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COPELAND CORE STRATEGY & MANAGEMENT POLICIES EXAMINATION
Inspector: Paul Crysell BSc MSc MRTPI

Mr John Groves
Head of Nuclear, Energy and Planning
Copeland Borough Council
The Copeland Centre
Catherine Street
Whitehaven
Cumbria
CA28 7SJ

27 November 2012

Dear Mr Groves

Please find attached a note from the Inspector regarding your Core Strategy and Development Management Policies Document (CS).

Kind regards

Yvonne Parker
Programme Officer

Initial note from the Inspector Mr Paul Crysell to Copeland Borough Council

My initial perusal of the Core Strategy and Development Management Policies Document (CS) has identified some matters on which I would appreciate a response. I have not had a chance to look at all the evidence so the issues I refer to may simply be a reflection of my failure to appreciate what the Council is trying to achieve. Hopefully, you will be able to reassure me that my concerns are unlikely to undermine the soundness of the Plan. However, if you have any doubts I would rather know as soon as possible.

My main concern is that the Core Strategy (CS) seems to devolve many important decisions to a future Site Allocation Plan. This allows the Council to put off some difficult, crucial and important spatial decisions even though the evidence base appears to be comprehensive and largely up-to-date. I am therefore surprised that some aspects, such as the broad locations for future development, have not been clearly identified and that sites to be carried forward from the Local Plan have not been shown on a revised Policies Map.

I also find it somewhat frustrating to have to 'pick out' the information from other documents or the supporting text in order to understand what the Council wants to do. This is despite the recognition in the Soundness Assessment that development pressures on the Borough are relatively modest in comparison to some parts of the country. I am therefore left wondering why you have not put more detail into the Plan.

This leads on to an apparent lack of recognition of the evolving development plan process. The Government is expecting councils to move away from a series of plans as originally intended under the Local Development Framework to a single local plan. I appreciate that some authorities will be producing more than one plan as part of its transition to a single document but I get the impression that Copeland is still intending to produce a number of documents. While this is not necessarily unacceptable can you advise me whether you have considered the need to produce a single local plan.

I would also welcome your views on the following matters:

1. Should I be concerned that the CS provides so broad a strategy and seemingly appears to devolve almost all 'what, where, when and how' questions about development to a subsequent plan? (This is perhaps most tellingly illustrated by the number of times the work 'appropriate' is mentioned in relation to future levels/locations for development);
2. Why is it necessary to look to the supporting text to gain an appreciation of housing numbers, employment issues and retail floorspace information rather than seeing this set out clearly in relevant policies?
3. Why there is no information to show the CS has identified specific deliverable sites capable of providing five years worth of

housing against the housing requirements, and a supply of specific, developable sites or broad locations for growth for the next two five year periods (15 years in total), as required by the NPPF (para. 47);

4. There seems to have been little attempt to estimate the housing and employment consequences of the changes taking place in the nuclear industry in Copeland. I appreciate this may be difficult given the uncertainty associated with the development programme, but some attempt to quantify this would help support the flexible strategy you wish to pursue.

As it stands at the moment I find the lack of clarity in the CS suggests it may be less useful or meaningful than it might otherwise be. While that does not necessarily indicate the document is unsound it could require modifications to address potential deficiencies. A limited number would be reasonable but the examination process is not an ideal format for making widespread changes. I may be unduly pessimistic in this regard but I am keen to get your views on the desirability of continuing with the examination process. Alternatively, it might be more beneficial (for all) and less expensive (for the Council) to redraft the CS with a view to incorporating the site allocation details into an expanded document for examination in due course.

I am sure you are keen to get an adopted plan in place as soon as possible in view of the Government's emphasis on having up-to-date development plans and I do not wish to detract the Council from its preferred path of plan production. However, I need to be convinced that the submitted document is potentially capable of being found or made sound without excessive changes. I look forward to your reply.

Please note, my comments relate solely to the strategic element rather than the Development Management policies.

Paul Crysell
Inspector