



Copeland LDF Issues and Options

Responses to Consultation

Appendix 3 – All Comments Received

September 2009

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

Rep No	Q1 Additional Info
I06	Section on Egremont has curious statement about polarisation of housing – Exec versus Social. This is questioned. There are a large number of rented or owned-occupied terraced houses in Egremont in between
I07	The Coal Authority considers that the descriptions for the Egremont, Cleator Moor and Whitehaven Locality Areas should include the need to positively address the mining legacy in the areas through appropriate remediation and regeneration. Reason – This is a locally distinctive issue for the Copeland area, which is recognised within the recently adopted Cumbria Minerals & Waste Core Strategy and the Generic Development Control Policies DPD, in particular policy DC16. PPG14 also requires development plans to set out both strategic and detailed policies to address unstable land.
I11	The Spatial Vision, as drafted, relates to Copeland as a whole. We feel it could be expanded to say a little more about the Council's aspirations for the Borough's principal settlements and priority areas for development, regeneration and conservation. This would help to make the vision more specific to Copeland.
I15	Section 2.23 lacks key detail –of ageing population Driver for change. Vital to include awareness of Demographic challenge posed by upwards of 22,200 over 65s by 2031 – as compared with only 40,900 working age pop. <i>[See ACNwC Challenge paper]</i>
I20	We would welcome further explanation that part of the Lake District National Park, a nationally designated landscape, lies within Copeland Borough. The explanation should include appropriate text to state that for the part of Copeland in the national park planning functions are undertaken by the National Park Authority and not Copeland. It would be helpful if the Local Area Portrait maps that are included in this section were to include the national park boundary. We would welcome Local Nature Reserves also being included in the Local Area Portrait „Place“ sections. Whilst the portrait covers many habitat and species assets we would welcome reference to the local Biodiversity Action Plan in terms of locally significant targets for habitat and species.
I25	English Heritage supports your approach of developing the spatial portrait using distinct localities. In introducing Copeland you describe the Borough as having distinctive towns and villages within very diverse landscapes. In describing the localities it is important to put flesh on these bones. What are the special characteristics of the historic environment in these localities, how will they be affected by change and development, where are improvements required. We welcome the references made to conservation areas and a number of specific heritage assets in the locality area descriptions but suggest that this needs to be supplemented by further work on the particular characteristics of Copeland’s historic environment and its condition.
I30	Space Northwest supports the principles of the Spatial Portrait and considers that the descriptions adequately capture the defining features and key issues faced by the communities of Copeland.
I38	Generally agree with the descriptions in the Spatial Portrait. With reference to paragraph 2.12, it is of note that the housing completions were not universally accessible to all the key services and facilities. Baseline information about Cumbria is currently being prepared by the Northwest Development Agency’s, Regional Intelligence Unit. Area profiles have recently been published for the Districts. These contain a wealth of supporting background information, which covers not just economic profiling, but also housing, deprivation, environment, transport, accessibility etc. It would be useful if these area profiles were aligned with information in the Local Development Framework to provide a consistent approach. The Cumbria Intelligence Observatory (CIO) also brings together existing research and analysis resources through joint working with partners to provide information and intelligence for Cumbria.

Rep No	Q1 Additional Info
139	<p>Para 2.2 – 2.3 underplay the importance of the coast, other than the heritage coast at St Bees Head, in terms of both its landscape importance and its role as recreational space and for tourism. The importance of this is increasingly being recognised, including as a result of the National Trust’s work with a range of partners, including the local community, in the area between Whitehaven Harbour and the Heritage Coast. It is requested that in para 2.2 the sentence relating to ‘The Irish Sea Coast’ makes specific reference to the wider landscape/recreation/tourism qualities/benefits of this coast; and that at para 2.3 the landscape/seascape qualities of the undeveloped, cliff, coast beyond the Heritage Coast is identified. (NB the related benefits such as those in respect of ecology, as referred to at para 2.4 also apply to the wider cliff coast.) Para 2.5 – the ‘obstacle’ of remoteness that is referred to is also a benefit in terms of matters such as the strength of communities, the quality of lifestyle, the values associated with self-sufficiency and the consequent attractiveness of a unique tourism offer. Equally whatever investments were potentially made in road infrastructure a) Copeland would still be geographically remote, and b) there would be adverse impacts upon its other qualities. More beneficial would be ensuring that investment is made in ICT. Para 2.7 (& 2.30) – given the overarching importance of climate change it would be sensible to make some reference here to changing weather patterns as they are affecting Copeland and either here, or further on, to the latest UKCIP climate change projections and their implications for the Borough. Para 2.29 – the discussion of the implications of ‘the Energy Coast’ are somewhat limited. Yes there will be major decisions to be taken about the appropriateness of significant on and off shore energy developments and related infrastructure; but the energy hierarchy has a range of other components that also need to be brought forward, not least in terms of the efficient use and conservation of energy. An energy coast should be an exemplar in terms of the energy efficiency and in the encouragement of both small and medium scale renewables involving consideration of the full range of potential technologies and their suitability to specific sites and circumstances (including ‘community owned’ infrastructure separate from the national grid). Para 2.35 (& 2.36 to 2.38) – Cleator Moor area portrait – generally there needs to be some clarity about the geographic areas of the Area Portraits – these appear to include all the land in Copeland Borough, which means that they incorporate land in the National Park and this LDF document does not relate to this land. The reference to ‘quiet’ Ennerdale remains true in terms of the fact that this is a very tranquil and remote location; however, the management of the area has changed significantly in recent years following the partnership working between the National Trust, Forestry Commission and United Utilities – this has resulted in a scheme of European-wide significance to ‘re-wild’ Ennerdale and accordingly the phrase ‘wild Ennerdale’ is now more apt. (Additional information on the re-wilding of Ennerdale can be provided on request, although of course this area is entirely outside the area covered by the Copeland LDF. Despite being relatively ‘quiet’ Ennerdale is nonetheless also a significant part of the local tourism offer and does have some related benefits for the Cleator Moor economy. Paras 2.47 to 2.49 – Egremont area portrait – it is considered that the specific economic role of agriculture in this area is worthy of particular mention. Paras 2.68 to 2.70 – Whitehaven area portrait – should identify the landscape qualities of the undeveloped coast. The industrial heritage of the area is also a defining feature of the place and its communities, in particular the coal industry and its key remnants such as Haig Colliery and Saltom Pit.</p>
140	<p>Reference should be made to the need for executive aspirational housing to cater for those in higher paid employment, particularly at Sellafield, and aid in the retention of money in the borough.</p>
142	<p>Copeland Borough Council fails to respond to letters written to them by their Parish Councils detailing problems experienced by the Parish Council found within their local communities.</p>

Question 2: Do you agree with the spatial vision for the Borough?

Rep No	Q2 Additional Info
115	The Demographic Challenge presents Opportunities not just increased Liabilities. Catering for the Housing, Leisure & Cultural, Retail, and Transport needs of the ageing population will lead to business developments. Inward migration of second/retirement home-owners represent a sector of market growth. Inward migration of retail and care workers, often of east European origin, may ease labour shortages but may bring other issues. Investment in promoting Independence will pay off in reduced pressure on statutory services and promote improved community well being.
120	We want to see Visions that are meaningful and achievable for a plan area. A vision needs to be locally distinctive with ambitious targets for the improvement of the natural environment, and include a definition for sustainable development in the borough. We consider that the Vision could be improved to make it locally distinctive, by including the names of key assets in Copeland. We would also welcome specific reference to "sustainable development" and "conserving and enhancing the natural environment and people's access to it".
121	The spatial vision appears limited in its scope. It is considered that the vision should broadened. Whilst the achievement of a sustainable economy is admirable, this should not be based solely on knowledge based economies as these exclude a large proportion of the population. Similarly, there is little in the way of achieving equality for all in terms of service provision, which has a significant impact on the well being of residents, is included within the vision.
125	The spatial portrait emphasises Copeland's distinctive character and whilst the Vision refers to industrial local heritage, and this is supported, the Vision should address the Borough's aspirations for the totality of its historic environment and heritage assets. To give the Vision and subsequent strategic objectives greater specificity, the Vision should set how the different places in Copeland will be by 2027. For example, Whitehaven is described as having a nationally important town centre outstanding conservation area. What is the Vision for Whitehaven? How will this outstanding asset be protected for future generations?
126	The Agency is generally supportive of the Council's vision, and welcomes reference to a well connected Copeland. With regard to the enhancement of the transport network, the Agency generally recommends that physical improvements to the transport network are considered as a last resort, with the implementation of demand management and sustainable alternatives given priority. The Agency would recommend that the vision refers to 'an improved sustainable transport network, where the need to travel by the private car is minimised' that would mitigate the need for any physical improvements.
130	Space Northwest supports the Spatial Vision for the Borough. However, we consider that the spatial vision should refer to the creation of sustainable communities and new housing provision. We recommend that the following paragraph is inserted:- "A place which will provide a variety of housing types to meet the needs of all sectors of the community".
132	Maximisation of brownfield development as described in Figure 9 runs the risk that brownfield sites that are valuable for biodiversity will be developed. Some brownfield sites are very species rich and are classified as the Biodiversity Action Plan (BAP) habitat Open Mosaic Habitats on Previously Developed Land, a Priority Habitat under the NERC Act 2006. Brownfield sites should not automatically be considered for development unless it is certain that they are not biodiverse, or there is strong policy for mitigation and compensation for loss of species-rich habitat. Under the NERC Act, PPS9 and the RSS policy EM1B local authorities are expected not only to protect biodiversity but to enhance and create it. The spatial vision laid out in Figure 9 does not identify biodiversity enhancement and creation as an issue. This should tie in with Green Infrastructure principles which are mentioned in the Spatial Vision.

Rep No	Q2 Additional Info
I38	The spatial vision for the Borough generally reflects the aims of the Cumbria Community Strategy Sub Regional Spatial Strategy. However to improve the vision's 'local distinctiveness' it should refer to specific examples within the Borough. It would also benefit from being more concise and succinct. The first paragraph perhaps needs to refer to the opportunities for the mix of energy generation to include renewables and low carbon. With reference to figure 9, page 35 it is of note that there are no Green Belt designations within Cumbria.
I39	The first two paragraphs are agreed. Para three needs to consider what the Borough's aspirations are in terms of reducing its emissions in order to reduce the overall impacts of climate change. So whilst the reference to adaptation is necessary and welcome there needs to be an unequivocal commitment by the Borough (including its residents/employers/employees/schools/ visitors) to reduce greenhouse gas emissions. Para four – the local industrial heritage is a key feature of the Borough (see response to Q.1 above) but it is not the only local heritage of note – in Whitehaven the Georgian planned town may in part be industrial, and is in large measure a response to industrial initiatives, but fundamentally it is a residential rather than an industrial heritage. The wording needs some additional consideration, perhaps simplifying it to refer to 'local heritage' (albeit the significance in part at least, is national rather than local). Para 5 – there is concern about the commitment to the 'enhancement of transport networks' having regard to the potential impacts of this in terms of matters such as the need to reduce emissions and the impacts upon environmental assets. More appropriate would be a commitment to reducing the need to travel and improving access to sustainable modes to travel.
I40	We agree with the vision in that development should meet the needs and aspirations of all.

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

Rep No	Q3 Additional Info
I07	<p>Comment – As presently worded none of the strategic objectives reflect the need in PPG14 to address ground stability issues, despite this being a significant issue within the plan area. The Coal Authority would suggest amending the following strategic objectives: <i>“Strategic Objective 1 - Adapt to and mitigate the impacts of climate change as well as addressing the impacts of former uses within the Borough using the best available practices, including in response to coastal erosion and flooding and mining legacy.” “Strategic Objective 9 - Promote recycling and waste minimisation in all developments, reuse existing buildings and appropriately remediated previously developed land wherever possible...”</i> Comment – The Copeland LDF will need to reflect the mineral safeguarding obligations set out in MPS1 as articulated in the recently adopted Cumbria Minerals and Waste Core Strategy. To reflect these obligations The Coal Authority suggests the following addition to strategic objectives: <i>“Strategic Objective 6 - To protect, safeguard and enhance the natural resources in the Borough, including air, water, minerals and soil.”</i> Reason – To reflect National Policy advice set out in MPS1 and PPG14, together with Policies CS14 of the Cumbria Minerals and Waste Core Strategy, and Policies CD9 and DC16 of the Cumbria Minerals and Waste Generic Development Control Policies DPD.</p>
I09	<p>Strategic Objective 7 - Ensure that all new housing development meets the standards for Decent Homes, quality and affordability, covers a range of types and tenures, and is provided in places that people want to live, in line with the Energy Coast figures as a minimal housing target. Strategic Objective 14 - Focus major development in the centre and surrounds of Whitehaven, and encourage complementary and additional development in the Key Service Centres of Cleator Moor, Millom and Egremont and local centres when opportunities exist, in line with but exceeding the RSS sub-area development priorities and strategic infrastructure provision.</p>
I11	<p>The Agency generally welcomes and supports the strategic objectives identified. Taken together, these provide a comprehensive basis for more detailed policy development. We would, however, like to see some reference to the employment land requirement in the Regional Spatial Strategy (RSS) within Strategic Objective 12 (in the same way that Strategic Objective 7 refers to RSS housing requirements).</p>
I13	<p>We support all the strategic objectives in section 3.7.1 and objective 9 of section 3.7.2</p>
I14	<p>We agree with the strategic objectives as written. An additional strategic objective is required: “Copeland Borough Council ensures it employs sufficient and competent staff to be able to operate efficiently and deliver its statutory obligations and services to the community”</p>
I15	<p>Sustainable Settlement section of Objectives should indicate explicitly engagement with the changing needs of older people in their settlements (especially the many in rural situations).</p>
I16	<p>Objective 13 could include a reference to Energus and the University of Cumbria at Lillyhall.</p>

Rep No	Q3 Additional Info
I21	It is considered that the sustainable settlement objectives do not go far enough with a view to achieving sustainable development. Whilst health and community services are mentioned and the provision of local facilities are specifically mentioned, it is considered that reference to the provision of local facilities are specifically mentioned, it is considered that reference to the provision of retail in achieving sustainable development should also be mentioned. Access to retail facilities plays an important part in influencing where people choose to live. Also, assisting people to meet their needs locally is one of the key factors in the achievement of sustainable development and in promoting social inclusion. With regard to the Economic and Regeneration objectives, in line with the comments made regarding the Spatial Vision, in diversifying the economic base of the borough reference should be made to retail as this is a major employer. Tesco Stores Limited employs over 260,000 employees nationwide at levels ranging from shop floor staff to management, providing training and staff progression where employees require it. The importance of retail to the economy has been strengthened through the publication of Draft PPS4.
I22	1) Add provision to strategic objective 8 to control/regulate/disencourage second homes purchases. 2) Add provision to strategic objective 15 to prevent commuter and construction traffic using minor roads through villages and open grazed fell roads as short cuts/rat runs.
I25	Whilst SO4 is supported it is suggested that it should relate more specifically to Copeland and flow from issues, opportunities and problems identified from developing work on the locality portraits and understanding the different qualities of place. Following on from the example above a specific objective could address the particular issues relating to the protection and enhancement of Whitehaven and its heritage challenges. Similar work will be required in Cleator Moor, Egremont, Millom etc. A new set of place related strategic objectives could also cover design and distinctiveness issues.
I26	The Agency is generally supportive of the City Council's objectives, particularly objectives 14, 15 and 16. The Agency's primary concern is ensuring that the sustainable growth of the area can be achieved without detrimentally impacting on the safe and efficient operation of the Strategic Road Network (SRN). As such the Agency requests to work with the Borough Council and its partners at the earliest opportunity, in accordance with PPS12 and the principles of good infrastructure delivery planning, in order to assist with the development of a robust evidence base to support the proposed objectives and future development proposals. As identified in Circular 02/2007, the Agency is able to offer advice and technical support and failure to involve and gain support from the Agency at the outset can run the risk of developing a strategy and policies that are not sustainable or deliverable. The Agency is particularly interested in evidence which identifies the potential number of trips generated by any proposed development and the impact these could have on the SRN, both individually and cumulatively, what measures are proposed to mitigate these impacts, including sustainable transport improvements, ITB measures and any physical measures. Such measures should be supported by its own evidence which demonstrates the level of mitigation provided and how they are linked to the proposed development sites, anticipated costs, funding sources and responsibilities for delivery.
I27	Yes, with conditions. The past consideration of the "Top Down" approach (i.e. Whitehaven down) has proved unsuccessful for the development/regeneration of other Key & local centres. Alter the following as shown: 1) Strategic Objective 7 - Ensure that all new housing development meets the standards for Decent Homes, quality and affordability, covers a range of types and tenures, and is provided in places that people want to live, in line with the Energy Coast figures as a minimal housing target. 2) Strategic Objective 14 - Focus major development in the centre and surrounds of Whitehaven, and encourage complementary and additional development in the Key Service Centres of Cleator Moor, Millom and Egremont and local centres when opportunities exist, in line with but exceeding the RSS sub-area development priorities and strategic infrastructure provision.

Rep No	Q3 Additional Info
128	<p>Yes, with conditions. The past consideration of the “Top Down” approach (i.e. Whitehaven down) has proved unsuccessful for the development/regeneration of other Key & local centres. Alter the following as shown: 1) Strategic Objective 7 - Ensure that all new housing development meets the standards for Decent Homes, quality and affordability, covers a range of types and tenures, and is provided in places that people want to live, in line with the Energy Coast figures as a minimal housing target. 2) Strategic Objective 14 - Focus major development in the centre and surrounds of Whitehaven, and encourage complementary and additional development in the Key Service Centres of Cleator Moor, Millom and Egremont and local centres when opportunities exist, in line with but exceeding the RSS sub-area development priorities and strategic infrastructure provision.</p>
132	<p>Cumbria Wildlife Trust supports Strategic Objectives 1-3, 5 and 6 (taking into account the comment below). Strategic Objective 6 actually describes what is known as Ecosystem Services – the services that the natural environment provides to humans, it may be useful to label these services for what they are. By automatically favouring brownfield sites for development there is potential for Strategic Objective No.9 to come into conflict with Strategic Objective No.3. Brownfield sites can have higher levels of biodiversity than Greenfield sites. Each site should be judged on its own independent merits including biodiversity value (see response to question 2). Strategic Objective 9 or 10 should include reference to small scale and community renewables and high energy efficiency design. Cumbria Wildlife Trust disagrees that it is possible to have “sustainable economic growth” (as referenced in Strategic Objective 12) in a world with finite resources, if the word “sustainable” is being used in the Brundtland report “sustainable development” sense. This should be rephrased as either economic growth (in which case it is not sustainable) or sustainable economic development.</p>
138	<p>Generally agree with the spatial objectives. However below are a number of suggested amendments: 1) Environmental Protection and Enhancement - Need to add that the environment makes a significant contribution towards the area’s economy. The objectives should also include that the prudent use of resources will minimise the generation of waste. 2) Sustainable Settlements - The objectives should advise that the location of development should be concentrated where there are existing services and facilities whilst allowing growth which marries opportunity and need. It is also important that developments should respect and be sympathetic to the character of the locality. 3) Economic Opportunity and Regeneration - An objective should be included which promotes the vitality and viability of town and local centres. There also needs to be an objective which seeks to address the obstacles to growth for example the need to assemble sites for development, traffic calming/easing congestion and environmental enhancements to improve the attractiveness of areas. 4) Accessibility and Transport - Should include an objective to develop and maintain high quality modern and integrated transport networks. The objectives would also benefit from specific reference to examples within the Borough to improve the ‘local distinctiveness’.</p>

Rep No	Q3 Additional Info
I39	<p>SO1 – As per the response to Q.1 this needs an element relating to reducing greenhouse gas emissions so that the impacts of climate change are lessened, not just the (welcome) commitment to seek to adapt to those changes that are now unavoidable, and mitigate impacts. SO2 – As the National Trust has demonstrated in its work in partnership with major house builders elsewhere in the Region it is possible through careful attention to design to reduce the existing flood risk to existing housing through careful management of the water environment as part of major new housing development (including through the use of SUDs and river restoration work). Accordingly there is no reason why the Objective should not reduce as well as mitigate flood risk, e.g. amend to read “...and is designed to mitigate, and where practical reduce, residual flood risk”. SO4 – does not explicitly acknowledge the importance of the settings of heritage features – often these are as much under threat as the features themselves and should also be protected/enhanced in accordance with relevant Statute and planning guidance. A straightforward amendment would be “...and archaeological importance and their settings”. SO5 – new development should do more than conserve energy; the whole design approach, including through measures such as the approach to passive solar gain, should reduce the need for energy in the first place; accordingly a reference to “reducing the need for energy” would be appropriate. SO8 – should include a specific reference to access to green infrastructure and the wider countryside. SO16 – see response to Q.2 regarding para 5 and the conflict between developing transport routes and various valued elements of the Borough including its environmental assets and their attractiveness to tourists.</p>
I40	However, SO7 should reflect the fact that RSS targets are now a minimum.
I42	More attention could be focussed upon providing skills training and adult education, attention to historic buildings, and the environment.

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

Rep No	Q4 Supporting Info
I06	It seems unnecessary to develop a separate policy
I11	Climate change is a cross-cutting issue; it may therefore be most appropriate to adopt a combination of Options 1 and 2, i.e., an over-arching policy on climate change linked to related policies on specific matters such as flooding, design of new buildings, renewable energy and reducing greenhouse gases.
I13	A number of policies in the LDF will need to reflect Copeland's strategic objective 1 of mitigating and adapting to climate change. One policy would not be able to reflect this as the requirements of Strategic objective 1 are wide ranging and will need to be embedded in a number of different spatial policies from, housing allocations, flood risk, urban design and green infrastructure to infrastructure provision, transport and tourism. For this reason we would recommend an additional option 3, where by the requirements of strategic objective 1 are integrated into a number of policies in the LDF and also specific policies that deal solely with issues relating to climate change only where they are not covered in other policies. We would support the development of policies that deliver the requirements of strategic objective 1 and would be willing to be involved in their development. All policies should reflect the latest information produced by the government regarding climate change. The latest information regarding climate change which was released on the 18th June 2009 under the title UK Climate Projections 2009 (UKCP09).
I15	Cumbria very much needs to work together on this as the impact of climate change will potentially change our landscape affecting for example Tourism as well as our daily lives.
I20	4.1 lists broad issues that are relevant to Copeland. We welcome inclusion of climate change, biodiversity, geology (needs to be referred to as geodiversity), natural habitats and landscapes, access to open countryside (although this could include any green spaces), and potential negative impacts of development on the natural environment (although if this were referred to as natural resources it would include both species and sites). We welcome the We support Option 1, for a specific policy on climate change, although elements of adaptation and mitigation should continue into other policies or supporting text where appropriate. To protect our natural environment against the inevitable effects of climate change much greater attention should be given to the role of planning in securing adaptation
I25	Both climate change and its mitigation impact upon the historic environment. Coastal erosion (as a result of climate change) is certainly a problem Copeland with the Scheduled Monument at Saltom Pit as the most obviously threatened asset, but others are threatened too. A specific policy on climate change which covers issues relating to the historic environment is supported. Please refer to our advice on www.helm.org.uk
I27	Yes, with conditions. Copeland has a unique identity (similar but somewhat removed from that of Devon/Cornwall) we have space to expand and must use our resources to allow and attract development such as; tourism, energy related industries, etc, which will encourage 'out of town' businesses and people wishing to locate into the area as a 'life style choice'.
I28	Yes, with conditions. Copeland has a unique identity (similar but somewhat removed from that of Devon/Cornwall) we have space to expand and must use our resources to allow and attract development such as; tourism, energy related industries, etc, which will encourage 'out of town' businesses and people wishing to locate into the area as a 'life style choice'.

Rep No	Q4 Supporting Info
I30	The impacts and effects of climate change are widely acknowledged, and it is essential that we aim to reduce energy consumption and CO2 emissions in line with regional and national targets. Space Northwest considers that the Core Strategy (CS) should not repeat National and Regional policies on climate change and sustainable design. Instead, the CS should be a means of implementing regional policies at a local level. Space Northwest can see no need for a separate supplementary planning guidance on this issue.
I31	The LDF will need to demonstrate how Copeland will reduce emissions and adapt to climate change, as set out in DP9, therefore options 1 or 2 apply. If there is no specific policy on climate change, we would suggest a statement in the supporting text, which draws together the climate change aspects of other policies and outlines Copeland's overall strategy for climate change, including any targets.
I32	Develop an overarching policy on climate change, but make sure that climate change is also considered in all the other policies in the LDF where it can be addressed (e.g. flooding, housing and building design, biodiversity and green infrastructure). This will ensure that it is explicitly stated in the LDF that the Authority needs to address climate change, but also that climate change will be addressed throughout the document within other policies. Copeland should take on board the recommendations of the Cumbria Climate Change Strategy and ensure that they are incorporated into the LDF in full.
I34	It would be easier to find rather than searching for it.
I35	A single policy on climate change would be a challenge and likely to be too general to be meaningful.
I38	The Cumbria Strategic Partnership has developed a strategy and 11 action plans on climate change to reduce greenhouse gas emissions. The strategy and action plans will support the Cumbrian Strategy, and guide policy and action by CSP members. Copeland Borough Council signed up to commit to implementing the actions set out in the Climate Change Action Plan on 16 March 2009. The emerging Core Strategy should set a number of key sustainable development principles which include a number of the key actions of the Climate Change Action Plan to help ensure that development within the Borough secures a sustainable level and pattern of development that creates balanced communities whilst addressing the impacts of climate change.
I39	Comments – Generally – see responses above to Qs. 2 and 3 re-the need to also consider how emissions are reduced, e.g. by the location of new development to reduce the need to travel, reduce journey lengths and encourage non-car modes of travel. Para 4.3 - it is also the case that we will experience more extreme individual weather events and these will have particularly dramatic implications, e.g. in terms of the severity of flash floods. Climate change considerations are over-arching and need to be addressed comprehensively. The overall approach is best set out in a specific policy, albeit that subsequent individual policies on water, biodiversity, new development will need to be consistent with this approach and set out more detailed requirements.
I40	It is difficult to consider all the challenges presented by climate change in one policy and it still be meaningful.

Question 5: Which of the following options should be pursued to reduce our reliance on no-renewable energy sources?

Rep No	Q5 Supporting Info
I11	The Agency would support an approach based on Option 3, i.e., where policy requirements are informed by an assessment of the Borough's capacity for renewable/low carbon energy production. In response to question 6, we would again favour Option 3 whereby all scales and types of renewable energy technologies are taken into consideration. As you will be aware, Government has indicated its intention to publish its draft National Policy Statement (NPS) on non-nuclear energy for consultation in the summer. This will need to be taken into account when developing the Core Strategy's policies on renewable energy. With regard to Question 7, whilst locational considerations are identified in national policy (PPS22), we suggest the LDF should address those that are relevant in the Copeland context, having regard to the ambitions of the 'Energy Coast Masterplan'. We would tend to favour a criteria based approach (i.e. Option 1), rather than an overly prescriptive policy (Option 2)
I16	This could be a joint evidence base with Allerdale.
I20	Paragraph 4.7 refers to ecology, and we would welcome use of the term “biodiversity” instead. Maintaining reliable and affordable energy supplies is essential to our modern lifestyle. Climate change creates the imperative to develop clean energy supplies in order to reduce the long-term impact on the natural environment, whilst ensuring that the natural environment is not irreversibly damaged. We support Option 3, as Local Development Frameworks should be locally distinctive and pursuing this option would produce a policy that is locally significant to Copeland.
I21	Policy should follow national and regional policy guidance as it should not place a burden on developers to the extent that development is not brought forward. Of particular importance is that policy makes provision for the non-delivery of such measures where it is not feasible or viable.
I22	Please 'tailor' situations to suit localities. A one size policy will not suit all!
I30	Space Northwest considers that any policy on climate change and sustainable design in the Core Strategy should provide guidance on the types of measures / renewable energies that may be more appropriate for the Borough in line with regional planning policy. Any target should be supported with evidence that demonstrates the types of viable and proven technologies that could help to achieve such a target. Copeland Borough Council should undertake a study to understand the renewable energy technologies that would be viable and appropriate for the Borough, the capacity of the Borough and/or developers to implement these technologies, the scale that would be most appropriate for the Borough, and the potential for local management mechanisms. With this information, the Core Strategy could promote new developments to meet the highest level of renewable energy that is viable in the context of other constraints and funding priorities, and other approaches to reducing energy consumption and carbon emissions. The policy should also make links between hard and soft measures to meet the carbon emission reduction targets in the Borough. Even though the Core Strategy may be limited to influencing carbon emission reduction in new development, it should reference the other measures being implemented across the Borough to reduce carbon emissions from existing buildings and to influence behaviour choices of existing residents. If the Borough is to tackle carbon emissions and contribute toward the achievement of Regional and National reduction targets, emissions must be reduced in both existing and new buildings, and through behaviour changes of existing and new residents and employees.
I31	Options 1, 2 and 3 are conformable with policy EM18. However if 3 is selected, option 1 or 2 would need to be used initially until the assessment is carried out.

Rep No	Q5 Supporting Info
I32	Developers of larger housing or industrial development should be seriously looking at community heating or energy schemes (e.g. solar hot water, photo voltaics). All new build should at least incorporate solar hot water heating as the costs of fitting this technology are lower when it is built in. The potential to use waste heat from some of the larger industries along “the energy coast” to power district heating schemes should be investigated.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Reducing size thresholds plus exceeding renewable energy requirements would have cost and viability implications, especially for smaller developers.
I38	The Planning and Climate Change PPS (PPS1 Supplement) confirms that there will be situations where it could be appropriate for LPAs to expect higher levels of building sustainability than the prevailing standards set nationally through building regulations. Local requirements should focus on known opportunities. LPAs are expected to demonstrate clearly the local circumstances that warrant and allow the local requirements. Any emerging policy within the Core Strategy should establish indicative baseline targets for renewable energy targets. These targets should be based on evidence which shows that there is sufficient capacity to deliver the levels of renewable/ low carbon energy production required. Any policy needs to be flexible to accommodate changing circumstances and the potential for opportunities to achieve higher than baseline targets.
I39	The third option is the best, but needs to be allied to an approach based upon reducing the need for energy – including through passive solar gain, high standards of insulation (including retro-fitting where changes of use and extensions are being proposed) etc. Once the overall approach to ensuring that the need for energy generation is minimised has been established then renewables should be encouraged so as to reduce our reliance on other energy sources, especially those requiring exploitation of fossil fuels – this is best achieved by having a Borough specific capacity assessment to inform detailed policy requirements.
I40	Exceeding regional targets would increase development costs and are unlikely to be recouped in sales values, these policies should be viability tested to ensure they do not result in less development.

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

Rep No	Q6 Supporting Info
I05	Support nuclear as our main renewable source instead of wind
I06	The viability of small scale plants weighed against their environmental impact has still to be fully assessed. There is a tradition of large power generation and usage in the area, and large scale low carbon generation would fit with this.
I07	The Coal Authority supports the aims and objectives of achieving regeneration of the coast which the 'Energy Coast' programme is seeking to achieve. Whilst in principle supporting the production of renewable and low carbon energy, large scale wind farm developments can have a significant impact on mineral resources, including coal, in terms of the potential they can present in terms of effectively sterilising mineral resources. If the LDF were to seek to promote major wind farm development then The Coal Authority would like to see the policy criteria including an assessment of the effect the development may have on minerals to avoid the unnecessary sterilisation of the coal resource in line with the underlying principles of MPS1. Reason – To avoid the unnecessary sterilisation of the coal resource in line with the underlying principles of MPS1 and to reflect the safeguarding principles set out in Policy CS14 of the Cumbria Minerals and Waste Core Strategy and Policy DC9 of the Cumbria Minerals and Waste Generic Development Control Policies DPD.
I09	Be a strong advocate for hydraulic/wave energy harvesting. Encourage discussions on removing portion of tax advantage/government subsidy for wind generation and allocate same/increased amount to further wave & river electricity regenerating technology. N.B hydraulic to include any moving or movable water, river, wears, streams etc
I11	See comments Q5
I16	This option would have the usual safeguards in terms of landscape. With respect to large scale commercial projects there is the issue of connection to the National Grid and as such the cross boundary issues with Allerdale in the upgrading of existing infrastructure needs to be acknowledged.
I20	Through its role as the Government's statutory advisor on the natural environment, Natural England is directly involved in all major proposals for new energy infrastructure. There is a clear difference between sustainable energy infrastructure and other energy infrastructure in terms of its overall impact on the natural environment. This does not imply, however, that sustainable energy developments are by their very nature sustainable. Sustainable energy infrastructure has a long term benefit for the natural environment through its contribution to reducing greenhouse gas pollution and therefore climate stabilisation. Sustainable energy infrastructure may also have a negative and potentially irreversible impact on the natural environment. Other conventional energy infrastructure which produces higher levels of greenhouse gas pollution will have a negative impact on the natural environment in the long term, in addition to negative and potentially irreversible impact on the natural environment. The key challenge is to identify appropriate locations for sustainable energy infrastructure which enable us to move to a low carbon economy, whilst minimising impacts on the natural environment. In our opinion we would wish to see a mix of options, i.e. Option 4. Copeland needs to be able to accommodate different types and scales of renewable energy whilst conserving and enhancing the natural environment, and contributing to the Governments target for renewable energy generation.
I26	The Agency has no specific comment to make, other than to identify that if an energy development is proposed lead to a detrimental impact on the safe and efficient operation of the SRN and would therefore wish to be consulted at the earliest opportunity to discuss any mitigation measures which may be deemed necessary in accordance with the provisions of Circular 02/2007 and the Guidance on Transport Assessments (GTA).

Rep No	Q6 Supporting Info
I27	Be a strong advocate for hydraulic/wave energy harvesting. Encourage discussions on removing portion of tax advantage/government subsidy for wind generation and allocate same/increased amount to further wave regeneration technology. N.B hydraulic to include any moving or movable water, river, wears, streams etc
I28	Be a strong advocate for hydraulic/wave energy harvesting. Encourage discussions on removing portion of tax advantage/government subsidy for wind generation and allocate same/increased amount to further wave regeneration technology. N.B hydraulic to include any moving or movable water, river, wears, streams etc
I30	Space Northwest supports the idea that policies which encourage all scales and types of renewable energy developments should be pursued. This will allow the Council greater flexibility in encouraging renewable energy developments in the Borough.
I31	A combination approach (option 3?) would be most in line with RSS policies EM17 and EM18.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	A number of options should be pursued to encourage renewable energy developments in the Borough.
I38	A combination of all options should be developed. A range of renewable energy technologies should be developed to support an increasing proportion of the sub region's capacity for generating electricity. Each renewable technology has its own locational characteristics and requirements and different areas are better suited to different technologies. Options for further/improved connections to the national grid should be thoroughly explored and should take into account economic, social and environmental factors as well as technical and viability considerations. The need and timescale to deliver new energy infrastructure should be recognised in the LDF.
I39	Options 1 and 3 are supported in principle, indeed both approaches have a role to play. However, the related implications for each of these are more challenging, especially in terms of the impacts upon environmental assets and their settings. Accordingly Options 1 and 3 need caveats attaching to the effect that such development needs to be in appropriate locations.
I40	Climate change should be tackled through a combination of factors.

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

Rep No	Q7 Supporting Info
I05	Make policies which prioritise our natural environment and tourist facilities use of small hydro energy where practicable
I06	This would fit with 6 above
I07	The Coal Authority supports the aims and objectives of achieving regeneration of the coast which the 'Energy Coast' programme is seeking to achieve. Whilst in principle supporting the production of renewable and low carbon energy, large scale wind farm developments can have a significant impact on mineral resources, including coal, in terms of the potential they can present in terms of effectively sterilising mineral resources. If the LDF were to seek to promote major wind farm development then The Coal Authority would like to see the policy criteria including an assessment of the effect the development may have on minerals to avoid the unnecessary sterilisation of the coal resource in line with the underlying principles of MPS1. Reason – To avoid the unnecessary sterilisation of the coal resource in line with the underlying principles of MPS1 and to reflect the safeguarding principles set out in Policy CS14 of the Cumbria Minerals and Waste Core Strategy and Policy DC9 of the Cumbria Minerals and Waste Generic Development Control Policies DPD.
I11	See comments for Q5.
I20	Our preference is for Option 1, criteria based policy approach to address each of the key planning issues.
I30	Space Northwest consider that the Core Strategy (CS) should not repeat National and Regional policies on climate change and sustainable design as there is sufficient national policy guidance to determine planning applications.
I31	Any approach will need to address how the LDF will contribute to meeting the targets set out in RSS policy EM17.
I32	Copeland will need to abide by the law and National, Regional and Local planning policies and guidance regarding location of renewables including the Cumbria Wind Energy Supplementary Planning Guidance. These policies should provide protection for the landscape, biodiversity heritage etc without Copeland needing to write more policies.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Not convinced that a prescriptive policy would address all types of development and still be meaningful.
I38	Criteria based approach should be pursued which will provide a clear indication of how renewable energy and low carbon developments will be sited within their environs and how they can be best assimilated into the local context. Renewable energy developments should be directed to locations where technology is most efficient and where environmental impacts can be satisfactorily addressed. The extant JSP policy R44 states that proposals for renewable energy, including any ancillary infrastructure or buildings will be favourably considered if :- 1) there is no significant adverse effect on the landscape character, biodiversity and the natural and built heritage of the area either individually or cumulatively through their relationship with other infrastructure; 2) there is no significant adverse effect on local amenity, the local economy, highways and telecommunications; 3) the proposal takes all practicable measures to reduce any adverse impact on landscape, environmental, nature conservation, historical and local community interests.

Rep No	Q7 Supporting Info
I39	It will be important for such developments to be assessed having regard to site specific considerations, whilst some of these are in part generic others will be Copeland specific – including the landscape character of the Borough and the historic dimension to this, the cliff coast (including the Heritage Coast) which is rare within the Region, and the site-specific heritage and bio-diversity considerations that potentially apply.
I40	It is difficult to develop a meaningful policy which could cover developments of wind turbines generating megawatts to individual plots, however a positive policy could be included to encourage such technologies.

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

Rep No	Q8 Supporting Info
I05	Developers will be making money from their schemes so should therefore help foot the bill
I06	Such a burden would inhibit investment
I15	This is not just a Copeland issue as it affects the whole west coast and access to it. It would seem reasonable that this cost should be shared and part of the regeneration of Cumbria and potentially the benefiting parts of the NE and NW. If this doesn't happen there is a danger that other services will be reduced.
I19	Such financial burdens should be proportionate to the development proposed.
I22	To build and lead on this ambition will require a positive demonstration or commitment. This will inevitably be an initial cost burden to Copeland. But this should be 'match funded' by central government as the whole country will benefit.
I30	Space Northwest considers that obtaining significant financial investment on renewable energy and low carbon generation from developers should be carefully considered as such a significant financial burden could impact on the viability and deliverability of developments.
I32	The developers who bring these schemes forward will make profit from them which will be paid to shareholders and taken out of the Copeland area (not withstanding payment to employees). If a profit can't be made from a scheme, then developers will not come forward and schemes will not be undertaken. There is little point in putting forward unprofitable schemes which will place a financial burden on Copeland and Cumbria County Council. It is unacceptable for Copeland to have to fund private developers using tax-payers money for schemes generating profit for shareholders. Copeland's finances should be spent on those things that cannot or will not be provided by the private sector. Developers should be expected to pay for their own developments, and also to fund any mitigation necessary to ensure that there is no net damage from the schemes to biodiversity/landscape/heritage/communities.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	This needs to be considered carefully against other demands placed on developers such as affordable housing, public open space, which may result in viability issues.
I38	A wide range of individuals and organisations will be responsible for the delivery of West Cumbria's ambitions, local authorities, government and government agencies, utility companies and private developers. It will be important to work in partnerships to achieve the vision and goal. The proposals contained in the current Planning Bill for Community Infrastructure Levy (CIL) have been identified as a potential means to direct "developer" funds towards large scale community infrastructure projects. Further consideration should be given to the provisions made for such a levy as a result of the planning reforms. At present, the Government are proposing to empower (but not require) local authorities in England and Wales to issue charges on most types of new development in their area. The proceeds of the levy would be spent on local and sub regional infrastructure to support the development of the area. Developers should also ensure that schemes contain a clear commitment to actively consult and involve local communities at an early stage and, where possible, enable the community, where the scheme is to be sited, to gain significant benefits.

Rep No	Q8 Supporting Info
I40	Maybe - need to consider viability. This must be carefully considered as it would have impacts on other areas delivered by developers such as affordable housing and environmental improvements, links between the developments and any investment plans would have to be proven in planning terms.
I43	Copeland's Energy Coast should be nuclear low carbon energy generation; it should NOT be wind farms.

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

Rep No	Q9 Supporting Info
I06	In particular to maintain the strategic link
I09	At present no. Profit making companies should support the cost. All taxpayers nationally should, if necessary contribute towards cost, subject to a clear identification of efficient management of costs by all government agencies (local/national)
I14	It is not clear to us that the initiatives described relate to the energy coast initiative.
I15	Only if it was part of a total plan thought through holistically
I22	To build and lead on this ambition will require a positive demonstration or commitment. This will inevitably be an initial cost burden to Copeland. But this should be 'match funded' by central government as the whole country will benefit.
I27	At present no. Profit making companies should support the cost. All taxpayers nationally should, if necessary contribute towards cost, subject to a clear identification of efficient management of costs by all government agencies (local/national)
I28	At present no. Profit making companies should support the cost. All taxpayers nationally should, if necessary contribute towards cost, subject to a clear identification of efficient management of costs by all government agencies (local/national)
I32	Yes. Unlike Q. 8 above, these are things for the public good that will not make a profit and therefore will not be provided by the private sector. There is also potential for funding some of these public goods through developer contributions (S.106 agreements) for large-scale development schemes.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Perhaps, although it is not considered that levels of council tax are matters that should be addressed through the LDF process.
I38	As above. The achievement of West Cumbria's ambitions will be dependent on the success of collaborative working between individuals and organisations. Combining resources and the effective management of budgets should aid the delivery of improvements.
I40	The issue of council tax rates is not appropriate for consideration within the LDF.
I43	Nuclear is <u>National</u> and the necessary infrastructure including new access road provision should be directly funded by Government. Copeland should be get <u>NET BENEFITS</u> for accepting NUCLEAR NOT bear increased costs!

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

Rep No	Q10 Supporting Info
I05	Design developments to minimise flooding
I06	The geomorphology of the landscape is such that there are no large river plains and there is a large amount of well drained undulating land. There is therefore no pressure to build in flood threatened areas
I09	Prohibit all development on the 'High/Significant risk' Flood Zone 3a & b except water based activities or suitable non-residential use. This borough has sufficient space to develop outside these areas. Planning decisions should not be allowed to place homeowners and businesses in a situation whereby insurance in the future is either unaffordable or indeed refused for flood threats.
I13	We support option 2 as it will prevent any increase in flood risk to people in the area. Given the scale of flood risk within Copeland this is a justifiable interpretation of the requirements of PPS25 and it should be possible to implement without preventing the delivery of required development. To make any policy more locally specific it should refer to your Strategic Flood Risk Assessment and areas that identified as having a high risk of flooding. These areas should be promoted only for water compatible development. We would strongly recommend that you develop locally specific guidance on the application of the Flood Risk Sequential Test required by PPS25. This local guidance would then be applied to any site allocations being proposed. It will also be used by Development Control and will allow you to steer any future windfall development away from areas at risk of flooding. We would be willing to work with you to develop such guidance and have examples of guidance produced by other authorities. In developing this policy further you should refer to the Catchment Flood Management Plan for the Area. Similar in principle to the Shore Line Management Plans, the Catchment Flood Management Plan is a long term plan which sets out the management of flood risk within a specific area. They are particularly important in identifying areas that may receive flood defences in the future and areas that may not. They have been written by the Environment Agency in consultation with stakeholders and Copeland Borough Council have revived summaries of the document.
I14	In Moresby Parish, all recent developments have had problems with flooding which could have been dealt with in the planning stage.
I15	At Age Concern we are aware that there is an increase in the number of older people affected by flooding. We would hope that a sensible mix of the above was undertaken to support sensible new build but to support people in areas where flooding is likely to be an issue and no insurance cover is possible.
I16	However there will be exceptional circumstances whether locating development in flood risk areas is the only option.
I21	Flood risk should not be a reason to refuse development on a site, with careful design there is no reason why the risks of flooding cannot be minimised and as such it is important that this is dealt with on a site by site basis rather than the application of a blanket policy across the borough.
I25	Both climate change and its mitigation impact upon the historic environment. Coastal erosion (as a result of climate change) is certainly a problem Copeland with the Schedule Monument at Saltom Pit as the most obviously threatened asset, but others are threatened too. A specific policy on climate change which covers issues relating to the historic environment is supported. Please refer to our advice on www.helm.org.uk
I27	Prohibit all development on Flood Zone 3a & b except water based activities. This borough has sufficient space to develop outside these areas. Planning decisions should not be allowed to place homeowners and businesses in a situation whereby insurance in the future is either unaffordable or indeed refused for flood threats.

Rep No	Q10 Supporting Info
I28	Prohibit all development on Flood Zone 3a & b except water based activities. This borough has sufficient space to develop outside these areas. Planning decisions should not be allowed to place homeowners and businesses in a situation whereby insurance in the future is either unaffordable or indeed refused for flood threats.
I31	The approach to flood risk should take into account all the measures set out in Policy EM5 – integrated water management.
I32	New development should be located away from flood risk areas and areas that will become prone to flood risk through the predicted increased winter rainfall which will be brought about by climate change (latest Met Office predictions June 2009 predict an increase in winter rainfall along the west coast of Cumbria by up to 70% by 2080). To locate within flood risk areas means there is potential for damage to property and the possibility that people will not be able to get insurance or mortgages for the new properties. Locating development in flood risk areas will often mean the loss of species rich riparian habitat which provides flood storage and prevents downstream damage by flooding. Flood storage is a service which can be provided by biodiversity-rich habitats. By encouraging upstream woodland planting, setting back river banks, reinstating meanders and blocking grips, the speed at which a flood moves downstream can be reduced, flattening the flood hydrograph and reducing peak water levels. Flood defences do not need to be hard engineered structures. Using natural flood storage methods is much cheaper and provides benefits to both humans and biodiversity.
I35	National policy requires that a sequential risk-based approach is taken to determining the suitability of land for development in flood risk areas. However, there are examples where sites meet sustainability principles and where mitigation measures would ensure that risk of flooding is minimised.
I38	Options 1, 2 and 3 are all worthy approaches to mitigate and adapt against flood risk. As part of any policy in the emerging Core Strategy proposals for development should reduce the risk of flooding within the development and elsewhere by promoting a sequential approach to the choice of locations in the following order of priority : a) sites with little or no flood risk, followed by; b) sites with low or medium flood risk and only then; c) sites in areas of high flood risk, Design proposals should minimise or mitigate any flood risk and where practicable include sustainable drainage systems.
I39	Overall we need to look at the wider impacts upon flood events, including the use and management of land in water catchments and our overall approach through shoreline management plans. Whilst in a few instances investment in flood defences may be justified we need to learn more about how to work with natural processes, e.g. reducing the rate of runoff, encouraging the multi-functional use of land so that, for example, at times in acts as an area for the temporary storage of flood waters. Relocation of existing development is likely to be impractical and prohibitively expensive – adaptation may be more achievable, possibly together with occasional abandonment; however, in some circumstances there will also be heritage implications that need to be considered, e.g. finding a viable use for a Listed Building situated on a flood plain.
I40	Avoiding flood risk is usually the preferred option, however there are instances where sites offer other advantages for example economic regeneration potential, visual enhancement. Here flood mitigation measures should be acceptable.

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

Rep No	Q11 Supporting Info
I05	Some areas could be developed more than at present
I06	There has been no material change since the last plan, and the definitions still stand. In particular the protection afforded to the St. Bees Heritage Coastline should be retained.
I13	We agree with the statement made in paragraph 4.23 that the Core Strategy should reflect the findings of the Shore Line Management Plan. The “Planning Cooperative” have produced some guidance on this topic for the Environment Agency titled “Translating Shoreline Management Plans into Spatial Plans” March 2009. We could provide you with copies of this if you contact the Penrith Office.
I15	There needs to be a recognition that the underdeveloped and remote area along the coast have attracted caravans , chalets and other build which is now home to a population which will have growing needs. I am not sure that current planning recognises the issues that are already occurring.
I20	Nationally, flood and erosion risk management policy is set by Defra (most recently in <i>Making Space for Water</i>), while delivery in this work area is undertaken by the Environment Agency and other operating authorities (local authorities and internal drainage boards). Natural England is therefore not directly responsible for the delivery of flood and erosion risk management. However, we are a major stakeholder and offer advice to government and the operating authorities. Natural England’s aim is to ‘ <i>influence the delivery of flood and erosion management so as to ensure the sustainable management of the natural environment and maximise the benefits to the environment and society</i> ’. In the right circumstances management of flood and erosion risk can also contribute multiple benefits, including natural resource protection, improved water quality, climate-change mitigation (through carbon sequestration and further flood risk reduction by created wetlands) and adaptation, biodiversity gain, access to the natural environment and recreational opportunities. Natural England’s Flood and Coastal Erosion Risk Management Policy can be accessed here; http://www.naturalengland.org.uk/Images/FCERM-policy_tcm6-11548.pdf . Call for Sites: Land that is designated for its environmental value, such as National Parks and AONBs, Heritage Coasts, Open Access Land, SSSIs, etc should already be part of your evidence base.
I30	Space Northwest considers that the Council should reconsider the designations in the Local Plan to see whether they are still appropriate/should be extended or reduced. A range of technical work will need to be undertaken, which will determine details such as boundaries, capacities, extent of development, phasing and infrastructure.
I31	Designation is only one aspect of coastal policy. The LDF will need to take into account the strategic approach to coastal development and the coastal environment set out in DP7, RDF3 and EM6.
I32	Sea level rise and erosion along with increased development produces coastal squeeze that increases pressure on valuable coastal habitats and species. Any re-designating will most likely favour an increase in “developed” designation effectively reducing undeveloped and remote coastal areas.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Designations should be revisited as circumstances may have changed.
I38	A full and considered assessment of the Local Plan designations should be undertaken to inform the Local Development Framework process. It is important that assessment looks at the potential for sustainable urban extensions and the roles of key and local services centres.

Rep No	Q11 Supporting Info
I39	Generally these areas, especially around Whitehaven, were carefully considered and tested quite recently through the last formal Local Plan process (and not long before that in more general terms through the Joint Structure Plan) there is no evidence that circumstances have changed significantly to warrant a full review. (Conversely indeed, in terms of the undeveloped coast south of Whitehaven, the progress with the coastal initiative since the adoption of the Local Plan has confirmed the appropriateness of the line set between developed and undeveloped coast (and the limit to the urban area).
I40	The evidence base for these designations should be revisited whilst undertaking the LDF as circumstances may have changed.

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

Rep No	Q12 Supporting Info
106	The designation of areas in box 1 should be kept, but overlaid with an adaptive approach to an assessment of each development with respect to the landscape character, history or bio-diversity. This is particularly a concern in St. Bees where an historic environment is in danger of being swamped by standard housing estate development.
107	The Coal Authority fully recognises the need to protect Internationally and Nationally designated features, however it would be concerned if the Borough were to seek to introduce further local designations, for example for landscapes under option 3. Such local designations have the potential to stifle economic development in terms of preventing appropriate mineral extraction, much of which has made the Borough the place it is. The continuation of mineral extraction in the Borough still has potential to positively contribute to the local economy in appropriate locations. Reason – The introduction of local landscape designations would be contrary to advice in PPS7.
113	We support option 3 provided that it includes the requirements to enhance as well and protect.
115	Partnership working with the Lake District Park is essential and particularly how their bid to be a world heritage site will impact on many areas of Copeland.
120	<p>Natural England believes that „all landscapes matter“. We endorse the European Landscape Convention’s definition of landscape as „an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors“, and this should be included in your policy context/framework on page 53. We promote the use of biodiversity mapping in the LDF and where appropriate wider asset mapping to include all environmental designations. Part of the Lake District National Park, a nationally designated landscape, lies within Copeland and the supporting text needs to reflect that. Therefore your policy context/framework needs to take account of PPS7, and in particular its reference to nationally designated landscapes. Paragraph 21 of PPS7 states, “<i>Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. The conservation of wildlife and the cultural heritage are important considerations in all these areas. They are a specific purpose for National Parks, where they should also be given great weight in planning policies and development control decisions.</i>” Natural England wishes to draw your attention to the „Key Principles“ in paragraph 1 of PPS9, which should follow through into any Copeland policy. PPS 9 (paragraphs 4 and 5) also states that: “<i>4. Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. They should ensure that policies in local development documents reflect, and are consistent with, national, regional and local biodiversity priorities and objectives (including those agreed by local biodiversity partnerships). 5. Local development frameworks should: (i) indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites; and (ii) identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies.</i>” This national policy needs to be reflected in any Copeland policy direction with appropriate links to specific local assets making it a locally distinctive policy to negate any desire to repeat national policy.</p> <p>Question 12 - We support Option 3 to develop character based assessments and policies to protect landscape character, historic value and biodiversity. We would welcome geodiversity being included in this option too.</p>

Rep No	Q12 Supporting Info
I25	The Issue set out on page 50 of the document includes historic value, question 12 does not include historic or heritage value yet the options do. There may be some confusion here. In terms of the historic environment, including the wider historic landscape, it is important to address more than just designated assets and their settings. A combined option which must cover designated assets and their settings, but also looking at locally important heritage assets and which is founded on an understanding (through characterisation) of the particular area/place should be developed. Call for Sites: Local Authorities have a duty to designate new conservation areas and review existing ones from time to time. It would be appropriate for this to be addressed as part of the preparation of this document and the Council should undertake its own researches in this respect.
I30	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability.
I31	A combination approach will be needed to implement policy EM1 which promotes integrated enhancement and protection of environmental assets, including landscape, natural environment, historic environment and trees, woodlands and forests. Plans and strategies should take a proactive approach by defining spatial objectives and priorities for conservation, restoration and enhancement, and provide area-based guidelines to direct decisions and target resources. The LDF will need to show how it will contribute to a “step change” increase in the region’s biodiversity resources. We support the development of landscape character assessments and strategies. In addition to policy EM1, policies for environmental assets will need to take on board the integrated approach to green infrastructure promoted by policy EM3, which stresses the multifunctional nature of green infrastructure, providing for biodiversity, climate change adaptation, leisure, health, and an attractive environment to encourage investment. Consideration should be given to the Green Infrastructure Guide for the North West and the emerging green infrastructure strategy in Cumbria.
I32	None of the above options on their own will ensure that biodiversity is protected and enhanced adequately in Copeland. Copeland BC should be using a Green Infrastructure/Living Landscapes approach to biodiversity to ensure that all biodiversity in the district is taken into account when planning development or change, not just that found within protected sites. National and Regional policy indicates that there should be no net loss of biodiversity through development. The NERC Act 2006 indicates that public bodies have a duty to conserve biodiversity (where “conserve” includes restoration and enhancement of populations and habitats) and lists the species and habitats which are of major concern (Priority Habitats and Species under Section 41 of the NERC Act). The known extent of these species and habitats in the district can be found in the Cumbria Biodiversity Evidence Base. Wildlife corridors should be identified throughout the district and all development should aim to conserve and enhance biodiversity and increase connectivity between areas of biodiverse habitat. Compensation should be provided for any loss of biodiversity through development and measures should be put in place to ensure that biodiversity in the district can be resilient in the face of climate change (this involves allowing space for and connectivity of habitat for migrating plant and animal species). Of course, all existing protected sites should continue to be protected and enhanced wherever possible, and it is particularly important to recognise County Wildlife Sites which are part of the National Indicator set in the Local Area Agreement (NI 197) which Copeland is working to along with the rest of the authorities in the County. Loss of County Wildlife Sites to development will lead to a reduction in sites in positive management, thus leading to a reduction in the score achieved in this indicator.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Character based assessments take a more holistic approach. Such assessments should enable criteria based policies to be developed.

Rep No	Q12 Supporting Info
I38	Traditionally, the policy approach to these environmental issues has been addressed separately. A more integrated approach will encourage better integration between management of the landscape and the natural environment within both rural and urban areas. A character based approach to considering development proposals should involve assessing the effect on the character and distinctiveness of features to ensure that they enhance or are in sympathy with local character.
I39	On the basis that multiple choices of options 1 – 3 were not allowed...it is actually necessary to address this matter at all levels. For example, there are statutory requirements, as well as relevant guidance, in respect of designated sites but, especially in terms of bio-diversity both local sites and the connections between these are essential in providing foraging opportunities and an overall network of linked resources (this will become ever more important as part of the response to climate change in enabling species to adapt, including through migration. In landscape and heritage terms an approach based upon characterisation work will be essential to understanding our resources and how new development can be assessed and informed to ensure that the valued resources are protected, respected and their character reinforced as part of the consideration of development proposals.
I40	Character based assessments and policies should result in sufficient criteria to enable either protectionism or development.

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

Rep No	Q13 Supporting Info
I06	Woodland areas have and are under threat from up-market speculative development which favours this kind of surroundings, but largely destroys it. This is particularly a problem in St. Bees where there is very little woodland, but large speculative pressure to build executive housing, usually in woodland. There is as yet no compensatory planting to balance such woodland felling that has been allowed. There has been therefore an overall loss of amenity. There is no instance yet of any historical, woodland or bio-diversity planning gain or balance which has been successfully enforced when these areas are encroached upon. There should be a very simple rule – no encroachment unless it is strategically vital for the life of the community, and if encroached upon there should be compensation and balance.
I13	The options chosen should reflect the staggered requirements of RSS Policy EM1 to first avoid any damage, then, if that is not possible mitigate and finally offset. There should be a presumption to avoiding damage to biodiversity and habitats but where that is not possible other methods can then be applied.
I16	If on site mitigation is not achievable off-site enhancement could be an alternative.
I20	<p>Natural England believes that „all landscapes matter“. We endorse the European Landscape Convention’s definition of landscape as „an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors“, and this should be included in your policy context/framework on page 53. We promote the use of biodiversity mapping in the LDF and where appropriate wider asset mapping to include all environmental designations. Part of the Lake District National Park, a nationally designated landscape, lies within Copeland and the supporting text needs to reflect that. Therefore your policy context/framework needs to take account of PPS7, and in particular its reference to nationally designated landscapes. Paragraph 21 of PPS7 states, “<i>Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. The conservation of wildlife and the cultural heritage are important considerations in all these areas. They are a specific purpose for National Parks, where they should also be given great weight in planning policies and development control decisions.</i>” Natural England wishes to draw your attention to the „Key Principles“ in paragraph 1 of PPS9, which should follow through into any Copeland policy. PPS 9 (paragraphs 4 and 5) also states that: “<i>4. Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. They should ensure that policies in local development documents reflect, and are consistent with, national, regional and local biodiversity priorities and objectives (including those agreed by local biodiversity partnerships). 5. Local development frameworks should: (i) indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites; and (ii) identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies.</i>” This national policy needs to be reflected in any Copeland policy direction with appropriate links to specific local assets making it a locally distinctive policy to negate any desire to repeat national policy.</p> <p>Question 13 - Our first comment is that landscapes, historic value and character should be linked together, and biodiversity includes both habitat and species therefore there is no need to specifically include habitat. Secondly geodiversity has been omitted and needs to be included. We choose Option 4, which would be a mix of the options quoted. We would want to see on site protection and restoration, but on site mitigation too, where mitigation is required. Policies should ensure no net loss.</p>

Rep No	Q13 Supporting Info
125	The Issue set out on page 53 covers the regulation of new development to protect and enhance heritage values and the question covers historic value and character. Yet the options are confusing. I assume that the wording relates in some part to RSS policy EM1 but the meaning and effect of the options is unclear. EM1 sets out a sequential approach, first avoid damage, then mitigate and compensate. Therefore option 1 avoiding loss or damage to assets must be the starting point, mitigation both on and off site may also be required.
130	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability.
131	A combination approach will be needed to implement policy EM1 which promotes integrated enhancement and protection of environmental assets, including landscape, natural environment, historic environment and trees, woodlands and forests. Plans and strategies should take a proactive approach by defining spatial objectives and priorities for conservation, restoration and enhancement, and provide area-based guidelines to direct decisions and target resources. The LDF will need to show how it will contribute to a “step change” increase in the region’s biodiversity resources. We support the development of landscape character assessments and strategies. In addition to policy EM1, policies for environmental assets will need to take on board the integrated approach to green infrastructure promoted by policy EM3, which stresses the multifunctional nature of green infrastructure, providing for biodiversity, climate change adaptation, leisure, health, and an attractive environment to encourage investment. Consideration should be given to the Green Infrastructure Guide for the North West and the emerging green infrastructure strategy in Cumbria.
132	A “one-size-fits-all” policy for protection of biodiversity will not work. Each site will have its own issues. Some sites will be able to accommodate both biodiversity and development; at others this will not be possible. Any policy dealing with biodiversity and development will need to emphasise that there is a duty to ensure no overall net loss of habitats and species. PPS9 emphasises that, where possible, biodiversity mitigation and enhancement should take place on site, but it is acknowledged that at some sites this will not be possible. In this case the policy needs to indicate that off-site compensation will be necessary. It should be expected that any compensation habitat provided off-site will need to be more extensive than the habitat which is to be lost, on the basis that there will otherwise be an overall net loss of biodiversity interest. This is because new habitat creation will never be as biodiverse as that which is being lost to development. It is also unacceptable for existing biodiverse habitat to be claimed as compensation land. Any compensation land created needs to be in addition to the resource already existing outside of a development site as there will be an overall net loss if biodiverse habitat is claimed as compensation. Compensation should be like-for-like (e.g. grassland created for grassland lost) and should aim to connect other existing habitats in the local area (see response to Q.12 for more about connectivity). Developers need to consider putting biodiversity mitigation in place as one of the first things undertaken in a development. A “no net loss” policy means that there should not be even temporary loss. Habitat creation (offsite if necessary) should be undertaken as soon as possible to ensure that, if species need to be excluded from an area that they were using due to the development, there is an equivalent area in size and quality available for their use as soon as the development commences. Policy needs to be put in place which will ensure that any habitat retained or created on- or off-site is managed in the long term for its biodiversity interest. Too many schemes have claimed to create biodiverse habitat, when in reality compensation habitat ends up unmanaged and species-poor. Copeland should look at policies for long-term developer contributions for the management of retained habitat on-site and off-site compensation land. It is worthwhile considering whether a Biodiversity SPD should be written for the Borough as this would guide developers and planners to the best outcomes for biodiversity.
134	It would not be appropriate for United Utilities Water to comment on this aspect.

Rep No	Q13 Supporting Info
138	Extant JSP policy E35 advises that development and other land use changes that are detrimental to nature conservation interests will not be permitted unless the harm caused to the value of those interests is outweighed by the need for the development. Where development is permitted the loss of nature conservation interest should be minimised and, where practicable, mitigation should be provided.
139	The overall approach needs to also consider the wider settings of environmental resources – especially of designated heritage sites. Generally the approach should be one based upon on-site/setting protection and enhancement so that the environmental resources are enhanced not diminished. Especially in terms of heritage and landscape off site mitigation will rarely be appropriate, secure an equivalent replacement or provide adequate compensation. New development should secure the protection of existing resources and where possible contribute to their enhancement.
140	Circumstances clearly change with designations and the Council's priorities for the land but where the evidence supports off-site mitigation this should be allowed.

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

Rep No	Q14 Supporting Info
I05	These options give more scope to planners and designers
I06	In reality it is felt that a prescriptive approach is the only one which will work. Other approaches will in practice be subject to design creep, compromise, and poor interpretation.
I15	Many people who have historic buildings are older people and some thought needs to be given to the impact this will have and how they might be protected from any additional costs
I17	Conservation Area character assessments should be undertaken and published to allow developers and the public to fully understand the reasons for designation and the form of development which may be appropriate. A general review of the borough's Conservation Areas should be undertaken.
I22	Note: An option 4 tick box (Article 4 Directions) as per the consultation document was not provided - I would have ticked this too!
I25	This question asks about a preferred approach to retaining features of historic value but only offers some of the options available. A key issue is how to integrate the protection and enhancement of the Borough's heritage assets (designated and non-designated) and wider historic environment with its development aspirations. This requires an informed approach to understanding the special significance of different places in the Borough through for example historic characterisation and leads to such approaches as conservation led regeneration and building in context. The Borough will need to pursue a number of approaches, there is no one answer to this questions. The LA has duty to review conservation areas as explained above. Design guidance based on characterisation is helpful. A policy to assess the implications of new development on the historic environment will be helpful. Conservation Area Appraisals and Management Plans will also be helpful. Public Realm Strategies, street clutter audits, area enhancement schemes, building repairs and conservation will all be required, to different extents in different parts of the Borough. It is unfortunate that the issue set out on page 54 falls into the trap and outdated view of seeing heritage as stifling regeneration. There is need for rigour in the control of development (both large and small scale) effecting conservation areas and listed buildings but this does not mean that no change is possible. Call for Sites: Local Authorities have a duty to designate new conservation areas and review existing ones from time to time. It would be appropriate for this to be addressed as part of the preparation of this document and the Council should undertake its own researches in this respect.
I30	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The 'historic environment' is not confined to standing buildings. While the policy should not repeat national and local planning policy, for the sake of clarity, it would be helpful to include in this section a brief consideration of the below ground historic remains. A combination of the approaches selected is encouraged but would suggest an amendment to option 3, in that the policy should be developed to assess the implications of new development on features of historic value including 'buried archaeological remains' and historic buildings, through the planning application process. A statement indicating that it is highly likely that archaeological remains will be encountered during the development of urban areas and brownfield sites would be desirable, and that the implementation of mitigation strategies to preserve and/or record the remains will be required.
I39	The first should be happening outside the LDF process already. The second option will provide an informed approach to new development which is consistent with PPG15 and current English Heritage guidance. The third option is necessary to give effect to the first two.

Rep No	Q14 Supporting Info
I40	New development does not always have to reflect the existing to be successful, as higher environmental requirements come forward design will inevitably change.

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

Rep No	Q15 Supporting Info
I06	In reality it is felt that a prescriptive approach is the only one which will work. Other approaches will in practice be subject to creep, compromise, and poor interpretation.
I09	Replacement must be with semi mature trees of same or agreed species. Relocation should be at site beneficial for the enjoyment/enhancement of the public. Maintenance of trees to be at cost to developer with agreed bond submitted at time of 'agreement to relocate'
I17	Comprehensive advice is provided by national planning guidance on this subject. The advice is sound and does not require modification or amplification by the LDF.
I27	Replacement must be with semi mature trees of same or agreed species. Relocation should be at site beneficial for the enjoyment/enhancement of the public. Maintenance of trees to be at cost to developer with agreed bond submitted at time of 'agreement to relocate'
I28	Replacement must be with semi mature trees of same or agreed species. Relocation should be at site beneficial for the enjoyment/enhancement of the public. Maintenance of trees to be at cost to developer with agreed bond submitted at time of 'agreement to relocate'
I30	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The principle of managing potential development impacts on trees which are situated in Conservation Areas, or which are subject to Tree Preservation Orders should be established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
I39	The relocation of trees is not a guaranteed process and if trees have amenity value as recognised by TPO status or make a contribution to a Conservation Area then it is important that this is respected.
I40	The ability to mitigate tree loss by planting elsewhere can result in a more effective development. Trees may be a particular issue where solar power is to be used. Subject to design reasoning which can be considered reasonable then planting of a sufficient standard should be acceptable.

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

Rep No	Q16 Supporting Info
I06	In reality it is felt that a prescriptive approach is the only one which will work. Other approaches will in practice be subject to design creep and compromise. Our experience is that developers are largely commercial enterprises, not receptive to reducing margins for the general community good, and will reduce costs to maximise investment and the loss of general amenity. There have been many examples in St. Bees of lost opportunity for planning gain, which a prescriptive policy would have averted.
I11	The Agency recognises the importance of good design in enhancing the quality of life of the public realm (for further information visit www.placesmatter.co.uk). This may, however, be an area where it would be more appropriate for the LDF Core Strategy to set out a general design policy, with more detailed requirements to follow, either in the Development Management DPD or a separate Supplementary Planning Document.
I12	Option 2 is more likely to be inconsistently applied. Whichever option is chosen, designing out crime considerations should be an essential requirement with the Council able to apply enforceable conditions taking into account the advice of the Police.
I13	Any policy for this topic should include the requirements of adapting to climate change. This can include the design of sustainable drainage systems and planting that promotes urban cooling. Design of public areas can also act to enhance green infrastructure where they are designed to include natural planting and spaces for habitat creation.
I15	More pedestrian-friendly/risk reduced public areas that can be accessed and enjoyed by older people. This includes accessibility and appropriate amenities
I17	A flexible approach is more likely to deliver appropriate local schemes.
I21	Deal with issues of urban design and the quality of public areas on a case by case basis to allow proposals to be considered on their merits and in context.
I25	An option should be pursued which fits the approach to the particular locality based on a sound understanding of its special qualities. This could be set out in more detail in a subsequent SPD or for specific areas as part of an AAP.
I26	The Agency has no specific comment to make, other than to say that urban design should be utilised to encourage and facilitate pedestrian access and sustainable transport to reduce the reliance on the private car, and hence reduce stress on the local and strategic networks.
I30	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability. Such a policy should also be flexible.
I32	When enhancing urban design or public areas it is important to invest in and apply the principles of Green Infrastructure. Such investment provides benefits to culture, health, wellbeing, community cohesion and the natural environment. A strong Green Infrastructure benefits in-situ biodiversity but also provides environmental connectivity and assists with climate change adaptation and mitigation. Whilst some basic principles need to be applied, a strict development policy will not allow areas to urban areas to evolve and adapt to future challenges of, for example, population growth or climate change.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	A flexible policy will encourage innovative design taking into account local circumstances.

Rep No	Q16 Supporting Info
138	The need to ensure the quality of urban design should be established as a key development principle within the emerging Core Strategy. High standards of design and construction should be ensured by giving careful consideration to the siting and scale of the development; the use of materials and landscaping which respect and, where possible enhance the distinctive character and townscape of the Borough. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
139	No specific preference.
140	An overly prescriptive policy will restrict imaginative design and unable to fully respond to changing local circumstances.

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

Rep No	Q17 Supporting Info
I06	On the basis that people want public art, a mandatory charge must be made.
I09	We would anticipate looking to include art throughout redevelopment/ regeneration projects.
I15	There is still a lack of public art (in its widest context) through Copeland. It needs encouragement as where it is good it is very successful.
I17	The issue should be considered on a development by development basis reflecting prevailing circumstances.
I21	Deal with applications on a case by case basis to allow each application to be considered in its context and on their own merits.
I30	Space Northwest considers that the Council should not impose unnecessary controls on development, which could impact on a schemes deliverability and viability.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A combination of the first two options is supported i.e. develop a policy which defines a threshold for which the LPA will seek some form of public art and a request for developer contributions. It will be important to include a justification as to why such thresholds are being used. It would be useful to provide clarity as to what could be delivered as public art as this could include a number of opportunities and not just the creation of a physical statue. It could include, amongst other things, the promotion of culture and the arts. Public art should be seen as being integral to the development process. This will help to establish its importance and in turn help to achieve improvements to the built environment, creating places which relate to their heritage and distinctiveness. It is important that the principal to include and enhance the provision of public art is established in the emerging core strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
I39	It is considered that in principle public art should be encouraged and the first option is the most appropriate to ensure that this is achieved.
I40	Incorporation of artwork into buildings and schemes should also be considered in lieu of contributions. Any artwork secured through such contributions should be on, or in the immediate vicinity, of the scheme. Consideration should be given to long term maintenance costs. Such a policy should be viability tested.

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

Rep No	Q18 Supporting Info
I05	Promote the countryside by any means available
I06	This is a long process. The solution is in the detail, and grand schemes have a habit of not getting off the ground. In St. Bees we have had a policy of gradual improvement of paths and access over the last 30 years which has borne fruit.
I09	We suggest a large primary recreational facility be considered along River Ehen; route from Ennerdale Water via Cleator through Egremont on towards coast, with access points for walking and cycling into the Forestry and LDNP.
I13	We strongly support the enhancement of green infrastructure across Copeland and encourage it to be designed for multiple uses, for example, habitat creation and protection, flood alleviation, surface water storage, urban cooling and recreation.
I15	Recognise that access is complex and diverse groups need different access to enjoy a diverse range of activities. There have been many suggestions and people are willing to support this but the co-ordination and protectionism remain significant blockages.
I17	Given the characteristics of the borough and current levels of access to the countryside large scale scheme are unnecessary.
I20	We agree Copeland's countryside is a valuable resource and it provides multiple benefits. We would have welcomed specific reference to access to the coast as this is as much an asset as the countryside. We therefore promote the concept of green infrastructure to make effective use of the resource and provide benefits. Natural England's overarching policy on access is to inspire people to engage with the natural environment. Natural England believes that: a) there should be provision of the widest range of access opportunities for people of all abilities, ages, ethnic groups and social circumstances to actively engage in, value and enjoy the natural environment; b) access opportunities should aid healthy activity and be integral to people's daily lives particularly close to where they live; c) access should contribute to achieving the transition to a low carbon economy by encouraging sustainable leisure use; and d) integrating people with landscape and wildlife is an essential outcome for all our work. Natural England's policy on access can be accessed here: http://www.naturalengland.org.uk/Images/access-policy_tcm6-11545.pdf . Question 18 – We favour all the options in this category.
I22	Prohibit commuter traffic from using designated tourist routes, and reconsider current routes which clash with commuters to Sellafield.
I27	I suggest a large primary recreational facility be considered along River Ehen; route from Ennerdale via Cleator through Egremont on towards coast
I28	I suggest a large primary recreational facility be considered along River Ehen; route from Ennerdale via Cleator through Egremont on towards coast
I32	Ensure that people have access to green space and that a Green Infrastructure approach is taken to access to the countryside
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	All the options have benefit to improving access to the countryside and therefore an element of all the options should be included within emerging policy. A number of these suggestions are included within the Rights of Way Improvement Plan. The CSP's Sub Regional Spatial Strategy identifies Derwent Forest within Allerdale Borough as being a key project to develop tourism. Closer working partnerships across the Boroughs and the Lake District National Park should consider and ensure how key projects can be developed without comprising the ability of other projects in neighbouring areas coming forward.

Rep No	Q18 Supporting Info
I39	Access needs to be considered in the context of a) networks of green infrastructure that expand and connect existing resources, consequently it is appropriate to concentrate on those routes of greatest value and to ensure that existing resources are not lost but are enhanced; and b) the need to improve the multi-functionality of green spaces, e.g. by recognising their value for other purposes (such as carbon stores or for flood storage) and securing wider benefits (such as improving the biodiversity value of large open spaces by planting native species along boundaries to provide cover and foraging opportunities, or improving surfacing on connecting routes to aid accessibility by all and also allow more active recreation).
I40	Identified and well used routes should be retained, maintained and improved. Development of larger primary recreation facilities should enable better use of council funds in terms of both offer and maintenance rather than multiple toddler facilities.

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

Rep No	Q19 Supporting Info
I06	Cannot see any reason why this is not acceptable – as long as it is not used as a lever for further housing development.
I17	No specific policy, consider each proposal on its merits consistent with other policies to protect the countryside.
I32	Ensure that domestic and small scale horsiculture is tightly controlled. Equine based development and land-use is very damaging to biodiversity and the natural environment as domestic horse-grazed fields are often overstocked and quickly become poached and denuded of vegetation, destroying any existing biodiversity.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	It is important that the principle which supports the development of commercial stables and equine activity and which allows for the development of domestic stable in certain circumstances is established in the emerging core strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
I39	This option is more likely to successfully address the increasing problems associated with equine uses in respect of wider land/soil management and visual impacts (over grazing, stables, jumps) in the wider landscape.
I40	Domestic stables should only be allowed adjacent to owner's properties to reduce car journeys to and from. Consideration should be undertaken where large curtilage extensions into open countryside are proposed, these should be carefully considered and paddocks specifically excluded from domestic curtilage.

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

Rep No	Q20 Supporting Info
I05	Give the Council more power to address the local issues
I06	Amenity does need to have some clearly-understood rules.
I12	This option specifically incorporates issues of safety and security which we consider are essential elements for inclusion.
I13	We have chosen option 1 which includes some areas of our responsibility (iv).
I17	Current prescriptive policies are inflexible and do not necessarily result in good decision making.
I30	Space Northwest supports the inclusion a specific amenity policy, which would provide more certainty for developers in addressing adverse impacts arising from development.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Policies would be covered by development management policies.
I38	It is important that the principle of addressing the potential adverse impacts arising from development on amenity is established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
I40	These policies should be development management policies.

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

Rep No	Q21 Supporting Info
I06	This area has to be tightly controlled, and this looks like a good start.
I07	This issue should be broadened out to address the bigger issue of addressing the legacy and impacts of former and previous land uses. The Coal Authority would favour the adoption of a policy approach based on Option 1. This would require a policy which would ensure that all relevant public safety hazards arising from former and historic land uses were properly addressed in new development. PPG14 sets out national planning policy on the effects of instability on development and land use, however as the Inspector at the Cumbria and Minerals Public Examination recognised this is a locally distinctive issue for Cumbria and as such should be reflected in suitable local policies to supplement National Policy. PPG14 emphasises that the ways in which instability might be treated in development plans and in considering individual planning applications. As part of The Coal Authority's new approach to interaction with the planning system, we are working on preparing a series of Coalfield Development Referral Plans for each LPA. The Coalfield Development Referral Plan illustrates the areas which contain coal mining related risks to public safety and the environment. Within the Referral Area the Coal Authority is seeking to introduce via the new 1App planning application format a local requirement which will ensure that applicants for planning permission will obtain the mining information and undertake a risk assessment in relation to the potential coal mining related hazards which may be present on the site. This work is currently being piloted in small parts of England, Wales & Scotland. In terms of scale, the area which contains mining legacy in the plan area is more than a small isolated pocket; indeed it covers around ¾ of the plan area. Reason – In order to properly reflect this as a locally distinctive issue and to comply with the requirements set out in PPG14 to have both strategic and detailed policies on ground stability issues.
I13	Any policy developed for contaminated land must comply with the requirements of PPS23 Planning and Pollution Control - Annex 2: Development on Land Affected by contamination. If it is decided that there will not be a specific policy it should be indicated that any development on contaminated and potentially contaminated sites will be determined with in line with Planning Policy Statement 23 and Copeland's own "Contaminated Land Strategy". This must also include a reference to the inclusion of a risk assessment as a component of the work and validation of remedial works as means of quality assurance.
I17	This is the only option which is consistent with other legal and lending requirements related to property transactions.
I20	PPS9 recognises that the re-use of previously developed land is part of a sustainable approach but that, where these sites have significant biodiversity and geological interest of recognised local importance, the aim should be to retain and incorporate it into the site. We would welcome a policy approach that can take account of this and translate it into a distinctive policy for Copeland.
I30	Space Northwest considers that the inclusion of a policy for determining proposals for the development of derelict and contaminated land would need to be reasonable in terms of the requirement on a particular site, and not be unduly restrictive so as to affect the viability and deliverability of developments.
I32	Brownfield sites needing contaminated land remediation are often biodiverse. There is a need to ascertain the nature conservation interest of these sites prior to any remediation work being carried out.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	This is a standard approach.

Rep No	Q21 Supporting Info
I38	The principle of dealing with the development of derelict or contaminated land should be firmly established within any sustainable development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
I40	These are standard requirements for development but it should be stated that where contamination cannot be successfully remediated, the site should be returned to a soft end use.

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

Rep No	Q22 Supporting Info
106	The current approach, which this refers to, has been successful. A more flexible approach will be subject to creep and compromise.
125	The control of advertisements should relate to special character of the area, urban areas will have different characteristics as will the countryside. This could require a more fine grained approach to control.
134	It would not be appropriate for United Utilities Water to comment on this aspect.
135	The impact of advertisements is different in rural and urban areas.
138	The principle of dealing with regulating the impacts of advertisements should be firmly established within any sustainable development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document.
139	The impact of advertisements needs local consideration, for example so that it has regard to the specific nature of the Borough's heritage; more particularly it is clear that a stronger stance will still be needed (and that there will remain less justification for) advertisements in rural areas, and where it is also necessary to safeguard the character of the landscape.
140	Rural and urban areas are impacted upon in very different ways by advertising.

Question 23: Which of the following approaches is most appropriate in relation to regulating the impacts of advertisements?

Rep No	Q23 Other (specify)
I20	We would welcome the inclusion of access to parks, gardens and green spaces in this question, and for Copeland it should also include access to the coast. We see green space or green infrastructure as a key element of sustainable communities and are disappointed that it has not had specific reference.
I22	Community recreation field/facilities
I26	The Agency supports the council's aims to develop sustainable communities and considers that the provision of public transport to a main town should be considered as 'essential'. However the Agency considers that a network of sustainable and public transport options should be promoted to provide access to key services and main towns. With regard to the other services identified, the Agency considers that a sustainable community should maintain a good mix of community services and facilities, which can help to reduce the need to travel further afield, particularly by the private car, for such provisions.
I32	Access to green space and biodiversity for formal and informal leisure.
I39	No specific comments to make.
I42	Footpath access.

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

Rep No	Q25 Supporting Info
I05	Some rural areas are unable to expand under current rules. Village <u>schools</u> , shops, pubs etc become unsustainable allowing development (Suitable) would save these assets especially schools.
I06	It is felt this is working.
I15	It is really important not to take a blanket approach to rurality. Each community needs to be looked at individually to consider the natural population who live there and what this profile may be like in 15 years time. This would ensure that the essential and desirable list above reflected true need.
I17	The current hierarchy is too restrictive. Limited infill development should be permitted in some sustainable rural settlements.
I21	It is important to ensure that all sectors of the community, irrespective of where they live, have access to convenience shopping facilities to meet their daily requirements. This includes those living in villages and not just the large settlements defined as key service centres and local centres.
I26	The Agency is generally supportive of Option 3 and the provision of a hierarchy comprising key service centres, local centres and sustainable villages. This can help to ensure development is delivered sustainably, at an appropriate scale for the locality, where there is an identified need and particularly where it would provide a reduction in the need to travel by car.
I30	Space Northwest considers that the Council should reconsider the hierarchy designations in the Local Plan to see whether they are still appropriate/should be extended or reduced. A range of technical work will need to be undertaken, which will determine details such as boundaries, capacities, extent of development, phasing and infrastructure. Cleator Moor is already identified within the Local Plan as an appropriate location for housing development. Space Northwest considers that future housing development should be focused within the development boundary of Cleator Moor which would help to deliver a sustainable pattern of development, where people can access shops, employment, services and facilities by walking or public transport. Additionally, once the Copeland and Allerdale SHLAA is complete, the Council should consider whether the development boundary of Cleator Moor in the emerging LDF could be extended to meet further identified need.
I31	As stated, any approach will need to be fully justified in relation to RSS policies RDF1 and RDF2. If option 3 is chosen, it may be an opportunity to implement RDF2's approach to remoter rural areas.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I37	Sainsbury's support option 2 which maintains the existing hierarchy of Key Service Centres and Local Centres, but allows for the identified Local Centres to be reviewed and option 3, which expands the retail hierarchy to enable more development to support rural areas. In view of this, Sainsbury's recommend that the boundaries of the identified centres be re-defined in order to plan for change over the plan period.

Rep No	Q25 Supporting Info
I38	<p>The settlement hierarchy of: 1) Whitehaven; 2) Key Service Centres of Cleator Moor, Egremont and Millom; 3) All other Local Service Centres is supported. However to improve clarity with Extant JSP ST5, the description of the levels of development in para 5.6 of the Issues and Options Discussion Paper should be amended to relate better to the type and scale of development outlined in table 2. Major development is required in Whitehaven to counterbalance the current and future loss of jobs and to improve the quality of life. Together Workington and Whitehaven have a regionally significant role. It is important that development and redevelopment of the two towns continues in a complimentary way, building on their individual strengths and exploiting their potential economic role. The other key service centres of Cleator Moor, Egremont and Millom are important in serving rural catchments, further development to satisfy economic and community will be needed. Small scale development should take place to help sustain local service centres, meet local needs and support rural business.</p>
I40	<p>Due to changing service provision, local centres should be reviewed to ensure they still fulfil the role.</p>

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

Rep No	Q26 Supporting Info
I05	Increase settlement areas
I06	Development must be community driven. Question to ask is “Does the community need this development?” St. Bees has suffered from the pro-rata and case by case approach with the over-building of the last two decades which are not necessary at the level to sustain the community.
I07	Whilst The Coal Authority has no preference as to how development should be distributed across the Borough, it is likely that major development if focussed on the larger settlements would fall within the coalfield area. This will raise issues of mineral safeguarding which will need to be addressed through the site allocation process in order to avoid the unnecessary sterilisation of the coal resource. The presence of coal resources need not prevent any chosen development strategy as options such as the prior extraction of surface mineral resources, including coal, where economically viable and appropriate in planning terms, can be built into the site allocation process. The prior extraction of surface coal resources can also assist in removing future public safety hazards from land which is to be developed. Reason – To reflect the requirements of MPS1 in relation to preventing the unnecessary sterilisation of coal resources within the Borough of Copeland.
I09	Ensure minimum level of sufficient availability for every community
I11	The Agency would favour Option 3, i.e. an approach where levels of development are informed by evidence such as the housing needs study, the strategic housing land availability study and the employment land study.
I13	When allocating numbers of dwellings to be delivered you should take into account what proportion of a settlement is at flood risk. Small communities that have a large proportion of the settlement at risk of flooding will not be able to deliver growth without either a revision to the settlement boundary or by putting new development at risk of flooding. This will need to be taken into account when considering the distribution of development.
I17	The alternative option would be difficult to monitor and would not deliver development required by the market in appropriate locations given the geographical context of the borough.
I21	The preferred approach provides more flexibility and opportunity for the development industry to bring forward investment and growth in the area during a time of economic recession.
I26	The Agency supports Option 3 that requires the production of a detailed evidence base to support the location of new development. With regards to infrastructure, the Agency is able to offer advice and technical support and can help to ensure a sustainable distribution of development is promoted across the Borough, which can be provided without detrimentally impacting the operation of the SRN. The Agency would wish to be consulted regarding any development which may impact upon the SRN, and will be able to provide a more detailed assessment further along in the process as the preferred approach is developed. Further the Agency considers that sites should be located where it is accessible by a variety of modes of transport, particularly those that reduce the need to travel by private car.
I27	Yes, with conditions - Ensure minimum level of sufficient availability for every community.
I28	Yes, with conditions - Ensure minimum level of sufficient availability for every community.

Rep No	Q26 Supporting Info
I30	Space Northwest supports the allocation of proportions of overall development to different locations based on evidence contained within the Housing Needs Survey. In particular, Space Northwest supports the 25% proportion allocation to Cleator Moor as it is considered to be a sustainable location with existing access to convenience shopping, schools, a library, public transport and employment.
I31	We would support option 3. It is difficult to see how Option 1 can provide a strategic approach, and option 2 does not draw on a robust evidence base.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Development should secure balanced and sustainable economies that support the roles of towns and villages; this should be informed by clear evidence of what is there at the moment and what is needed to provide sustained and continued growth. The exact scale and level of development should be based on the settlement hierarchy and the capacity of existing services to accommodate growth, critical thresholds for new service investment, the size, character and environmental capacity of existing centres and the need to secure regeneration or investor confidence. The indicative proportions should be subject to review based on the latest evidence of need.
I39	This approach should also be sensitive to related considerations such as the wider impacts upon landscapes and heritage considerations.
I40	Apportionment of housing on the basis of evidence such as housing needs, infrastructure capacity and availability of sites should result in sites which are achievable. Case by case consideration does not allow for best practice in terms of spatial planning.

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

Rep No	Q27 Supporting Info
I05	This would strengthen the case for sustainable villages
I06	It should be community-needs driven.
I11	The above evidence base (see Q26) should also inform the distribution of development to meet the needs of rural areas. Whilst the Core Strategy will need to focus development in Whitehaven and Key Service Centres in accordance with RSS, this should not preclude consideration of the needs of the Borough's rural areas.
I15	It is important that there are centres big enough to enable local choice without having to leave Copeland with regard to any service; however local access is very important when you are unable to drive.
I17	Whitehaven is key to the economic viability of the area.
I21	Allowing for a more dispersed pattern to take place if the market determines will help stimulate economic growth, both in the main settlements and more rural areas of the Borough.
I26	The Agency is generally supportive of concentrating development in the main existing centres, which generally represent the most accessible locations with better access to a wider variety of sustainable transport options. Development should be provided at a scale commensurate with the locality and where there is identified need. As such, the Agency is therefore supportive of Option 2.
I31	The approach to rural areas will need to conform with policy RDF2. It should be noted that RDF2 does promote more innovative and flexible solutions in the remoter rural areas.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Concentrating development in line with a settlement hierarchy i.e. directing more to areas that offer the greatest concentration of existing services and villages will mean that people can live and work closer to key service and facilities. This should reduce the need to travel long distances, thereby stabilising traffic levels and congestion within the Borough. In rural and sparse rural areas the character of individual areas should be respected. However policy should also include the opportunity which allows innovative and flexible solutions to be found to meet particular development needs. These should be aimed at achieving more equitable access to housing, services, education, healthcare and employment. They should also create a more diverse economic base, whilst maintaining support for agriculture and tourism. In the open countryside, development should only be permitted in exceptional circumstances. These circumstances could include as essential requirements for a rural location which cannot be accommodated elsewhere and development which is fundamental to delivering transformational change to the local economy.
I40	The allocation should allow for small scale development in rural areas to meet local needs. However, it must be careful not to stop exception sites coming forward as these should be positively encouraged.
I42	Development of brownfield sites to be preferred at all times.

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

Rep No	Q28 Supporting Info
I06	These are necessary to prevent creep. Experience has shown that formal boundaries are the only way of preventing continual speculative development pressure. There have been cases of appeals where development has straddled a boundary – so insistent can be the pressure. The boundaries must be enforced otherwise precedent will be used to expand development.
I09	Settlement boundaries should continue to be identified but must be an indicator not a restrictor for community growth. A flexible approach to development adjacent to settlement boundaries should be acceptable.
I15	And understand the population profile over time
I17	But include for sustainable villages.
I25	The use of defined boundaries will be important in some settlements where a firm edge to development is important in defining the special character of the area and this should be retained. There may also be areas where the setting of a new settlement edge would be beneficial in redefining its character. Therefore an option which takes a selective approach to defining settlement boundaries may be appropriate.
I27	Settlement boundaries should continue to be identified but must be an indicator not a restrictor for community growth. A flexible approach to development adjacent to settlement boundaries should be acceptable.
I28	Settlement boundaries should continue to be identified but must be an indicator not a restrictor for community growth. A flexible approach to development adjacent to settlement boundaries should be acceptable.
I30	Space Northwest supports the inclusion of a policy which uses settlement boundaries in order to provide certainty and clarity as to the type of development which is appropriate within and outside settlements.
I32	Continue to use settlement boundaries as in the first option above, but acknowledge that there are sometimes areas of open land (often brownfield) within settlement boundaries which are used by local people for recreation (e.g. dog-walking) and are also often valuable for biodiversity.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	This approach gives clarity to developers and helps to contain development.
I38	Option 1 should be used as a basis for policy. Defining settlement boundaries around the key service centres and local service centres will provide clarity. For smaller settlements consideration should be given to small scale development, to satisfy local needs, which allows the infilling or rounding off of the settlement. This could provide greater flexibility to assess individual schemes on their merits and in the context of local need.
I39	The current approach has by and large worked well and was comparatively recently endorsed in the Local Plan review. It is considered that it also continues to have merit in safeguarding the character of the Borough's settlements.
I40	Settlement boundaries are essential for certainty; however they should not be so tightly drawn as to hamper development opportunities.

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

Rep No	Q29 Additional Info
I11	The indicative target in RSS is that <u>at least</u> 50% of new housing in the Borough should take place on previously developed land. Both Options 1 and 2 would be consistent with this requirement, whilst Option 3 would not.
I20	We would welcome reference to the potential biodiversity resource that both green field and brown field can provide.
I26	The Agency is generally supportive of providing a high percentage of new housing on previously developed land which is generally located within main conurbations and provides a more sustainable location with generally better access to sustainable modes of transport and key public transport corridors. As such the Agency would be supportive of Option 1 or 2.
I31	Options 1 and 2 conform to RSS policy L4. Option 3 would not be conformable with L4 so would need strong evidence base and justification.
I32	Maximisation of brownfield development runs the risk that brownfield sites that are valuable for biodiversity will be developed. Some brownfield sites are very species rich and are classified as the Biodiversity Action Plan (BAP) habitat Open Mosaic Habitats on Previously Developed Land, a Priority Habitat under the NERC Act 2006. Brownfield sites should not automatically be considered for development unless it is certain that they are not biodiverse, or there is strong policy for mitigation and compensation for loss of the species-rich habitat. Greenfield sites are far more abundant in Cumbria than in the rest of the North West region. It would seem obvious that what is suitable for the North West's major conurbations regarding housing allocation is not necessarily suitable for a mostly rural district like Copeland. Copeland does not have huge tracts of brownfield sites, and many of those that do exist are of high biodiversity value. The concentration on brownfield sites for development has led to large losses of biodiversity in other parts of the County.
I38	Whilst the proportion of new housing development built on previously developed land should be in line with the RSS, the policy should allow flexibility during the plan period and across the Borough to accommodate changing circumstances. The Core Strategy should include a set of sustainable development principles which advises that within the settlement hierarchy development should seek locations in order of priority: - 1) The appropriate reuse of existing buildings worthy of retention, followed by, 2) The reuse of previously developed land, and only then 3) The use of previously undeveloped land.
I40	It should however be remembered that brownfield land is finite in its availability and where volumes of required housing cannot be accommodated this should not be an artificial brake on development.
I42	Target 100%.

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

Rep No	Q30 Supporting Info
I06	This would be a tailored approach which takes account of community needs and the environment.
I12	We are concerned that Option 1 may not see Safety and Security as a 'Key Issue' and therefore see Option 2 as most appropriate. Design and Access Statements should address how crime prevention has been taken into consideration in the design of the proposal, in accordance with Para 87 of DCLG Circular 01/2006, and we ask that the LDF makes specific reference to this as a material consideration in validating an application.
I20	We broadly support the development of a policy for sustainable design and construction. Elements should include the use of reclaimed materials. We support Option 1, criteria based policy. We suggest that it would be appropriate to support this with policy with detailed SPD.
I25	The Issue set out on page 75 includes Quality of Design yet question 30 only asks about sustainable design. I refer you to the section in Building in Context covering The Right Approach and the questions for Appraising a Proposal which could form the basis for developing a policy.
I26	The Agency has no particular comment to make, other than to reiterate that accessibility and the use of sustainable transport should form a key part of the policy criteria.
I32	A Supplementary Planning Document laying out design codes for developments would be useful for developers, house-owners and consultees. Cumbria Wildlife Trust would like to see any guidance produced include building biodiversity into developments as a criteria. Please see our response to question 29 regarding the development of brownfield sites which have biodiversity interest.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The emerging Core Strategy should identify a number of sustainable development principles. These principles should be applied alongside all the policies within the local development framework. They should establish that development should seek to ensure a high standard of design.
I40	The policy should act as a guide rather than prescriptive enforcement as technologies are constantly changing.

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

Rep No	Q31 Supporting Info
I06	It would be sensible to anticipate this regulation.
I11	See comments in relation to Q16.
I12	This should include a requirement to meet the principles of Secured By Design, with the council able to apply enforceable conditions taking into account the advice of the Police. On occasions applicants may be unaware of the crime history in the vicinity of the proposed development, or the proposals may contain features which may generate crime or anti-social behaviour, and impact upon the quality of life of future users, and ultimately the sustainability of the development. It is therefore essential that our Architectural Liaison Officers are consulted at the earliest possible stage to assist the applicants and the council to design out crime.
I13	We support an aspirational approach in this area that goes beyond the requirements of Building Regulations. Requiring new building in the area to meet a higher level of the Code for Sustainable Homes and BREEAM Standards than is presently required by Building Regulations will build expertise in this area. This supports the agenda of Energy Coast and a desire to make Copeland a sustainable community.
I15	This policy must tie in with the health and social care plans for maintaining people in their own homes – this cannot be a stand alone decision
I30	Space Northwest consider that over stringent requirements could impact on the viability and deliverability of housing schemes, and the reliance on Building Regulations will still ensure that buildings are sustainably constructed for the future. If targets for new homes are to meet the Code for Sustainable Homes and Life Standards, Space Northwest would like to see clarity over the reference to specialist needs in terms of lifetime homes and adapted accommodation. The application of these requirements in the Core Strategy would benefit from greater certainty on this issue. In particular, economic viability should be a consideration in proposals for implementation of lifetime homes and adapted accommodation.
I31	The LDF will need to show how it will encourage new homes to be built to Code for Sustainable Homes standards and promote the use of the lifetime homes standard (policy L4). RSS is not prescriptive as to how this is achieved.
I38	The Cumbria Climate Change Action Plan seeks to adopt a common approach to development management and building regulations that delivers and implements zero carbon policies contained with core strategies. It also seeks to explore and agree new local standards that exceed current Part L Building Regulations and BREEAM 'excellent' rating in anticipation of higher national building regulations and standards being introduced.
I40	The sustainable construction of buildings does increase build costs which are generally not reflected in increased values, this must be acknowledged when considering this issue.

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

Rep No	Q32 Supporting Info
I05	Not set targets but go with the flow of what is required
I06	A target based upon a projection of likely local economic factors. Note that the demand for housing, as shown by people willing to speculate on creating development is linked to such economic indicators. The important thing is to ensure good housing in the right place and with minimum impact is produced.
I09	Energy Coast: Masterplan when successful will require minimum of their quoted development figures. The type of housing will predominately be mid to higher standard and will assist the present lack of variety in design and must be encouraged within the LDF.
I11	To satisfy the requirements of RSS Policy L4, the LDF Core Strategy should provide for a minimum of 230 dwellings per annum plus any additional provision for clearance replacement. Option 3, which proposes a rate of 180 to 200 dwellings per annum, would fall short of this requirement. Option 2 proposes a substantially higher level of provision based on the Energy Coast Masterplan for West Cumbria. Since the housing requirements in RSS are no longer expressed as ceilings, it would be possible for the Council to propose a level of provision above that in RSS. This would, however, need to be justified within the Council's evidence base in terms of need, capacity, sustainability and the wider implications for the spatial strategy for the Cumbria sub-region. In relation to the 'Call for Sites' exercise, the Agency does not wish to put forward any additional housing sites for consideration. We would, however, ask that the NWDA-owned site at Devonshire Road, Millom, which is allocated for housing in the adopted Copeland Local Plan, is carried forward into the Site Allocations DPD.
I15	There is a need to understand what homes are required. Our research would indicate that there is a need to consider affordable supported homes for older people as much as affordable homes for younger people.
I16	The Masterplan scenario would require working closely in partnership with Allerdale in terms of delivery. In particular phasing of development would be to be complementary as well as the co-ordination of infrastructure delivery across West Cumbria.
I17	But accept the build rate will be around 190 p.a.
I26	The Agency generally considers that any proposals for housing growth should be provided in line with the provisions of the RSS. The Agency will be able to give greater consideration to the scale and location of housing development as specific allocations and in particular any strategic allocations are identified. The Agency would wish to be involved in assessing the impact of such proposals, which will need to be considered in terms of individual site impact as well as cumulative impact. It will be essential as part of the evidence base that the necessary measures are identified in order to mitigate any potential detrimental impacts and that the effectiveness and deliverability of such measures is demonstrated.
I30	Space Northwest considers that additional new housing provision should accord with the statutory development plan provision as set out in the Regional Spatial Strategy. However, Britain's Energy Coast: A Masterplan for West Cumbria could be a material consideration in providing additional housing where it is required to meet additional low cost housing, the shortage of executive, large family homes and also more affordable, apartment style accommodation suitable for first time buyers or those wanting to live within a town centre.

Rep No	Q32 Supporting Info
I31	We would support option 1 or 2. Policy L4 requires authorities to achieve the housing provision set out in table 7.1, but along with the supporting text set out in paragraph 7.19, there is flexibility to exceed those figures were justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies. Option 2 would therefore need to be justified by evidence.
I38	The scale of housing provision and its distribution should seek to support economic growth. The overall housing figures covered by the approved RSS from 2003 – 2021 and the annual average figures are not absolute targets and may be exceeded where justifies by evidence of need, demand and affordability and sustainability issues and fit with relevant and sub regional strategies.
I40	The LDF must be in conformity with the RSS therefore this should be the target within it; however it should be clear that the RSS target is a minimum in terms of yearly completions.

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

Rep No	Q33 Supporting Info
I05	Would help rural communities
I06	If sites have been identified, then this must have been on the basis of objective planning and development criteria, so these should be maintained
I17	The community and development industry requires certainty.
I26	The Agency's preferred option is Option 1 as the promotion of allocations through the LDF process requires the development of evidence to support the sustainability and deliverability of proposed allocations. Further, it provides the Agency with the opportunity to assess the impact of such development, both individually and cumulatively, on the operation of the SRN and enables the necessary infrastructure to be planned and mitigation measures to be determined and assessed.
I30	Space Northwest considers that the Council should ensure that sufficient housing is provided to meet the targets in the RSS (and potentially 'Britain's Energy Coast') during the life of the LDF by focussing on allocated housing sites within the LDF but allowing for other opportunities, which may arise within adjacent settlements identified in the settlement hierarchy. The RSS identifies a significant oversupply of employment land in Cumbria [¶16.14 RSS]. Therefore, we consider that in accordance with PPS3, redundant employment land in sustainable locations should be reallocated for housing development where it can be demonstrated in an up to-date Employment Land Study that they are no longer required. Space Northwest also consider that the Council should recognise that sustainable greenfield extensions are likely to be needed to accommodate development requirements, in some locations, in the District over the plan period. The release of greenfield sites should be focussed in the main settlements of Cleator Moor, Egremont and Whitehaven where development will be the most sustainable.
I31	PPS3 puts an emphasis on a plan-led approach reducing reliance on windfall sites. There is clearly a need for some flexibility and PPS3 does not rule out the use of windfall sites if there is full justification, some of which could include looking at trends regarding how much contribution windfall sites have previously made to supply. If options 2 and 3 are pursued there will need to be a continued emphasis on the plan-led approach. Those two options will also depend on the approach taken to the settlement hierarchy covered in questions 25 and 26.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	The LDF should be more flexible and responsive than the previous system.
I38	Copeland Borough Council should manage their allocation of land and granting of planning permissions to maintain a minimum five year supply of deliverable housing land and use their housing trajectory to help monitor and manage the achievement of their housing figures and the extent to which this meets local need and demand for housing.
I40	The LDF should be more responsive than the previous system, however unexpected brownfield opportunities may arise and these should not be artificially constrained if they are no longer required for employment purposes.

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

Rep No	Q34 Supporting comments
107	<p>Whilst The Coal Authority has no preference as to how development should be distributed across the Borough, it is likely that major development if focussed on the larger settlements would fall within the coalfield area. This will raise issues of mineral safeguarding which will need to be addressed through the site allocation process in order to avoid the unnecessary sterilisation of the coal resource. The presence of coal resources need not prevent any chosen development strategy as options such as the prior extraction of surface mineral resources, including coal, where economically viable and appropriate in planning terms, can be built into the site allocation process. The prior extraction of surface coal resources can also assist in removing future public safety hazards from land which is to be developed. Reason – To reflect the requirements of MPS1 in relation to preventing the unnecessary sterilisation of coal resources within the Borough of Copeland and to reflect the safeguarding principles set out in Policy CS14 of the Cumbria Minerals and Waste Core Strategy and Policy DC9 of the Cumbria Minerals and Waste Generic Development Control Policies DPD.</p>
125	<p>I attach a standardised response which English Heritage has developed in response to SHLAA methodology consultations. When selecting housing sites the capacity of the historic environment to accommodate development without damage is an important consideration. There will also be opportunities for housing to support the conservation of the historic environment through for example the sensitive re-use and adaptation of historic buildings.</p>
126	<p>The Agency considers that all of the criteria identified should provide an important consideration when selecting housing sites. From the Agency's perspective Options F and G are particularly important.</p>
131	<p>The value of ranking the priorities is not clear. It is important that all of the issues identified are considered, and in some places some issues will be more important than others, for example infrastructure issues will be more critical on some sites than others.</p>
135	<p>A combination of factors will determine the most appropriate, suitable and sustainable housing sites.</p>

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

Rep No	Q35 Supporting Info
I05	High density housing is not suitable for rural areas
I06	Density is always something that developers “try on” to start with, (high density on first application followed by revised plans), then after initial permission is given, there is density creep as amendments are requested. The rules should be stated at the beginning. There should however be variable density which takes account of the site and the social need and type of housing.
I12	Density requirements can have a direct impact on defensible space and parking arrangements in a development, and can deny residents private space and/or in-curtilage parking in favour of parking courts or on-street parking which offer greater opportunities for crime. Parking courts if not carefully designed can lead to anti-social behaviour and no-one using them for their intended purpose. On-street parking can lead to tensions between neighbours when they are unable to park their second most expensive possession within view of their own property.
I17	The approach is overly prescriptive and leads to inappropriate house types, particularly an over supply of small units.
I25	Combination of option 2 and 3 would be appropriate.
I26	The Agency considers that higher density housing should be concentrated in locations that are in close proximity to major transport nodes and along major public transport corridors.
I30	In accordance with PPS3, Space Northwest considers that the Council should adopt a density range across the Borough to determine the appropriate residential capacity of a site and to taking into account the local context and type of location by differentiating between urban and rural areas.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	A flexible approach should be adopted within a range.
I38	Emerging policy should be based on a combination of options 1, 2 and 3. It is important that development reflects the character of the area. Design considerations can help to achieve a range of densities. Whilst national planning policy in respect of housing (PPS3) indicates that 30 dwellings per hectare should be used as national minimum to guide policy development and decision making, it does not say that it must be used in every single case.
I40	This allows for site specifics to be considered in every case and for site density to be guided by design considerations as well as the aspirations of the local authority and information in the housing market assessments.

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

Rep No	Q36 Supporting Info
I06	This is probably one of the most important drivers for the type of housing development. The organic growth of communities in a way which takes account of the character and needs of the community is of paramount importance.
I30	In accordance with PPS3, Space Northwest considers that the use of Strategic Housing Market Assessments and other local evidence to guide the mix of housing types, sizes and tenures will ensure that new housing developments will contribute to the achievement of mixed sustainable communities across the Borough.
I31	Option 3 is more in line with Policies L2, L4 and L5 which implicitly suggest a mix of appropriate house types, sizes, tenures and prices in line with evidence e.g. Strategic Housing Market Assessments.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Mixes should also be guided by the market.
I38	A combination of options 1 and 3 should be pursued. It is important to ensure that a range of house types, sizes and tenures and prices which address the housing requirements (including local needs and affordable housing needs) of different groups of the community are met. This needs to be informed by clear and consistent evidence. The market can help inform this process.
I39	No specific preference
I40	Mixes should be guided by both the SHMA etc and the market.

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

Rep No	Q37 Supporting Info
I06	There should be a much more proactive approach in guiding developers. The present system does not engage the parties concerned early enough – planners and developers. Plans are submitted often with little guidance or imagination. Developers would be much happier with clearer guidance which would give greater chance of acceptance and reduce costs in the design stage.
I12	It is essential in the interests of sustainable communities that designing out crime considerations are included in this policy, and that the council are able, when it sees fit, to apply enforceable conditions based on the recommendations of the Police in relation to designing out crime.
I15	This needs to reflect the policy decisions others have made alongside CBC decision making.
I17	Detailed policy will be prescriptive.
I30	Space Northwest considers that the Council should rely on other policies in the LDF and national guidance.
I35	Detailed design guidance can result in ‘standard’ development. More flexibility required on individual sites.
I38	The principle to ensure a high quality of design should be firmly established within any development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning document. Such design guidance should consider all forms of development to set a standard for the attainment of good quality of design throughout the Borough.
I39	No specific preference
I40	Design must be improved generally in the borough but design flexibility must be allowed for to allow for solutions which are right for the site rather than designing to fixed parameters which results in standard layouts - for example the 21m rule.

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

Rep No	Q38 Supporting Info
I05	This should be made to include all development on the site and not the amount of homes being built as one time.
I06	It would be impractical to negotiate housing on a case by case basis. What is the driver for the developer? Only by setting these targets will potential developers understand in advance what is required before they start investment.
I11	National planning policy on Housing (as set out in PPS3) says that Local Development Documents should set an overall, i.e. plan-wide, target for the amount of affordable housing to be provided and the range of circumstances in which affordable housing will be required. If the Council were to pursue Option 2, i.e. a range of affordable housing requirements in different parts of the Borough, this would need to be informed by an assessment of the economic viability of any thresholds/proportions proposed as well as affordable housing needs identified in the Strategic Housing Market Assessment. Option 3 does not appear to offer prospective developers a sufficiently clear indication of the Council's affordable housing requirements.
I15	Note form above – older people need affordable supported housing throughout Copeland
I17	Largely not an issue.
I30	Space Northwest welcomes the flexibility of being able to provide affordable housing on site, in a different location or as a commutable sum. Space Northwest also requests that that an affordable housing policy in the Core Strategy ensures a mix of properties in terms of size, tenure and type to meet the needs of all residents. In relation to the mix of social and intermediate housing, it will be important to maintain a degree of flexibility in order to respond to market demand and fluctuations, as we are seeing in the current economic climate.
I31	We would suggest there is a need to combine option 1 and 2. PPS3 gives flexibility to Local Authorities to set different thresholds over the plan area, and the Strategic Housing Market Assessment should help to inform that (RSS Policy L5). There is a need to clarify that the presumption will be that affordable housing will be provided on site, although there may be exceptional circumstances where that cannot be achieved.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Affordable housing should be provided in areas where there is clear evidence of need.
I38	A combination of option 1 and 2 should be pursued. There needs to be a threshold to provide clarity that affordable housing may be sought. But such thresholds need to be clearly aligned with Strategic Housing Market Assessments. If there is no need for affordable housing the policy should not demand it. Flexibility also needs to be maintained to monitor the changing requirements of the SHMA. If proportions of affordable housing are high this could further frustrate the housing market and reduce the amount of housing being delivered. Flexibility to vary the requirements for affordable and local occupancy within individual cases should be included within policy.
I39	No specific preference
I40	Affordable housing should only be provided where there is a clear evidenced need in that location.

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

Rep No	Q39 Supporting Info
I06	Difficult to define key workers.
I15	Especially catering for changing needs of ageing population
I17	Rural affordable housing.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The requirement to secure local occupancy for these groups should be fully evidenced and justified.
I39	No specific comments
I40	Key workers will usually be provided for through other provisions such as general affordable housing.

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

Rep No	Q40 Supporting Info
I05	Derelict buildings should be removed by the Council
I06	This would be the most cost-effective.
I09	This answer is in relation to older pre C20th housing. In the case of some areas of newer social housing, we would support transformation through clearance and replacement.
I31	RSS Policy L3 considers both the need to manage the delivery of new build and its impacts on the existing stock and making the best use of existing stock. The impact of option 1 on the existing stock will need to be fully understood if it is taken forward.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A combination of both options should be pursued. Clearance should be undertaken where there are problems with housing that is unfit, beyond economic repair, unsuitable for modern living, in areas of extremely low demand or it is necessary for the better functioning of local housing markets or the overall improvement and regeneration of an area. However this needs to be based on clear evaluation of condition of the area. In many cases older housing areas are a valuable resource and their contribution to the character and heritage of an area needs to be fully evaluated. To retain existing residents and attract new people into the area it is necessary to be able to offer them housing choice in both older property and new houses.
I40	Clearance of properties may result in greater issues and improvement of whole area environment may give more effective results particularly given the current economic climate.

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

Rep No	Q41 Supporting Info
I04	Circular 1/2006 is clear that core strategies should contain a fair and realistic set of criteria to guide allocations for needed sites and meet unexpected demand. Even if the identified need in the RSS is low allocations should still be made. One of the reasons why the new circular was introduced, and why allocations are required for identified need, is that reliance of criteria based policies in the past following the superseded Circular 1/94 have failed to provide needed sites. Hence most certainty is via allocations. This would also ensure that Gypsy and Traveller provision is mainstreamed alongside conventional housing, a clear aim of government and developing regional policy.
I06	No comment.
I12	The Council should work closely with Allerdale to ensure adequate provision is made for a permanent site within the area as a matter of some urgency and in order to secure Government Funding whilst it is available. It is anticipated that legislation will be introduced requiring Councils to provide such a site and as such the Council should consider this as a priority action in accordance with the Cumbria Cohesion Strategy.
I15	We are concerned at the number of travellers who are now ageing and will have wider needs.
I16	A West Cumbria approach to site provision could be a possible option and provide greater choice for Gypsies and Travellers.
I17	No apparent need in borough.
I26	The Agency has no specific comment to make regarding the location of gypsy and traveller sites, other than that they should be located close to essential services and amenities, as well as employment opportunities, in order to reduce the need to travel by private car.
I31	The policy approach to Gypsy and Traveller sites (and provision for Travelling Showpeople) will need to take into account the emerging RSS Partial Review, which due to be submitted in the near future.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A combination of all the options is required. It will be necessary for Copeland Borough Council to work with all the Cumbrian Districts to ensure that sufficient provision is made within the sub region to accommodate any need that may arise within the County. The Cumbria Gypsy and Traveller Accommodation Needs Assessment (March 2008) identified need across Cumbria. The table below is an extract from the CGTAA. It presents the 'needs where they arise' requirements. However due to the lack of accurate information and data about the entire Gypsy and Traveller population it is likely that these requirements represent the minimum additional accommodation provision required. SEE TABLE IN RESPONSE FORM!!! The table shows that one additional pitch is the minimum required in Copeland for the period up to 2012. There will be a need to make sufficient provision available within the emerging Allocation of Land DPD beyond the period 2012. Any policy should follow a criteria lead approach for the identification of sites and guide the determination of planning applications. This should be based on need, established business links with the area, adjacent to the centres of growth, assessment of environmental impact, transport implications, necessary infrastructure and long term management of the site.
I39	No specific comments

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

Rep No	Q42 Supporting Info
106	The criteria based approach would take account of those factors which would naturally determine whether we are going to use such assets in the future.
125	It is unclear if the poor quality reference in paragraph 5.55 is in fact poor condition. The distinction between condition and quality and the need for assessment of both is important. I refer you to our guidance on The Conversion of Traditional Farm Buildings.
134	It would not be appropriate for United Utilities Water to comment on this aspect.
138	The principle of how to deal with replacement dwellings, conversions, residential extensions and alterations to buildings in the countryside should be firmly established within any development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
139	The preferred approach also needs to ensure that landscape, heritage and bio-diversity impacts are assessed.
140	This will encourage the re-use of buildings in the countryside where appropriate and with a suitable re-use.

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

Rep No	Q43 Supporting Info
I06	Area-based approach would suit best the protection of areas that need it, whilst allowing continuation of minimum standards in other areas.
I12	Care needs to be taken to ensure that extensions or alterations do not compromise safety or security, for example a flat roof extension offering accessibility to a previously inaccessible window creates an opportunity for crime. We would like to see designing out crime considerations included in this policy, incorporating the ability for the council, if it saw fit, to apply enforceable conditions based on the recommendations of the Police in relation to designing out crime.
I15	There needs to be some reflection on the need to change homes to meet lifelong needs. There is also a growing trend to house more than one generation in large houses – some consideration needs to be made as to the CBC view on this as it has other impacts.
I17	Gives certainty.
I25	Option 3 which draws attention to the particular requirements in conservation areas is supported. However it is important this should not lead to the application lower standards elsewhere.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The principle of how to deal with replacement dwellings, conversions, residential extensions and alterations to buildings within the boundaries should be firmly established within any development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
I39	No specific comments
I40	A criteria based policy will ensure that all issues are raised and considered in each case but that there is flexibility.

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

Rep No	Q45 Supporting Info
I06	This is the most flexible and can lead to some real gains in consultation with such as Parish Councils.
I16	Flexibility maybe better so that viability of contributions can be factored in.
I17	Clear policy as to when a s106 agreement applies. Improve best practice in delivering planning obligations.
I20	We welcome the inclusion of green infrastructure (GI) in this category and would want to see a planned strategic network of GI secured in the LDF. GI is recognised as a network of formal and informal green spaces and related environmental assets that can underpin the sustainability of a local neighbourhood, a whole town, county or region. It does this by providing a host of „ecosystem services“ (for example, biodiversity, sustainable urban drainage, and climate change mitigation and adaptation) and social benefits (recreation, health, etc). We wish to promote the work of the Natural Economy NW in demonstrating the economic value of GI. Their work can be followed on the web here http://www.natureconomynorthwest.co.uk/green+infrastructure.php .
I21	Guidance on securing planning obligations is provided by Circular 05/05. Within this context obligations should be addressed on a case by case basis as the nature, location, scale and impact of different developments will vary. A standard tariff approach could mean that funds are used for measures not directly related to the proposed development or with little connection to that development. This would not be in line with Government Guidance.
I26	The Agency is supportive of utilising planning obligations to seek contributions from developers for infrastructure improvements and is supportive of pooling contributions for strategic infrastructure. Further, where multiple development proposals may have a significant impact on the SRN, proportional investment may be require utilising a ringmaster approach. Further details regarding the Agency’s requirements and involvement in securing planning obligations can be found in Circular 02/2007 and should be fully considered when developing a policy for planning obligations
I30	Space Northwest considers that the Council should continue to seek to negotiate planning obligations on a case by case approach, recognising that this allows maximum flexibility to consider the unique characteristics of each application. However, to ensure more certainty, we would request that thresholds are provided in the Core Strategy or in an SPD in respect of affordable housing contributions, infrastructure, utilities, education, public realm, sports facilities and play areas and sustainability issues.
I32	A combination of options 1 and 2 would provide a structure to decide on a case by case basis, but would allow Copeland to collect contributions for strategic infrastructure schemes. The strategic infrastructure schemes could include setting up compensation habitat for large developments that have adverse effects on biodiversity, where the compensation offered by a number of developers can be pooled to have greater beneficial effects for biodiversity than fragmented areas of compensation habitat provided by individual developers.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A combination of both options should be pursued. Much will depend on how effective the current site by site basis for S106 contributions has been. There needs to be a clear policy which establishes that appropriate contributions will be sought for infrastructure provision (on and off site), but that flexibility could be used to accommodate changing circumstances and the unique characteristics of an application. It should be clearly expressed that a test will be applied for the appropriate use of planning obligations. A planning obligation must be: i) relevant to planning; ii) necessary to make the proposed development acceptable in planning terms; iii) directly related to the proposed development; iv) fairly and reasonable related in scale and kind to the proposed development ; and reasonable in all other aspects.

Rep No	Q45 Supporting Info
139	No specific comments
140	Standard charges in terms of open space payments, maintenance of SuDS etc would be useful to providing certainty for viability assessments. Obligations must be reasonably required to make the proposed development acceptable.

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

Rep No	Q46 Supporting Information
I13	We would suggest that the first option that we have selected: Utilities infrastructure or connections to existing infrastructure. Should be reworded to say 'Utilities infrastructure (including surface and foul drainage) or connections to existing drainage infrastructure (surface and foul) and flood defence assets'.
I20	We support the inclusion of nature conservation and wildlife, but would also wish to see landscape and townscape enhancements, green infrastructure, and community green spaces for informal recreation.
I25	It is important that developer contributions also cover matters relating to the historic environment in addition to the public realm.
I26	The Agency is supportive of seeking developer contributions for transport network improvements. As detailed above, the Agency's requirements and involvement in securing planning obligations can be found in Circular 02/2007.
I39	Potentially all could apply, and also green infrastructure improvements/provision

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

Rep No	Q47 Supporting Info
I06	The areas cited above need continued protection specifically targeted.
I11	Overhead power lines of 132 KV or more and nationally/regionally important pipelines are, in future, likely to fall within the remit of the Infrastructure Planning Commission. Decisions on these and other nationally significant infrastructure projects will be informed by National Policy Statements on which consultation is scheduled to commence later in the year.
I16	Would a restrictive policy impact on the aspirations of the Energy Coast and Nuclear new build?
I20	We would welcome continuation of the local plan approach with a distinctive policy to provide added value protection for locally important designations.
I25	Option 1 is supported but should also include the WHS and “in the vicinity of” should be replaced by “setting”.
I38	The resolution of electricity transmission will be needed to allow future development of renewable and low carbon energy developments (including nuclear new build and wind energy etc). The National Grid has undertaken a transmission options study which looks at the optimum power line routes and infrastructure necessary to export electricity generated from various sources into the high voltage national grid transmission system. There will be a need to have a clear and co-ordinated approach from all of Cumbria’s planning authorities with regard to power line routes. The local factors identified in the Local Plan policy should continue to be material factors in determining future grid infrastructure.
I40	A local policy is more effective.
I42	All small, medium and large scale infrastructure projects such as pipelines and electricity cables should be buried underground at all times.

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

Rep No	Q48 Supporting Info
106	All steps should be taken to protect community facilities.
115	Vital for wellbeing that older people sustain social networks or build new ones after bereavement – harder to do if village hall etc is closed down – leading to dangers of greater social isolation
126	The Agency considers that the protection of community facilities where there is demand for such facilities can help to maintain sustainable communities and reduce the need to travel. The Agency is therefore generally supportive of Options 1 and 2.
129	There should be an overarching policy to promote and protect your existing community facilities as without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community. This policy or other site specific policies should also allow for new development of community, cultural and leisure facilities as although a town may already have a theatre and is unlikely to need another there might well be a demand for an arts centre or other cultural activity.
134	It would not be appropriate for United Utilities Water to comment on this aspect.
138	A combination of both options should be pursued. It is important that opportunities are provided locally where possible so as to build sustainable communities, whilst ensuring that facilities that attract larger numbers of visitors are accessible by walking, cycling and public transport.
139	No specific comments
140	It would be unreasonable to protect all facilities regardless of size and viability as refusal to permit change of use does not guarantee active continuation of the use.

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

Rep No	Q49 Supporting Info
I05	Don't know
I06	Community land has a long term amenity value. Once lost it cannot be regained.
I29	The loss of an existing facility should be resisted unless it can be demonstrated that the facility is no longer needed or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community. A Needs and Impact Assessment for community and cultural provision, in particular theatre, should be undertaken before any decision is taken. The Trust requests that the document provides sufficient protection to ensure continued theatre use within the area, particularly where buildings for performance arts, may not be covered by listing or conservation area designations, or may be affected by proposals which come forward for development sites. This should include performing arts facilities that stand-alone, are part of other facilities, or are contained within educational or community buildings.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	If a facility becomes redundant then its reuse or redevelopment should not be permitted unless it can be demonstrated that the use is no longer viable and the site or building is not required by the community for a business or community use. The potential for the dual use of facilities should also be thoroughly considered.
I39	No specific comments
I40	They should be protected to ensure all options are explored before the community facility is lost.

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

Rep No	Q50 Supporting Info
I06	Bowling greens.
I09	Consult with local/national medical advisors and similar to bring about health related ideas. Endeavour to support ideas that are fun, exciting & beneficial to the physical & mental well being of the elderly
I15	Village halls for all types of indoor activities & groups. Transport connections to Copeland facilities (Baths, Sports Centre etc). Sufficient swimming to meet the criteria for children and those over 60. More Internet access. More cycleways + way-marked footpaths. Opportunities to use powered scooters safely
I27	The whole of the Borough is in much need of much more easily accessible leisure opportunities, meaning combating against the barriers of participation, e.g. travel, expense, & time. But the aging population ought to be of major importance as to improve a healthy lifestyle for all. We must provide the aging population with specific leisure opportunities in order to combat disease & improve quality of life. We could develop referral schemes from local GP's & involve local venues & facilities in order to promote a healthier lifestyle. We could also set up talk seminars to advice on healthy living, which would involve nutrition & physical activity. This can be seen as a social event in order to improve physical & mental well being.
I28	The whole of the Borough is in much need of much more easily accessible leisure opportunities, meaning combating against the barriers of participation, e.g. travel, expense, & time. But the aging population ought to be of major importance as to improve a healthy lifestyle for all. We must provide the aging population with specific leisure opportunities in order to combat disease & improve quality of life. We could develop referral schemes from local GP's & involve local venues & facilities in order to promote a healthier lifestyle. We could also set up talk seminars to advice on healthy living, which would involve nutrition & physical activity. This can be seen as a social event in order to improve physical & mental well being.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The provision of recreational and leisure facilities should be provide for all sectors of the community. Such facilities should be accessible and adaptable to the changing requirements of the community.
I39	No specific comments
I40	It may be more effective to provide community gardens/allotments than increasing toddler play provision so the space can be used by a number of community groups.
I42	Extra facilities for adult education.

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

Rep No	Q51 Supporting Info if Yes
I05	Improvement for younger people aged 8-14 at sports centre
I06	See 52.
I09	Continued improvement of the existing to support particularly areas with poor health and local need.
I15	Yes for more new facilities for all ages – see Q50
I17	Sport facilities.
I20	We do not wish to answer this question, but would want to seek guidance from evidence in the commissioned PPG17 study. Our aim would be to secure no net loss of green spaces, yet provide for the needs of the communities that these spaces serve. It is not sufficient to seek advice from solely adults in this matter and we would urge you to also liaise with children and young adults who may be the primary users of some spaces.
I22	All currently designated Local Centres to have funding priorities to ensure that local recreational/leisure facilities/swing parks etc. are encouraged, supported and maintained.
I27	Improve Existing as main thrust: It would be more favourable to make use of the existing facilities & venues and use the finance available to improve the quality of what is already available. Copeland already consists of wonderful surroundings and open spaces; the community just needs to know where to go. Some advertising or leaflets on local walks / outdoor pursuits could be an option. I am aware that advertising already takes place, but why are many of the residents within the Copeland area still not aware of what is available?
I28	Improve Existing as main thrust: It would be more favourable to make use of the existing facilities & venues and use the finance available to improve the quality of what is already available. Copeland already consists of wonderful surroundings and open spaces; the community just needs to know where to go. Some advertising or leaflets on local walks / outdoor pursuits could be an option. I am aware that advertising already takes place, but why are many of the residents within the Copeland area still not aware of what is available?
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The Council should support, through permissive planning policies, proposals and activities that protect, retain or enhance existing leisure/recreation/cultural facilities and open space provision or which lead to the provision of additional assets.
I39	Both options need to be considered and the best chosen on a site by site/case by case basis
I40	Priority should be given to the improvement of existing facilities.

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

Rep No	Q52 Supporting Info
I06	The natural environment with a maximum of human contribution should be used, rather than those items which should be supported by other means. A cycle track St. Bees to Whitehaven is an example of something that would give exercise, be a leisure facility, and be functional.
I11	The creation of new employment opportunities in the Borough will have a crucial role to play in fostering health and well-being. This is a significant omission from the range of options put forward under Q52.
I15	Improved layout of towns - see Q16
I20	We choose, options 1 more green spaces; 3 more safe car free routes for walking and cycling; 4 retain and increase the number of allotments ; and 6 to add better access to footpaths, countryside and the coast. There is increasing interest in how contact with the natural environment can improve health and wellbeing, with this policy contributing to seven of the Government's Public Service Agreements. Natural England believes that better health and wellbeing are two of the major social and economic benefits we can secure through good management of the natural environment in both rural and urban settings. Natural England's Natural Health Service manifesto calls for two actions. The first is to increase the number of households that are within five minutes" walk of an area of green space covering at least two hectares – the benchmark set by our Access to Natural Green Space Standard (ANGST). We will be working with local authorities and the NHS to achieve this goal and encouraging members of the public to measure their access to green space using our online ANGST questionnaire. You will find a link to this on our homepage when the campaign is launched. The manifesto's second aim is to make sure every GP or community nurse is eventually able to refer patients to an approved health walk or outdoor activity programme. To achieve this we want all primary care trusts and local authorities to set targets for the delivering these services.
I22	1) Provide pavements in rural areas. 2) Provide commuter rat-run free minor roads through settlements (e.g. In Asby, Lamplugh, Kirkland, Ennerdale Bridge, Beckermest, Haile, Wilton) and also across open fell roads (e.g. Cold Fell and Corney Fell).
I26	The Agency has no specific comment to make regarding opportunities to improve health, however supports Option 3's aim to provide safe, car free routes for cycling and walking.
I27	We need to look at what has been carried out in the past in Copeland and in other districts; we need to look at what has worked, what hasn't worked? & if some scheme has not worked we need to look at why it didn't work? But most importantly we need to get out into the community & ask residents what they would like to be available. A physical activity leader / coach could be employed with a goal of providing opportunities for the residents of Copeland to improve their health & well being. It is expected that Sport England could provide the funding for employment.)
I28	We need to look at what has been carried out in the past in Copeland and in other districts; we need to look at what has worked, what hasn't worked? & if some scheme has not worked we need to look at why it didn't work? But most importantly we need to get out into the community & ask residents what they would like to be available. A physical activity leader / coach could be employed with a goal of providing opportunities for the residents of Copeland to improve their health & well being. It is expected that Sport England could provide the funding for employment.)
I31	We would support a combination of all the measures identified – see policies DP2, DP5, L1, RT9 and EM3.
I32	Enhance the Green Infrastructure of the district. When enhancing urban design or public areas it is important to invest in and apply the principles of Green Infrastructure. Such investment provides benefits to culture, health, wellbeing, community cohesion and the natural environment. A strong green infrastructure benefits in-situ biodiversity but also provides environmental connectivity and helps with climate change adaptation and mitigation.

Rep No	Q52 Supporting Info
134	It would not be appropriate for United Utilities Water to comment on this aspect.
138	All of the above would effectively contribute to the quality of life and community development.
140	Quality of open space should be priority rather than amounts.

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

Rep No	Q53 Supporting Info
I06	Knowledge-based industries must be encouraged; these are within our control. We have seen the local decline of manufacturing industry and agriculture due to global economic factors outside our control. We can only change those things within our control.
I09	Tourism employment site/s including activity ventures and shopping facilities particularly but not exclusively for activity range of goods
I11	The LDF will need to provide a range of employment sites, both in terms of their size and the types of use for which they are best suited. We see this as primarily an issue for the Site Allocations DPD rather than the LDF Core Strategy. Key issues for the Core Strategy are the overall scale of employment land provision and the allocation of any strategic issues. PPS 12 defines these as those that are central to the achievement of the Strategy. Within Copeland, we suggest that consideration is given to the allocation of Westlakes Science and Technology Park, which is identified as a strategic regional site in the Regional Economic Strategy, as a strategic site within the LDF Core Strategy.
I15	More rural workshops/sites for local small-scale enterprises that could employ older people on part-time basis
I27	Tourism employment site/s including activity ventures and shopping facilities particularly but not exclusively for activity range of goods
I28	Tourism employment site/s including activity ventures and shopping facilities particularly but not exclusively for activity range of goods
I30	Space Northwest considers that the Leconfield Industrial Estate is an appropriate site which could accommodate higher value employment sectors, small businesses start-up premises and opportunities for existing firms to expand. The redevelopment of the Leconfield Industrial Estate is acknowledged in the existing Local Plan, which considered that there is a need to comprehensively redevelop the site. More recently, The West Cumbria Employment Land & Premises Study (2008) prepared by DTZ refers to the fact that at the Leconfield Industrial Estate there may be scope to meet demand more accurately by investing in redevelopment, reconfiguration and refurbishment.
I31	All of these may be needed – provision will need to be developed using a strong evidence base.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A range of employment land and market sectors is required. A key function of the saved JSP policy EM13 is to make sure that there is an adequate supply of land for a variety of employment uses and splits this requirement into market sectors. The definition of employment land sectors allows for flexibility in the provision of land to a range of business needs. Clear definitions of employment land will allow an assessment to be undertaken as to whether the Borough has the right type of employment in the right location. Evidence shows that in order to help significantly increase GVA in the county there will need to be readily available and attractive employment land provision, particularly in the business park/ science park sectors, in order to bring about transformational change.
I39	No specific comments
I40	Flexible space should be available / allocated.

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

Rep No	Q54 Supporting info
I05	Again support rural areas
I06	Would dispute that Whitehaven has the best transport links, or potential, as it is becoming more congested.
I07	Whilst The Coal Authority has no preference as to how development should be distributed across the Borough, it is likely that major development if focussed on the larger settlements would fall within the coalfield area. This will raise issues of mineral safeguarding which will need to be addressed through the site allocation process in order to avoid the unnecessary sterilisation of the coal resource. The presence of coal resources need not prevent any chosen development strategy as options such as the prior extraction of surface mineral resources, including coal, where economically viable and appropriate in planning terms, can be built into the site allocation process. The prior extraction of surface coal resources can also assist in removing future public safety hazards from land which is to be developed. Reason – To reflect the requirements of MPS1 in relation to preventing the unnecessary sterilisation of coal resources within the Borough of Copeland and to reflect the safeguarding principles set out in Policy CS14 of the Cumbria Minerals and Waste Core Strategy and Policy DC9 of the Cumbria Minerals and Waste Generic Development Control Policies DPD.
I09	Remove 'limited small scale' from my selection. If the employment market considers an 'elsewhere' can accommodate larger scale employment it must be actively encouraged.
I11	As noted above (Q 53), we see the allocation of employment sites as an issue for the Site Allocations DPD rather than the LDF Core Strategy. At this stage, however, we note that none of the options identified under question 54 would expressly support the retention of Whitehaven Commercial Park which is located to the east of Whitehaven, close to Moresby Parks. The site, which is owned by NWDA, is allocated for employment use in the adopted Copeland Local Plan. It is identified in the Council's Land and Premises Study as the 3rd largest employment site in West Cumbria. The Agency would therefore suggest an approach which directs employment uses to Whitehaven, other Key Service Centres and existing employment allocations (other than those that are no longer fit for purpose - see response to Q55), with other employment development permitted elsewhere provided that the scale and nature of development is appropriate to its location.
I26	Generally the Agency is supportive of the options which focus employment land provisions within Whitehaven and the other Key Service Centres where, as described, there is best access to external transport links. Until specific details regarding the location and scale of employment land provision and in particular strategic sites, are identified, the Agency is unable to provide any detailed assessment. However, the Agency would wish to be involved in assessing the impact of such proposals, which will need to be considered in terms of individual site impacts as well as cumulative impacts. It will be essential as part of the evidence base that the necessary measures are identified in order to mitigate any potential detrimental impacts and that the effectiveness and deliverability of such measures is demonstrated.
I27	Remove 'limited small scale' from my selection. If the employment market considers an 'elsewhere' can accommodate larger scale employment it must be seriously considered
I28	Remove 'limited small scale' from my selection. If the employment market considers an 'elsewhere' can accommodate larger scale employment it must be seriously considered

Rep No	Q54 Supporting info
I30	Space Northwest agrees with the approach that further employment growth should be supported within and on the edges of Whitehaven and the other Key Service Centres of Cleator Moor, Egremont and Millom, with limited small scale employment development permitted elsewhere. The Leconfield Industrial Estate, which is located approximately 0.6 km to the west of Cleator Moor town centre, is an existing and appropriate employment site, which could provide for further direct employment growth.
I31	The option chosen will need to be in line with RSS policy W3 Supply of Employment Land. We would stress the importance of a comprehensive review of commitments in line with the principles of W3, to inform the approach taken in the LDF.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The development of employment land should reflect the settlement hierarchy. A full assessment of all potential locations for employment use within the Borough will be required. Employment sites should be accessible by a choice of transport, and where possible utilise existing infrastructure, facilities and services. Measures should be included to ensure that there are no undesirable impacts on the environment. Regional and sub regional policy would suggest that strategic employment sites should be well located to Key Service Centres.
I39	No specific comments
I40	Large scale employment should be directed to Whitehaven where it has the greatest choice of achieving viability.

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

Rep No	Q55 Supporting info
I09	We are entering a time when the area is trying to increase its employment base. The Energy Coast document when successful will achieve such. We need all the existing sites. We must not use historic figures to allow a reduction of sites thereby reducing the availability and variety of employment site available within Copeland (don't chase employment away from Copeland)
I11	Where allocated employment sites are genuinely no longer fit for purpose, there would be merit in reallocating them for alternative uses (or a mix of uses incorporating employment elements). The case for reallocating existing employment sites should be informed by the findings of the Employment Land and Premises Study. With regard to the 'Call for Sites' exercise, the Agency does not wish to put forward any additional sites for consideration. Whitehaven commercial park, as discussed above, has been taken into consideration as part of the Council's Employment Land and Premises Study.
I21	Draft PPS4 makes reference to retail as a major employer generating use. Given the need for further retail within Copeland identified in the 'Spatial Portrait of the Borough' and the findings of the White Young Green, West Cumbria Retail Review, then consideration should be given to retail as an employment generating use, subject to it meeting other policy requirements.
I27	We are entering a time when the area is trying to increase its employment base. The Energy Coast document when successful will achieve such. We need all the existing sites. We must not use historic figures to allow a reduction of sites thereby reducing the availability and variety of employment site available within Copeland (don't chase employment away from Copeland)
I28	We are entering a time when the area is trying to increase its employment base. The Energy Coast document when successful will achieve such. We need all the existing sites. We must not use historic figures to allow a reduction of sites thereby reducing the availability and variety of employment site available within Copeland (don't chase employment away from Copeland)
I30	Space Northwest considers that surplus and vacant or underused employment sites that could be redeveloped for alternative uses should be de-allocated. Indeed, PPS3, PPG4 and PPS4 support the re-use of under used or vacant land for other beneficial purposes. Space Northwest has also submitted 'Call for Sites' representations seeking to allocate the Leconfield Industrial Estate as a mixed use site comprising retail, housing and employment in the emerging LDF. The site's allocation in the Copeland Local Plan [Policy EMP3 and supporting text at ¶ 5.2.17] refers to the fact that:- "The site has provided traditional 'industrial estate' accommodation for many years but there are now several vacant/underused units and the site exhibits a rather unkempt, neglect look. There is need for a comprehensive treatment to make the site an attractive proposition and the Council and owners consider that a range of job-creating commercial opportunities should be explored. Exploratory work will be carried out in partnership to establish cost-effective ways of ensuring that the estate is able to make an improved contribution to regeneration. A residential component could turn out to be part of an overall approach to investment in the site." Furthermore, The West Cumbria Employment Land & Premises Study (2008) prepared by DTZ refers to the fact that at the Leconfield Industrial Estate there may be scope to meet demand more accurately by investing in redevelopment, reconfiguration and refurbishment. Non-employment uses may be acceptable on part of the site in order to facilitate such investment. In the 'Call for Site's' representations, we have identified that the Leconfield Industrial Estate is appropriate for mixed uses. We have demonstrated that housing is appropriate on this site, there is a qualitative and quantitative need for a food store in the Cleator Moor area; and redevelopment of the employment use is necessary to facilitate regeneration and investment in the area.

Rep No	Q55 Supporting info
I31	Option 5 – the approach to deallocation should take place within the context of the comprehensive review of commitments referred to in W3, and in line with policy W4 – release of allocated employment land.
I32	If the site proposed for de-allocation is biodiverse brownfield, it should be allocated as part of the Green Infrastructure and ecosystem services within the district and allowed to maintain its biodiversity interest.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The Council should undertake a review of employment land alongside reviews of housing capacity. This review should include quantitative and qualitative assessments to inform the Borough's employment land portfolio. Saved JSP EM14 advises that sites, premises, allocation will be considered for non employment or mixed uses where it can be demonstrated that they are unsuitable for employment purposes or that they are not needed to meet the requirements of the overall employment land provision required.
I39	No specific comments
I40	A realistic approach should be taken to the re-use of employment land or adjoining settlements. Retention of sites does not ensure their use for employment. Following appropriate marketing, sites should be considered for other appropriate uses.

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

Rep No	Q56 Supporting Info if Yes
I30	The West Cumbria Employment Land & Premises Study (2008) prepared by DTZ refers to the fact that at the Leconfield Industrial Estate [REF C8] there may be scope to meet demand more accurately by investing in redevelopment, reconfiguration and refurbishment. Non-employment uses may be acceptable on part of the site in order to facilitate such investment. The reallocation of the site for mixed uses will provide a catalyst to improve the potential development of the site. A separate 'Call for Sites' form has been completed to cover this issue.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	In assessing whether a site or premises is unsuitable consideration will need to be given to the availability and quality of alternative sites or premises, the condition of the site or premises, service infrastructure capacity and the views of the economic development agencies for the area.

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

Rep No	Q57 Supporting Info
I06	Make them easy to employ people on.
I09	'Easy in & easy out' (where appropriate) letting conditions. Financial incentives for local, national, international company/s to attract uptake.
I12	The screening of sites can considerably compromise the security of premises, and their sustainability, by creating exactly the kind of environment that criminals like to operate in, for example penetrating a perimeter fence while completely concealed from view by dense foliage. Use of defensive planting and restricting the height of shrubs and the canopy of trees can offer suitable screening while maintaining natural surveillance. This needs to be acknowledged in the LDF to enable the council if it saw fit, to apply enforceable conditions based on the recommendations of the Police in relation to designing out crime.
I15	Better co-ordination of vacant property. Joining up of incentives for entrepreneurship amongst older people particularly those who retire to CBC early
I27	'Easy in & easy out' (where appropriate) letting conditions. Financial incentives to attract uptake.
I28	'Easy in & easy out' (where appropriate) letting conditions. Financial incentives to attract uptake.
I30	Space Northwest considers that the Council should seek to invest money in marketing strategies to help with the take-up of developed employment sites that are unviable at the present time.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	A combination of both options is required.
I39	No specific comments
I40	Improve accessibility to employment sites.
I43	Improve transport system road and rail.

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

Rep No	Q58 Supporting Info
I06	It will just turn into another industrial estate otherwise.
I11	The Agency designated Westlakes as a strategic regional site in 2001. It was subsequently identified as such in the 2003 and 2006 Regional Economic Strategies. The site presents the opportunity to build on and develop knowledge-based industry in West Cumbria in a high quality environment. The strategic regional site designation applies to both the existing Science and Technology Park and the proposed extension identified within the Copeland Local Plan. The Agency has recently undertaken a consultation exercise on a review of the strategic regional sites. The Agency proposes to retain Westlakes on the basis that it will: act as a flagship for research and inward investment; attract knowledge-based industry with a special emphasis on technology related to nuclear power and decommissioning; and, assist in the creation of a centre of excellence for the nuclear industry. The Agency would therefore strongly support Option 1, i.e. restricting employment to B1 and D1 uses that are research based.
I16	It may be worth mentioning the complementary roles for Westlakes Science and Technology Park and Lillyhall. WL to have high level research and business uses particularly relating to nuclear issues.
I31	Westlakes Science and Technology Park is one of the NWDA's Strategic Regional Sites, and as such is of regional significance. It is important therefore that any development supports the regional economic role of the site. The flexible approach suggested in option 2 could potentially prejudice the regional role and purpose of the site. Policy W2 deals with locations for regionally significant economic development.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The Cumbria Sub Regional Spatial Strategy advises that Westlakes Science and Technology park should be available for high value businesses, but that this should also include tertiary education facilities.
I39	No specific comments
I40	Where it will enable employment to come forward, a flexible approach should be adopted where it will not be to the detriment of existing businesses.

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

Rep No	Q59 Supporting Info
I05	This would save on car use and help young families etc.
I06	Why discourage it?
I09	The provision and improvement of communications in all forms allows persons to locate to the area as a 'lifestyle choice'. These home workers can (hopefully) bring about an increase in the 'entrepreneurship' lacking in the area at present. In turn this will increase the demand for improvement/s in services, e.g. health, education, recreation etc
I14	It is difficult telecommute with such a shocking broadband connection – see answers for 79 and 80
I15	Improved Broadband access and speeds will help Silver surfers too – some of whom may continue in work, working from Home
I26	The Agency is generally supportive of home working which can help to reduce the number of journeys undertaken by the private car.
I27	The provision and improvement of communications in all forms allows persons to locate to the area as a 'lifestyle choice'. These home workers can (hopefully) bring about an increase in the 'entrepreneurship' lacking in the area at present. In turn this will increase the demand for improvement/s in services, e.g. health, education, recreation etc
I28	The provision and improvement of communications in all forms allows persons to locate to the area as a 'lifestyle choice'. These home workers can (hopefully) bring about an increase in the 'entrepreneurship' lacking in the area at present. In turn this will increase the demand for improvement/s in services, e.g. health, education, recreation etc
I32	Working from home reduces the need to travel and therefore reduces carbon emissions and the number of cars on the road. It also allows employed working-age people to live in rural/more isolated communities where otherwise there would be population loss.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I35	Working from home allows more flexibility and is a sustainable option.
I39	No specific comments
I40	Working from home is a sustainable solution.

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

Rep No	Q60 Supporting Info
I09	Not a natural supporter of home food production for business use within residential areas
I15	This would help those who need to supplement income in later life
I16	A mixture of both
I17	Assess on an individual basis.
I22	1) Strengthen the mains power grid- make less prone to disconnection due to wind. 2) Improve/extend Broadband service to Key Service Centres and all Local Centres. 3) Improve mobile phone coverage in rural areas e.g. Ennerdale.
I27	Not a natural supporter of home food production for business use within residential areas
I28	Not a natural supporter of home food production for business use within residential areas
I38	The principle of working from home should be encouraged within any development principles established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
I39	No specific comments
I40	Policies should encourage flexibility of space. If in an area where there is a high evidenced need for home working then consideration should be given to the incorporation of technologies such as broadband.

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

Rep No	Q61 Supporting Info
I17	Needs sufficient flexibility.
I26	The Agency is generally supportive of Options 1 and 2, and considers that accessibility and the impact of any allocation on any allocation should be fully considered, as identified in the issues set out in paragraph 6.14.
I30	Space Northwest considers that a criteria based policy approach which covers all types of employment uses, and considers all the key development issues/impacts should be included. However, it should not be unduly restrictive and impact on the deliverability and viability of developments.
I34	It is important that surface water is not discharged to public sewer wherever possible and this could be a requirement.
I38	The principle of managing the potential impacts of employment uses should be established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
I39	No specific comments

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

Rep No	Q62 Supporting Info
I11	The Agency would support an approach which promotes a combination of Options 1 and 2, i.e., identify, where possible, opportunities for small-scale employment sites in villages and a policy which supports the conversion/re-use of existing buildings for employment uses in rural areas.
I25	An option which supports the sensitive re-use and conversion of existing buildings is supported.
I31	The options chosen will need to accord with Policy RDF2. It should be noted that RDF2 does promote more innovative and flexible solutions in the remoter rural areas. More generally, the approach to the rural economy should take on board Policy W1 by giving positive support to the sustainable diversification and development of the rural economy through the growth of existing businesses and the creation of new enterprise. In Cumbria, there is a particular need to both develop high value business activities and sustain traditional economic activities.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Policies should allow innovative and flexible solutions to be found to meet particular development needs which will support economic opportunity in rural areas.
I39	No specific comments
I40	Villages which could support employment should be identified.

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

Rep No	Q63 Supporting Info
I11	Option 1 (a criteria based policy to assess farm diversification proposals) would be consistent with national planning policy emerging in Draft PPS4.
I31	The options chosen will need to accord with Policy RDF2. It should be noted that RDF2 does promote more innovative and flexible solutions in the remoter rural areas. More generally, the approach to the rural economy should take on board Policy W1 by giving positive support to the sustainable diversification and development of the rural economy through the growth of existing businesses and the creation of new enterprise. In Cumbria, there is a particular need to both develop high value business activities and sustain traditional economic activities.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The principle of working farm diversification and related development should be established within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents.
I39	No specific comments
I40	Option 1 & 3 chosen. Combination of existing policies complimented with new criteria as relevant.

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

Rep No	Q64 Supporting Info
I06	This is the most cost-effective and least intrusive.
I09	Sites adjacent to existing is preferable but if sufficient land is not available for all proposed sites to be accommodated adjacent to existing then other sites must be considered, but only as a last resort.
I11	The Government's proposed nuclear new build programme could have very significant implications for economic development in both West Cumbria and the region as a whole. The consultation paper (paragraph 6.24) notes that three sites in Copeland have been nominated as potential sites for new nuclear power stations: Sellafield, nominated by NDA; Braystones, nominated by RWE npower; and Kirksanton, also nominated by RWE npower. All of the UK site nominations are currently being assessed by the Office for Nuclear Development within the Department for Business Innovation and Skills. Sites that are considered potentially suitable for the deployment of new nuclear power stations by 2025 will be identified as part of the forthcoming draft National Policy Statement (NPS) on nuclear power. Consultations on the Draft NPSs are scheduled to take place in Autumn/Winter 2009. Of the Options put forward in the consultation paper, Option 2 appears to most closely reflect the ongoing nominations process.
I13	Please see attached appendices A and B.
I16	Nuclear power plants are consistent with the aspirations contained in the Energy Coast Masterplan. The role and impact of a new nuclear plant, particularly in terms of infrastructure,
I27	Sites adjacent to existing is preferable but if sufficient land is not available for all proposed sites to be accommodated adjacent to existing then other sites must be allowed
I28	Sites adjacent to existing is preferable but if sufficient land is not available for all proposed sites to be accommodated adjacent to existing then other sites must be allowed
I32	The proposed nuclear sites at Braystones and Kirksanton have the potential to be extremely damaging to biodiversity due to their proximity to internationally protected sites and species, and also due to the amount of work that will need to be done to raise them above potential flood risk zones.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I36	We dispute the statement made under para 6.24 'What you have told us: - Pursue development of Nuclear repository / Nuclear New Build'. We question that there is any evidence for this assertion, and believe that the statement is likely to seriously mislead respondents. In the absence of a comprehensive plan for existing waste, it is irresponsible to decide to create facilities that will produce more waste. No such plan yet exists, and indeed plans are still at the consultation stage. Moreover, no design for a Nuclear repository along the lines proposed in the Government's June 2008 White Paper is yet operational anywhere in the world. There is new evidence from a nation-wide German study (known as the Kikk study) of hitherto underestimated adverse health effects on children (increased cancers) who lived near all its nuclear power plants. This is why the Germans are no longer building any new plants. It is also why German companies are seeking to build plants elsewhere, e.g. in Copeland, where people are ignorant of these findings. The Council needs to understand that it will put the health of families at risk in the area if new nuclear power plants are built. FoE is very willing to arrange to brief the Council on these matters.

Rep No	Q64 Supporting Info
I38	Cumbria County Council, at their cabinet meeting 3 February 2009, gave support to the nomination of NDA land to the north west of Sellafield site for a new nuclear build. Any support that the cabinet gave to the nomination of the Sellafield site does not prejudice either the County Council or its officers (or other councils and their officers) in considering the merits of any specific new build development at Sellafield or associated power line upgrade requirements. Specific developments would require environmental assessments and sustainability appraisal. The new Planning Act will transfer determinative capacity from local planning authorities to the new Infrastructure Planning Commission who will be guided by policy set out in National Policy Statements. This applies to both nuclear new build and the grid transmissions system. Current County Council policy support for new nuclear build is subject to both assurance about safety and progress with the implementation of national policy for higher activity legacy wastes. Any specific development will be subject, as now, to a regulatory control regime. The Health and Safety Executive is already undertaking a 'generic design assessment' of reactors that could be deployed in the UK to ensure they meet generic safety requirements.
I39	No specific comments
I40	Sites should be considered to ensure that Copeland remains at the forefront of the nuclear industry.
I42	Due to extreme power loss through cables over a long distance power generation should be sited near to high population areas where most of the power is consumed. Power plants can then also provide district heating schemes as two thirds of energy used is lost through cooling plant.

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

Rep No	Q65 Supporting Info
I06	We do this already. It is unlikely to go elsewhere. We have the track record and expertise, also the community has founded the UK nuclear industry, and understands it.
I09	Benefits package should be agreed with payments made during full lifetime and clear up of the site/s. Consideration of suitable bond payment covered by guarantee against company ceasing to trade
I13	The Environment Agency will independently regulate the disposal of radioactive waste into such a facility in England and Wales. We will examine all proposals with an open mind. We will also engage with local communities, as they wish, to provide expert input top them regarding the siting of such a facility. We wish to point out that the second and third options are not tenable with respect to the progressive nature of safety case development for such facilities over the extend time period required. These options may raise unrealistic expectations.
I14	We support the CALC position on this issue
I16	As agreed by both Councils the initial assessment of sites would include Allerdale and would not be confined to Copeland in the event the geology in Copeland proves unsuitable.
I27	Benefits package should be agreed with payments made during lifetime and clear up of the site/s. Consideration of suitable bond payment covered by guarantee against company ceasing to trade
I28	Benefits package should be agreed with payments made during lifetime and clear up of the site/s. Consideration of suitable bond payment covered by guarantee against company ceasing to trade
I32	Community benefits in this case should also include benefits for biodiversity.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I36	We dispute the statement made under para 6.28: 'What you have told us - Pursue development of Nuclear repository / Nuclear New Build'. As with other similar statements in the consultation document, no evidence is supplied for this assertion. WC & NL FoE have found a considerable amount of disquiet about the proposal for a repository, and have submitted a petition expressing this to Cumbria County Council & Copeland Borough Council of nearly 1000 signatures (i.e. 'you') gained in the space of about 6 weeks from local people and visitors to the area. We know of no similar exercise that has been undertaken in Copeland, only a decision of the Council (i.e. 'us') to make a 'without commitment expression of interest' to DEFRA on 3rd July 2008. We question the validity of a consultation document that makes such a statement. It is liable to give respondents the impression that they are part of a 'you' that holds this view, and that only a minority does not hold this view. The statement in para. 6.27 is also misleading. The BGS screening programme is meant to screen sites out, not in. We are also concerned about the framing of the question that brings the two projects of 'nuclear repository' and 'nuclear new build' together. It must be made clear that any successful nuclear repository project would not accommodate waste from nuclear new build. Therefore new build would require additional facilities not yet even in a consultation stage. Finally, we question the way that the options are framed, since the Council well knows that they beg a huge number of questions.

Rep No	Q65 Supporting Info
	<p>The very idea that Copeland is best placed to host all the country's high level radioactive waste is highly contentious, and one over which no-one has the information to take a view. For example, there are problems posed by the high-level waste (especially waste in liquid form) that is already being kept at Sellafield; there are plans in the UK for the development of high burn-up reactors which would add to the difficulties and length of time for which high – level heat generating waste must be stored; and there are no repository designs for such waste anywhere in the world that are operational. There are several flaws in the Government's 2008 (June 2008) White Paper on Radioactive Waste Management of which 3 are rehearsed here: Firstly, it relies on two central elements – partnership with host 'communities' and the operation of the regulatory bodies in such a way that that there is no independent scrutiny of the arguments being put forward. This could lead to a situation where issues for which the regulators have no remit are decided upon through the partnership element which does not have the benefit of full scientific & technical scrutiny. Secondly, the process outlined by the government may lead to a situation where only one 'community' volunteers. So far this is the case, with West Cumbria the only volunteer. This means that even if the scientific rationale could be proven under this process, any scenario where no suitable place exists in West Cumbria will either slow down the whole process, or even worse, will result in a highly unsatisfactory outcome of having a repository imposed in an unsuitable place. Thirdly, it pays no attention to the way that waste is treated, handled and packaged. Much of the waste, it is assumed, will be contained in concrete drums. The potential for emission of radionuclides from within such a system to the environment has been analysed and forecasted mainly according to solubility and water flows, to the relative neglect of gas emissions. Thus the criteria within the BGS programme refer to geology and hydrogeology only. Recent work by the NDA shows that there are contradictory requirements for handling gas emissions according to the behaviour of different gases (bulk hydrogen or radioactive methane) where containment and venting are needed at the same time. Obviously these polar opposite requirements cannot be achieved simultaneously.</p>
I38	<p>It is understood that progress is being made with the implementation of government policy to site a deep geological disposal facility for higher level radioactive wastes. The County Council have engaged with this process. Assurances about nuclear safety and the availability of a waste disposal route are key issues for new nuclear development generally.</p>
I39	<p>No specific comments</p>
I40	<p>The borough must ensure that it gets sufficient community payback.</p>
I42	<p>No nuclear repository to be sited in Copeland or Allerdale.</p>

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

Rep No	Q66 Supporting Info
I12	We note that the Retail study found that security and crime were found to be key concerns, particularly in Cleator Moor. We would suggest this is supporting evidence for the issue of designing out crime to be an integral part of the LDF.
I15	Encourage local trade organisations and provide officer support for them to develop the local market
I16	The west Cumbria retail study highlighted the complementary roles of Whitehaven and Workington. This could be reflected in the policy
I21	Whilst enhancing retail in the main town centre and key service centres is important, so too is meeting peoples everyday needs at local level if sustainable patterns are to be achieved. Therefore, there should be less prescription and applications should be accepted where there is demonstrable need and where they are in accordance with relevant policy. Should PPS4 come forward in its current form then the impact test and sequential approach become important for development outside existing centres.
I25	The development of tailored strategies as in option 1 is supported.
I26	The Agency is generally supportive of the approach identified for the provision of services and facilities in key service centres, where the scale of development is commensurate with the locality and identified need, and particularly where it would provide a reduction in the need to travel by car.
I29	Planning policies should aim to recognise the key role played by leisure and cultural facilities in contributing towards creating vital and vibrant town centres. This question concerns the vitality of the Borough's town centres. The Council's aim should be to ensure that there is a dynamic and healthy retail economy (in Whitehaven) and that its other district centres are the focus for a range of appropriate services. The document should recognise the contribution which other (non-retail) main town centre uses make to vital and viable centres, and we suggest that positive strategies are proposed to promote commercial leisure and other main town centre uses within existing centres.
I30	Space Northwest considers that the LDF must seek to ensure that there is sufficient floorspace to meet the needs of the Borough over the plan period. Although Government policy in PPS6 and Draft PPS4 maintains the primacy of a town centre, there is no embargo on out-of-centre retailing and the Council should consider out-of-centre sites which are complementary to the existing offer and meet the existing quantitative and qualitative need identified in the West Cumbria Retail Study. Ignoring the need to facilitate an allocation within the emerging LDF will open the way for speculative application-led development. There is a quantitative need for additional convenience shopping provision in Copeland. The West Cumbria Retail Study (2009) forecasts that convenience goods capacity within the Borough as a whole comprises some £33m in 2015, rising to £43m by 2019 and £53m by 2023. There is a qualitative need to improve food shopping provision in the Cleator Moor area. The closest supermarket is the Co-op food store and Nisa Store at Leconfield Street, opposite the site. Further convenience retailing is found within Cleator Moor town centre at the Spar and Paul's Food & Wine supermarket, approximately 0.45 miles and 0.92 miles from the site respectively. Convenience retailing within the Borough is dominated by the out of centre Morrison's store, Flatt Walks (2.7 miles from the site) and Tesco, Northshore (3.3 miles from the site). Given the fact that local residents in Cleator Moor are having to travel to Morrison's and Tesco at Whitehaven the provision of a food store at the Leconfield Industrial Estate will meet the need for the area and retain shoppers in Cleator Moor.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.

Rep No	Q66 Supporting Info
I37	Sainsbury's consider that centres should provide the local population with access to shops, services and facilities. Each centre should provide a choice and range of convenience and comparison goods. The size and scale of the centre should reflect the population which it supports, in order to continue to support economic growth. In this regard, Sainsbury's support Option 1 which advocates developing tailored strategies in the LDF for each proposed Key Service Centre, and Option 2 which seeks to review the future role of the smaller Key Service Centres where the retail/service function is shrinking, and may need further development to make a more sustainable pattern of development, whilst focusing larger scale new retail activity within Whitehaven.
I38	Measures which secure or promote the sustainability of communities and the vitality and viability of town centres and which create safer and more attractive environments should be supported. In particular development of land use change should: 1) support the role of the town centre and meet the needs of its catchment area, 2) provide an appropriate scale of development 3) support a mix of uses. 4) Enable the consolidation or regeneration of centres in cases where the centre has a declining role
I39	No specific comments
I40	It is realistic to accept that the retail function of Key Service Centres is likely to diminish and therefore it is acceptable to plan accordingly to minimise empty retail space.

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

Whitehaven

Rep No	Q67 - A Whitehaven Supporting Info
I09	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I15	More traffic free central space + better access on foot to Harbour + better access to buses & connection to trains and hospital. More accessible toilets [?Electric mini-bus shuttle services as "Energy Coast Green scheme?"]
I25	Such a question may be premature until conservation area appraisals have been carried out. The appraisals will help to identify issues and problems in the conservation area and help in the development of solutions. It is not clear how the particular improvements have been arrived at.
I26	The Agency considers the Key Service Centres would benefit from improved access to public transport.
I27	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I28	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I41	Other - High quality planting - trees and support for baskets.
I43	Adequate car parking should be provided as all Key Service Centres. Disabled parking in particular.

Cleator Moor

Rep No	Q67B - Cleator Moor Supporting Info
I09	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I25	Such a question may be premature until conservation area appraisals have been carried out. The appraisals will help to identify issues and problems in the conservation area and help in the development of solutions. It is not clear how the particular improvements have been arrived at.
I26	The Agency considers the Key Service Centres would benefit from improved access to public transport.
I27	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I28	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I41	Other - High quality planting - trees and support for baskets.
I43	Adequate car parking should be provided as all Key Service Centres. Disabled parking in particular.

Egremont

Rep No	Q67C - Egremont Supporting Info
I09	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I25	Such a question may be premature until conservation area appraisals have been carried out. The appraisals will help to identify issues and problems in the conservation area and help in the development of solutions. It is not clear how the particular improvements have been arrived at.
I26	The Agency considers the Key Service Centres would benefit from improved access to public transport.
I27	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I28	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I41	Other - High quality planting - trees and support for baskets.
I43	Adequate car parking should be provided as all Key Service Centres. Disabled parking in particular.

Millom

Rep No	Q67D - Millom Supporting Info
I09	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I25	Such a question may be premature until conservation area appraisals have been carried out. The appraisals will help to identify issues and problems in the conservation area and help in the development of solutions. It is not clear how the particular improvements have been arrived at.
I26	The Agency considers the Key Service Centres would benefit from improved access to public transport.
I27	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I28	Each community needs to retain and improve its own identity. Our local aspirations for better education and increased expectations of health, identity, employment etc are enhanced by a vibrant attractive community to live within
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I41	Other - High quality planting - trees and support for baskets.
I43	Adequate car parking should be provided as all Key Service Centres. Disabled parking in particular.

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

Rep No	Q68 Supporting Info
I07	It is likely that major re-development and regeneration in Whitehaven will raise issues of needing to address mineral legacy issues, which need not prevent development taking place providing adequate and appropriate remediation measures are undertaken. Reason – To reflect the requirements of PPG14 in relation to dealing with ground stability issues. The Coal Authority welcomes the opportunity to make these early comments, we are of course willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of its concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.
I09	N.B. future avoidance of such as fast food outlets and funeral parlours on major entrance/s would assist. A development strategy must be brought about to avoid such occurring in the future
I22	New developments do not appear to have complemented or blended with the historic architecture and layout of Whitehaven. This must be improved!
I25	Paragraph 6.41 refers to the recent preparation of conservation area appraisals and management plans for Whitehaven. Question 68 relates to a 2006 report. There is no information how they relate to one another in respect to the suggested revitalisation actions. It could be considered wrong to seek to prioritise the actions listed in Question 68 since a multiplicity of actions will be required to take Whitehaven forward to 2027. Which takes me back to the Vision and Strategic Objectives and the need to reflect the Borough's most important town in this part of the Core Strategy.
I26	The Agency considers that improving the integration and prestige of public transport services in the town centre should be identified
I27	N.B. future avoidance of such as fast food outlets and funeral parlours on major entrance/s would assist. A development strategy must be brought about to avoid such occurring in the future
I28	N.B. future avoidance of such as fast food outlets and funeral parlours on major entrance/s would assist. A development strategy must be brought about to avoid such occurring in the future
I29	It is important that town centres should not become 'dead' when the shops and offices close for the night. Evening and night-time activities are a fundamental part of the urban renaissance because they ensure the vitality of an area beyond normal working hours. A balance needs to be found between the main function of Whitehaven as the Borough's main shopping and employment destination, the available amenities for the residential population and the opportunities for people to enjoy an evening out. All the points listed are relevant and equally important.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I40	Whitehaven's best asset is the harbour. The relationship between the town centre and harbour should be strengthened as a Council priority.
I43	Unless adequate <u>car parking</u> is provided people will go where there is whatever plan of revitalisation is chosen!

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

Rep No	Q69 If 2 Supporting Info
I15	Whitehaven is a huge missed opportunity. It greaves us on a daily basis that so little is made of the harbour make over and any opportunity to support activity is so unwelcomed.
I21	The option chosen encourages investment in 'Gateway' sites but also allows for other brownfield land to be regenerated in line with national guidance.
I25	The sensitive planning for the future of the sites listed in paragraph 6.42 will be important for the conservation and enhancement of the conservation areas. Where the condition of these sites detracts from the character and appearance of the conservation areas finding an appropriate solution should be a priority.
I26	The Agency generally considers that the Council should concentrate on facilitating the development of sustainable sites with good access to sustainable modes of travel.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I40	However, these sites tend to be apartment led and may not best suit the housing needs of the area therefore the protection of these sites should not prejudice sites coming forward which facilitate family housing.

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

Rep No	Q70 Supporting Info
I21	Our approach would be to support Option 3 above but excluding reference to the Broadway Malyan study. This was not a study prepared under planning regulations and it has no formal planning status. Consequently, to rely upon it in the way suggested without final public consultation would not in our opinion be appropriate. In the current recession and given the need to see investment, flexible approach should be adopted.
I25	The site development guides mentioned in option 3 are not described in this document. In terms of land use flexibility may be appropriate but it will be important to consider what alternative uses mean for the form of development and its appropriateness to the particular context.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I39	N/A
I40	Flexibility should be allowed in order to not discount any potentially beneficial uses.
I42	N/A

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

Rep No	Q71 Supporting Info
I09	Prescriptive limits should not include residential use on upper floors of town centre shops
I15	This surely is linked to decision making on what CBC want Whitehaven to be. And be clear about this and support the implementation. Other small towns in Britain do this well.
I27	Prescriptive limits should not include residential use on upper floors of town centre shops
I28	Prescriptive limits should not include residential use on upper floors of town centre shops
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Primary retail frontages are important to support the shopping function of key service centres and can prevent the shopping area becoming fragmented. In identifying primary retail functions account should be taken of the types of uses within a specific length of shop fronts, the type of outlets they contain, the number of national stores and pedestrian foot flows.
I39	No specific comments
I40	Criteria based policies will be more adaptable and stand greater chance of achieving appropriate solutions.

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

Rep No	Q72 Supporting Info
I06	Uncontrolled, this can be a major detraction from the prestige of the town, and licensing laws are not adequate to deal with these. Can lead to degradation of the quality of life in the town centre, and thereby inner-town decay.
I09	Night time entertainment is needed for the economy of a town. Policies should be considered to separate entertainment from residential (difficult). Policing and clean up of debris cost should be reflected in charges to relevant business users.
I12	The night time economy must be a safe place for all who use it and we therefore suggest it is essential that Police (Crime Prevention Officers) advice is sought at the earliest possible stage in the planning process, and that the council has the ability if it sees fit to apply enforceable conditions based on the recommendations of the Police in relation to designing out crime and disorder. This should also include adequate provision for CCTV coverage. Due consideration should also take account of serious issues where there is conflict between planning decisions and licensing committee decisions. This could be achieved by introduction of a close working relationship between planning and licensing. The Council should also look seriously at enforcement where there are clear breaches of planning regulations.
I27	Night time entertainment is needed for the economy of a town. Policies should be considered to separate entertainment from residential (difficult). Policing and clean up of debris cost should be reflected in charges to relevant business users.
I28	Night time entertainment is needed for the economy of a town. Policies should be considered to separate entertainment from residential (difficult). Policing and clean up of debris cost should be reflected in charges to relevant business users.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I39	No specific comments
I40	Given the potential amenity issues, there is more reason for night time economy policies to be more prescriptive.

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

Rep No	Q73 Supporting Info
I06	We really need some focus on this in Copeland. There has been no cogent policy to date and little involvement of communities. (St. Bees PC is never consulted on tourism policy or issues)
I08	Cumbria Tourism would suggest that Options 1 and 3 are not mutually exclusive and should, in fact, be pursued in tandem and be guided by the location specific recommendations set out in the Cumbria West Coast Tourism Study. In relation to the Issue of Large-scale Service Infrastructure, i.e. siting of overhead power lines, large regionally or nationally important pipelines and associated installations, the restriction of same within or closely adjoining Proposed Tourism Opportunity Sites.
I09	My response is to support TOA (TOS) as defined in the Local Plan, but the additional caveats to that option failed to include the Ennerdale via Cleator to Egremont TOS and Ehenside site – both of which are under consideration for tourism development. The Ehen Valley area if given the correct emphasis could compete (almost) with the presently considered St Bees valley scheme and facilities at Whinlatter/ Grizedale.
I11	Both questions 73 and 74 relate to the Council's approach to tourism development and, to some degree, the two questions appear to overlap. For example, under Question 74, Option 3 proposes an area-based approach, as do Options 2 and 3 under Question 73. Whilst the Agency would not be averse to an approach which actively encourages different types of tourism development within certain areas, we would not wish to see sustainable tourism developments discouraged from rural areas as this would be at odds with emerging policy as set out in Draft PPS4.
I20	We agree that the tourism industry needs to recognise that its development must be sustainable and not cause harm to the environmental assets that are the main attractions for visitors. We would also support joint working between Copeland and the Lake District National Park Authority in order to facilitate types of tourism development that would be inappropriate in the National Park. We support a strategic planned approach through option 3. Any policy direction must be locally distinctive and this option is beginning that local focus through the specific areas listed.
I26	The scale and location of development is unlikely to be of particular concern to the Agency, however, the Agency would generally wish to see such development promoted in sustainable and accessible locations where there are a variety of sustainable transport options and where the need to travel by the private car is minimised.
I27	My response is to support TOA (TOS) as defined in the Local Plan but the additional caveats to that option failed to include the Ennerdale via Cleator to Egremont TOS. This area if given the correct emphasis could compete (almost) with the presently considered St Bees valley scheme
I28	My response is to support TOA (TOS) as defined in the Local Plan but the additional caveats to that option failed to include the Ennerdale via Cleator to Egremont TOS. This area if given the correct emphasis could compete (almost) with the presently considered St Bees valley scheme
I31	Any combination of approaches should be acceptable as long as they conform to RSS policies, in particular W6 and W7 which deal with tourism, and are supported by the evidence base. However Options 2 and 3 do seem to provide a more positive strategic approach than option 1.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	New tourism facilities should be developed in a sustainable manner and not prejudice Cumbria's distinctive environmental, cultural and historic character and visitors' enjoyment and understanding of it. The emphasis should be on sustaining these attributes and adding quality.
I40	Tourism changes rapidly therefore assessments of proposals are appropriate.

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

Rep No	Q74 Supporting Info
I06	As 74
I08	Cumbria Tourism would prefer Options 1 & 3 to be operated in tandem, as suggested above.
I11	See answer to question 73.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	New tourism development should be directed to key service centres and to locations that enable the economic and physical regeneration of an area, where they bring benefit to the local community. Tourism development should broaden the role and attractiveness of each centre. In rural areas tourism uses should aim to assist in the diversification of existing businesses and encourage rural regeneration. It is an important role for the LDF to identify opportunity sites for economic, leisure and tourist development
I39	An area based approach is needed to ensure appropriate sensitivity to different surroundings especially having regard to designations such as the Heritage Coast and heritage buildings/sites and their settings, and the Undeveloped Coast.

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

Rep No	Q75 Supporting Info
I06	Whitehaven has long lacked a good waterfront/central hotel.
I08	Cumbria Tourism believes that Quality is a cross-cutting issue and one which should be applied equally to all tourism accommodation. This approach would suggest that Options 1 & 2 should be pursued, so that all new serviced accommodation in Whitehaven and elsewhere, achieves a high standard of design and that proposed redevelopment or extensions to existing, or new serviced accommodation are built to the highest quality throughout the Borough. In relation to designation of sites for tourism development, Cumbria Tourism would again stress the importance of the location specific recommendations set out in the Cumbria West Coast Tourism Study. Of particular relevance are recommendations for Silloth, Maryport, Whitehaven, Ravenglass and Muncaster and Millom and Haverigg where there is actual or potential market demand or developer interest. For example, we are aware of developer interest at Poolside, Port Haverigg for tourism development incorporating, caravan park and boat storage/self catering development which we would support and where the market is currently strong. [Source; Caravan & Camping (Touring) Occupancy Rates for Cumbria; Demand for caravan and camping remains strong. In Cumbria 27% of visitors choose camping/caravanning as their preferred accommodation choice (including static caravans). This compares to 12% of visitors to England. (Cumbria Tourism Visitor Survey 2006; Visit Britain United Kingdom Tourism Survey 2007)].
I09	Option one above with the inclusion of 'and other locations' following the name 'Whitehaven'. A variety of good quality is required 'as is the variety of attractive locations'
I16	A mixture of both
I27	Option one above with the inclusion of 'and other locations' following the name 'Whitehaven'
I28	Option one above with the inclusion of 'and other locations' following the name 'Whitehaven'
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The principle of supporting improvements to the quality of tourism accommodation in the Borough should be included within the Core Strategy. Further detail of how this could be achieved should be included within appropriate development plan documents or supplementary planning documents
I39	No specific comments
I42	None of the above.

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

Rep No	Q76 Supporting Info
I06	Rail usage has increased 15% between 07 and 08, and the lack of a modal interchange at Whitehaven inhibits further growth. The general decrepitude of the Bransty Station area belies what is essentially a good service, and discourages users. The town is dominated by the motor car, and better use should be made of the rail link. Further south the line now supports 20 passenger trains a day with faster journey times south and general awareness and promotion of this should be encouraged.
I11	Paragraph 7.4 identifies a number of key transport issues facing the Borough. Several of these are simply factual statements. The only comment we would make in respect of the issues is that we welcome bullet point 7's recognition of the need to increase the economic competitiveness of the Borough.
I14	We note that there is a large, vacant building close to the station that would appear to be suitable for use as a bus station. With appropriate strategic town planning this could be part of the proposed "transport hub". You limit the aspiration of a dual carriageway to a small section through the borough. There is a requirement for this to be joined up further – to junction 40 on the M6 and road improvements to the South of the Borough and on to Barrow. At a minimum, the entire route should be passable by two HGV vehicles travelling in opposite directions at the same time and there should be safe passing points.
I15	Question posed in wrong order??
I16	Poor public transport between towns especially for work and education. Links to M6 and main coast railway. Poor air links
I20	We consider that transport policies should provide a sustainable transport system that provides adequately and efficiently for people's everyday needs including leisure trips. Natural England seeks to ensure that transport delivers positive outcomes for the natural environment and people's enjoyment of it. We want to see an environmentally sustainable transport system – one that protects and enhances the natural environment as well as delivering economic and social benefits. We consider that transport policy should concentrate on improving its negative impacts on the natural environment, and tapping its great potential for a positive contribution to green infrastructure, reconnecting habitats, and landscape character. Transport also has a significant role in providing the sustainable links to green space that can enhance people's enjoyment of the natural environment.
I25	The key transport issues set out in paragraph 7.4 include the minimisation of potential adverse environmental impacts. The starting point should be the avoidance of such adverse impacts.
I26	The Agency generally agrees with the key transport issues identified in paragraph 7.4, however feels that a modal shift from the private car to more sustainable means of transport should be identified. The Agency would firstly wish to see mechanisms introduced that seek to reduce the need to travel, particularly by private car. Subsequently the Agency would wish that efforts are made to maximise the level of sustainable accessibility to sites, particularly by public transport. Only as a last resort would the Agency seek physical improvements to the network and when so, the Agency would look at demand management measures prior to any consideration of providing additional capacity.
I38	The current feasibility work to evaluate town centre accessibility should be supported in the LDF. Potential exists to further improve movement and the environment for all town centre users.
I39	It is not considered that the case is made that strategic communication routes must be improved.
I43	The key transport issue is to improve the A595 to the south this road runs through the heart of Copeland and in places it is a mere cart track, this <u>MUST</u> be improved.

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

Rep No	Q77 Supporting Info
I06	(Comment for Explore feasibility of an airfield in West Cumbria and links to Carlisle airport - ranked as 6 - but in reality a much lower priority and has little benefit with the faster train times. The areas cannot afford to lose its rail link, which will continue to increase in importance as fossil fuels rise. This should be considered in the light of Energy Cost and low carbon aspirations. The local airfield idea would neither have utility, be cost-effective, or competitive given that it is 3¼ hour journey time Carlisle – Euston. It should not be pursued with any public money.
I14	At the public enquiry into the A595 Distington Bypass, the Highways inspector acknowledged that the road increased the problems of access onto the A595 for the parishioners of Moresby (and Lowca and Parton). He instructed the Highways Agency, and the County Council to solve work together to solve the problem, which they have so far failed to do. This improvement is non-negotiable. It is difficult to see the “Energy Coast” or any other initiative to revitalise West Cumbria being successful without a better road access to the Motorway network. The strategic document describes the link as being 40 miles (from Millom or Whitehaven). This statement does not do the poor quality of the road justice. Under even moderate traffic conditions, this can easily result in a journey time in excess of one hour to cover the distance, and that excludes the occasions where there are road traffic accidents or road works slowing down traffic further. It is difficult to see the “Energy coast” or any other initiative to revitalise West Cumbria being successful without a better access to the national railway network from west Cumbria for both passengers and freight. It is not clear what benefit there will be to improve links to Carlisle airport as to our knowledge, there are no regular passenger flights from Carlisle.
I16	Poor transport infrastructure is a key issue across West Cumbria. The Core Strategy should acknowledge the need to address cross boundary issues and work in partnership with adjoining authorities to find solutions.
I22	Much damage is being done to the life, livelihood and livestock of rural communities by commuter vehicles driving too fast, too careless and too frequently on minor and fell roads in order to avoid delays on inappropriate 'A' class roads (e.g. A595 and A5086). Tourism is also being damaged - driven away by this selfishness.
I25	Transport improvements should be predicated on the need to minimise the need to travel and reduce climate change effects. Walking, cycling and public transport should therefore be prioritised.
I26	The Agency is supportive of investment in improving public transport and routes for sustainable means of transport. As identified above, the Agency would seek physical improvements to the network as a last resort and when so, the Agency would look at demand management measures prior to any consideration of providing additional capacity.
I27	My selection No 2 regarding airfield link should include ‘and Manchester, Glasgow & Newcastle’. We should encourage/attract private nuclear developers & others to fund a small regional airport hub that would accommodate mid/small fixed wing & rotary crafts
I28	My selection No 2 regarding airfield link should include ‘and Manchester, Glasgow & Newcastle’. We should encourage/attract private nuclear developers & others to fund a small regional airport hub that would accommodate mid/small fixed wing & rotary crafts
I31	We would stress the importance of infrastructure proposals being made within an integrated, strategic approach to transport networks, as promoted by policy RT1. Any proposals identified in the LDF should be supported by evidence of deliverability.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Improving public transport services in Copeland and delivering the new interchange in Whitehaven is a priority in the Local Transport Plan.

Rep No	Q77 Supporting Info
I40	Whilst walking and cycling facilities should be improved they are unlikely to provide many people with a real alternative to the car due to the dispersed nature of the geography of the area.
I43	Option 4 ranked as priorities 1, 2 and 3. A595 must be improved south of Sellafield. Dual carriageway south.

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

Rep No	Q78 Supporting Info
I05	Seek a dual-carriageway south to M6
I09	Towns such as Cleator Moor would benefit from a traffic management review in the centre and main street.
I14	The A595 is supposed to be a trunk road, but the absence of lay-bys for buses means that when a bus stops, so does all of the traffic. This is another example of how the road network is not fit for purpose. Clearly the state of the A595 is not the responsibility of the borough council, but we would appreciate greater lobbying for improvements.
I15	Improved access to health facilities – especially WCH – shuttle minibus from town/station?
I22	Parking facilities - off main streets are required in Cleator Moor, Frizington, Arlecdon, Keekle, Hensingham. Parking on pavements, double parking, parking on bus routes should be cracked down on to improve access and through routes.
I26	Generally the Agency considers that the DPD should emphasise the need to improve sustainable connectivity and promote better network management and ITB measures.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I39	Traffic management improvement should be specifically improved.
I42	Ferry service to the Isle of Man.
I43	If Nuclear New Build is to come to Copeland the <u>Government</u> should fund improvements necessary, new roads, better public transport road and rail.

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

Rep No	Q79 Supporting Info
I06	Opto-hubs in villages.
I14	It is pitifully inadequate
I22	In rural settlements many households are not able to get Broadband. Village schools are not able to get 3Mbps.
I27	It has been good quality but expectations and availability now allow for increased speed
I28	It has been good quality but expectations and availability now allow for increased speed
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Modern telecommunications are an essential part of everyday life and make a substantial contribution to the economy. New technologies need to be supported wherever possible. Improved access to ICT could significantly improve community services, education, training and opportunities for small businesses. It can increase the potential for home working and reduce the need to travel.
I39	No specific comments
I40	N/A
I43	In rural areas if you are not within 1 or 2 miles from a telephone exchange broadband is rubbish! Only fibre optic or satellite access can improve the present system.

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

Rep No	Q80 Supporting Info
I09	West Cumbria is never going to have easy transport access. We must ensure that company's can speedily with assurance be in contact with customers/suppliers worldwide. Residents also need such availability. More company's and people including home workers will be able to locate into the area as a 'lifestyle choice'
I14	It is strongly felt that the existing broadband provision is poor, but we are being cheated at present because we currently pay as much for it as areas with better connections. Our service needs to be upgraded to the same standard as elsewhere, and as we have overpaid for the service to date, there is no justification for us being asked to pay again for the improvement.
I15	Is this Q still right after BBC announcement?
I27	West Cumbria is never going to have easy transport access. We must ensure that company's can speedily with assurance be in contact with customers/suppliers worldwide. Residents also need such availability. More company's and people including home workers will be able to locate into the area as a 'lifestyle choice'
I28	West Cumbria is never going to have easy transport access. We must ensure that company's can speedily with assurance be in contact with customers/suppliers worldwide. Residents also need such availability. More company's and people including home workers will be able to locate into the area as a 'lifestyle choice'
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I39	No specific comments
I40	This is accounted for through Central Government policies and is therefore not relevant to an LDF.

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

Rep No	Q81 Supporting Info
I10	This policy is consistent with the provisions of PPG8 and strikes a good balance between facilitating network rollout and safeguarding the environment. Whilst the revised guidance in PPS12 confirms that national policy should not be duplicated unless there are mitigating local circumstances, PPG8 itself encourages a concise policy to be contained within development plans. Such a policy is helpful in directing relevant stakeholders to the key material issues within the national guidance on which a decision should be based and reduces dubiety on the part of the applicant and decision maker. We consider that through previous representations to the local plan this ultimately resulted in a concise and relevant policy in SVC8 which accords with PPG8 and still remains relevant. Therefore it would be appropriate to have this policy, or a policy with similar wording within the LDF, perhaps in a Development Control Policy DPD, rather than the Core Strategy.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	The Local Plan policy is generally consistent with saved JSP policy T33.
I39	No specific comments
I43	UHF fibre optic and satellite links are only practical options.

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

Rep No	Q82 Supporting Info
I06	More cycle tracks. For instance, there are still a lot of people cycling on the narrow road at Iron Bridge to Sellafield.
I26	The Agency is generally supportive of all the measures suggested to encourage the use of public transport, walking and cycling. Such measures can provide vital mitigation to increasing car trips generated by development proposals and can help to reduce the need for physical infrastructure improvements. They should be promoted through Core Strategy policies which should be supported by evidence to demonstrate how they will be delivered, who will be responsible for delivery, estimated costs, phasing and timescales for implementation, the scale of provision required to meet the identified demand and level of mitigation provided and tied to specific development proposals. As identified in Circular 02/2007, the Agency is able to offer advice and technical support, particularly regarding assessing the impact of development proposals on the SRN and measures proposed to mitigate such impacts. As such early consultation with the Agency, as promoted by PPS12, to discuss development aspirations, proposals and allocations, can help to ensure a robust, sustainable and deliverable strategy is developed from the outset.
I31	Approaches to Public Transport, Walking and Cycling will need to have particular regard to RSS policies DP5, RT2, RT3 and RT9.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Policy should be based on a combination of all the above options. Option 3 should refer to 'travel plans' not green travel plans. All development proposals which require a transport assessment should also be required to produce and implement a travel plan to promote sustainable travel options and reduce car use. The policy should include all developments not just employment. In order to ensure the development is sustainable, the policy should seek sites that are or will be made accessible by public transport, walking and cycling, providing a realistic choice of access by means other than private. However in rural locations which are not served by public transport but where development meets local needs, a contribution will be sought will be sought towards improvements to public transport provision to offset the impact.
I40	The focus should be on the facilitation of public transport as a realistic option for people. Most developments now where a transport assessment is required have a Green travel Plan, it is unlikely that a contribution per new dwelling unit would have a significant impact on the borough unless housing numbers are substantially increased - again this should be viability tested.

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

Rep No	Q83 Supporting Info
I06	The very poor parking provision at Westlakes is an example of a national policy carried out to the letter.
I22	Please ensure that vehicles do not park on pavements. Please enforce the requirements of the Highway Code, particularly in key centres where bad habits are rife and access to facilities is being made unsafe by parking on main roads and bus routes.
I26	The Agency has no particular preference but is generally supportive of Options 1 and 2. The scale of parking provision should be carefully assessed to ensure that a sufficient supply is provided without undermining ITB measures and sustainable transport improvements.
I31	Parking Standards will need to take into account the emerging RSS Partial Review, which due to be submitted in the near future.
I38	It is of note that the parking standards in the RSS are currently being reviewed. The level of car parking should be designed to be a package to promote sustainable transport choice, maintain the vitality and viability of areas and reduce land take. Areas where it may be appropriate for less or more car parking may be defined for the LDF process, subject to there being no adverse impact on road safety and traffic management.
I39	No specific comments
I40	These are standards which can be altered where local circumstances dictate.

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

Rep No	Q84 Supporting Info
I21	The context for a proposed development will vary on a case by case basis. Consequently decisions on need or otherwise for a Transport Assessment or Travel Plan can only be assessed on a case by case basis.
I22	Most Sellafield workers have to travel to get to work. Due to lack of appropriate travel plans the majority travel by private car. A workers bus service used to operate and was very well used. Why can this not be resurrected and made attractive to use?
I26	The Agency would welcome reference in the Core Strategy to the need for Transport Assessments and Travel Plans, to be provided in accordance with the provisions and thresholds set out in the DCLG and DfT joint Guidance on Transport Assessments. The Agency would further welcome reference to early discussions with the Highways Agency regarding such requirements, particularly where development proposals could potentially have a detrimental impact on the safe and efficient operation of the SRN.
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Appendix B national guidance on Transport Assessments sets out indicative thresholds for transport assessments, transport statements, transport assessments and travel plans. This should be used as a baseline for assessing the requirement and should be decided on case by case basis in consultation with the highway authority.
I39	No specific comments
I40	Standards required by the County Council are already tightening and allow for consistency across the County. They provide enough scope to require a Transport Assessment if congestion is an issue.

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

Rep No	Q85 Supporting Info
I05	Also some provision for children when on holiday i.e. small play area (marine design)
I09	Chandlers and all associated retail availability. Ship building in relation to smaller vessels and the introduction of permanent tall ships.
I13	See database for additional comments also see additional documents supplied by EA - Appendix A; Appendix B; EA Response to BERR Consultations - The role of nuclear power in a low carbon economy and The proposed processes for justification and strategic siting assessment and EA Response to BERR Consultation - The Strategic Siting Assessment Process and the siting criteria for new nuclear power stations in the UK
I15	More family facilities than at present + better meeting spaces than Beacon basement e.g. Maryport has Aquarium + Wave near to Harbour. Better promotion and co ordination of activities and then build on these
I16	The roles of Whitehaven harbour should complement those of Workington and Maryport.
I17	Water sport centre - water based recreation in outer harbour.
I27	Chandlers and all associated retail availability to be encouraged. Also **** alter 4 th bullet point' replace 'ship building' with 'boat building' this can be considered a more suitable scale for the harbour
I28	Chandlers and all associated retail availability to be encouraged. Also **** alter 4 th bullet point' replace 'ship building' with 'boat building' this can be considered a more suitable scale for the harbour
I34	It would not be appropriate for United Utilities Water to comment on this aspect.
I38	Leisure and recreational based facilities which maintain and enhance the historic character of the harbour should be encouraged.
I39	No specific comments
I40	These activities both offer interest on the harbour resulting in both increased economic activity and also providing tourist interest.
I43	Ferry service to the Isle of Man

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

Rep No	Q86 Additional Comments
I01	Have looked at Council's website in detail and no comments to make.
I07	The Coal Authority welcomes the opportunity to make these early comments, we are of course willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of its concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.
	<p>1. We strongly support Strategic Objective 10 and recommend this is formally adopted unchanged.</p> <p>2. Taking into account:</p> <ul style="list-style-type: none"> • The provisions of Section 17 of the Crime and Disorder Act 1998 (which creates a duty of Local authorities to do all they reasonably can in the exercise of their various functions to prevent crime and disorder in their areas) • Planning Policy Statements 1 and 3 (which both make reference to the need for 'safe' communities) • Revised PPG12 (which draws attention to the need to include measures for crime prevention in the social considerations of a development plan), <p>crime prevention should be a material consideration in determining planning applications, with the aim of making crime more difficult to commit, increase the risk of detection and provide people with a safer, more secure, (and therefore more sustainable) environment.</p> <p>However any solution should remain sensitive to local circumstances and there should be a balanced approach to design which attempts to reconcile the visual quality of a development with the needs of crime prevention. Developments can be made more secure without resorting to razor wire, grilles, bars, unsightly types of fencing and other visually intrusive measures, if safety and security is considered at an early stage of the design process.</p> <p>We would therefore suggest the attached policy proposal for consideration for inclusion in the LDF:</p> <p style="text-align: center;">DEVELOPMENT PROPOSALS SHOULD BE DESIGNED TO ENSURE A SAFE AND SECURE ENVIRONMENT AND REDUCE THE OPPORTUNITIES FOR CRIME</p> <p>Developers will need to ensure that crime prevention is considered as an integral part of the initial design of any development and not as an afterthought. Development should incorporate the principles of 'Secured by Design.' In particular, they will need to demonstrate how their development proposal has addressed the following issues, with regard to designing out crime:</p> <ul style="list-style-type: none"> • Natural surveillance of public and semi-private spaces, in particular, entrances to a development, paths, play spaces, open spaces and car parks • Defensible space and the clear definition, differentiation and robust separation of public, private and semi-private space, so that all spaces are clearly defined and adequately protected in terms of their use and ownership • Lighting of the development, in particular, streets and paths • Design and layout of pedestrian, cycle and vehicular routes into and within the site, including how these integrate with existing patterns • Landscaping and planting; in particular, hiding places and dark or secluded areas should not be created.
I12	The design and layout of access opportunities is of fundamental importance to designing out crime and needs careful consideration to avoid the creation

Rep No	Q86 Additional Comments
	<p>of opportunities for crime. The 'Places Streets and Movement: A Companion Guide to Design Bulletin 32 – Residential Roads and Footpaths' provides advice on security issues in relation to the design of routes and connections. It emphasises that while clear and direct routes through an area for all forms of movement are desirable, they should not undermine the 'defensible space' of particular neighbourhoods.</p> <p>Developers should, at the earliest stage, seek advice from the West Cumbria Area Police Architectural Liaison Officers on designing out crime.</p> <p>Transport Issues:</p> <p>Presently, the Copeland Area of West Cumbria key links rely on three main 'Primary Routes' being: A595 A66 A5086. West Coast Rail and 'Bus services also provide important commuter provision. (There is also the optional use of the A596).</p> <p>Transportation to/from West Cumbria during most periods can take up to one hour to reach the M6.</p> <p>Urgent consideration given to improved road networking would in its self produce major and valuable advantages.</p> <p>A595 in its present design has reached saturation point especially during Sellafield ingress/egress muster times, with a number of adjacent narrower rural roads subject to 'short cuts' by high volume, high speed traffic - encroaching upon quality of life. As experience has shown, during any prolonged closure of the A595 - especially between Whitehaven and Millom the only (equal) alternative route is a detour via the M6. There is no local carriageway capable of controlling or absorbing any high volume vehicle factors over a short period of time. The most recent dual carriageway upgrade has made a significant impact between Parton and Lillyhall. However, any time:effect gains can dissipated when encountering a mix of Large Goods Vehicles (LGVs) and 'Rural Farm Traffic' causing disproportionate delay in progress. South of Whitbeck, the A595 basically becomes a narrow single carriageway, dependent upon the slowest moving vehicle.</p> <p>A66 - notwithstanding improvements - has only two <i>very short</i> stretches of dual carriageway. The West Bound section when mainly collision blockages occur, is impassable. Narrowness in design reduces the progress factor when LGVs are encountered introducing overtake reluctance. The advantages in traffic progress tend to be situated towards the easterly M6 access! Outwith the dual or wider carriageway sections of the A66 progress can be retarded by slower moving and/or larger vehicles.</p> <p>A5086 is a valuable link between Egremont and Cockermouth. However, the road dissects the villages of Cleator and Frizington. The route is used in high numbers by LGVs, as an opportunity to short-cut the A595 to/from Sellafield. Between Frizington and Cockermouth the carriageway is in a rural setting, undulating with tight bends and narrowness. Numerous complaints have previously been raised by residents of Cleator and Frizington, relating to the road not being fit for purpose, especially concerns about the high volumes of LGVs.</p> <p>Whilst it is highly desirable to have more use towards public transport, it appears the necessity for secure car/cycle parking facilities - linked with bus/train time table integration would be most favourable. Presently there are no such facilities in West Cumbria. Frequency of integrated public</p>

Rep No	Q86 Additional Comments
	<p>transport and passenger comforts is a key element. The higher proportion of users of public transport - it necessary follows - there should be a marked reduction in collisions, especially on the Primary Routes. Serious Injury Collisions - not to mention the human aspect - come in various categories with a high cost element.</p>
115	<p>Whole Strategy needs to be informed by Key National Reports on the Demographic Challenge of the ageing population [which includes Planners and Councillors!]</p> <p>There seems no reference whatsoever to the Cumbria Public Health agenda as outlined in The 2009 Annual Report of the Director of Public Health</p> <p>ACNwC - CHALLENGES to CBC LDF Issues Paper</p> <p><i>“The evidence base is constantly being added to and will be updated as work progresses. The full list of documents which have been used to inform this consultation document can be found in Appendix 3.</i></p> <p><i>Legislative and Policy Framework</i></p> <p><i>1.23 As with the Copeland Local Plan, we are not starting with a blank canvas when we prepare the LDF. There are a number of national, regional and subregional documents which set parameters which we must work within.”</i></p> <p>MISSING?</p> <ol style="list-style-type: none"> DWP– “Opportunity Age - Preparing for our ageing society” - 2005 Audit Commission – “Don’t Stop Me Now” 2008 (esp.Age-Proofing Checklist and Age-Proofing Mainstream services) JRF – “That Bit of Help” (esp.3-shops,shopping & supermarkets) and “Housing with Care for Older People” CCC/NHS Cumbria – “The Five Challenges” – John Ashton CCC/NHS Cumbria – “Health in Cumbria 2009” – Public Health –(esp. Foreword and Section 3 – The demographic challenge) <p><i>“1.27 The planning system places a lot of emphasis on ‘local distinctiveness’. We have to reflect the unique characteristics of Copeland in our Core Strategy and other LDF documents. The new planning system therefore relies upon the input and support from the wider community to succeed. The emphasis in the new system is on making decisions about future land uses very early on in the process, rather than at planning application stage, which means that if you want a say in the future development of your area, you will need to get involved in the consultation process early on.</i></p> <p><i>1.32 This consultation is in accordance with the Statement of Community Involvement (SCI). The SCI is effectively the consultation strategy for the whole of the LDF.”</i></p> <p>MISSED?</p> <p>Older People’s Forum say they were not included in this LDF consultation</p>

Rep No	Q86 Additional Comments															
	<p>Age Concern Northwest Cumbria has offered to undertake Age Proofing in the way other Cumbria Councils use Age Concern services. We are disappointed that we are still not engaging effectively with CBC.</p> <p>NO PROJECTION?</p> <p><i>“Spatial Portrait - 2.23 The Borough has an ageing population, caused by the falling birth and fertility rates and modest inward migration by older people. This trend is demonstrated by the 17.5% decrease in the number of under 40s between 1991 and 2007 and the 18.7% increase in the number of over 40s in the same time period.</i></p> <p><i>2.24 Over the past decade the Borough has experienced a higher than average outmigration of younger age groups”</i></p> <p>Inadequate reference to key driver of demographic challenge as presented in “Cumbria in numbers-2009” – Supporting Cumbria’s JSNA :</p> <table><tr><td></td><td><i>2006-20031 - % change</i></td><td><i>Pop. nos. 65+yrs</i></td></tr><tr><td>65-74 yrs</td><td>+63.8</td><td></td></tr><tr><td>75-84</td><td>+82.9</td><td></td></tr><tr><td>85+</td><td>+161.5</td><td>22,200</td></tr><tr><td><i>Working age pop</i></td><td></td><td><i>40,900</i></td></tr></table> <p>“Do you agree with our Spatial Vision?” <i>[good if you can read it!]</i></p>		<i>2006-20031 - % change</i>	<i>Pop. nos. 65+yrs</i>	65-74 yrs	+63.8		75-84	+82.9		85+	+161.5	22,200	<i>Working age pop</i>		<i>40,900</i>
	<i>2006-20031 - % change</i>	<i>Pop. nos. 65+yrs</i>														
65-74 yrs	+63.8															
75-84	+82.9															
85+	+161.5	22,200														
<i>Working age pop</i>		<i>40,900</i>														
120	Please see database for SA comments – detailed response.															
129	Issue: Community Services and Facilities - The inclusion of this heading is important for the future of the Borough and because the subject matter is so wide-ranging, for clarity and greater certainty of intended outcomes, so that advice is clear and consistent, we recommend a description in your Glossary - community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. In this way all services will be incorporated in any policy that mentions the enhancement and development of community facilities.															

Rep No	Q86 Additional Comments
132	<p>Cumbria Wildlife Trust welcomes the inclusion of biodiversity as a factor in the Sustainability Appraisal Scoping Report and also the references to biodiversity, habitats and species under other headings. Despite consideration being given to biodiversity within the report, the omission of County Wildlife Sites as part of the evidence base is disappointing. County Wildlife Sites, although not statutorily designated, can and often do provide habitat and species diversity of the same quality as found in SSSIs. Furthermore these sites provide a wider ecological network connecting the less numerous statutory sites and creating part of the Green Infrastructure in the Borough. National Indicator 197 (Improved Local Biodiversity – proportion of local sites where positive conservation management has been or is being implemented) has been adopted as a stretch target at the County level as part of the County’s Local Area Agreement. Understanding and managing the County Wildlife Site resource in Copeland will contribute greatly to meeting the targets for positive management that have been set out. Only by taking County Wildlife Sites into consideration along with their levels of current and past positive management can this target be achieved and a more accurate picture of the Borough’s biodiversity be provided. Cumbria Wildlife Trust is concerned that the Biodiversity Evidence Base is referred to on page 7 of Appendix 1 as “The report [which] provides the evidence base for decisions on landscape character”. This is factually incorrect as the Cumbria Biodiversity Evidence Base has been written to provide the evidence base for decisions on biodiversity.</p>
133	<p>We would like to provide comment regarding two points: St Bees Head, identified in the Sustainability Appraisal Scoping Report, and hen harriers, a red listed Bird of Conservation Concern with an important wintering area not identified with the consultation documents.</p> <p>St Bees Head</p> <p>Within the Sustainability Appraisal Scoping Document, we welcome the recognition of St Bees Head as a National Nature Reserve (Section 2.3.5), Site of Special Scientific Interest (SSSI) (Section 3.3.6) and heritage coastline (Section 7.3.6). However, there are a number of other details regarding this area that we like to provide comment on:</p> <ul style="list-style-type: none"> • In addition to the recognition of its geological value, St Bees Head SSSI has a biological interest that is not detailed in Chapter 2 of the Sustainability Appraisal Scoping Report. In particular, the SSSI citation highlights that the cliffs provide the only breeding site on the Cumbrian coast for a variety of colonial seabirds. This includes fulmar, kittiwake, razorbill, cormorant, puffin and shag. The cliffs are also the only breeding site on the English coast for black guillemots. The site is also important for other breeding birds including raven and rock pipit. • The RSPB manage a large part of the SSSI as a nature reserve. • The area is part of the Whitehaven to St Bees Cliffs and Coast Project, not mentioned in the Sustainability Appraisal Scoping Report. This is a partnership project between the RSPB, Natural England and the National Trust. The Project area, shown in the map below, encompasses 660 hectares and is broken down into a ‘coastal slope zone’ (green shading) and a ‘wider benefits zone’ (pink shading). The Project area is crossed by the Cumbria Coastal Trail, forms one end of the Coast-to-Coast trail, and links to the Hadrian’s Wall cycle route. • The Whitehaven to St Bees Cliffs and Coast Project is of note as it will deliver a number of outcomes including the restoration and management of coastal habitats, landscape enhancement, access improvements, socio-economic improvements, eco-tourism opportunities and benefits to resource protection.

Rep No	Q86 Additional Comments
	<p>Hen Harriers</p> <p>The hen harrier is listed on Annex 1 of the EU Birds Directive due to its unfavourable conservation status in Europe. It is also a red listed Bird of Conservation Concern in the UK and has been included on the Government's list of species considered of principal importance for conserving England's wildlife (Section 41 of the Natural Environment and Rural Communities Act).</p> <p>Hen harriers winter in a discrete area of West Cumbria, as shown in the map below, and the numbers recorded within this area show it to be of international importance (present in nationally important numbers (7% of national population) and Annex 1 listed species).</p> <p>Their roost complex and associated foraging sites within this area are particularly vulnerable to change. The RSPB therefore consider that the wintering area identified in the map below should be incorporated into the LDP documentation. Identification of this area within the documentation would enable improved consideration of potential impacts (both positive and negative) from future development. Important development considerations would include, for example, a change in land-use, the location of future wind farms and increased development of the area.</p>
I38	7.3.11: Please note Millom has a conservation area.