is Plan not in for th
106	OWH13	Marchon South	Whitehaven	Opportunity (mixed use)	31.5	n/a		The s for th metal assoc ref: 4 West The L clear be re transp and 1 deper use o educ Site is Plan not in for th
	OCL01	Cleator Mills	Cleator	Opportunity (commercial)	9.9	n/a		No c subje

				and residential)				Devel consi
	OEG01	Chapel Street	Egremont	Opportunity (town centre uses)	0.83	n/a		The includ CCC of t bound and d highw Redev needs of the provis
107	OEG02	Former Red Lion PH, Main Street	Egremont	Opportunity (town centre uses)	0.04	n/a		No c subje Devel consi Site c annot Map.
	OEG03	East Road Garage	Egremont	Opportunity (commercial and employment preferred)	0.62	n/a		No c howe Nation be Site is Plan not in for th
	OMI01	Millom Pier	Millom	Opportunity (employment or tourism/visit or)	3.09	n/a		Safe possi subm site demo possi If sa achie princi appro Manag consi

108								<p>partic be ta site's susta mode Site i Plan not in for th Conc which aroun press of th devel the system allevi secur Addit the i allevi put to alread system It is c of th suffic propo the L that appro comp Local that Millor Phase</p>
STRATEGIC EMPLOYMENT SITES					Site Size ha	Undeveloped Allocation (Gross Area)		It is n of Empl

110	ES2b	Leconfield Eastern Extension			4	CBC confirm to	detail Council suitability Assessment transport vehicle usage development Council working agreement assess A Dr Flood the Council site plan the be drainage and application application the (scope Assessment
EMPLOYMENT SITES					Site Size ha	Undeveloped Allocation (Gross Area)	It is not of Employment differ to wh
	ES3	Whitehaven Commercial Park, Moresby Parks	Whitehaven		17	11	No subject Development considered Site cannot Map.

	ES4	Sneckyeat Rd	Whitehaven		4.9	1.1		No c subje Devel consi
	ES5	Haig Business Park	Whitehaven		2.6	0		No c subje Devel consi
	ES6	Red Lonning	Whitehaven		1.8	0.6		No c subje Devel consi
111	ES7	Bridge End	Egremont		12.5	5		The s Cumb Miner Plan mana alloca the s alloca its d mindf Waste and th in the Subje Devel consi
	ES10	Devonshire Rd	Millom		5.9	1.3		Conc which aroun press of th devel the c

								system allevi: secur Addit the i allevi: put to alread system It is c of th suffic propc the Lo that appro comp Local that Millor Phase
112	E12	Mainsgate Rd	Millom		3.4	1.5		Conc which aroun press of th devel the system allevi: secur Addit the i allevi: put to alread system It is c of th suffic propc

								the L that appro comp Local that Millor Phase
	ES8	Furnace Row	Distington		3.1	3.1		No c subje Devel consi
	ES9	Frizington Rd	Frizington		1.6	0.8		No c subje Devel consi
113	ES11	Haverigg Industrial Estate	Haverigg		2.6	0		No c subje Devel consi
	ES14	Seascale Rural Workshop	Seascale		1.4	0.7		No c subje Devel consi
		Energy Coast Business Park	Haile		3.6	0		No c subje Devel consi

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Appendix 3: Cumbria County Council's Representations to the Copeland Local Plan (2021- 2038) Publication Draft Consultation
Comments of Members of Cumbria County Council's Local Committee for Copeland

Local Members were given a presentation on 14 February 2022 which outlined Cumbria County Council's draft representations to the Copeland Local Plan (2021-2038) Publication Draft Consultation.

The following Local Members attended the presentation:

Councillor	Division
Michael Hawkins	Mirehouse
Keith Hitchen (Chair)	Millom Without
Frank Morgan	Cleator Moor West
David Southward	Egremont
Paul Turner	Gosforth
Chris Whiteside	Egremont North and St Bees
Emma Williamson	Kells and Sandwith
Doug Wilson (Vice Chair)	Millom

A summary of Local Members comments is provided below. The summary of comments was agreed by Copeland Local Committee on 22 March 2022.

- The consultation material needs to be user friendly. The information on the website is complex and not easy to understand, which doesn't encourage the public to respond.
- There was general support that the development of the Local Plan is progressing. The implications of Copeland Borough Council not having an up to date Local Plan (and lack of an Infrastructure Delivery Plan) has had consequences for Cumbria County Council and for the local population. It was acknowledged that a significant amount of resource is required to develop a Local Plan but the lack of one in place has meant that it is sometimes been difficult to refuse unsuitable development.
- Developers need to provide play park facilities for large residential sites and funding for maintenance.
- Members raised concern that the Infrastructure Delivery Plan and Viability Assessment were not included at the start of the consultation process.
- Members stressed that whilst supportive of growth the impact on the Local Transport network needs to be carefully considered.
- Support for Phase 3 at Leconfield was given but the highway impacts will need to be properly considered.
- Copeland Borough Council need to take into account the Local Government Reform in relation to the programme for adopting the Local Plan,
- Members commented that the Whitehaven Relief Road is important to the economy of Cumbria and Copeland. The need and case for the investment needs to be better explained within the Local Plan. Members stated that Copeland Borough Council should also consider safeguarding the route and work with National Highways to do this.

- As service and infrastructure provider, Cumbria County Council need to clearly express what infrastructure is needed to allow development to proceed so that CBC can properly secure contributions for education, highways and flood and drainage infrastructure.
- Members were advised that Education is not currently dealt with in the Local Plan /Infrastructure Delivery Plan but the current draft provides a commitment to work with the County Council to develop a joint position paper prior to the submission of the plan to the planning inspectorate.
- Members commented on the importance of ensuring that there is education capacity in the right location, there are examples of families with 3 children who attend 3 different schools, this doesn't build a sense of place or social cohesion.
- It was suggested that stronger linkages need to be made with the emerging Whitehaven LCWIP.
- Members raised a general concerns that developers are getting the opportunity to build houses and make a profit but no investment is being returned to the local community.
- Members commented that there is a need to strike right balance between being able to retain young people but then not putting too much of a strain on existing services and assets.
- Members asked if the Spatial Frameworks for the three Key Service Centres were referred to in Local Plan. It was explained that they are referred to as being draft and not yet adopted. The County Council's position is that before they are adopted a review is required to ensure that any further assessment which has been done to inform the preparation of the Local Plan has been considered.



Appendix 1: Cumbria County Council's Representations to the Copeland Local Plan 2021- 2038 Publication Draft Consultation

Appendix 1 sets out Cumbria County Council's representations to the Copeland Local Plan 2021- 2038 Publication Draft Consultation. The representations should be read in conjunction with Appendix 2 which sets out Cumbria County Council's representations to the Site Allocations contained within the Copeland Local Plan 2021-2038 Publication Draft Consultation.

These representations build upon Cumbria County Council's responses to the :

- Copeland Local Plan Preferred Options Consultation (December 2020).
- Copeland Local Plan Focused Pre-Publication Draft Changes Consultation (October 2021).

Representations are also aligned with the Cumbria Transport Infrastructure Plan (CTIP) which was adopted by Cumbria County Council on the 10 February 2022 and has been developed by Cumbria County Council and Cumbria Local Enterprise Partnership to set the policy framework for the role of transport in supporting sustainable and inclusive growth in Cumbria for the period 2022-2037. It replaces the current Local Transport Plan 2011-2026.

The Transport Vision for Cumbria within the CTIP is that by 2037 Cumbria will be one of the best connected rural geographies in the UK. Clean growth and decarbonised transport networks will be integral to a growing inclusive economy where our communities will be able to access opportunities, services, education and leisure facilities. Cumbria will be a destination of choice; where people choose to live, visit and work.

The development and delivery of accessible, sustainable and connected transport networks is necessary to support communities and economic growth. This needs all modes of transport to be effectively integrated with each other, and with land uses, in a manner that respects Cumbria's world-class environment. To support this the CTIP has three Objectives:

1. Clean and Healthy Cumbria: Promoting active travel and digital infrastructure as enablers of inclusive economic growth and supporting the health and well-being of our communities and the decarbonisation of transport networks.
2. Connected Cumbria: Promoting improved transport networks across and into Cumbria to connect our places and support economic growth and opportunities for businesses and communities.
3. Community Cumbria: Promoting integrated approaches to transport that are affordable, safe and meet the access and mobility needs of all, and which support opportunity and renewal within towns and communities across Cumbria with better transport used to improve social inclusion.

To support the development of the Copeland Local Plan, Cumbria County Council used the West Cumbria Transport Model to assess the impact of the proposed site allocations on the highway network. The results of this were used to prepare the Copeland Transport Improvement Study (CTIS) (commissioned jointly with Copeland Borough Council) to identify and develop transport interventions that will mitigate the impact of the Local Plan and support the delivery of the allocated sites. The CTIS linked improvement schemes to the site-specific allocations and their requirements for delivery are included within the Copeland Local Plan Infrastructure Delivery Plan.

The County Council is aware that Copeland Borough Council intend to submit their plan to the Planning Inspectorate in May 2022, with the intention of adopting the plan early 2023. It is however suggested that taking into account updates that will be required in advance of submission, timescales for the Planning Inspectorate to conduct and Examination in Public (EiP) amendments that may be required during the EiP, that consideration is given to the programme in the context of Local Government Reform, particularly in relation to decisions making.

Cumbria County Council's representations to the explanatory paragraphs and policies align with the format of the Copeland Local Plan 2021-2038 Publication Draft Consultation (reproduced text is shown in italics).

2. *Introduction*

2.1.8 *Table 1: Developments outside of the Local Plan Remit*

Table 1 sets out the several other elements of the planning system are outside of Copeland Borough Council's planning remit and are dealt with at either a county or national level.

The role of Cumbria County Council as planning authority needs to be made clearer in "Education and other County Council development" and the last column saying, "Applications for schools, educational facilities and other County Council developments (e.g. libraries) are determined by Cumbria County Council." The final column of the Minerals and Waste row, needs to be amended to say, 'Minerals and waste matters come under the remit of Cumbria County Council as minerals and waste planning authority. Applications are determined in accordance with the Cumbria Minerals and Waste Local Plan'

In respect of Minerals and Waste Planning, the reference should read: Minerals and Waste Planning (including Low Level Waste Repository at Drigg and radioactive waste matters at Sellafield).

The explanation in respect of NSIPs has an error in the final sentence. It looks like there was an intention to refer to a later paragraph number. Or the word 'in' should be deleted.

2.5 *Evidence Documents*

2.5.2 *Table 3: Local Plan Evidence Base*

The Infrastructure Delivery Plan and Viability Assessment form a key part of the evidence base and are critical to understand what infrastructure is required to support the delivery of the Local Plan and if the Local Plan is viable. Cumbria County Council is responsible for the local highway, education and has an interest in flood prevention infrastructure. Cumbria County Council will commit to work with Copeland Borough Council to develop these documents to ensure that the Local Plan and evidence base is sound.

It is noted that the final viability assessment has not yet been produced, historically some sites in Copeland have had viability issues, the Viability Assessment is a vital piece of evidence that is needed to demonstrate the Local Plan is deliverable. The County Council requests to have the opportunity comment on and input to the final Viability Assessments and be involved in any discussion in relation to prioritisation of infrastructure as a result if viability issues and emerge.

Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure includes reference to the Whitehaven Parking Strategy (March 2020). It is suggested that reference is made to the study in Table 3.

4 *Spatial Portrait*

4.2 *Longer Term Growth Aspirations*

Para 4.2.1 explains that the Key Diagram identifies a number of Broad Locations where growth can be delivered if at the Local Plan review stage it becomes apparent that there are insufficient specific deliverable sites to deliver the Local Plan Strategy. The key for the Key Diagram does not annotate any areas of Broad Location for growth, apart from an undefined annotation at Moorside.

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. It is considered that the Local Plan needs to provide a clear explanation as to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient and undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

Cumbria County Council considers the Whitehaven Eastern Relief Road has the potential to have a significant impact on the economy of Cumbria and Copeland, capable of supporting strategic growth, addressing challenges surrounding capacity on the A595 and reducing traffic through Whitehaven. This is supported in the Cumbria Transport Infrastructure Plan.

Whilst acknowledging that the delivery of the current Local Plan housing and employment allocations is not dependant on the Whitehaven Relief Road the potential of the route to support longer term growth and potential major investments to the south of Whitehaven, including at Moorside, is an important principle and one that needs to be clearly articulated through the Local Plan to further support the preparation of its business case to secure the investment.

The Local Plan needs to be cognisant that to date no funding for the delivery of this route has been confirmed through the Department of Transport Route Investment Strategy (RIS) nor have National Highways confirmed a preferred route. The maps need to be clear that the route is a broad corridor and potential junction locations for the Whitehaven Eastern Relief Road identified are indicative only. The development of appropriate route options for this scheme by National Highways would include extensive design work and further public consultation.

Figure 3: Longer Term Growth Aspirations needs to make clear in the key what are Local Plan Allocations and what are long term growth aspirations e.g. Local Plan Strategic Employment Allocations are conflated with other broad term locations for employment; Well Being village and further housing. Figure 3: Longer Term Growth Aspirations also needs to clearly identify the locations referred to in the explanatory paragraphs.

Reiterating comments made to the Preferred Options Consultation, Figure 3, the Well Being Village, shown as Longer-Term Growth Aspirations is located on a Minerals Safeguarding Area for sand and gravel. Additional sand and gravel resources will be required before the end of the Cumbria Waste and Mineral Plan period (2030), as current permitted reserves are insufficient to maintain the required landbank of at least 7 years supply. It should be noted in the explanatory text that Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences. Both the NPPF and the PPG require district planning authorities to have regard to the minerals safeguarding areas / local minerals plan when identifying suitable areas for non-mineral development in their local plans. In respect of proposed Site Allocations and Opportunity Sites the issue of minerals safeguarding should be identified as part of any Site Assessment so that developers are aware from the outset of the need to

consider the prior extraction of any known mineral resource before any non-minerals development is permitted to take place.

5. Development Strategy

5.2 Presumption in favour of Sustainable Development

Strategic Policy DS1PU: Presumption in favour of Sustainable Development

Strategic Policy DS1PU would be improved by additional criterion which also considers the delivery of appropriate infrastructure necessary to mitigate the impacts of the development.

5.3 Addressing Climate Change

Strategic Policy DS2PU: Reducing the impacts of development on Climate Change

The criterion..... "Increased resilience to the effects of climate change through elements such as avoiding deforestation, providing SuDs and avoiding development in areas with high flood risk" should be amended to read....."providing SuDS for the storage, conveying (where possible) and cleaning of water and avoiding areas of flood risk".

An additional criterion should be included which states developments must ensure that they do not increase traffic congestion that may lead to the reduction in air quality.

5.4 Settlement Hierarchy

Para 5.4.10 – 5.4.17 sets out the methodology to establish the settlement hierarchy and refers to the 2020 Settlement Hierarchy and Development Strategy. Para 5.4.11 refers to 'an update to this document was produced earlier this year'. For clarity it is suggested that reference is made to the month and year in which the update was completed. In addition, in the interests of transparency and consistency, it would be helpful for the Copeland Local Plan 2021-2038 to refer to the Village Services Survey 2021 by its current given name of 'Settlement Hierarchy & Development Strategy Paper Update 2021'.

Strategic Policy DS3PU: Settlement Hierarchy

Strategic Policy DS3PU states that "...delivery will be closely monitored against these figures..." Cumbria County Council request that additional text is added to explain how the Copeland Local Plan will continue to monitor and update the Village Services Survey and the content of policy DS3PU, should the position change once again within the next two years. Without doing so, the policy could quickly become out of date before the Government's suggested five-year Local Plan review takes place.

5.5 Settlement Boundaries

Strategic Policy DS4PU: Settlement Boundaries

Strategic Policy DS4PU advises that development outside of the settlement boundaries will only be accepted in a number of cases. Cumbria County Council request that the policy should make reference to accessibility and include criterion that is clear and consistent in respect of the assessment of a development's impact on the local highway, education and flood risk.

6. Development Standards

The Local Plan Publication Draft contains a number of inconsistent statements within a number of policies in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes. The Local Plan policies and explanatory text need to follow a clear and consistent approach to how this is worded or there needs to be a specific Development Management Policy or revisions made to Policy DS6PU: Design and Development Standards. This would avoid the need to repeat

references throughout a number of policies. A specific policy/or revision should include the following criterion and state that development should:

- not give rise to severe impacts on highway safety and/ or a severe impact on the capacity of the highway network. Should a development create such an impact then mitigation measures will be sought.
- not be in an area of flood risk and will not increase the flood risk on the site or elsewhere.
- encourage the use of sustainable transport (public transport) and active travel (walking and cycling) modes.

Cumbria County Council is happy to discuss the approach and agree appropriate wording.

6.2 *Development and Infrastructure*

Para 6.2.11 makes reference to 'charging'. It is suggested that this is amended to read, "...electric vehicle charging....".

Strategic Policy DS5PU: Planning Obligations

It is suggested that Strategic Policy DS5PU should state that developer contributions will be sought to mitigate the impact of development where it meets the tests.

6.4 *Design and Construction*

Policy DS6PU: Design and Development Standards

It is suggested that reference is made within the supporting text in respect of providing walking and cycling building upon the work of undertaken as part of Copeland Transport Improvements Study.

In addition it is suggested reference should be made in the supporting text to ensure that development supports the outcomes and schemes of Whitehaven's Local Cycling and Walking Infrastructure Plan (LCWIP). The final LWCIP will include a priority pipeline of scheme information including cycling and walking improvements to accompanying the network route maps.

It is also suggested reference should also be made in the supporting text to the adopted Cumbria Development Design Guide (2017) which takes into account national standards and includes guidance in relation to sustainable drainage systems as well as detailed guidance in relation to highways.

6.5 *Landscaping*

Policy DS7PU: Hard and Soft Landscaping

Policy DS7PU should include the provision of SUDs features in landscaping where possible.

6.6 *Reducing Flood Risk*

Para 6.6.4 states that the Cumbria Coastal Strategy (April 2020) sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. This is incorrect. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.

A number of Opportunity Sites within Whitehaven town centre are at risk of flooding. Such sites aren't allocated for a specific use and a site specific Flood Risk Assessment and Drainage Strategy will be required as part of any future planning application.

Strategic Policy DS8PU: Reducing Flood Risk

Criterion a) of Strategic Policy DS8PU should be amended to: "Directing development to allocated sites outside areas of flood risk" deleting ~~where possible~~.

6.6.9 *Sustainable Drainage*

It is suggested that the last sentence is amended to read, "All new development must incorporate sustainable urban drainage in accordance with Policy DS9PU below, unless it is shown that this would not be appropriate in the particular location."

Policy DS9PU: Sustainable Drainage

Policy DS9PU should be amended to: "New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate".

The second sentence should be amended to read, "Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for *landscape*, biodiversity and recreation."

6.8 *Air Quality*

Policy DS11PU: Protecting Air Quality

Policy DS11PU should be amended to include: "Applications for major new development must include details showing that the development will not lead to traffic congestion that would result in unacceptable levels of air pollution"

7. *Copeland's Economy*

Para 7.3.2 states: "Copeland is home to Sellafield Ltd, which has approximately 12,000 people working on the Sellafield site, and many thousands more working in the supply chain. It occupies a prominent position on Britain's Energy Coast' and is the UK's Centre of Nuclear Excellence."

As of July 2021 SL confirmed that there are approximately 6,300 staff (now close to 6,000) who have been relocated. Section 7.5.3. mentions SL off-siting as part of the EDNA and major employment site packages so it should be recognised at 7.3.2 that SL off-siting is already well underway.

Para 7.4.1 suggest omitting the hyperlink (or just include it as a footnote), as this may not always be available during the life of the local plan.

Strategic Policy E1PU: Economic Growth

It is suggested that reference is made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development.

7.5 *Location of Employment*

Para 7.5.2 refers the modelling undertaken as part of the Economic Development Needs Assessment (EDNA) 2021 to assess the likely additional jobs created from a number of major projects and opportunities discussed earlier that could take place by 2038 as growth scenario.

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

7.7 *Cleator Moor Innovation Quarter at Leconfield*
Strategic Policy E4PU: Cleator Moor Innovation Quarter at Leconfield

Cumbria County Council recognises the importance of this site. The site has the potential to support Sellafield Ltd., in its delivery of the Sellafield Travel Plan – which Cumbria County Council is in full support of, and the strategic importance of Leconfield aligns with other economic development regeneration priorities in Cleator Moor, notably its inclusion as a key strategic project within the Cleator Moor Town Investment Plan.

It is however important to note that it is considered due to the scale of the proposed site there will potentially be land assembly and site preparation issues. It is therefore important that clear evidence is provided by Copeland Borough Council to demonstrate that the site is deliverable.

Cumbria County Council will continue to work with Copeland Borough Council in a proactive manner to try and achieve the ambitious goals for this site. The scale and timing of how the site will come forward needs to be investigated in detail once Cumbria County Council is in receipt of a suitably scoped Transport Assessment considering the transport impact, for both vehicles and non-vehicular usage, of the site for this development. Cumbria County Council is currently working with the applicant to agree the scope for this assessment.

The same response applies for drainage proposals for the site. Cumbria County Council will be in a position to comment on these matters once in receipt of a Drainage Strategy and Flood Risk Assessment for the site. Cumbria County Council would expect the site proposals to conform to the best practice sustainable drainage systems principles and recommends the applicant engages in pre-application discussions with the Council to agree the scope of the Flood Risk Assessment.

Copeland Transport Improvements Study (CTIS) 2021 recommends that, where traffic demand is likely to exceed the available road capacity, even after a capacity improvement, travel demand management measures will need to be adopted in order to deliver some of the Local Plan sites and mitigate potentially significant impacts. The Study goes on to further recommend that a wide range of measures could be delivered at sites to manage the timing and volume of vehicles arriving / departing from site. This could be through restricting parking permits to drivers with at least one additional passenger (car share) or by providing dedicated bus services to key origins/destinations (park and ride).

7.8 *Employment Sites and Allocations*
Strategic Policy E5PU: Employment Sites and Allocations

Appendix 2 provides Cumbria County Council Representations in respect of the Employment Sites and Allocations.

7.9 *Opportunity Sites*
Strategic Policy E6PU: Opportunity Sites

Strategic Policy E6PU needs to reference that the Opportunity Sites need to have further assessment undertaken to consider the transport impact, drainage and flood risk assessment and depending on the defined use of the site, an assessment of education provision.

Appendix 2 provides Cumbria County Council Representations in respect of the Opportunity Sites.

8. *Rural Economy*
8.3 *Agricultural Buildings*

Policy RE1PU: Agricultural Buildings

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

There is repetition in criterion a). Suggest deleting the word 'demonstrable'.

There is nothing in the supporting text to explain what the issue is with ammonia emissions (criterion e)) and how these arise from farm buildings.

8.4 *Equestrian Related Development*

Policy RE2PU: Equestrian Related Development

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

8.5 *Conversion of rural buildings to commercial or community use*

Policy RE3PU: Conversion of rural buildings to commercial or community use

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

9. *Low Carbon and Renewable Energy*

9.2 *Large Scale Energy Developments (excluding nuclear and wind energy developments)*

Policy CC1PU: Large Scale Energy Developments (excluding nuclear and wind energy developments)

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Suggest amending the last sentence of the second paragraph of the policy to read, "Impacts on the following, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively: etc". The bullet points are 'receptors', not 'impacts'.

The previous sentence needs an 'and' before 'battery stores' and the energy types should be in lower case.

In the third paragraph, add 'is' after 'harm'.

9.3 *Wind Energy Developments*

Policy CC2PU: Wind Energy Developments

Suggest that the 4th paragraph of the policy is amended to read, "Proposals will only be considered suitable where it can be demonstrated that *relevant* planning impacts identified by local communities during consultation have been fully addressed."

10. *Nuclear Development*

10.1 *Nuclear Development Headlines*

Cumbria County Council suggest the following amends:

Strengths

Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand. Suggest amending to read, "Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the 'Clean Energy Coast'."

Query reference to Drigg as this is purely a waste site and therefore falls within the scope of the Cumbria Mineral & Waste Local Plan.

The availability of land at and adjoining Sellafield for new nuclear development is an opportunity.

Challenges

Ageing population means there is a need to attract additional working age population in to support nuclear sector. Suggest amending to read, "Ageing population means there is a need to attract more people of working age."

Opportunities

Correct spelling of 'produce'. Lower case 's' for 'small'.

Opportunities could be made more general, e.g. "Opportunities for the development of new nuclear development, including small or advanced modular reactors to produce net zero carbon electricity, a demonstration project for nuclear fusion and large new nuclear generation."

10.2 *Copeland's Nuclear Sector*

Reference to the 'Cumbria Nuclear Prospectus' has different titles (see para 10.2.2 and 10.3.1). It would also be useful to state when was it agreed and published.

10.3 *Sellafield*

For clarity it is requested that a sentence be inserted explaining that development at Sellafield is controlled by two planning authorities and that Cumbria County Council is responsible for waste related development at Sellafield. Within para 10.3.6 reference to Cumbria County Council as a partner should be made.

10.4 *Moorside*

Cumbria County Council is supportive of the reference to opportunities that nuclear related development at Moorside will bring and that the Moorside site is fundamental to the delivery of the nation's energy security and Net Zero Carbon target and will bring potentially significant economic benefit to the area, including the generation of significant employment opportunities.

Para 10.4.1 should be amended to read "...identified in the National Policy Statement...". Change second sentence to read, "The NPS is expected to be updated during 2022." This will make the text more meaningful throughout the life of the plan.

Para 10.4.2 is historic and needs rewording. Whilst the original NuGen proposals were for up to 3.8 GW of new electricity generating capacity, they were followed by Kepco's plans for up to 3GW and both proposals were withdrawn. The second sentence could say "Any proposal for a new nuclear power station is likely to require significant infrastructure works, including

railway improvements along the Cumbrian Coast Line, marine loading facility, highway improvements and worker accommodation.”

Para 10.4.3 should be amended to read, “The Council believes that the Moorside site can play a fundamental role in the delivery of.....”. Delete the second sentence as the figures quoted relate specifically to the redundant NuGen proposals.

10.5 *Cumbria Clean Energy Park*

It is suggested that the explanatory paragraph explains that to achieve the vision of the Cumbria Nuclear Prospectus a number of investment proposals are being developed around the concept of a Cumbria Clean Energy Park, primarily at the Moorside site.

10.6 *Industrial Solutions Hub*

Para 10.6.1 should be reworded to “The Industrial Solutions Hub (ISH) – a flagship initiative by Sellafield and its business partners – seeks to.....etc”. As currently written it is unclear.

10.7 *New Nuclear Technologies*

Para 10.7.1 states that the Local Plan supports the deployment of any of the following new nuclear technologies in Copeland in accordance with the criteria set out in the nuclear policies in Table 10: New Nuclear Technologies.

Specific reference also needs to be made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development which will need to be considered as part of any consenting process

10.8 *Other Supporting Developments*

Para 10.8.1 it is recommended that abbreviations like AI and R&D are written in full or added to the list of abbreviations in the plan. Clarification is required by what is meant by first bullet, “integration of RAI projects into local planning as a supporter to new policy”?

10.9 *Supporting Development of the Nuclear Sector*

Para 10.8.1 should be amended to: “Where proposals for large scale nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will be considered by the Planning Inspectorate and decided by the Secretary of State.” Amend second sentence to read, “The Council will be consulted on such applications as a ‘host authority’ under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below:”

Strategic Policy NU1PU: Supporting Development of the Nuclear Sector

Strategic Policy NU1PU should be amended as follows: “The Council will support and encourage the development of the nuclear sector, including new nuclear missions, within Copeland where the following criteria are met:

a) Proposals are ~~will be~~ in accordance with relevant National Policy and Government Guidance;

In relation to criterion b), it is not clear what is meant by ‘where appropriate’. An explanation of when it will or won’t be appropriate is required?

Is the statement relating to Sellafield needed, as there is a separate policy for Sellafield development? This statement also risks implying the proposals will be supported irrespective of other policies in the plan, notably NU4PU.

Suggest explaining somewhere the shared planning responsibilities for the Sellafield site (Copeland Borough Council and Cumbria County Council). This would help to contextualise the need for joint working between the Councils.

Clarification is required as what is meant by "proportionate and meaningful contribution to local economic, social and environmental strategies/priorities."

10.10 *Nuclear Decommissioning*

Para 10.10.2 should be amended to read: "The safe treatment *and storage* of low level, intermediate level and high-level waste."

10.11 *Nuclear Energy Sector Development and Infrastructure*

Strategic Policy NU3PU: General Nuclear Energy and associated

Amend criterion a) as follows: "The development is sited on a designated employment site or on a suitable site within settlement boundaries or is justified as an ~~otherwise be accompanied by a justifiable exceptional need case.~~"

Amend criterion b) as follows: "~~Any new energy infrastructure~~ The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;"

Amend criterion c) as follows: "~~Sites must be~~ The proposal is located, developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities."

There is lack of clarity on the circumstances when a positive legacy will be required.

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Specific reference also needs to be made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development.

10.12 *Development at Sellafield*

Para 10.12.2 is inconclusive and doesn't explain what the Council is trying to ensure. Should be amended as follows: "The Council's approach to dealing with proposals for nuclear development including those related to decommissioning, site remediation and radioactive material management in the borough is to work with operators of the facilities at the Sellafield nuclear licensed site and Cumbria County Council to ensure that, so far as it is possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority."

Policy NU4PU: Nuclear Development at Sellafield

Should be amended to read:

a) All nuclear development (other than monitoring, maintenance and investigatory work necessarily done off-site) shall be sited within the existing Sellafield site boundary unless Criterion b) applies.

b) Where any proposed development is outside the Sellafield site it shall be sited on a designated employment site or on suitable sites within settlement boundaries in accordance with the principles set out in Policies DS3PO and DS4PO, unless ~~or~~ otherwise accompanied by a justifiable exceptional need case.

- e) Proposals include provision for necessary ~~adequate~~ infrastructure to support the new development.
- g) Proposals shall include satisfactory measures for carbon offsetting. ~~via off-site/other agreed compensatory means~~ Where it has been demonstrated that they cannot be achieved on site, they shall be achieved via off-site /other agreed compensatory means.

The policy needs a caveat somewhere explaining that this policy does apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan. Or make it clear that the definition of 'radioactive material' does not include radioactive waste. Criterion c) could otherwise imply that radioactive waste cannot be imported for management, treatment or storage at Sellafield.

Is it not clear whether this policy is intended to cover all aspects of development at Sellafield, or whether other plan policies also apply. As written, criterion g) does not require carbon offsetting on site. The suggested wording corrects this.

10.13 *Nuclear Demolition*
 Policy NU5PU: Nuclear Demolition

Should be amended as follows:

- 3) ~~Shall not~~ Not adversely affect any ecological assets unless it can be demonstrated that appropriate mitigation or compensation (on or off site) can be provided; and
- 4) ~~Shall not~~ Not give rise to other adverse impacts, including those relating to the disposal of demolition waste, unless it can be demonstrated that they can be adequately mitigated.

The word, 'shall' does not need to be repeated as it is in the first line of the policy. Cumbria County Council has previously asked for waste arising from demolition to be referenced as the quantities (and impacts) can be significant.

11. *Retail and Leisure*
11.2 *Retail and Leisure in Copeland*

Para 11.2.6 refers to Spatial Frameworks for Whitehaven (draft - not yet adopted) and the Key Service Centres being produced. The paragraph goes onto add, developments which help to achieve the ambitions within these documents will be supported by the Council. The strategy and guidance provided by these Spatial Frameworks needs to be more articulated in policy if they are to be used as a basis for decision making. The draft Spatial Frameworks were produced in 2018. Before they are adopted, Cumbria County Council would like to review the Spatial Frameworks to ensure that any further assessment which has been done to inform the preparation of the Local Plan has been considered.

11.5 *Whitehaven Town Centre*
 Strategic Policy R3PU: Whitehaven Town Centre

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.6 *Key Service Centres*
 Strategic Policy R4PU: The Key Service Centres

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development

Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.7 *Local Service Centres, Sustainable Villages and Rural Villages*

The explanatory paragraphs could be improved by the addition of a section to emphasise the importance of improving transport infrastructure to access Local Service Centres, Sustainable Villages and Rural Villages.

Policy R5PU: Retail and service provision in rural areas

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.8 *Whitehaven Town Centre – Primary Shopping Area*

Policy R6PU: Whitehaven Town Centre Primary Shopping Area

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.9 *Sequential Test*

Para 11.9.3 refers to Opportunity Sites within and on the edge of Whitehaven which are in need of regeneration. These are identified in policy E6PU. Please refer to Cumbria County Council's representations made in respect of this policy.

Policy R7PU: Sequential Test Policy

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.10 *Retail and Leisure Impact Assessments*

Policy R8PU: Retail and Leisure Impact Assessments

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.11 *Non-Retail Development in Towns*

Policy R9PU: Non-Retail Development in Town Centres Policy

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development

Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

11.12 *Hot Food Takeaways*

R10PU: Hot Food Takeaways

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

12. *Tourism*

12.2 *Copeland's Tourism Offer*

12.3 *Opportunities and Challenges*

12.4 *Tourism Development*

Strategic Policy T1PU: Tourism Development

It is considered that the supporting text in relation to opportunities should refer to the opportunity for diversification.

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy T2PU: Coastal Development along the Developed Coast

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

The wording of the policy could be simplified if the words, 'The proposal' were removed from each criterion and added to the introductory sentence, as follows, "Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported where the proposal:

a), b), c) etc.

Suggest rewording criterion d) as follows, "The proposal enhances the offer for both onshore and offshore visitors.....etc". This ensures the wording flows with the above revision and avoids repetition of the word 'opportunities'.

The last sentence of the policy could also be reworded as additional policy criteria.

In addition it is suggested that this policy is mindful of the recommendations of the Cumbria Coastal Strategy, (April 2020).

12.5 *Caravans and Camping Sites for Short-Term Letting*

Policy T3PU: Caravan and camping sites for short-term letting

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13. Housing

13.3 *Improving the Housing Offer*

Strategic Policy H1PU: Improving the Housing Offer

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.4 *The Housing Requirement*

The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.

Strategic Policy H2PU: Housing Requirement

Cumbria County Council acknowledge that the Strategic Housing Market Assessment (SHMA) recommends a requirement of 146 dwellings per year and supports a growth figure of 200 dwellings per year. It is considered that that the requirement will help to ensure Copeland is an attractive location for people to live and work in, which is important in the context of a declining working age population across the county.

Strategic Policy H5PU allocates land for 2963 dwellings over the Plan Period. There is an assumption the delivery of windfall development (previous completions and extant permissions) will provide a minimum of 3,400 dwellings (an average of 200 dwellings per annum) over the Plan period.

Housing delivery will be monitored and where development is not coming forward as anticipated, interventions will be sought as set out in policy H3PU.

13.5 *Housing Delivery*

Strategic Policy H3PU: Housing Delivery

This policy would benefit from a clear articulation of the anticipated phasing of housing allocation in the plan period. This would support the phasing and delivery of key infrastructure.

At the end of part 4 of the policy, suggest rewording as follows, "... in accordance with the NPPF (or other relevant national policy)."

13.6 *Distribution of Housing*

Strategic Policy H4PU: Distribution of Housing

It is anticipated that in relation to Whitehaven there will be a pressure on school places in the south of the town. A site previously identified for a new school at the Rhodia site by a developer is unsuitable and there is a need to develop a clear plan for the provision of capacity through developer contributions to support the planned level of housing growth. Linked with the IDP, Cumbria County Council will commit to work with Copeland to develop a solution prior to the submission of the Local Plan.

13.7 *Housing Allocations*

Para 3.7.5: Cumbria County Council is the Local Highway Authority and Lead Local Flood Authority. Amend to read as follows, “Specialist advice from key stakeholders, including Cumbria County Council as the local highway authority and Lead Local Flood Authority, and United Utilities was also considered.”

Para 13.7.6 states that discounted sites can be considered when the Local Plan is being reviewed if the allocations have not come forward as anticipated. It is important to note that these sites would need to have further assessment undertaken to consider the highways impact, drainage and flood risk assessment and an assessment of any required education provision.

Cumbria County Council reiterates concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and surface water drainage system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme could put too much pressure on an already overburdened system.

A Risk Management Authority (RMA) Outline Business Case (OBC) is being developed to seek approval to deliver a Flood Risk Management Scheme to protect properties in Millom and Haverigg. Progression to detailed design, consents, land agreements etc is expected between May 2022 and May 2023. It is considered that phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until phase 1 has commenced.

Whilst the scheme will be designed to take into account the proposed development in the Local Plan, it is however considered that developer contributions will be required to ensure the scheme is deliverable. The estimated cost of phase 1 will be known by April 2022 and which can find into the updated to the IDP and final viability assessment to conclude what an appropriate contribution from all the developments will be.

Strategic Policy H5PU: Housing Allocations

Appendix 2 provides Cumbria County Council Representations in respect of the Housing Allocations.

13.8 *Broad Locations*

Para 13.8.1 states that the SHLAA has also identified a number of potential Broad Locations, which go beyond individual sites and are large areas of land on the edges of settlements where potential long-term growth (10 years plus) could be considered. These are identified on the Proposals Map. The Broad Locations are shown on Figure 3: Longer Term Growth Aspirations and explains that the Key Diagram identifies a number of Broad Locations that are not identified on the Proposals Map for North or South Copeland.

The paragraph further states that the Broad Locations will only be considered at the Local Plan Review stage if there are insufficient deliverable and undeliverable sites to meet the identified

need. At this time, if required, a full consultation will take place and constraints will be identified to ensure the more appropriate location is taken forward.

As set out in the requirements of the Town and Country (Local Planning) (England) Regulations 2012, a review of the local plan would warrant consultation. It is also important to note that reference needs to be made to the assessment of the highway impact; drainage and flood risk and additional education provision which the development within the areas will create.

The paragraph also states that most of the Broad Locations are linked to a growth corridor on the edge of Whitehaven that would be created by the construction of the Whitehaven Relief Road. There is an opportunity here to better evidence future growth and economic benefit to better articulate the case for investment for the Whitehaven Eastern Relief Road and improve the foundations of the business case.

13.9 *New Housing Development*
Policy H6PU: New Housing Development

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.12 *Gypsy and Traveller Accommodation*

Amend para 13.12.4 to read, "...and is seeking views from Cumbria County Council as the Lead Local Flood Authority and Local Highways Authority.

Strategic Policy H9PU: Allocated site for Gypsies, Travellers and Travelling Showpeople

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy H10PU: Gypsies, Travellers and Travelling Showpeople Windfall Sites

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Amend wording to read, "Planning applications for the development of new or the extension of existing gypsy and traveller sites will be supported where *they accord* with the Development Plan and *meet* the following criteria: etc"

Amend criterion f) so that it reads correctly alongside the other criteria: "Pitch size, type and parking is designed in accordance with national guidance;"

Copeland Borough Council recently announced consultation on the Gypsy and Traveller Site Allocations Publication Draft (21st March and 3rd May 2022). The Gypsy and Traveller Site Allocations will form part of the Copeland Local Plan 2021-2038. The final Assessment

concludes that Copeland has a requirement to make provision for 12 Gypsy and Traveller Pitches in the borough. Two sites have been identified, these are:

1. Land North of Greenbank, Whitehaven (12 pitches)
2. Land at Sneckyeat Industrial Estate, Whitehaven (12 pitches)

One site will be taken forward under proposed policy 'Strategic Policy H9PU: Allocated Site for Gypsies and Travellers'.

Cumbria County Council is considering this consultation and will be respond in due course.

13.13 *Community-led and Self and Custom Housing*

Policy H11PU: Community-led, Self-build and custom build housing

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

13.14 *Specialist and Older Persons housing*

Policy H12PU: Residential Establishments, including Specialist, older persons housing and purpose-built student and key-worker accommodation

Cumbria County Council request that the policy is amended as follows:

"The Council will work collaboratively with providers and partners to identify sites which may be suitable for specialist or older persons housing, including sheltered accommodation, extra care housing, residential and nursing care home accommodation and purpose-built keyworker and student accommodation, taking into account housing needs evidence including the latest SHMA and Housing Needs Study."

In addition, for clarity it would be beneficial if the policy referred to other Adult Social Care groups, such as young people with disabilities.

13.17 *New Housing in the Open Countryside*

Policy H15PU: Rural Exception Sites

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

Policy H21PU: Residential Caravans

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

14. *Health, Sport & Culture*

14.2 *Health and Well-being*

Strategic Policy SC1PU: Health and Wellbeing

It is acknowledged that that a Health Impact Assessment has been completed as part of an Integrated Assessment which includes the Sustainability Appraisal and Strategic Environmental Assessment. The response is clear that there needs to be a clear explanation of how outcomes will be monitored, for example model shift and active travel.

The County Council supports Strategic Policy SC1PU as it will provide opportunities for a healthy lifestyle and to enable residents to live in their own home for longer. It isn't however clear the policy states that says supports will be provided to new development that produces a Health Impact Assessment. The Health Impact Assessment should be used to shape the policies within the Local Plan and isn't for a new development to provide. It is considered that it should be clear in the Local Plan and should be linked to outcomes that can be monitored, for example model shift and active travel.

It is also considered that the policy could go wider in terms of securing developer contributions beyond the types of facilities listed within the policy, to include seeking developer contributions to health facilities such as surgeries and hospitals where possible.

In addition the policy should cross reference to specialist housing, supporting people within their communities for longer via adaptations and specialist housing etc.

14.6 *Provision of new, and protection of existing, sport and leisure facilities*
Policy SC2PU: Sporting, Leisure and cultural Facilities (excluding playing pitches)

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

14.7 *Community and Cultural Facilities and Policy SC5PU: Community and Cultural Facilities*

Cumbria County Council request that the policy criterion includes clear and consistent wording in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced. This would avoid the need to repeat references. Cumbria County Council is happy to discuss the approach and agree appropriate wording.

15. *Natural Environment*

15.12 *Water Resources and Policy*
N5PU: Protection of Water Resources

Cumbria County Council request the inclusion in the policy which explains that new discharge into a watercourse (or work with it) may require consent from Cumbria County Council as the Lead Local Flood Authority or the Environment Agency, depending on whether it is main river or not.

Strategic Policy N7PU: St Bees and Whitehaven Heritage Coast

Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.

15.14 *The Undeveloped Coast and Strategic Policy N8PU: The Undeveloped Coast*

Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.

Reference to the St Bees and Whitehaven Heritage Coast appears to duplicate the policy content of N7PU.

16. Built and Historic Environment
16.9 Advertisements
Policy BE6PU: Advertisements

Cumbria County Council request that the following additional sentence is added to Policy BE6PU, "They should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority".

Amend to add the word 'the' in the first sentence of the policy after 'where'.

17. Connectivity
17.3 Communications and Strategic Policy CO1PU: Telecommunications and Digital Connectivity

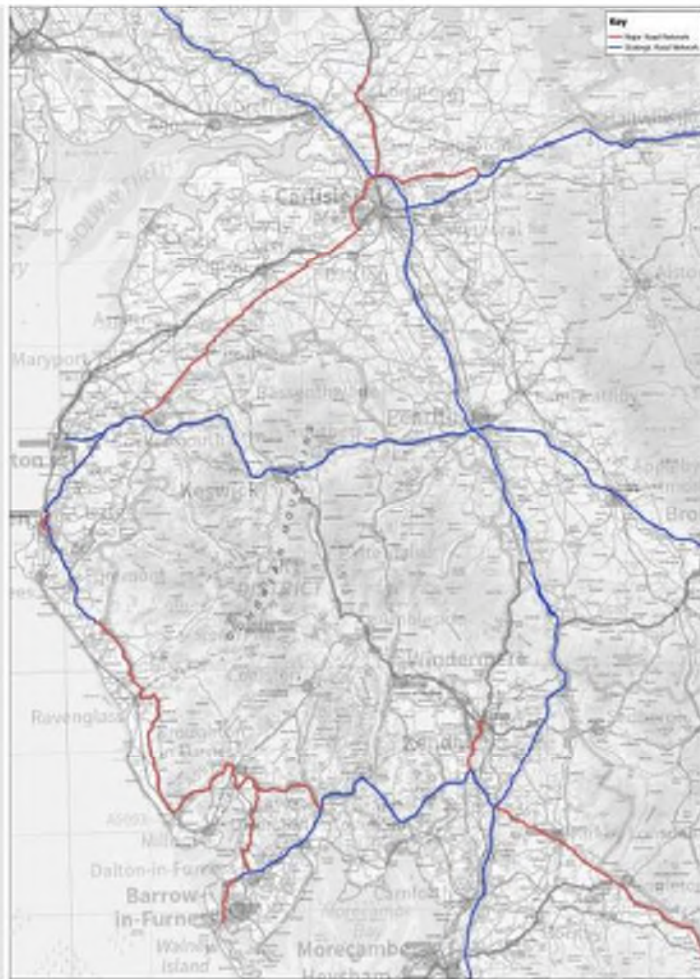
In respect of para 17.3.5, Connecting Cumbria is now about the delivery of the broader Digital Infrastructure Strategy not just the superfast contracts with BT where deployment is now complete. Connecting Cumbria is now working with several fibre broadband providers and as such specific mention of BT should be removed. Amend to read, "....a partnership between Cumbria County Council and broadband providers."

Para 17.3.7 Discussions are ongoing to ascertain if 5G may be an alternative to wi-fi in Whitehaven depending on the content that this project aims to deliver.

Para 17.3.7 Openreach plan to provide full fibre broadband in Egremont commercially and so a subsidy for broadband is unlikely to be compliant with State Aid guidance. To align with the Egremont Place Plan reference should read: "The Egremont Place Plan states that Egremont is well place to attract investment with its digital connectivity."

17.4 Transport networks within and around Copeland

It is suggested that Figure 12: Major Road Network in Copeland is improved to show clearer annotation of the road network in Cumbria. The map below provides shows DfT's Major Road Network in Cumbria.



In respect of paragraph 17.4.3 and discussion regarding the Whitehaven Relief Road, please refer to Cumbria County Council’s comments set out above in response to the Longer-Term Growth Aspirations.

Suggest amending third sentence to read, “It is anticipated that the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough.”

Para 17.4.4; suggest amending last sentence to read. “The route of the Cumbrian Coast Line is shown in Figure 13 below”. Figure 13 does not actually show the line of the railway. Cumbria County Council request that the route be shown and a key provided for the stations that are depicted.

17.5 Planning for transport

Para 17.5.4 needs to be more specific about the Cumbria Transport Infrastructure Plan which has now been adopted. The Cumbria Transport Infrastructure Plan (CTIP) sets the policy framework for transport and connectivity in supporting sustainable and inclusive growth in Cumbria for the period 2022–2037. It is the council’s Local Transport Plan . It sets out a vision for improving transport and infrastructure in Cumbria that provides for the needs of residents, businesses and visitors. The CTIP has three broad objectives, which are further split into nine action areas. These action areas detail the ambitions and proposals for improving transport in Cumbria.

The last sentence of the para “It will sit alongside, and support the Cumbria.” should be deleted.

Section 7.5 should include a paragraph about the development of cycling and walking projects (including the LCWIPs), Active travel is also relevant to Planning for transport and this section provides the context for Policy CO2PU.

Suggest rewording the paragraph (to remove the emphasis on road transport) as follows, “It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the transport network and sustainable public transport are delivered across the borough, The Infrastructure Delivery Plan (IDP 2022) identifies the Council’s priorities for transport, including cycling, walking and highway improvements.”

Strategic Policy CO2PU: Priority for improving Transport networks within Copeland

It needs to be clear that Policy CO2PU refers to schemes that are not currently funded or have a defined preferred route (Whitehaven Eastern Relief Road) or to general improvements that have not specifically been identified (A595, A5086, A5093). There is considerable work required to identify routes or the extent of land required for these schemes before land could be allocated or safeguarded in a future update to the Local Plan. However, it is recognised that these improvements, would bring significant benefit to Copeland and potentially unlock development land.

The final criterion ‘Improvements to the local cycle and walking network to encourage active travel’ should also refer to strategic cycle and walking networks.

17.6 Sustainable Transport

17.7 Active Travel

In emphasising the significance of active travel, Cumbria County Council considers it a good opportunity to refer to electric bicycles within the policy or in supporting text, particularly in terms of the easing some of the perceived barriers around the Cumbria topography.

17.8 Transport Assessments and Travel Plans

Strategic Policy CO4PU: Sustainable Travel

Cumbria County Council requests that greater emphasis on active travel within this policy in terms of ‘positively encouraging’ proposals which make provision for greater connectivity to housing and employment sites using cycling and walking modes of transport. This would further strengthen Copeland’s commitment to active travel and modal shift, rather than simply supporting developments which encourage the use of sustainable modes of transport.

Explicit reference should be made in the supporting text to encourage development to support the outcomes and schemes of Whitehaven’s LCWIP.

The LCWIP echoes the adopted Cumbria Transport Plan, which recognises the active travel schemes can play in improving health, access to education, employment and services and supporting the local economy. The CTIP places active travel centrally in the aim to develop a ‘Clean and Healthy Cumbria’.

The final Whitehaven LCWIP will be discussed at Cumbria County Council’s Local Committee for Copeland in May 2022. It will include priority networks which provide the core strategic network of main routes intended to facilitate movement in those corridors of highest usage..

The secondary networks supplement the priority networks and represent key corridors of movement in terms of where people are traveling from and to and are link routes that ensure there is a web of infrastructure designed to connect specific attractors such as education and employment sites to the strategic priority network. The LCWIP aims to prioritise future investment where the most benefits can be realised.

The Active Travel schemes identified in the Copeland Transport Improvements generally align to the objectives of the secondary network. Cumbria County Council's response below to the IDP highlights where consideration should be given to secondary network and how these schemes align with the Active Travel Schemes of the Copeland Transport Improvements Study and the delivery of allocated sites.

Cumbria County Council notes the requirement for Transport Assessments and Travel Plan to support developments that are likely to generate a large amount of movement. Cumbria County Council requests that the policy should include requirements for developers to demonstrate a commitment to travel plans or travel demand management in relation to the development of employment sites which would generate a significant impact on the local and strategic road network. In addition, Cumbria County Council advocates that an additional criterion is added which accounts for the Sellafield Travel Plan and how this should be monitored and revised as significant proposals relating to the Sellafield site arise.

Amend policy CO4PU as follows:

"Proposals must include safe and direct connections to cycling and walking routes where appropriate.

The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:

- a) Proposals that promote active travel, such as walking and cycling, and those that provide access to regular public transport services;
- b) Proposals that enable the sustainable movement of freight;
- c) Proposals that make provision for electric vehicles
- d) Proposals for the integration of electric vehicle charging infrastructure into new developments. This will have different requirements dependent on the scale of development.
- e) Proposals that take opportunities available to use disused railway lines to widen sustainable transport choices, encourage active travel within the borough and provide spaces for biodiversity. New development that would prejudice the future use of disused railway lines that are well connected either to settlements, other sustainable travel routes or key tourist facilities within the open countryside for this purpose will only be considered in exceptional circumstances.

Development proposals that are likely to generate a large amount of traffic movement will be required to be accompanied by an appropriate Travel Plan and be supported by a Transport Assessment in line with the Cumbria Design Guide (or any document that replaces it).

17.9 *Transport Hierarchy*
Policy CO5PU: Transport Hierarchy

Policy CO5PU: Transport Hierarchy

Cumbria County Council considers that the policy needs to have some flexibility based on the criteria listed as the priority will depend on the place and its needs. A prescribed one size fits all approach does not work in Cumbria. Modal choice needs to be encouraged but it needs to be in the right context, for example it may not be appropriate for bikes to be always considered ahead of buses.

17.10 *Countryside Access*
Strategic Policy CO6PU: Countryside Access

Suggested amendments to the policy:

Amend last sentence to read, "Where appropriate, access proposals should make provision for those with limited mobility and comply with the Equality Act 2010".

And

Existing public rights of way are protected by law and therefore do not need policy protection but clarity could be provided which states that their inclusion in the policy would allow for the development of the network to safeguard new public access in Copeland.

17.12 & 17.3 *Parking Standards and Electric Vehicles*

Cumbria County Council suggest that it would be useful to include in the supporting text to the policy that the policy responds directly to the Government's Ten Point Plan for a Green Industrial Revolution and aligns with the priorities of the EV Infrastructure Group comprising Cumbria County Council, Cumbria District Councils, Cumbria Local Enterprise Partnership, NHS, Police and other key stakeholders, for the purpose of creating further visibility of electric vehicle infrastructure priorities.

Para 17.12.1 Suggest amendment; inserting the word 'use' instead of 'promotion'.

There is inconsistency in para 7.12 with EV's being referred to as 'Electric Vehicles' and 'electric vehicles'. Suggest lower case is used.

Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure

Cumbria County Council welcome the inclusion within the policy Whitehaven Parking Study and it is suggested that reference is made to it in Table 3: Local Plan Evidence Base.

Suggest the last line of the policy is amended to read, "... and are situated in appropriate locations". 'Park and Ride Facilities' should be lower case.

Suggest omitting the various abbreviations for different types of electric vehicles as they are not used subsequently.

Copeland Local Plan 2021 – 2038: Infrastructure Delivery Plan Stage 1

Section 8:

Flooding, drainage and coastal change management

Cumbria County Council has previously made comments on Stage 1 of the IDP and would like to reiterate some of those comments.

Para 8.1 – It is important to be clear what the statutory responsibilities of the bodies are, for example the LLFA are responsible for flood investigation, not for flood risk.

8.6 – The Cumbria Surface Water Management Plan was not published, reference should be made to the Local Flood Risk Management Strategy.

Copeland Local Plan 2021 – 2038: Infrastructure Delivery Plan Stage 2

Section 2:

Delivery Mechanisms

It is noted that the Infrastructure Delivery Schedule in Appendix 1 which summarises is the infrastructure projects required to deliver the local plan is incomplete. To improve the effectiveness and consistency of how the information is presented and to support monitoring amendments to its structure are suggested below.

Section3:

Development Quantum

The assumed housing quantum of development for the Local Plan is 146 dwellings per annum which equates to a minimum of 2,482 between 2021 and 2038. The Plan will contain sufficient sites to meet this requirement and also deliver the growth figure if required.

As explained above the Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This is such an important point that clear explanation needs to be provided on how the Growth Scenarios were developed – particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, deliverable, sufficient sites). And this needs to be cross referenced in the IDP to clearly articulate what infrastructure is required

Employment Allocation

It is noted that the quantum of development for Employment Allocations differs in Table 2 of the IDP to what is in the Local Plan. The table below identifies the discrepancies.

Site Ref.	Name	Settlement	Area	Developable Area (approx.)	Area (ref in Local Plan)	Developable Area (approx.) (ref in Local Plan)
ES1a	Westlakes Science Park	Moor Row	61.3	6.4	?	?
ES1b	Westlakes Science Park Rounding Off Allocation	Moor Row	2.7	2.7	?	?
ES1c	Westlakes Science Park	Moor Row	6.3	6.3	?	?

	Southern Growth Area					
ES2a	Leconfield Industrial Estate	Cleator Moor	16.2	13.0	17.6	?
ES2b	Leconfield Eastern Extension	Cleator Moor	1.5	1.5	4	?
ES3	Whitehaven Commercial Park	Whitehaven	16.8	11.2	17.5	11
ES6	Red Lonning	Whitehaven	1.7	0.6	1.8	0.6
ES8	Furnace Row	Distington	3.2	0.9	3.1	3.1

Section 4:

Highways and Transport

Para 4.5 states that *'the Council, working with Cumbria County Council and National Highways, have supported the need to deliver a Whitehaven Eastern Relief Road. A Transport Appraisal Guidance stage 1 study was completed and led to an options appraisal and business case being produced in 2017. It was then considered as a project for Road Investment Strategy 2 (RIS2), but required further confirmation about its position with the Local Plan and future growth opportunities, and the Council now hopes it will be included with the next Road Investment Strategy which cover the period 2025-2030'*.

In respect of support for the scheme in Local Plan policy CO2PU, it is important to note that the scheme is not currently funded or has a defined preferred route. Para 4.5 goes onto to state it would remove traffic from Whitehaven town centre; significantly improve the capacity, resilience and reliability of the A595 corridor and also enable strategic growth and new investment opportunities, especially to the south of Whitehaven. As explained above the Local Plan needs to be clearer regarding future growth particularly in relation to the impact of major nuclear investment and economic benefit to better articulate the case for investment for the Whitehaven Relief Road and improve the foundations of the business case.

Local Plan Impacts

As a general introduction to how the impact of the location and quantum of development was assessed it is suggested that the following text be used:

To understand the impact of the growth identified in the Local Plan, the West Cumbria Transport Model was used to identify where on the local highway network the level and location of development could pose constraints.

Building upon the results of this, the Copeland Transport Improvements Study was commissioned jointly by Cumbria County Council and Copeland Borough Council to identify and develop transport interventions that will mitigate the impact of development and support the delivery of the Copeland Local Plan. There is a particular emphasis on identifying improvements that are sustainable and promote health and access for all where possible.

The identification of improvements followed a defined industry standard methodology (Department of Transport).

Indicative cost estimates for improvements have been developed based on the information provided in the scheme proformas (included in the CTIS) . The costs are

provided in 2021 Q2 prices, with no allowance for future inflation and thus they will need to be adjusted for inflation in line with the PRIX when the schemes are to be delivered, regular updates will be required to align with market conditions. They also include assumptions and exclusions.

The improvements were grouped by transport mode:

- Active Travel: Walking and Cycling Improvements that connect Local Plan sites to existing infrastructure, and where required, upgrade existing infrastructure to improve connectivity between sites and key destinations such as public transport interchanges.
- Public Transport (Bus and Rail): Bus service routing improvements, including enhanced frequencies, new services, demand responsive services and bus shelters. Improved rail station facilities and active mode connections.
- Highway Improvements: Schemes that improve the capacity and/or safety of a junction that would otherwise be a constraint to the road network with the additional traffic that is forecasted to be generated by new Local Plan sites.
- Travel Demand Management: Plans and policies that seek to reduce the amount of vehicular traffic during the normal peak periods in order to limit the potential increase in traffic congestion at key pinch points as a result of Local Plan Sites.

It is considered that the information in Appendix 1: Infrastructure Delivery Schedule is incomplete. The delivery schedule needs to link schemes to the Local Plan site allocations and be mindful of the sites phasing and when the infrastructure will be required to be delivered by. It also needs to be mindful of when the costs were derived and their stage of design. An alternative format is suggested.

Appendix 2: Cumbria County Council's Representations to the Copeland Local Plan 2021-2038 Publication Draft Consultation Comments on Housing and Employment Sites Allocations cross references the CTIS projects with the Local Plan Sites.

It should be noted that the following sites were assessed in the CTIS but are not allocated in the Publication Draft therefore consideration needs to be given as to whether the improvement is still required or if more than one site is required to deliver it how the funding requirement is reapportioned.

- HB13 Land adjacent to Springfield Court
- HDH1 Land north Meadowbank, Drigg
- HSE1 Land west of Stanton Way
- HFR1 Land at Griffin Close- shown as planning approved on site allocation map
- ELA1 Hensingham Common

It is also important that an appropriate monitoring system is established to ensure the recording of when funding contributions are received to aid the comprehensive delivery of schemes

The Infrastructure Delivery Schedule also needs to be clear when schemes are not directly related to a development site but are required to support the 'making of the place'. There are a number of the rail projects would fall into this category and reference to Town Deal Fund projects.

Bus

The Infrastructure Delivery Schedule identifies public transport improvements including bus service routing improvements, including enhanced frequencies, new services, demand

responsive services and bus shelters. The future maintenance of these facilities needs to be carefully considered.

Rail

Para 27 states that Local Plan allocations provide an opportunity for developers to promote rail travel to new house purchasers; this could include providing service timetables and maps of safe access routes from the development to the nearest station in new home welcome packs. Contributions may be required towards infrastructure to make access to the station easier and rail travel more attractive; this could include way finding signage, installation of dropped kerbs, provision of discounted tickets and additional parking where the nearest rail station is not within walking distance. The mechanism by which this infrastructure could be provided by developers needs to be explained.

Walking and Cycling

As explained above, the final Whitehaven LCWIP will be discussed at Cumbria County Council's Local Committee for Copeland in May 2022. It will include priority networks which provide the core strategic network of main routes intended to facilitate movement in those corridors of highest usage. The secondary networks supplement the priority networks and represent key corridors of movement in terms of where people are traveling from and to and are link routes that ensure there is a web of infrastructure designed to connect specific attractors such as education and employment sites to the strategic priority network. The LCWIP aims to prioritise future investment where the most benefits can be realised.

The Active Travel schemes identified in the Copeland Transport Improvements generally align to the objectives of the network. It would be constructive if the routes and improvements within LCWIP priority list were included in the next iteration of the IDP.

The table below shows outlines how the LCWIP schemes align with the Active Travel Schemes of the Copeland Transport Improvements Study and the allocated sites. It should be noted that costs will need to be reviewed regularly subject to changes in the market.

Given the shared principles of the LCWIP and CTIS and the synergies of the LCWIP schemes and CTIS Active Travels Schemes, there is merit in including these within the next iteration of the IDP to support the request for a match contribution.

Scheme No / ID on Priority Plan	Scheme name and location	Scheme description	Importance of improvement/ what it connects and how it fits with the priority network	km	Existing provision	Allocation	Direct / Indirect Link to IDP / TIS	A / B see note *	DfT Scheme type	Total Cost (£) note**
1	NCN72 Northern Spur	Segregated cycleway where width allows. Possible improvements to New Road / Brantsy Row / Brantsy Row junctions.	Widen where possible. Significant changes to junction of New Road / Brantsy Row / Brantsy Row.	1.66	Off road greenway, on road within highway extents.	HL01	Indirect link - NCN Route from Whitehaven to Lowca	B	Upgrades to existing facilities (e.g. surfacing, signage, signals)	£910,735.49
2	Thornton Road to Corkickle	Traffic calming to create a quiet street approach on Thornton Road. Segregated cycleway on Loop Road / A595. Improvements to the Midgley Gill bridge to create an off road cycleway. Likely includes improvements to Coach Road/Corkickle junction to accommodate cyclists and provide pedestrian crossings.	Low Traffic Neighbourhood and Quiet Streets potentially possible in Thornton Road Estate. New infrastructure in Midgley Gill and on Loop Road.	1.81	None apart from Bridleway in Midgley Gill.	n/a	Indirect link - Route connects IDP improvement on Moresby Road to Corkickle	B	Low Traffic Neighbourhood / selective road closures (e.g. using planters, cones or similar)	£5,599,281.29

3	<p>Ask Avenue to Richmond Hill Road via Hensingham and West Cumbria and Hospital</p>	<p>A new traffic free link between Whinlatter Road and the A595, if possible. Improved crossing points at A595/Homewood Road roundabout. Traffic calming measures on Homewood Road. The Hensingham Bypass/Homewood Road roundabout will require alterations to accommodate a segregated cycle track and new cycle (and pedestrian) crossings.</p>	<p>New greenway between Whinlatter Road and A595. Shared use routes alongside A595 and improved crossing points at Roundabout Junction with homewood road. LTN on homewood road between sports academy and hospital. Use automatic bollards for emergency vehicle access.</p>	2.75	<p>No provision at all along length of corridor.</p>	<p>ES4 HW/H1 HW/H1</p>	<p>Direct overlap with improvements identified IDP, short section of shared use on Homewood Road £373,900 & Improved crossing points at A595/Homewood Road roundabout £113,600</p>	A	<p>Low Traffic Neighbourhood / selective road closures (e.g. using planters, cones or similar)</p>	<p>£4,525,588.04</p>
4	<p>Western Orbital Route</p>	<p>An opportunity to create segregated infrastructure alongside new development on Woodville Way and Wilson Pit Road. Traffic calming schemes are likely to be required on High Road and Harbour View. The Mirehouse Road/St Bees</p>	<p>Opportunity to create segregated infrastructure alongside new development on Woodville Way and Wilson Pit Road. Traffic calming schemes on</p>	5.05	<p>None.</p>	<p>ES5 HW/H3 HW/H4 HW/H5 HW/H6</p>	<p>Direct overlap with ES5 HW/H3 HW/H4 HW/H5 HW/H6 £116,200</p>	A	<p>New on-road segregated cycleway (permanent)</p>	<p>£12,668,104.80</p>

		Road/Wilson Pit Road junction will require alteration to provide segregated cycle infrastructure, including potentially controlled crossings.	High Road and Harbour View.				No detail in Copeland TIS. Key north south route connecting the Westlakes Science Park to Whitehaven Town Centre	B	New cycleway (e.g. canal towpath)	£792,475.87
5	NCN72 Alternative Route	New off road cycleway providing a more direct route for NCN72, running parallel to the railway line.	New scheme that offers a more direct route for NCN72 parallel to the railway line as opposed to the existing route through housing.	0.83	None.					
6	Urban NCN72	Realign sections of the current NCN72 to follow quiet streets, providing suitable on-road facilities with new crossing points where necessary.	Realign sections of route to follow quiet streets providing suitable on-road facilities with new crossing points where necessary	2.01	Some off-road (greenway / marina), on-road.	OW/H01 OW/H02 OW/H03 OW/H04	Indirect pedestrian access to OW/H01 and Direct overlap with OW/H02 / OW/H03 with higher than	A	Traffic calming (e.g. lane closures, speed limits)	£1,289,679.30

							desirable speed and traffic flow results requiring intervention and indirect link to OWH04 - all			
7	Coach Road to Oakbank Road	Traffic calming and junction improvements on Station Road /The Gardens to create good mixed traffic cycling conditions. Provide and off road cycleway link through Castle Park. Scheme is likely to include improvements to the Station Road/Coach Road junction, likely linked to the Coach Road / Flatt Walks junction.	Improve existing streets around train station, Junction around Corkickle, Flatt Walks. Largely off-road greenway.	1.61	None.	OWH05	No listed improvements in IDP or Copeland TIS. Providing northward link from site OWH05	B	New cycleway greenway, (e.g. canal towpath)	£4,786,004.40
8	Main Street and Red Lonning	Shared use cycle and footpath along Red Lonning, with the option of a possible bi-directional cycleway. Traffic calming on Main	Shared Use Path along Red Lonning. Possible bi-directional. Main Street - Traffic	2.25	None.	HWH2	Direct link to HWH2, Provision of shared use path utilising	A	New on-road segregated cycleway (permanent)	£7,247,448.00

75		<p>Street to be considered. Traffic free link between Egremont Road and Whinlatter Road where practicable. Improvements are likely required at the Red Lonning/Red Lonning junction north of St Benedict's Catholic High School, as well as significant changes to the Cleator Moor Rd/Moresby Rd roundabout and the B5295/Main St roundabout to ensure cyclists can safely navigate the junctions.</p>	<p>calming. New Greenway through Snebra Beck</p>				<p>wide verges on Red Lonning. Northern end. £573,400</p>		<p>Traffic calming (e.g. lane closures, speed reducing limits)</p>	<p>£1,888,204.50</p>
9	<p>Harras Road</p>	<p>Light segregated cycleway connecting Red Lonning in the east to Hillton Terrace in the west. The Harras Road/Red Lonning junction will likely require changes to incorporate cyclists and ensure continuity between schemes.</p>	<p>Connects Red Lonning in east to Hillton Terrace in west. New provision required along length of the route.</p>	<p>1.25</p>	<p>None.</p>	<p>HWH2</p>	<p>Direct overlap with IDP/TIS, Traffic calming measures on Harras Road £10,300 & Provision of shared-use path using</p>	<p>A</p>		

							existing verges on Harras Road £656,500			
10	New Road and Aikbank Road	Segregated cycleway on New Road, where possible, with a new crossing over the A595. Traffic calming on Aikbank Road leading onto a traffic free link. The New Road/Loop Road North junction will require alterations to accommodate cyclists and onward connectivity in multiple directions.	Segregated facilities on New Road, with new crossing over A595, quiet streets provision on Aikbank Road and new greenway link.	1.92	None.	n/a	Review Rationale	B	New on-road segregated cycleway (permanent)	£3,409,286.40
76										
11	Northern Orbital Route	Shared use path on Red Lanning with traffic calming and quiet street approach on Victoria Road.	Shared use path on Red Lanning with Quiet Street Interventions on Victoria Road.	2.53	None.	HWH2	Indirect link - From Harras road improvement. Link route also connects north to Moresby Park allocated site REF?	B	Traffic calming (e.g. lane closures, speed limits)	£1,307,322.90

12	Highlands	Shared use path on the A595 (subject to approval with National Highways) and traffic calming to promote a quiet streets approach on Highlands.	Shared use path on A595 and Quiet Street Interventions on Highlands	0.86	None.	HWH2	Indirect link - From Htarras road improvement.	B	Traffic calming (e.g. lane closures, speed limits)	£517,771.89
13	NCN72 Rural South	South Whitehaven to Moor Row along NCN72. Targeted upgrades to lighting, accesses, signage etc to comply with guidance.	South Whitehaven to Moor Row along NCN72. Targeted upgrades to lighting, accesses, signage etc to comply with guidance.	2.95	Existing surfaced route part of NCN72.	ES1a	No detail in Copeland TIS. Key north south route connecting the Westlakes Science Park to Whitehaven Town Centre	B	Upgrades to existing facilities (e.g. surfacing, signage, signals)	£1,091,188.80
77										
14	NCN 72 Urban South	NCN72 through south Whitehaven. Various targeted upgrades such as, vegetation clearance, resurfacing and street scape improvements.	NCN72 through south Whitehaven. Various targeted upgrades.	2.37	Existing surfaced route part of NCN72.		No detail in Copeland TIS. Key north south route connecting the Westlakes Science	B	Upgrades to existing facilities (e.g. surfacing, signage, signals)	£1,607,467.68

15	NCN72 Northern Section Parton to Lowca	NCN72 to the north of Whitehaven. Various targeted upgrades such as, resurfacing and street scape improvements.	2.14	On road within highway extents part of NCN72.	HL01	Direct overlap with IDP at Lowca, Existing NCN 72 to be subject to surfacing improvement £85,200	A	Upgrades to existing facilities (e.g. surfacing, signage, signals)	£1,325,712.96				
16	St Bees to Whitehaven	Proposed new traffic free route from Mirehouse to St. Bees.	4.43	None.	n/a	Review Rationale	B	New cycleway, greenway, towpath)	£5,063,713.20				
17 & 18	Cycle links from the West Lakes Science Park to the West Cumberland Hospital	Longer term aspirational routes that could provide a traffic-free cycle route between the West Lakes Science Park to the West Cumberland Hospital, further feasibility studies would be required to determine if either route would be possible.	1.59	None.	ES4 ES1a	Indirect link from ES4 onto Homewood road / No ref to Westlakes Science Park in TIS schemes list - Direct connectio	A	New cycleway greenway, towpath)	£2,976,339.60				

Secondary link ID 12	Red Lonning	Red Lonning secondary route. Wide verges which could be used for a segregated cycle route	Off-road cycle infrastructure connecting Local Plan sites	0.50		ES6	n between employment sites	A		
79										
Secondary link ID 13	Red Lonning and Moresby Road	Secondary routes on Red Lonning and Moresby Road proposed shared use path utilising wide verges	Off-road cycle infrastructure connecting Local Plan sites	0.70		ES6	Direct link to employment site - Provision of shared use path utilising wide verges on Moresby Road £581,700	A		

Secondary link ID 14	Moresby Parks Road	Widen footway on Moresby Parks Road Secondary cycle route on Moresby Parks Road require segregation to the south	Off-road cycle infrastructure connecting Local Plan sites	1.50		ES3	Direct link to employment site - Provision of shared use path on Moresby Parks Road	£664,800	A	
Note *	A	Schemes which directly match the improvements identified in the IDP / Copeland TIS.								
80	B	Schemes providing indirect or part links to improvements identified in the IDP / Copeland TIS								
Note **		All Preliminary Design, Build Costs including Diversions and Traffic Management, Risk Contingency and Assumed Construction Inflation								

Section 5: Broadband

Below are points of clarification for this section.

Para 5.14: Wireless local loop is more commonly known as Fixed Wireless Access or FWA.

Para 5.15: Clarification of superfast Broadband - 'superfast above 30Mbps download'. It is suggested that the thinkbroadband 'fibre' figure is not quoted as this could be any speed and isn't necessarily fibre. Instead of 'the expansion of fibre based broadband' say 'the expansion of broadband to the majority of properties...'

Para 5.17: It's the 'UK Gigabit Programme'. The UK Government target is 85% by 2025 not 80%, albeit the expectation is that 80% of that will be delivered commercially. Instead of 'the remaining 20% are the hardest to reach premises' say 'the remaining *harder* to reach premises will need public subsidy..' as the current wording could be confused with the UK Government term 'Very Hard To Reach Premises' which is 0.3% of premises across the UK. Copeland will require subsidy through the UK Gigabit Programme. Planning and survey will start in 2022, but deployment in terms of the build won't start until 2023.

Para 5.18: Copeland Borough Council is also exploring the creation of a digital grid for Whitehaven which would provide access to secure and free wifi to support businesses. In future this could be replaced by 5G and as such this para may want to refer to 5G as well as public wi-fi.

Para 5.19: It is considered that there will be consumer demand for 5G services in rural areas as well.

In addition the UK Gigabit Programme budget for Cumbria is now £109m.

Section 7: Flooding, drainage and coastal change management

As outlined above Millom is a high flood risk area. The LLFA are progressing a comprehensive flood mitigation scheme that should benefit both Millom and Haverigg. Need to align with comments

A Risk Management Authority (RMA) Outline Business Case (OBC) is being developed to seek approval to deliver a Flood Risk Management Scheme to protect properties in Millom and Haverigg. Progression to detailed design, consents, land agreements etc is expected between May 2022 and May 2023. It is considered that phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until phase 1 has commenced.

Whilst the scheme will be designed to take into account the proposed development in the Local Plan, it is however considered that developer contributions will be required to ensure the scheme is deliverable. The estimated cost of phase 1 will be known by April 2022 and which can find into the updated to the IDP and final viability assessment to conclude what an appropriate contribution from all the developments will be.

Section 8: Health

The section Care Homes refers to Extra Care Housing. Extra Care Housing services/units are not care homes. A care home is a specifically regulated service and should not be confused with extra care.

Amends to Para 8.8. The Stage 1 Infrastructure Delivery Plan identified a need for an additional ~~349~~ 350 Extra Care Housing Units in Copeland by 2025 in line with the Extra Care Housing and Supported Living Strategy 2016-2025.

Amends to Para 8.12. To further support the development of Extra Care housing and Supported Living accommodation, in 2017 ~~a capital fund was established to facilitate the development of the 'social housing' element of extra care housing. There are currently £3.684 million in the Capitt Programme from the original £6.624 million allocation~~ Cumbria County Council established an Extra Care Housing and Supported Living Development Programme, supported by £4.240million of capital funding.

Section 9: Education

Primary

The IDP references the need to identify how the required additional places can be provided in response to Local Plan proposals. This work includes commissioning a study to assess the suitability of sites for a new build education facility as well as assessing which currently operating schools have the ability to be extended.

The IDP goes on to state that once the results of this work have been completed, Copeland Borough Council intend to release a follow up iteration document to this Infrastructure Delivery Plan which will set out the joint position of Copeland Borough Council and the "Local Education Authority" as to how the required school places could be delivered across the period of the Local Plan. It should be noted that the terminology "Local Education Authority" does not exist anymore in legislation, the County Council has statutory responsibilities in relation to education and would advise it is replaced with "Cumbria County Council". The County Council is supportive of the reference to working together to agree a joint approach.

We note that within the IDP reference is made to the potential delivery of a new school at the Rhodia site. It is important to note that a site previously identified at Rhodia by a developer to accommodate a school is considered to be unsuitable by Cumbria County Council due to an historic mineshaft. It should also be noted that for that development agreed between Copeland Borough Council and the developer is insufficient to deliver a new school.

Whilst development of the former Marchon site may well generate a further contribution it is unclear whether that would be sufficient to cover the outstanding balance of the cost of a new school and there is considered to be limited alternative funding opportunities available.

There have been a number of discussions between the County Council and Copeland Borough Council in relation to education provision in South Whitehaven where it has been explained that the site provided at Rhodia is unsuitable. Cumbria County Council has commissioned an independent feasibility study to confirm the unsuitability of the site identified at Rhodia. However, owing to the placement of 4m of earth on the area that the survey needs to take place, until removed mounds are too unstable for the drilling rigs delaying this work.

With respect to capacity, the local schools of Kells Infant and Monkway Junior have insufficient capacity to accommodate the pupil requirements of the proposed growth in the Local Plan growth. Previously the intention was to seek to amalgamate Kells and Monkway, relocating them to the Rhodia site, and this concept was included in Copeland Borough

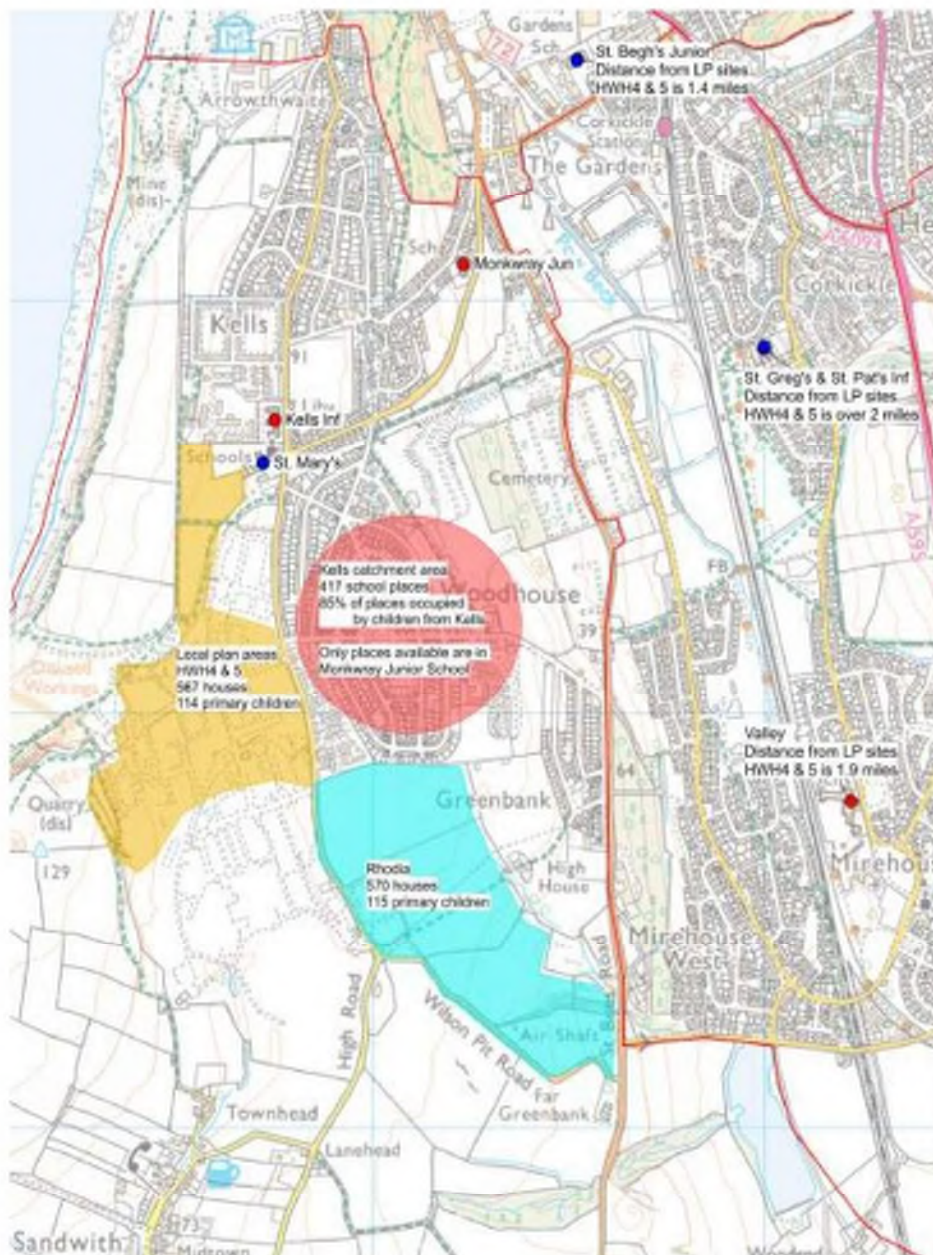
Council's South Whitehaven SPD (2013) produced to support the regeneration of the area and was seen as a vehicle for integrating the new and existing communities.

The SPD states that "*Developers will be expected to contribute towards the provision of local early years and primary education through the establishment of a new school in the area. Overall the aim should be to create high quality local educational facilities which benefit existing as well as new communities and which maximise opportunities for the integration of children from different backgrounds*". The County Council has also carried out some feasibility work which has shown that Kells and Monkway sites are constrained and do not offer scope for expansion.

The proposed Local Plan allocates a substantial housing development in the south of Whitehaven, which will impact on the pattern of admission to primary schools in the area. Whilst there are primary school places available elsewhere in the town, some children living in the traditional catchment areas of Kells Infant and Monkway Junior schools are unlikely to be able to access a place at those schools in the future.

They will be forced to seek places outside of south Whitehaven unless additional provision is put in place. This position is not considered sustainable and would undermine Copeland Borough Council's aspiration to create high quality local educational facilities which benefit existing as well as new communities and which maximise opportunities for the integration of children from different backgrounds.

The plan below helps to demonstrate the position.



*Schools marked blue are faith schools

The Department for Education guidance, Securing developer contributions for Education (November 2019). Paragraph 3 of this guidance advises that it is important that the impacts of development are adequately mitigated, requiring an understanding of:

- The education needs arising from development, based on an up-to-date pupil yield factor;
- The capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries;
- Available sources of funding to increase capacity where required; and

- The extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time.

In relation to accessibility Paragraph 106 of the National Planning Policy Framework also states that planning polices should “support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Paragraph 20 highlights that strategic policies should make sufficient provision for community facilities such as education. The Planning Practice Guidance states that “Plans should support the efficient and timely creation, expansion and alteration of high-quality schools. Plans should set out the contributions expected from development. This should include contributions needed for education, based on known pupil yields from all homes where children live, along with other types of infrastructure including affordable housing”.

It is therefore considered that taking into account capacity and the local schools, NPPF, the Planning Practice Guidance and Copeland Borough Councils SPD for South Whitehaven a new school is required in south Whitehaven. The last estimated cost of a 1FE school on a full serviced site is £7m however these costs are now undergoing review in light of building cost inflation seen nationally. The Council is happy to work with Copeland Borough Council to identify a preferred site for a school and to develop a plan for further delivery funding.

Secondary

There are 4 secondary schools within Copeland. There are currently places for those wishing to attend Millom School, but there has been a high demand for a number of years for places in West Lakes Academy and St Benedict’s Catholic High School (the latter on the new Campus Whitehaven).

Whitehaven Academy has had places available during this time, but the school is not attracting the pupil cohort it could accommodate. Whitehaven Academy is now part of the Cumbria Education Trust (a multi academy trust) and has benefitted from a total rebuild by the Department for Education (DfE). The original school was built at a time when there were many more secondary aged pupils in the area and the new build reflects the reduced birth rates as determined by the DfE.

Mayfield Special School is located at the new Campus Whitehaven, alongside St Benedict’s Catholic High School. Demand for Special Needs places has increased in recent years across the whole of Cumbria and, even since the move to the new purpose built campus site, the number of places available at the site has been increased to cover this growth trend. Based on current application trends it’s unlikely that additional places will be required at Whitehaven Academy.

There will however be a requirement for contributions from developments that are within the catchment West Lakes Academy catchment. The estimated impact and cost of these are summarised below:

Additional places needed: -

167 x £25,189 (current secondary multiplier) = £4,206,563

The pupil multiplier of £18,188 has been indexed linked to present day costs, there will be a need to continue to update costs in line with inflation.

It should be noted that there is an increasing demand for special educational needs and disability places (SEND) and there may be a requirement within the Local Plan period for developer contributions to provide additional capacity.

It is important to also be noted that trends in parental preference for school places can alter significantly over time and pupil projections will change to reflect this, thereby affecting the projected availability of places in any particular area. In-depth consideration of individual planning applications will be made at the point of their submission. It should also be noted that during the plan period, there may be changes in school capacities outside the control of Cumbria County Council (e.g. at academies) which may alter the availability of school places.

CBC IDP Infrastructure Delivery Schedule

The delivery schedule needs to link schemes to the Local Plan site allocations and be mindful of the sites phasing and when the infrastructure will be required to be delivered by. It also needs to be mindful of when the costs were derived and their stage of design. Below are suggestions for a revised format and examples of how the information could be provided:

Type	Infrastructure	Project ID & Source	Estimated Cost £	Year Cost Derived	Site Ref	Site Name	Phasing	Infra Required to be delivered by	Design stage	Funding Source	Funding Confirmed £	Funding Required £	Delivery Agency		
Active Travel	Traffic Calming along Arlecdon Road	e.g CTS	5,100	2021	HA R1	Garage Site Arlecdon	0-5 years		Concept	Developer Contributions	0,000	0,000	Developer via sec 278 Local Highway Authority Via S106		
87	Footway Surfacing on Arlecdon Road	e.g CTS	54,000	2021	HA R1	Garage Site Arlecdon	0-5 years		Concept	Developer Contributions	0,000	0,000	Developer via sec 278 Local Highway Authority Via S106		
					OW H01	Old Dawnfresh Factory Site							Developer Contributions	0,000	Developer via sec 278 Local Highway Authority Via S106
						Westlakes Science Park							Developer Contributions	0,000	Developer via sec 278 Local Highway Authority Via S106
					OW H12	Former Bus Station Bransly Row							Developer Contributions	0,000	Developer via sec 278 Local Highway Authority Via S106
Highway Capacity	Installation of a splitter island for the A595 southbound	ID 26 CTS	1,497,800	2021	OW H01	Old Dawnfresh Factory Site			Concept	Developer Contributions	0,000	0,000	Developer via sec 278 Local Highway Authority Via S106		
	Adjustment of the northern kerb line between Inkerman Terrace and the A595 Widening of the A595 either side of the Ribton Moorside Junction southbound					Westlakes Science Park				Developer Contributions	0,000	0,000	Developer via sec 278 Local Highway Authority Via S106		
	Changing the left-				OW H11	Mark House and				Developer Contributions	0,000	0,000	Developer via sec 278 Local Highway Authority Via S106		

	turn lane on Ribton Moorside					Park Nighclub Netherfow n Station								Train Operator (Northern)
Rail	New shelter					Braystones Station								Train Operator (Northern)
Rail	New shelter					Bootle Station								Train Operator (Northern)
Rail	Resurfaced/ marked area at the front of the railway station for drop off/pick up and a small number of bays allocated for rail users (includes disabled parking)					Sellafield Station								Sellafield Train Operator (Northern) Network Rail
Rail	Develop the station as a 'hub'	Millom Town Investment Plan	£1.2m	2022	2026	Millom Station	0-5 years	2026	GRIP Stage 2: Preliminary / Option appraisal	Towns Fund Net	0,000	0,000		CCC Network Rail
88	This is the wrong terminology – this project relates to station gateway enhancements e.g accessibility improvements and public realm.													
Rail	Additional car parking facilities					St. Bees Station								St. Bees Parish Council
Rail Capacity	Cumbrian Coastal Railway to include re signalling; site access	Cumbrian Coast Line OBC	TBC via OBC	2021	2026	Cumbrian Coast Rail Line	0-5 years	2026	OBC/ GRIP Stage 2: preliminary	Department for Transport Cumbria LEP	TBC	TBC		Network Rail

	the public sewer system.																		
	Need to refer to App 2					HM 12	Moor Farm												
						ES 10	Devonshire Road												
						ES 12	Mainsgate Road												
						OM 101	Milium Pier												

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale	Design Stage	Funding Source	Funding Confirmed	Funding Required	Delivery Agency
Flood and Drainage	Ravenglass LLFA	Upgrade to existing drainage system	N/A	N/A	Walls Drive Main St Jun/ Croftlands Drive	22/23	Preliminary Scheme Design	Environment Agency/GIA	Indicatively Allocated		LLFA
Flood and Drainage	Seascale	Watercourse attenuation will be provided within a housing development (Persimmon Homes) to the north of the Fairways estate to reduce flood risk from the culvert carrying the watercourse through this area	N/A	PA ref. 4/02/0889	Fairways, Seascale	21/22	Scheme Being Delivered	Environment Agency/GIA, Local Levy, Highways, Developer Contributions	Allocated		LLFA
Flood and Drainage	Norbeck Park, Cleator Moor	Some work has been undertaken by the EA however recent surface water flooding to carriageway at "The Crescent" may indicate issues, further investigations required	N/A		Norbeck Park Incl The Crescent, Coniston Park & some of Bowthorn Rd	22/23	Options Appraisal	Environment Agency/GIA, Local Levy, United Utilities, EA (other)	Indicatively Allocated		LLFA
Flood and Drainage	Orchard Place Cleator Moor	Issues with ground water and surface water run off during weather events, low lying properties next to the carriageway suffer from flooding and water running from high ground enters the rear properties on the frontage of the B5295.	N/A	N/A	Orchard Place Incl William Morris Ave & a section on Ennerdale Rd)	22/23	Options Appraisal	Environment Agency/GIA	Indicatively Allocated		LLFA

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale	Design Stage	Funding Source	Funding Confirmed	Funding Required	Delivery Agency
Flood and Drainage	Greenmoor Road, Egremont	This site is not part of the scope of the EA's Skirting Beck Scheme. Surface water flood risk associated with the combined sewer systems results in frequent flooding. Need to work with United Utilities to resolve issues	N/A		Greenmoor Road	23/24	Pre - option Appraisal	Environment Agency/GIA	Indicatively Allocated		LLFA
Flood and Drainage	Kirkland Road Emmerdale Bridge	Properties suffer flooding due to close proximity to water course, which when runs with high volumes surcharges back up surface water system causing carriageway flooding which then effects properties nearby.	N/A		Emmerdale Bridge	23/24	Pre - option Appraisal	Environment Agency/GIA	Indicatively Allocated		LLFA
Flood and Drainage	Parton	Historic flooding issues in past. Tidal flooding, fluvial & pluvial, Potential for culvert improvements and need to deal with high water levels in the drainage network as a result of high tides and storm events.	N/A		Parton Village	23/24	Pre - option Appraisal	Environment Agency/GIA	Indicatively Allocated		LLFA
Flood and Drainage	Bootle	Surface water run off from the lake district falls in significant rainfall events travels to the River Annas via overland flow. The river in circa a 1 in 20 year event breaches it's banks near to Hinninghouse Bridge flood farmland and properties. There is a need to consider NFM solutions to attenuate peak flow in	N/A		Bootle Village (A595)	25/26	Pre - option Appraisal	Environment Agency/GIA, WCRT	Indicatively Allocated		LLFA

Type	Infrastructure Name	Description	Est Cost £	Ref	Location	Delivery timescale	Design Stage	Funding Source	Funding Confirmed	Funding Required	Delivery Agency
Flood and Drainage	Sandwith	Surface water run-off from farm land above village is impacting local water course causing flooding to local properties and impacting the local highway network.	N/A		Sandwith Village, Whitehaven	22/23	Early Modelling	Environment Agency GIA, HA & UU	Indicatively Allocated		LLFA

Stage 2 Local Plan Viability Study (Financial Viability Assessment) (February 2022)

The Stage 2 Local Plan Viability Study has been published in draft to allow stakeholders a further opportunity to feed into the viability process. This further consultation will enable stakeholders to review the detailed evidence base supporting the study. This will provide a more in depth understanding of how the assumptions and inputs adopted in the viability testing have been formulated and the judgements that have been made. It is expected that consultation responses from stakeholders will include full supporting evidence and information in support of any changes that they believe are justified. This will then be considered and as appropriate adjustments made to the final version of the Stage 2 Local Plan Viability Study.

Section 1: Introduction

No mention of the Focused Pre-Publication consultation which took place between September and October 2021 (p1, para 1.1.3) (although it is mentioned further in the report at 3.1.3).

Would suggest including the date of the NPPF as there have been a couple of iterations over recent years and may well be more in the future (p2, para 1.1.6). Although the date does is mentioned further in the report at 4.1.2, it would be usefully to have it earlier in the document.

Section 3: LP Policies

It is no longer the case that 12,000 workers are on the site at Sellafield. SL advised in a Travel Plan meeting July 2020 that approximately 6,300 people have been relocated to other sites including Albion Square and Leconfield (p14 para 3.2.9)

Section 4: Methodology

Clarification is sought as to why the following Strategic Policies:

- CO1PU: Telecommunications and Digital Connectivity.
- CO2PU: Priority for improving Transport networks within Copeland
- CO3PU: Priorities for improving transport links to and from the Borough
- CO4PU: Sustainable Travel

Were not considered relevant to the study.

Table 4.9: Implications of Development Policies, there is no mention of highways and transport schemes identified in the Copeland Transport Improvement Study, prepared to inform the development of the Local Plan. Appendix 12 only seems to identify Active Travel and Bus Improvements. None of the Highway Capacity and Safety measure on both the local network and A595 (National Highway's SRN).

Section 6: Financial Appraisal Assumptions

Following comments received to the draft IDP and VA there may be a need to undertake further modelling to assess the validity of the assumptions and approach to prioritisation. For example if education provision isn't prioritised this may create difficulties for the delivery of future housing sites.

Alternatively there may be a need to review the surpluses generated from the site(s) in question and be satisfied that viability is sufficient to facilitate delivery of critical infrastructure.

In reality where the affordable housing ask is only a maximum of 10% the actual site value paid (as opposed to the theoretical 'EUV+' figure of the plan-wide viability testing regime) should be the by-product of a reasonable s106 on-site and off-site 'ask', along with any site-specific abnormal costs. However, there is obviously the risk (particularly in the context of the updated PPG on 'viability') that an applicant will refer back to the plan-wide FVA (and potentially the wider Local Plan evidence base) and attempt to argue that any costs not contained therein should not be taken into account when considering site-specific viability.

The Keppie Massie approach for the pool of money available for s106 Planning Obligations to be treated as a surplus sum is not unusual within plan-wide FVAs. However comment is raised in respect of the assumptions which have been adopted in relation to build costs, particularly when compared to those used in other FVAs round the north-west.

This FVA is supported by a comprehensive QS-produced 'construction costs' report (included at Appendix 11). Almost uniquely amongst viability consultants, Keppie Massie have opted to use their own construction costs assumptions, rather than BCIS.

The Keppie Massie construction rates are based on their 'database...from approximately 250 schemes in the North of England coupled with bespoke Cost Plans of typical house types that have been measured and rated.' For reasons of commercial confidentiality none of this information has been included in Appendix 11, so it is not possible to sense-check. Despite the thoroughness of the QS report the ultimate output is that assumed base build costs are typically higher than BCIS median rates (although this should be caveated by the fact that at Appendix B of the Appendix 11 report, Keppie Massie appear to have used BCIS costs, in error, for Blackburn with Darwen Borough instead of Copeland, so the specific BCIS cost comparison is likely to be flawed).

Also, only a relatively small 'economy of scale' discount has been applied for sites larger than 100 units (3 to 5% discount). For sites below 25 units the base cost has been inflated above the base assumption. These build cost assumptions are higher than for any other FVA, however it is appreciated that there may be more the challenging issues of attempting to develop within Copeland which could result in higher costs than the overall average for north-west England.

There is uncertainty that the surplus sums that are generated for each site within the viability process are likely to be sufficient to fund the likely 'ask' for items that haven't been specifically modelled in the testing. See viability results for housing allocations and generic sites at pages 118 to 144 of the linked FVA pdf: [Bloor Homes \(copeland.gov.uk\)](#). Where the affordable target is 10% all sites are either unviable or marginally viable. None have any significant surplus remaining for additional s106 contributions.

Section 7: Viability Results and Policy Impacts

The report suggests that the viability results for some sites may be initially unviable (e.g. HWH5) but start to become viable with an increase in sales prices and reduction in construction costs however, this does not reflect other contributions sites would need to deliver. There doesn't appear to be much indication here that there will be a surplus to fund the requisite level of education contribution. However, this site is an example of where the theoretical EUV+ land value of plan-wide viability is unlikely to accord with what the market will pay. KM assume that all sites (greenfield & brownfield) will have a benchmark land value of £150k per net acre, with the level of assumed abnormal costs for this site circa £400k per acre. The 'pain' of abnormal costs is reflected in a reduction in land value, along with a reduction in the level of planning obligations (particularly on-site affordable housing). KM perhaps should be making some degree of downward adjustment to assumed land value for sites with the highest abnormal costs.

Section 8: Plan Making and Delivery

The Local Plan does not include minimum density standards. Density assumptions can make a big difference to viability. By reducing the site density assumed residential values should increase, as plot sizes would be bigger. However at overly low densities the GDV would be lower and therefore viability would be worse.

Para 8.2.8 states that Copeland is seeking clarification from Cumbria County Council regarding education contributions. This is incorrect. There have been a number of discussions in relation to education provision in South Whitehaven where it has been explained that the site provided at Rhodia is unsuitable. Cumbria County Council has commissioned an independent feasibility study to confirm the unsuitability of the site identified at Rhodia.

The local schools of Kells Infant and Monkway Junior have insufficient capacity to accommodate the pupil requirements of the proposed growth in the Local Plan growth. Previously the intention was to seek to amalgamate Kells and Monkway, relocating them to the Rhodia site, and this concept was included in Copeland Borough Council's South Whitehaven SPD (2013) produced to support the regeneration of the area and was seen as a vehicle for integrating the new and existing communities.

The proposed Local Plan allocates a substantial housing development in the south of Whitehaven, which will impact on the pattern of admission to primary schools in the area. Whilst there are primary school places available elsewhere in the town, and within 2 miles walking distance, some children living in the traditional catchment areas of Kells Infant and Monkway Junior schools are unlikely to be able to access a place at those schools in the future. They will be forced to seek places elsewhere, being 'displaced' in priority order for places by those occupying the proposed new housing, unless additional primary school provision is constructed in the immediate south Whitehaven area.

Para 8.2.8 states "The results of the viability testing do however identify the surplus that is available to fund these additional contributions should they be required." Where the affordable target is 10% all sites are either unviable or marginally viable. None have any significant surplus remaining for additional s106 contributions.

In terms of achieving a balance between affordable housing and other s106 contributions it is queried how obligations are prioritised e.g. which contributions may need to be considered less critical to secure than others? In particular certain infrastructure will be essential to the delivery of some of the sites.

In addition the following comments were made in respect of the EDNA and which may be relevant in the context of the Viability Assessment.

Concerns was expressed about the baseline growth forecasts (2021 as the start year) which could be misleading. 2021 is itself a projection year which in more normal economic times might not be a major issue but the 2021 figures are heavily influenced by early estimates of the Covid impact on jobs which were highly speculative. It means that most of the projected baseline growth referenced in the report (and particularly that for accommodation & food services) is actually recovery bounce rather than genuine expansion growth so the consequent impact on demand for sites and premises could be overstated. In fact even the scale of recovery bounce is much lower in more recent projections because the impact on jobs has transpired to be less than originally anticipated.

It may have been more appropriate to select 2019 as the base year for calculating change in order to avoid the pandemic dip/bounce effect or to have made manual adjustments to reflect the degree to which the growth referred to is not all expansion growth which will result in sites and premises demand.

									Improvements ID36
Greenfield	HWH4	Land south and west of St Marys School	Whitehaven	Housing	2.39	60	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Brownfield	HWH5	Former Marchon Site North*	Whitehaven	Housing	20.9 5	532	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Brownfield	HWH6	Land South of Waters Edge Close	Whitehaven	Housing	1.41	35	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Greenfield	HCM1	Land at Jacktrees Road	Cleator Moor	Housing	5.07	127	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Bus Travel
Greenfield OO 08	HCM2	Land North of Dent Road	Cleator Moor	Housing	4.75	96	6 + yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Bus Travel Stop Infrastructure
Brownfield	HCM3	Former Ehsenside School	Cleator Moor	Housing	1.11	40	7 + yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Mixed	HCM4	Land at Mill Hill	Cleator Moor	Housing	3.3	81	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Bus Travel Stop Infrastructure Highway Capacity on A595 ID30 Highway Capacity Highway Capacity ID 32 Highway Capacity on A595 ID33

								already overburdened system. It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that Phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Phase 1 has commenced.	
Greenfield	HMI2	Moor Farm	Millom	Housing	7.84	195	6 + yrs	<p>Reiterate concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme would could put too much pressure on an already overburdened system.</p> <p>It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that Phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in</p>	Active Travel Bus Stop Infrastructure Bus Service Provision
100									

									Million can commence until Phase 1 has commenced.	
Mixed	HAR01	Land East of Arlecdon Road	Arlecdon & Rowrah	Housing	1.73	37	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active travel	
Greenfield	HD11	Land south of Prospect Works	Distington	Housing	1.21	30	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel	
Brownfield	HD12	Land South West of Rectory Place	Distington	Housing	2.56	30 (This figure is based on HD12 being recommended as a Local Green Space through the Open Space Assessment. As a result, CBC would expect 50% of the site to be retained as open space)	6 + yrs	No objection in principle subject to appropriate Development Management considerations/mitigation. Site does not appear to be annotated on the Proposals Map.	Active Travel	
Greenfield	HSB1	Land adjacent Abbots Court	St Bees	Housing	2.33	58	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel	
Greenfield	HSB3	Land adjacent Fairladies	St Bees	Housing	1.16	30	No phasing provided	No objection in principle subject to appropriate Development Management considerations/mitigation.		
Greenfield	HSE2	Fairways Extension	Seascale	Housing	0.88	22	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel	

Greenfield	HSE3	Town End Farm East	Seascale	Housing	1.28	32	No phasing provided	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Greenfield	HTH1	Land to South of Thornhill	Thornhill	Housing	2.59	20	0-5 yrs	Providing National Highways are content with only a single access from the A595 Strategic Road Network then it would be acceptable with CCC.	Active Travel
Greenfield	HBE1	Land North of Croftthouse Farm	Beckermat	Housing	1.97	46	0-5yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Greenfield	HBE2	Land adjacent to Mill Fields	Beckermat	Housing	1.66	27	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
Greenfield 102	HB11	Land North of Springfield Gardens	Bigrigg	Housing	2.6	65	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/ mitigation. Access is from A595 Strategic Road Network which is managed by National Highways.	Active Travel
Mixed	HB12	Land West of Jubilee Gardens	Bigrigg	Housing	1.45	35	0-5 yrs	No objection in principle subject to appropriate Development Management considerations. mitigation. Access is from A595 Strategic Road Network which is managed by National Highways.	Active Travel
Greenfield	HDH2	Wray Head, Station Road	Drigg	Housing	0.87	22	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/ mitigation.	Active Travel

Brownfield	HDH3	Hill Farm, Holmrook	Holmrook	Housing	1.60	20	6 + yrs	Safe access does not seem possible at present Prior to submission the applicant / site promoter needs to demonstrate that access is possible. CCC commented on this site at Preferred Options stage (Dec 2021) under site reference 'DH0077a, farm at Holmrook and field behind'.	
Greenfield	HMR1	Land to North of Social Club	Moor Row	Housing	1.51	37	0-5 yrs	No objection in principle subject to appropriate Development Management considerations/mitigation.	
Greenfield	HMR2	Land to South of Scalgill Road	Moor Row	Housing	1.8	41	No phasing provided	No objection in principle subject to appropriate Development Management considerations/mitigation.	
Greenfield	HLO1	Solway Road	Lowca	Housing	0.9	22	0-5 yrs	Solway Road is not part of the adopted highway and is in a poor state of repair. Housing developments of this scale would typically be subject to adoption via s38 agreement. No objection in principle subject to appropriate Development Management considerations/mitigation.	
Greenfield	HSU1	Land to South West of Summergrove	Summergrove	Housing	8.52	80	0-5 yrs	No objection, subject to suitable Development Management considerations/mitigation. Reference previous application 4/19/2126/0B1 and CCC response dated 20.01.20	
OPPORTUNITY SITES									

	OWH01	Old Dawnfresh Factory	Whitehaven	Opportunity (employment preferred)	1.23	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel Highway Capacity on A595 ID26 Highway Capacity on A595 ID30 Highway Capacity on A595 ID33 Travel Demand Measures
	OWH02	Jacksons Timber Yard	Whitehaven	Opportunity (employment preferred)	0.47	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
104	OWH03	Preston St Garage	Whitehaven	Opportunity (employment preferred)	0.45	n/a		No objection in principle subject to appropriate Development Management considerations/ mitigation. Site is included in the Local Plan site allocations list but not in modelled for the CTIS Dec 2021	Active Travel Safety Improvements ID29
	OWH04	BT Depot	Whitehaven	Opportunity (employment preferred)	0.92	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	Active Travel
	OWH05	Land at Ginn's	Whitehaven	Opportunity (town centre and employment)	2.98	n/a		The boundary of the site includes public highway. CCC object to the allocation of this site until the boundary line in adjusted and does not include public highway	

	OWH06	Land at Coach Road (former Jewsons)	Whitehaven	Opportunity (town centre uses)	0.63	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	
	OWH07	Marlborough Street	Whitehaven	Opportunity (town centre uses)	0.08	n/a		No objection in principle subject to appropriate Development Management considerations/ mitigation. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	
105	OWH08	Pow Beck	Whitehaven	Opportunity (commercial and employment preferred)	11.97	n/a		The boundary of the site includes public highway. CCC object to the allocation of this site until the boundary line in adjusted and does not include public highway.	Safety Improvements ID55
	OWH09	Car Park Quay Street East	Whitehaven	Opportunity (town centre uses)	0.15	n/a		No objection in principle subject to the appropriate Development Management considerations/mitigation. Redevelopment of the site needs to consider the impact of the loss of car parking provision within Whitehaven town centre. Consideration needs to be given to the recommendations of the Whitehaven Parking Study. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	Active Travel

	OWH10	Quay Street West	Whitehaven	Opportunity (town centre uses)	0.35	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	
	OWH11	Mark House & Park Nightclub	Whitehaven	Opportunity (town centre uses)	0.25	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation.	Highway Capacity on A595 ID26
	OWH12	Former Bus Garage, Bransly Row	Whitehaven	Opportunity (town centre uses)	0.18	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	Highway Capacity on A595 ID26
106	OWH13	Marchon South	Whitehaven	Opportunity (mixed use)	31.5	n/a		The site has been assessed for the development of a metallurgical coal mine and associated development (PA ref: 4/17/9007 submitted by West Cumbria Mining). The Local Plan needs to be clear that an assessment will be required to consider the transport impact, drainage and flood risk impact and dependent on the defined use of the site, the required education provision. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	
	OCL01	Cleator Mills	Cleator	Opportunity (commercial)	9.9	n/a		No objection in principle subject to appropriate	Active Travel Demand Measures

				and residential)				Development Management considerations/ mitigation.	
	OEG01	Chapel Street	Egremont	Opportunity (town centre uses)	0.83	n/a		The boundary of the site includes public highway. CCC object to the allocation of this site until the boundary line in adjusted and does not include public highway. Redevelopment of the site needs to consider the impact of the loss of car parking provision.	
	OEG02	Former Red Lion PH, Main Street	Egremont	Opportunity (town centre uses)	0.04	n/a		No objection in principle subject to appropriate Development Management considerations/mitigation. Site does not appear to be annotated on the Proposals Map.	
107	OEG03	East Road Garage	Egremont	Opportunity (commercial and employment preferred)	0.62	n/a		No objection in principle however, the views of National Highways should be sought. Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.	
	OM101	Millom Pier	Millom	Opportunity (employment or tourism/visit or)	3.09	n/a		Safe access does not seem possible at present. Prior to submission the applicant / site promotor needs to demonstrate that access is possible. If safe access can be achieved no objection in principle, subject to appropriate Development Management considerations/mitigation, in	

STRATEGIC EMPLOYMENT SITES				Site Size (ha)	Undeveloped Allocation (Gross Area)		<p>particular measures need to be taken to improve the site's connectivity to sustainable and active travel modes.</p> <p>Site is included in the Local Plan site allocations list but not in those sites modelled for the CTIS Dec 2021.</p> <p>Concerns are reiterated which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme would put too much pressure on an already overburdened system.</p> <p>It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that Phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until Phase 1 has commenced.</p> <p>It is noted that the quantum of development for Employment Allocations</p>	

							differs in Table 2 of the IDP to what is in the Local Plan.		
	ES1a	Westlakes Science Park				CBC to confirm	CBC to confirm	Access onto A595 is maintained and managed by National Highways.	Travel Demand Measures Active Highway Capacity on A595 ID26 Highway Capacity on A595 ID Highway Capacity on A595 ID30 Highway Capacity on A595 ID33 Highway Capacity on A595 ID34 Highway Capacity ID35 Highway Capacity ID31 Highway Capacity ID32 Safety Improvements on A595 ID43 Safety Improvements ID36 Safety Improvements ID41 Safety Improvements ID50
	ES1b	Westlakes Science Park Rounding Off Allocation				CBC to confirm	CBC to confirm		
	ES1c	Westlakes Science Park Southern Growth Area				CBC to confirm	CBC to confirm		
109	ES2a	Leconfield Industrial Estate				17.5	CBC to confirm	The scale and timing of how the site will come forward needs to be investigated in	Travel Demand Measures Active

110	ES2b	Leconfield Eastern Extension			4	CBC confirm to		<p>detail once Cumbria County Council is in receipt of a suitably scoped Transport Assessment considering the transport impact, for both vehicles and non-vehicular usage, of the site for this development. Cumbria County Council is currently working with the applicant to agree the scope for this assessment.</p> <p>A Drainage Strategy and Flood Risk Assessment for the site. Cumbria County Council would expect the site proposals to conform to the best practice sustainable drainage systems principles and recommends the applicant engages in pre-application discussions with the Council to agree the scope of the Flood Risk Assessment.</p>	<p>Highway Capacity on A595 ID30 Highway Capacity on A595 ID33 Highway Capacity ID31 Highway Capacity ID32 Safety Improvements on A595 ID43 Safety Improvements on A595 ID44</p>
EMPLOYMENT SITES	ES3	Whitehaven Commercial Park, Moresby Parks	Whitehaven		17	11		<p>It is noted that the quantum of development for Employment Allocations differs in Table 2 of the IDP to what is in the Local Plan.</p> <p>No objection in principle subject to appropriate Development Management considerations/ mitigation. Site does not appear to be annotated on the Proposals Map.</p>	<p>Active Bus Infrastructure Provision Highway Capacity ID31 Travel Stop Service ID31 Safety Improvements on A595 ID43</p>

	ES4	Sneckyeat Rd	Whitehaven		4.9	1.1		No objection in principle subject to appropriate Development Management considerations/ mitigation.	Active Travel Highway Capacity on A595 ID30 Safety Improvements ID50 Safety Improvements ID53
	ES5	Haig Business Park	Whitehaven		2.6	0		No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
	ES6	Red Lonning	Whitehaven		1.8	0.6		No objection in principle subject to appropriate Development Management considerations/mitigation.	
	ES7	Bridge End	Egremont		12.5	5		The site is safeguarded in Cumbria County Council's Minerals and Waste Local Plan (2015-2030) for waste management facilities. This allocation does not preclude the site as an employment allocation. Any proposals for its development need to be mindful of the Mineral and Waste Local Plan allocation and this needs to be explicit in the Copeland Local Plan. Subject to appropriate Development Management considerations/ mitigation.	Active Travel
	ES10	Devonshire Rd	Millom		5.9	1.3		Concerns are reiterated which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water	Active Travel Bus Stop Infrastructure Bus Service Provision

								system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme would put too much pressure on an already overburdened system. It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in	
1	E12	Mainsgate Rd	Millom		3.4	1.5		Concerns are reiterated which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme would put too much pressure on an already overburdened system. It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in	Active Bus Infrastructure Provision Travel Stop Service
2									

									the Local Plan. It is expected that Phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until Phase 1 has commenced	
	ES8	Furnace Row	Distington		3.1	3.1			No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
	ES9	Frizington Rd	Frizington		1.6	0.8			No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
	ES11	Haverigg Industrial Estate	Haverigg		2.6	0			No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
1	ES14	Seascale Rural Workshop	Seascale		1.4	0.7			No objection in principle subject to appropriate Development Management considerations/mitigation.	Active Travel
		Energy Coast Business Park	Haile		3.6	0			No objection in principle subject to appropriate Development Management considerations/mitigation.	

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Appendix 3: Cumbria County Council's Representations to the Copeland Local Plan (2021- 2038) Publication Draft Consultation
Comments of Members of Cumbria County Council's Local Committee for Copeland

Local Members were given a presentation on 14 February 2022 which outlined Cumbria County Council's draft representations to the Copeland Local Plan (2021-2038) Publication Draft Consultation.

The following Local Members attended the presentation:

Councillor	Division
Michael Hawkins	Mirehouse
Keith Hitchen (Chair)	Millom Without
Frank Morgan	Cleator Moor West
David Southward	Egremont
Paul Turner	Gosforth
Chris Whiteside	Egremont North and St Bees
Emma Williamson	Kells and Sandwith
Doug Wilson (Vice Chair)	Millom

A summary of Local Members comments is provided below. The summary of comments was agreed by Copeland Local Committee on 22 March 2022.

- The consultation material needs to be user friendly. The information on the website is complex and not easy to understand, which doesn't encourage the public to respond.
- There was general support that the development of the Local Plan is progressing. The implications of Copeland Borough Council not having an up to date Local Plan (and lack of an Infrastructure Delivery Plan) has had consequences for Cumbria County Council and for the local population. It was acknowledged that a significant amount of resource is required to develop a Local Plan but the lack of one in place has meant that it is sometimes been difficult to refuse unsuitable development.
- Developers need to provide play park facilities for large residential sites and funding for maintenance.
- Members raised concern that the Infrastructure Delivery Plan and Viability Assessment were not included at the start of the consultation process.
- Members stressed that whilst supportive of growth the impact on the Local Transport network needs to be carefully considered.
- Support for Phase 3 at Leconfield was given but the highway impacts will need to be properly considered.
- Copeland Borough Council need to take into account the Local Government Reform in relation to the programme for adopting the Local Plan,
- Members commented that the Whitehaven Relief Road is important to the economy of Cumbria and Copeland. The need and case for the investment needs to be better explained within the Local Plan. Members stated that Copeland Borough Council should also consider safeguarding the route and work with National Highways to do this.

- As service and infrastructure provider, Cumbria County Council need to clearly express what infrastructure is needed to allow development to proceed so that CBC can properly secure contributions for education, highways and flood and drainage infrastructure.
- Members were advised that Education is not currently dealt with in the Local Plan /Infrastructure Delivery Plan but the current draft provides a commitment to work with the County Council to develop a joint position paper prior to the submission of the plan to the planning inspectorate.
- Members commented on the importance of ensuring that there is education capacity in the right location, there are examples of families with 3 children who attend 3 different schools, this doesn't build a sense of place or social cohesion.
- It was suggested that stronger linkages need to be made with the emerging Whitehaven LCWIP.
- Members raised a general concerns that developers are getting the opportunity to build houses and make a profit but no investment is being returned to the local community.
- Members commented that there is a need to strike right balance between being able to retain young people but then not putting too much of a strain on existing services and assets.
- Members asked if the Spatial Frameworks for the three Key Service Centres were referred to in Local Plan. It was explained that they are referred to as being draft and not yet adopted. The County Council's position is that before they are adopted a review is required to ensure that any further assessment which has been done to inform the preparation of the Local Plan has been considered.

From: [REDACTED]
Sent: 24 March 2022 10:57
To: Local Plan Consultation
Cc: [REDACTED]
Subject: RE: Copeland Local Plan 2021-2038 Extension to Publication Draft Consultation

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Good morning Chris,

Please accept my apologies as this response to the latest consultation should have been sent on Friday last week.

Thank you for consulting with National Highways on the latest draft local plan. We have reviewed the documents and associated evidence base with assistance from our spatial planning consultants, WSP.

Overall, it is considered that the transport evidence provided at this stage is good, and has helped to inform the impact of the plan proposals on the SRN, at both an individual site allocation level, and on a cumulative basis.

Our review established some comments which require further information / clarification, and these are outlined below:

- While it is acknowledged that this section of Policy CO2PU seeks to align with these national policies, it is recommended that the wording is reconsidered to align more closely with paragraph 111 of the NPPF and paragraph 9 of the DfT Circular.
- The CTIS states that three different scenarios of demand sets from the West Cumbria Traffic Model were assessed. It is presumed that Scenario 2 formed the main basis on which the junction analysis was undertaken but this is not specified, it would be useful if CBC could clarify this.
- It is understood that the traffic impact of developing the proposed Local Plan allocations has been assessed in the local plan transport evidence, which is gathered in the CTIS. It is understood that the CTIS is underpinned by outputs from the WCTM SATURN model which was provided by Cumbria County Council. It would be useful if CBC should clarify that the final site allocations presented are aligned to the spatial information used to underpin the strategic modelling, to ensure that the allocations reflect what has been assessed in terms of traffic impacts on the SRN.
- The CTIS provides a methodology for the apportioning of contributions for infrastructure schemes, where paragraph 9.4.1 of the study report stipulates that sites which contribute 25 trips or more during the AM & PM peak hours to junctions where schemes are proposed, or where sites are geographically proximate to proposed schemes, developers of these sites will need to make a contribution to the infrastructure scheme. Based on the above methodology, the CTIS identified sites which were attributed to proposed highway interventions on the A595. It is recommended that CBC confirms its view on the above

approach, and confirms how it proposes to apply the recommendations made in the CTIS in the collection of developer contributions as sites come forward through the planning process.

- The IDP has defined the required highway schemes, an indicative cost, and the preferred delivery mechanism (developer contributions) – however the IDP has not identified when these schemes will need to be delivered. Further clarity is required to confirm when the identified highway schemes will need to be delivered in the development of the Local Plan and its respective site allocations.

Once all outstanding queries have been addressed, it is recommended that a separate Statement of Common Ground for transport is written and agreed between our two organisations.

On a related note, National Highways is in the process of concluding its A595 Stage 2 study. Whilst colleagues at CBC have been involved at different stages, it may be useful to schedule a catch up to review the findings and the synergies with the Local Plan, evidence base and ongoing activities.

Kind regards,

Ryan Billinge

Network Development and Planning Team

National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD

Tel: [REDACTED]

Web: <http://www.nationalhighways.co.uk>

GTN: 0300 470 5135

From: Local Plan Consultation <localplanconsultation@copeland.gov.uk>

Sent: 04 February 2022 17:09

To: Local Plan Consultation <localplanconsultation@copeland.gov.uk>

Subject: Copeland Local Plan 2021-2038 Extension to Publication Draft Consultation

Dear Consultee,

Please find attached a letter outlining an extension to the Publication Draft Consultation of the Copeland Local Plan 2021-2038. The consultation has been extended to allow for the completion of several evidence base reports, which have taken longer than expected to finalise, and will now run until **Friday 18th March 2022**. This will ensure that all consultees have a full six weeks to consider all of the evidence and respond to the consultation.

The Publication Draft is the final draft of the Local Plan. Responses to this consultation will help to inform the final version of the plan, which will be submitted to the Planning Inspectorate in April 2022 for a public examination. It is then anticipated that the Local Plan will be adopted in early 2023.

Regards,

Chris Hoban

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[REDACTED]

From: [REDACTED]
Sent: 08 May 2022 09:23
To: Local Plan Consultation
Subject: traveller site allocation local plan 2021 2038

Follow Up Flag: Flag for follow up
Flag Status: Flagged

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There should be more than one site... there should be three sites of at least 8 pitches in the region.

No trees should be removed to build the sites.

No urban green space should be used up for a site.

The Hensingham site looks the best example to use to identify more candidate sites.

The old marchon site in whitehaven would be better than the greenbank proposals.

There is land that would be usefully redeveloped at Mainsgate road in Millom.

There is land that would be usefully redeveloped at Railway Yard Dalzell St Moor Row.

There is land that would be usefully redeveloped at Yottenfews Sellafield.

There is land that would be usefully redeveloped at Ieconfield estate cleator moor

There is land that would be usefully redeveloped within west lakes moor row.

There is land that would be usefully redeveloped at coach road whitehaven

[REDACTED]

Sent from [Outlook](#)