

Register of Preferred Options Consultation Responses

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

Introduction

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P435/20	Natural England	We are pleased that the vital importance of climate change is mentioned in paragraph 1.1.1, the opening paragraph of the document, and that some of the natural assets of the borough are recognised in paragraph 1.1.2.	Support noted.
P144/46	GONW	There is an inaccuracy in the fourth bullet point in para 1.5.1. The 6 weeks consultation period after the publication of the submission draft gives stakeholder an opportunity to comment only on the 'soundness' of the document.	Taken on board – this point will be made in the statements that are published when the consultation begins.
P143/46	GONW	There is an inaccuracy in the final bullet point of para 1.5.1. It should say that, after the consultation in bullet 4, the document will be examined by a Planning Inspector and, subject to his/her comments, will then be adopted.	Taken on board – the correction will be made.
P145/46	GONW	Fig 1.4 (and elsewhere) refers to the 'final draft for submission'. This should not be considered a 'draft' but the Council's final word and should be called the 'Pre-submission Publication Core Strategy'.	Taken on board
P436/20	Natural England	We would hope that the protection and enhancement of the environment could be explicitly included alongside the drive for economic and social success, which are included in the introductory remarks under paragraph 1.1.4. (Note from the Leader of the Council).	

Setting the Strategy – Section 2.1

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

			Strategy takes them into account implicitly throughout and explicitly where the Council has felt the need to make a specific strengthening reference.
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Drivers of Change and the Growth Agenda – Section 2.2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P097/32	Cumbria Wildlife Trust	Cumbria Wildlife Trust supports this paragraph on the basis that it identifies biodiversity as relevant to sustainability.	Noted; this section is now redrafted to be more concise.
P315/39	National Trust	This section is deficient in terms of the adequacy of the consideration given to environmental matters, especially the biodiversity and landscape assets of the Plan area. There are no references to heritage assets.	Not accepted. The Core Strategy as a whole, along with the Development Management DPD, places a proper degree of priority on the nurture of these assets. The purpose of this section is to set the Core Strategy in the context of other development strategies affecting Copeland, and it is not necessary to give specific attention here to biodiversity, landscape or built heritage.
P182/63	Mr R Curwen	2.2.3 - Support the urban concentration & prioritise the use of brownfield land over Greenfield sites. The aim of 50% brownfield allocation is a realistic achievable target. The strategic objective to “support the sustainability of rural communities” is also in support of this.	Support noted.
P267/70	RWE npower	2.2.6 & 2.2.7 - npower welcome the recognition that the energy sector in terms of nuclear, wind and water generation is likely to play an important part in the economic objectives of the strategy. Given that Copeland has 3 sites identified in EN-6 there is likely to be significant reinvestment in the Nuclear Energy sector.	Support noted. However there is now only one site in Copeland that has been identified for nuclear new build i.e. the Moorside site.
P251/14 P256/67	Moresby Parish Council Parton Parish Council	2.2.16 - does not fully explain the position so far as the question of Geological Disposal Facility is concerned. The government Managing Radioactive Waste Safely policy is based on voluntarism and partnership and communities can withdraw at any stage.	This section has been substantially redrafted, to remove descriptive content not needed in the final strategy. The Geological Disposal Facility proposal is dealt with in policy ER1.
P253/14 P257/67	Moresby Parish Council Parton Parish Council	2.2.17 - does not make clear that benefits from hosting a repository may be different from that of the building of new nuclear generating plants. Whilst the latter may require improved infrastructure and ‘planning gains’ through the planning process a community which hosts a repository will be volunteering an essential service to the nation and the benefits to the community must be over and above those normally associated with a large development.	This section has been substantially redrafted, to remove descriptive content not needed in the final strategy. This point is acknowledged, but the distinction goes beyond the scope of the Local Development Framework. The Council will pursue a proper level of community benefit associated with the hosting of a repository at the appropriate time. At present we do not know if the repository will go ahead or if the Council will support it.
P305/73	Leconfield Estates	Fig. 2.5 - the Council should allow for additional growth beyond the recession (i.e. 2016), being informed by both the economic activity derived from the implementation of the masterplan (‘planning for success’) and a robust SHLAA and SHMA. The provision for a 5-year review of the housing figures needs to be clarified.	No change, although the Council agrees with the sentiment. The Core Strategy seeks to demonstrate that it is providing realistically for a supply of land under current circumstances, while also being flexible enough to accommodate growth. This is reflected in appropriate policies, notably ER4, ER5, SS1 and SS2. Evidence base documents and the economic development and housing topic papers support this case. It is anticipated that the Site Allocation plan will set out phasing arrangements allowing for accelerated release of land if growing demand requires it.

Vision

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P015/8	Cumbria Tourism	The ambition to grow the tourism sector is reflected in the preferred Options Vision under ‘Beautiful’ and ‘Place of Choice’. Both these statements are supported.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings so nothing has been lost in terms of aspiration. Tourism is still mentioned as an important part of the economy that the Council wishes to expand and grow as a means of diversifying the economy.
P098/32	Cumbria Wildlife Trust	Cumbria Wildlife Trust supports the Spatial Vision for Copeland in 2027 which indicates that biodiversity will be protected and enhanced.	Support noted.
P268/70	RWE npower	npower supports the Spatial Vision for Copeland which seeks to encourage a sustainable and broad economic base that builds on opportunities, including those presented by the low carbon and renewable energy sectors.	Support noted.
P306/73	Leconfield Estates	The Spatial Vision for Copeland is supported, in particular the Council’s vision to create an economically sustainable place and a place of choice.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings so nothing has been lost in terms of aspiration.
P428/46 P016/11	GONW NWDA	The Vision is not locally distinctive enough. As a result the policies seem to repeat national policy instead of addressing identified local need and delivering local aspirations. Policies should have been driven by issues within each of the locality areas.	The new vision is locally distinctive as it mentions opportunities presented by the low carbon and renewable energy sectors, the coastal location and abundant natural assets. These are aspects that are particular to Copeland. The Vision would be too detailed if individual settlements are mentioned. The strategic objectives cover issues in specific

			settlements and the introductory context setting chapters make the issues faced in each part of the borough clear.
P189/38	Cumbria County Council	Support is given to the Spatial Vision of an environment that is able to adapt to climate change. Support is given to the Vision of green infrastructure and biodiversity that is protected and enhanced in their own right and that the biodiversity of Copeland is valued as a tourism asset.	The Vision has been revised to make it more concise and so that it would fall into line with the four definite themes that run through the Core Strategy i.e. economic issues, social sustainability, transport and environmental protection. The principles that were expressed in the 'Beautiful' and 'Place of Choice' parts of the previous Vision have been integrated into the revised text under the appropriate headings but biodiversity is no longer expressed as a tourism asset, although it undoubtedly is. The protection and enhancement of biodiversity is still included under the heading 'Environmentally Responsible'.
P031/25	English Heritage	The Vision does not address the totality of the historic environment and only refers to heritage in the context of tourism. It is suggested that the Vision emphasises the borough's sense of place, its heritage assets and the challenges faced in achieving a high quality built environment.	The vision has been reworked and is now a shorter statement. It acknowledges the heritage of the borough to be very important and worthy of protection. The detail around the historic environment and its value to the borough is covered in the Strategic Objectives and policies. The Vision statement needs to be concise and not cover any aspect of Copeland in detail.
P051/26	Highways Agency	The Agency is generally supportive of the Spatial Vision and welcomes the references to providing a well-connected place with improved access to sustainable modes of transport and reducing the need to travel.	Support noted.
P122/45	Sport England	The Vision should make explicit reference to sport and recreation.	A specific reference to sport does not fit into the Vision very well but it has been added to para 1.1.3 under Strategic Objectives.
P316/39	National Trust	Under 'beautiful' – there is apparent lack of ambition with regards to the landscape, heritage and biodiversity assets. These are merely 'recognised'. There is no aspiration to protect. Alternative wording is suggested.	The wording of the vision has now been changed to make the statement more concise. However under 'Environmentally responsible' the aim is now to protect and enhance the landscape, heritage and biodiversity rather than just recognise its value.
P316/39	National Trust	Under 'well-connected' there is some ambiguity and duplication in the wording. Alternative wording is suggested.	Well-connected - The text has been altered to remove any duplication.
P444/20	Natural England	We recommend that the vision for the borough should encompass 'where the character and quality of its distinctive landscapes are conserved and enhanced', thus recognising that all landscapes matter – not just the most outstanding landscapes.	The protection and enhancement of the landscape is mentioned in the Vision. As the vision statement is now shorter, more detailed statements are included in the strategic objectives and in the case of landscapes particularly SO16. This objective specifies that all landscapes should be conserved and enhanced.

Strategic Objectives

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

			objectives do this.
P052/26	Highways Agency	The Agency is supportive of the aims to develop and maintain safe, efficient, high quality, modern and integrated transport networks and improve access to employment opportunities and services by more sustainable means of transport.	Support noted.
P099/32	Cumbria Wildlife Trust	An additional objective should be added that deals with encouraging carbon sequestration. Potential wording has been provided by the respondent.	A sentence has been added to SO14 that aims to improve tree cover in the borough, a recognised form of carbon sequestration.
P123/45	Sport England	There is no direct reference to protecting, enhancing and providing open space, sport and recreation facilities. This requirement is covered in national policy but as the LDF policies should do this, it would be advisable that this requirement is included in the objectives.	Para 1.1.3 says that it is important to ensure that settlements meet the needs of their communities and this includes access to leisure and sporting facilities. SO8 underneath this heading states that facilities that are already present will be protected and that appropriate new provision will be supported. Although sporting facilities are not specifically mentioned they are included in the collective term ‘facilities’.
P190/38	Cumbria County Council	Strategic Objective 10 should be revised to include high design standards for biodiversity / environmental enhancement.	Objective 10 - Strategic objective 9 (previously SO10) now states that developments should be of high design quality and should make provision for biodiversity.
P190/38	Cumbria County Council	The reference to improving green infrastructure could be strengthened in SO19.	Objective 19 - SO18 (previously SO19) strengthens the statement on improving green infrastructure with particular regards to biodiversity although it is recognised that green infrastructure includes other types of open space e.g. sports pitches. These are, however, dealt with in SO8.
P190/38	Cumbria County Council	A minor amendment to the wording of SO20 is suggested.	Objective 20 - The subject of dealing with former land uses is now addressed in SO19.
P190/38	Cumbria County Council	It is recommended that the Strategic Objectives should cover the health and social wellbeing agenda generally.	1.21 - Health and social wellbeing are inherent in the objectives. Almost all the objectives make reference to something that is a factor in the overall health and wellbeing of the community.
P190/38	Cumbria County Council	Another objective should be added that ensures that a range of additional infrastructure provision is in place before nuclear new build commences.	1.22 Knowledge of the procedural context of Nationally Significant Infrastructure Projects has evolved since these comments were made. The Council's position is that such projects and associated development should have regard to the Core Strategy. Policy references as now drafted have given voice to these issues, and go as far as is likely to be permissible. We have considered inserting a strategic objective but it might be argued that such an objective would be unlawful; we consider that the intentions of this comment, which we support in principle, are adequately fulfilled by the amended Core Strategy as a whole.
P307/73	Leconfield Estates	SO7 underplays the importance of the Key Service Centres. Whilst it is important to direct most of the new development to Whitehaven, additional recognition needs to be given to the Key Service Centres.	The overall proportions given in para 3.5.7 of the pre-submission draft have not changed a lot. However, the figures for Whitehaven and the Key Service Centres are expressed as a minimum and not expressed as an absolute proportion any more.
P317/39	National Trust	There is an implicit intention in SO14 to promote the development of new road improvements. This is inconsistent with other objectives and does not reflect national policy or the reality of delivery within the plan period.	SO13 (previously SO14) has not been changed. Good roads remain an important part of an efficient, high quality, integrated transport network even though public transport will play a larger part than it has previously. Good roads will be required to attract more business to West Cumbria and therefore the objective must remain as it is.
P445/20	Natural England	In objective 18, our view is that the text should read ‘protect and enhance the character and quality of all landscapes’, as recommended above in relation to the spatial vision.	SO18 comment - SO16 (previously SO18) now says that the Council will conserve and enhance all landscapes in the borough.
P445/20	Natural England	In objective 19, mention should also be made of geological conservation or geodiversity.	SO19 comment - SO18 (previously SO19) now states that the Council will protect and enhance the rich biodiversity and geodiversity of the borough
P445/20	Natural England	In relation to objective 20, soils should be included in the compass of this objective as a natural resource.	SO20 comment - SO19 (previously SO20) now says ‘Safeguard and where possible enhance the natural (including mineral & soil) resources in the borough’.

Principles for Development (ST1)

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

		D(i) Quality Places – apply rigorous design standards which retain and enhance locally distinctive places and increase their quality. This is very much in line with our comments at the Issues and Options stage, where we stated our view that Quality is a cross-cutting issue, which should be applied not just to tourism but to all development proposals, including public realm.	
P033/25	English Heritage	Policy ST1 is supported; it reflects the diverse role of the historic environment in planning for a successful and sustainable future for the borough.	Support noted.
P053/26	Highways Agency	The Agency is generally supportive of Preferred Options Policy ST1 and in particular parts v) and vi) under ‘Environmental Sustainability’ which promote minimising the need to travel, the provision of sustainable transport infrastructure and prioritising development where there is infrastructure capacity. The Agency is also supportive of part iii) under ‘Ensure the creation and retention of quality places’, to accommodate traffic and access arrangements to make it safe and convenient for people to move around in.	Support noted.
P308/73	Leconfield Estates	Preferred Options Policy ST1 is supported.	Support noted.
P080/31	4NW	The policy could be improved by including reference to green infrastructure and ecological networks as well as features and sites.	A new statement has been added (ST1B(iii))
P100/32	Cumbria Wildlife Trust	The Core Strategy should include a preferred policy referring to the role of the natural environment in meeting some of the environmental challenges and therefore the sustainability of the borough.	Added another statement now ST1B(iii)
P446/20	Natural England	We concur with the Cumbria Wildlife Trust’s comment on ST1 that the natural environment is both a valued asset and has an important role to play in a sustainable Copeland, in mitigating against the effects of climate change and in providing a robust and sustainable environment.	Added another statement now ST1B(iii)
P124/45	Sport England	There is no reference to protecting existing leisure facilities or sport in general. The link between this aspect of the strategic policy and earlier strategic objectives is not clear.	Some leisure facilities are classed as green infrastructure and these will be protected by ST1B(iii). Other sporting facilities would be supported under ST1A(iv).
P125/45	Sport England	The box below paragraph 3.2.3 in the core strategy contains reference to PPS6 which has been cancelled and replaced by PPS4.	Reference to PPS6 and been changed to PPS4
P191/38	Cumbria County Council	There appears to be some duplication between the objectives and policy ST1. ST1 should be a logical progression of the objectives. This section should be simplified to ensure a clearer direct message.	ST1 puts the principles in the Strategic objectives into policy and is required. ST1 is clear in that the overall message is one of increased sustainability. There are many messages within that and these have to be covered here. It would be difficult to simplify the policy without detracting from it.
P191/38	Cumbria County Council	It is important to recognise in ST1A(iii) that some brownfield land can be of high biodiversity value. It is also recommended that policy ENV3 and DM24 and their supporting text is strengthened to enable appropriate protection and mitigation.	1.24 - This is now dealt with in ST1C(v). This is noted and information will be passed on to colleagues working on the SHLAA.
P191/38	Cumbria County Council	The heading to ST1C should be should be reworded to ‘Protect, enhance and restore the borough’s valued assets’.	The title of ST1C has been changed as suggested.
P191/38	Cumbria County Council	ST1C(i) should refer to areas, sites, features and species of nature conservation, possibly with a list of these in the explanatory text . It is considered to be too general a statement. Consideration should also be given to the settings of these areas and features, buffer zones around them and the potential for expanding resources.	The text of the policy has been changed as suggested. ENV 3 expands on this as ST1 is not able to go into too much detail.
P191/38	Cumbria County Council	Policy ST1C(v) does not seem to fit well with the principle of protecting the boroughs assets. This policy could lead to the loss of biodiversity assets. Alternative wording has been suggested.	The text of ST1C(v) has been changed to include the suggested wording.
P270/70	RWE npower	The wording of ST1 fails to recognise that there may be conflicts between the development of new nuclear power stations and the protection of valued assets. The policy should make it clear that development proposals will be considered on their merits and where conflict exists, mitigation measures will be sought.	Policy DM1 states that proposals for nuclear developments will be subject to an Environmental Assessment. Policy ENV3 states that any development will have to 'incorporate measures to protect any biodiversity interest.' Policy DM25 states that mitigation and compensatory measures will be secured through planning obligations or conditions. It is felt that there is enough provision for this issue in later policies and that specifics are not needed in the text of ST1 which deals with general principles only.
P318/39	National Trust	The measures in ST1A do not cover all the environmental considerations and would more accurately be under the heading ‘Climate Change Sustainability’.	The matters covered in ST1B (previously ST1A) are broader now and it seems appropriate to retain the current title of Environmental Sustainability.
P318/39	National Trust	A locational caveat is needed in ST1B(i) to be more in line with the policy statements in ST1A(iii), (iv) and (v). The words ‘in appropriate locations’ could be added to the end of the statement.	Bi) Have added the wording 'in appropriate locations' to the end of ST1A(i) (previously STB1i) as suggested.

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

Spatial Development Strategy (ST2)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P008/8	Cumbria Tourism	Support the premise that spatial development should be based on a growth assumption. Particularly pleased to see the inclusion of provision for development outside the settlement boundaries, specifically the mention of ‘tourism activities. Pleased to see that tourism development is supported across the whole settlement hierarchy in Fig 3.1 (now fig 3.2).	Support noted.
P119/40	Story Group	Story Group support the principle of focusing the majority of development within Whitehaven as the main town of the borough to support regeneration aims and objectives.	Support noted.
P272/70	RWE npower	npower welcomes the recognition that new power plants, by their nature, will have to be developed outside settlement boundaries.	Support noted.
P434/73 P314/73	Leconfield Estates	More development should be allocated to Egremont as it has the ability to offer executive homes near to local employment hubs.	No change, although the principle of growth in Egremont is supported. The level of development foreseen by the Core Strategy for Egremont provides for a realistic response given the levels of development over the last ten years. The figures quoted are not a ceiling, and there is sufficient land identified (in the SHLAA) to accommodate significant growth if the demand is there. This will be a matter for the site allocation process. (It should be noted, though, that growth may be constrained by factors such as the adequacy of the road network, the Ehen flood plain and other physical factors.)
P004/7	The Coal Authority	Major development, if focussed in the larger settlements would fall within the coalfield area, raising issues of mineral safeguarding. This need not prevent any development from taking place if prior extraction where appropriate is built into the site allocation process. It is likely that the major regeneration of Whitehaven will raise the issue of needing to address mineral legacy issues. This should not prevent development if adequate and appropriate remediation measures are undertaken.	No change here. This comment is noted and will be a factor in the site allocation process, including site release phasing. The Council is confident that the strategy, and evidence regarding the land supply, will mean that the plan can be realised without compromising mineral resources.
P018/11	NWDA	In particular we welcome references to: - providing for and facilitating growth in the local economy and - supporting the development of new nuclear and renewable energy generating capacity and essential infrastructure to support this.	Support noted.
P018/11	NWDA	ST2C(iv) should be split into two different clauses, one dealing with Westlakes and safeguarded employment sites, and one dealing with the other employment types.	Clause C(iv): agreed in part. The Council does not agree that a separate clause is needed, but the existing clause has been reworded for greater clarity.
P034/25	English Heritage	It will be important that evidence about the historic environment informs the revision of settlement boundaries. This could be reflected in paragraph 3.3.9 .	3.3.9: agreed. Historic environment referred to in extended reference to settlement boundaries (3.3.10)
P182/63	Mr R Curwen	3.3.10 - Support the urban concentration & prioritise the use of brownfield land over Greenfield sites. The aim of 50% brownfield allocation is a realistic achievable target. The strategic objective to “support the sustainability of rural	

		communities” is also in support of this.	
P034/25	English Heritage	Paras 3.3.13 and 3.3.14 refer to activities that would be acceptable outside settlement boundaries. It will be important to clearly set out the criteria for acceptability including the impact upon the historic environment.	No change needed. It is important to note here that development outside settlements will generally be resisted. Where acceptable in principle, it will have to satisfy policies ENV 3-5 and DM 23-29. Repetition of those criteria is not considered necessary here.
P054/26	Highways Agency	Regarding growth in the energy sector – consideration may be required of the specific transport issues and challenges associated with this growth.	No change needed here. The Strategy for Infrastructure refers to this issue, as far as current knowledge about developer intentions permits. The Highways Agency's comments will be sought both prior to and during the preparation of the Site Allocations DPD, and the Agency will be involved, along with the County Council, in planning for Nationally Significant Infrastructure Projects.
P081/31 P192/38	4NW Cumbria County Council	Fig 3.1 may not enable a sufficient level of development in the Local Centres. Small scale employment uses should be encouraged in Local Centres.	Agreed in part. The Core Strategy focus is on concentrating development in the towns. Policy ER6, as amended, sets out criteria for employment development elsewhere. It should allow for development on a scale sufficient to support rural vitality whilst not deflecting development away from the locations, which ST2 prioritises, in line with the Core Strategy's overall thrust. Figure 3.1 has also been reworded slightly to remove references which may appear overly negative.
P192/38 P081/31	Cumbria County Council 4NW	Whilst concentrating development in Whitehaven and the three Key Service Centres will be beneficial in the long term for sustainable transport options, it will be important to promote car sharing and rural wheels schemes in areas where public transport is less available. There may also be scope for developers building in rural areas making a contribution to alternative rural transport initiatives.	No change needed here, though the point is accepted. Policies ER6 (as amended) and T1 refer to greater transport sustainability.
P081/31 P193/38	4NW Cumbria County Council	Consideration should be given to whether concentrating 50% of development in Whitehaven would undermine the sustainability of smaller centres and lead to a greater need to travel.	No change. The Core Strategy aims to improve the sustainability of the towns, particularly Whitehaven, by promoting development there, reversing the trend of recent decades whereby sustainability has been undermined by too great a share of development happening in rural areas. It is not accepted that urban concentration will increase the need to travel overall; the reverse is more likely. Neither is it anticipated that the Core Strategy will unduly restrict development which will protect the viability of villages.
P081/31 P193/38	4NW Cumbria County Council	If nuclear new build is to take place there will be intense development pressure on the surrounding rural area. This will need to be taken into consideration.	No change needed here (but see ER1/ER3 and supporting text). The Council's position is that development associated with nuclear new build should take place in accordance with the Core Strategy. The Council believes that there is enough suitably located land to accommodate this, and that will be the starting point in negotiations with the developer and representations to the Major Infrastructure Planning Unit.
P193/38	Cumbria County Council	The Core Strategy would benefit if it were demonstrated how the proportions of development for each of the settlement types were derived and whether or not they are related to existing service provision, the findings of the SHMA etc.	Agreed; see revised Chapter 3 and supporting evidence base and topic papers. The development allowances reflect the Council's wish that regeneration of the towns should be promoted actively, supported by evidence (SHLAA and employment research) that the land supply can support this.
P146/46	GONW	Para 3.3.6 includes some proportions of development but does not specify whether these apply to development other than housing and if so how it will be calculated (hectares, number of applications etc.)	Agreed; see redrafted paragraph 3.3.6.
P311/73	Leconfield Estates	The proportion of development that has been allocated to Egremont needs to be revisited. Egremont is very well placed in relation to employment opportunities and therefore could accommodate more housing.	No change, although the principle of growth in Egremont is supported. The level of development foreseen by the Core Strategy for Egremont provides for a realistic response given the levels of development over the last ten years. The figures quoted are not a ceiling, and there is sufficient land identified to accommodate significant growth if the demand is there. This will be a matter for the site allocation process. (It should be noted, though, that growth may be constrained by factors such as the adequacy of the road network, the Ehen flood plain and other physical factors.)
P156/47	Mr G Garrett	Low Moresby should be designated as a Local Centre as it is only a short distance from local services and facilities.	Although there are a number of services within a short drive of Low Moresby there are none actually within the settlement itself. This makes it very difficult for the Council to justify designating it as a Local Centre. Note also that Policy ST2 and Table 3.1 allow for appropriate development in villages.
P156/47	Mr G Garrett	The LDF is too reliant on the nuclear industry which is currently in decline. In the short term there will be less demand for housing in the Whitehaven area and existing stock will be devalued.	Reliance on nuclear industry and the housing supply: not accepted. The Council's duty is to recognise the importance of the nuclear industry and plan for its anticipated needs, whilst also seeking to make the Borough more attractive for diversifying investment. The Council believes that the Core Strategy achieves an appropriate balance. House building provision is based on forecast need.
P157/48	Ponsonby Parish Council	Para 8.7.6 says that ST2 gives support to a high level nuclear waste repository in the general area around the Sellafield complex. This has not yet been discussed with the Parish Councils.	Policy ST2 C(i) states that there is a 'willingness to discuss' a potential High level Waste repository. Whether or not the Council will support hosting this national facility will depend very much on the outcome of discussions around the extent of community benefits. Consideration needs to be given to changing the text to make this very clear. Regarding a review of Sellafield security - an Emergency Plan for the site exists and is dealt with as a standalone issue, separate to the LDF.
P183/63	Mr R Curwen	Clarity is required as to why prisons are included in ST2C(iv).	Prisons fall into a category of development that, for the sake of amenity, should be sited away from settlements.
P192/38	Cumbria County Council	The terminology used in ST2 with regards to the scale of development in each of the types of settlement does not reflect that used in the Cumbria Sub-Regional Spatial Strategy. It is suggested that it should. (see para 1.31 in the County Councils response)	The terminology in ST2 has been modified, but it is not accepted that it needs to be coterminous in order to be consistent with the Sub-regional Spatial Strategy. The Borough Council considers that the words adopted are a better basis for managing development. The different terminology in ER10 reflects a differing focus applied specifically to tourism development.
P192/38	Cumbria County	The term 'Higher Activity Waste Repository' is more commonly termed a 'Geological Disposal Facility'.	Reference deleted from this section, though the point is correct and has been addressed elsewhere (ER1)

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P192/38	Cumbria County Council	Copeland should reflect the County Council's view not to support nuclear new build at Braystones and Kirksanton within the text of ST2.	Comment no longer relevant as Braystones and Kirksanton have been rejected.
P194/38	Cumbria County Council	Para 3.3.10 should clarify which villages have a settlement boundary and those that do not.	Revisions (now 3.2.10) give more guidance on the evolution of settlement boundaries. This will be taken forward in the site allocations document. The boundaries themselves are and will remain on the Proposals Map; the Council does not see any gain in listing the settlements here.
P271/70 P273/70	RWE npower	ST2 states a preference for nuclear new build at Sellafield. EN-6 does not provide a preference for some sites over others. Strategic Site Assessments will be carried out by Government and all 3 sites could potentially be developed. In the absence of detailed environmental and technical information all 3 sites should be considered equally.	Comment no longer relevant as Braystones and Kirksanton have been rejected.
P289/71 P300/72	Cleator Moor Town Council Cllr J Hully	The amount of development directed to Cleator Moor should be increased from 10% to 30%.	Whilst the Council strongly supports the regeneration and growth of Cleator Moor and will do its utmost to bring this about, the Core Strategy has to demonstrate that it is feasible. 30% would almost certainly be unachievable given the supply of developable land available. It should also be noted that the figure quoted (now 'at least' 10%) is not a ceiling, and development proposals above that level, if they emerge, would be likely to be supported.
P309/73	Leconfield Estates	Enabling sustainable long term growth requires a more flexible housing target post 2016. ST2 should provide some clarity regarding the mechanism to regularly review the housing figures.	No change here but the point is accepted; SS2, along with supporting text and background evidence, addresses this, and the Site Allocation DPD will take it further. The published Core Strategy puts forward an approach which is based firstly on demonstrating that the Borough can supply enough land to build homes to meet forecast need, whilst also showing that there is a capability to supply land to accommodate an aspirational level of growth, if that growth is generated. Monitoring will be carried out regularly as laid out in the revised Monitoring Framework, and the strategy will be reviewed in the future as necessary. For the time being, phasing of the delivery of the housing land supply will be a matter for the site allocation plan.
P309/73	Leconfield Estates	A wider overview needs to be taken of the benefits of growing Egremont. ST2B does not allow for the expansion of the settlement boundaries and only permits supporting development that contributes to the regeneration of the Town Centres. There is likely to be a need to review the settlement boundaries of the Key Service Centres and this should be supported by robust evidence.	It is not accepted that ST2 (B) is not in line with the strategy. However, the published Strategy explains more clearly how development can be accommodated in the Key Service Centres, including a more explicit recognition that the development figures envisaged are not a ceiling, and providing for settlement boundary changes (to be consulted on in detail in the site allocation process).
P310/73	Leconfield Estates	Fig 3.1 (Key Service Centre) needs to be reworded to provide more than local employment sites and more than just general needs housing, the hierarchy needs to reflect the Core Strategy Vision and the Masterplan.	In line with this, Figure 3.1 (Key Service Centre) needs to be reworded to provide wider than local employment opportunities and extensive, carefully planned allocations for new housing to meet more than 'general' needs. The hierarchy needs to reflect the Core Strategy Vision and the Masterplan.
P312/73	Leconfield Estates	We welcome the recognition of the need to revise the Settlement Boundaries at Paragraph 3.3.9 and suggest that the boundaries of Egremont be revised to accommodate additional development in response to long term development needs.	Noted. The text now lays the ground for detailed reconsideration of Egremont's settlement boundary in the site allocation process.
P442/20	Natural England	In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Nuclear new build will be a matter for the Major Infrastructure Planning Unit, whilst other low carbon energy proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies. Natural England can expect to be engaged where any proposal may have impacts on protected areas.
P319/39	National Trust	ST2C(iii) – should include the same locational condition as C(ii) i.e. 'at sites ...which minimise environmental and amenity impacts (to?) within acceptable limits.'	Not accepted. As infrastructure supports development, the critical factor is where development goes. The considerations for supporting infrastructure are different to those for the developments themselves, and will be taken into account when applications for development are considered. The environmental impact of infrastructure provision may also be a factor in the site allocations process. (The reference to 'within acceptable limits' in ST2 (ii) has been removed as unnecessary verbiage when the objective is already to minimise impacts.
P319/39	National Trust	The way that ST2C(iv) is currently worded, any employment use might be contemplated outside settlement boundaries. Alternative text is offered.	Accepted in part. The policy text has been sharpened although it is not considered necessary to adopt the format suggested.
P319/39	National Trust	In ST2C(v) the use of the word 'including' suggests that a range of other housing development might also be located outside the main settlements. Alternative text is offered.	Not accepted that the policy should have a finite list of uses. However, the policy wording has been amended to be more specific about why such uses are permissible.
P352/19	Taylor & Hardy	ST2 B uses the term "within defined settlement boundaries". Figure 3.1 clearly anticipates "extensions" in all of the settlement hierarchies where further housing is anticipated. This potential conflict could be resolved by deletion of the term "within defined settlement boundaries".	The point is accepted and paragraphs 3.2.9 to 3.2.11 now clarify the position as regards settlement extension.
P352/19	Taylor & Hardy	An additional criterion (vi) should be added to C to allow for opportunities to redevelop or restore vacant or derelict sites to accord with policy ST1C(v).	Not accepted; the policy lays down types of development which might be acceptable if they have a proven requirement to be outside settlements. The suggested clause could be inferred as inviting it to be overridden.
P372/9 P395/27	Regen North East Copeland Richard Mulholland	In ST2C(v) the need to meet proven specific local needs should be removed from the text and instead 'housing that supports the community for local needs and growth' should be inserted instead.	There is a presumption against development in the open countryside. The suggested alternative wording for ST2 C (v) will give the reader the impression that housing that does not fulfil the criteria will not necessarily be refused whereas the opposite is true. For this reason it is likely that the current wording of the policy statement will be retained (or revised only slightly so as not to change its meaning).
P391/74	West Cumbria Land LLP	The Core Strategy has perhaps missed the opportunity to identify a range of strategically linked areas where leadership and guidance would help deliver long term objectives. The document should make reference to the area that would	Agreed in part and the amended ST3B refers to south and central Whitehaven as a location encompassing all these sites, which are already identified in the Energy Coast Master Plan. This is amplified in the Whitehaven Locality strategy

		link the opportunities at Pow Beck to Woodhouse/Kells and to the former Rhodia site – a strategic priority area that would help focus investment and create impetus.	section and will be a factor, as a package of sites of major significance for Whitehaven, in further development of plans in the Local Development Framework. (This area may also be suitable for off-site development associated with nuclear new build.)
P396/27	Richard Mulholland	The text of ST2D should be changed to say that 60% of all non-nuclear development should be accommodated in Whitehaven and the three service centres (instead of 80%) with more detailed figures to achieve sustainable regeneration for each settlement to be defined.	Not accepted. The stated approach has been generally supported and is seen as essential if regeneration is to succeed in the towns.
P397/27	Richard Mulholland	Concentrating 80% of the areas future development in the towns will discourage inward migration as most people are attracted by the pleasant surroundings offered by our less populated areas. Development should be allowed in smaller settlements where people with skills and disposable income are more likely to want to settle.	Not accepted. The dispersal to rural settlements in recent decades has not been sustainable. The vitality and sustainability of the towns (which induce most of the areas of greatest deprivation), and the economy of the Borough as a whole, will be boosted by their regeneration, which can only be achieved if urban concentration is a focus. The Council intends to work with developers to ensure that new housing in and adjacent to the towns achieves a standard which will be attractive to incomers. There is already housing in Whitehaven which demonstrates that this can succeed.
P426/47	Mr G Garrett	There should be restricted or no new development within a five mile radius of Sellafield until the Legacy ponds and silos have been fully decommissioned. There should be minimum development within a ten mile radius until improvements to road infrastructure take place.	Point understood, but no change needed. The strategy will tend to achieve this as only a small scale of development is anticipated in villages. The Council does not consider that growth in Egremont and Whitehaven, although arguably within 5 and 10 miles respectively, would be problematic. Safety zones are under review but indication from the Health and Safety Executive and Office of Nuclear Regulation have not so far indicated that such extensive restricted development zones would be needed.
P426/47	Mr G Garrett	The main areas of residential development should be in Millom, Frizington, Parton, Distington and Lowca – the edges of the borough basically where there is good access in and out of the area. Old housing stock should be replaced with new energy efficient housing in these areas.	Agreed that growth should be encouraged in Millom, but otherwise not accepted, though some development will be acceptable in the smaller settlements, as indicated by ST2 and table 3.1. Accessibility is maximised by concentrating the greatest proportion of development in the towns, where most services are located and where there is the greatest choice of transport. Whilst access in and out of the Borough needs to be improved, it is not accepted that development should be focused in places where people might tend to use services outside the Borough, rather than creating jobs within it.
P426/47	Mr G Garrett	Whitehaven does not have enough retail and office accommodation to justify any increase in housing stock. Housing will only reduce the number of development sites for employment.	Not accepted. House building supports retail provision, not the other way around, and the Council is working with the NDA and others to create more office provision in Whitehaven. Whilst residential and commercial development close to the centre would be encouraged, the policy refers to encouraging development in the whole town including housng sites on its outskirts, not only centrally. (It is agreed that the removal of education facilities from the centre was unfortunate, but that cannot be rectified in the short term.)

Strategic Regeneration Priorities (ST3)

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

		to capture the potential benefits and transformation that could flow from more co-ordinated development.	joined up outcome.
P443/20	Natural England	In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies, and the advice of Natural England will be sought as appropriate and/or required.

Strategic Infrastructure Policy (ST4)

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P181/63	Mr R Curwen	Good recognition of the implications of the Nuclear Industry & also of the requirement to improve the associated transportation infrastructure.	Support noted.
P035/25	English Heritage	It will be important for any document dealing with S106 contributions to cover the historic environment.	No change, but the point is supported. The Strategy for Infrastructure recognises this, and the Developer Contributions SPD will also make allowance for it.
P056/26	Highways Agency	CIL provides a better mechanism for funding sub-regional strategic infrastructure and infrastructure that mitigates the cumulative impacts of multiple developments. With the new limitations to the use of S106 contributions, consideration should be given to using CIL.	Agreed. ST4 and supporting text now make provision for the production of a CIL document if circumstances justify it.
P101/32	Cumbria Wildlife Trust	Para 3.5.2 should make reference to biodiversity in the green infrastructure bullet. It is important to ensure habitat connectivity when assessing development proposals.	Agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.
P102/32	Cumbria Wildlife Trust	ST4 - Cumbria Wildlife Trust supports the inclusion of the environment in the list of infrastructure contributions it will seek.	Support noted.
P103/32	Cumbria Wildlife Trust	In para 3.5.6 – contributions should also be sought for the long term management that will be needed to make sure that there are positive biodiversity outcomes from compensation, mitigation and enhancement conditions attached to planning decisions.	Agreed. Paragraph 3.4.4 now refers to this and the SPD will develop it.
P126/45	Sport England	It is not clear what is meant by ‘strategic’ infrastructure and also what role the infrastructure plan would play. Will contributions only be sought for infrastructure identified in the plan or will these be in addition to any site specific requirements?	No change here but the point is agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.
P127/45	Sport England	With regards to establishing any deficits in sports and leisure infrastructure, quality, quantity and accessibility will have to be assessed.	No change here but the PPG17 study in the evidence base goes further than capacity and provides a basis to develop a broad approach in the Developer Contributions SPD.
P128/45	Sport England	Would it be more appropriate to set out the approach to developer contributions in the Core Strategy, rather than an SPD?	The Council believes that ST4 does this as far as is necessary or appropriate in a Core Strategy. It is backed up by the infrastructure work in the evidence base and will be taken forward in the SPD. The elimination by the CIL regulations of the possibility of a tariff removes the complication referred to.
P155/47	Mr G Garrett	Any monies gained from the NDA to fund infrastructure should be spent on one or two larger projects that will make a difference rather than spread across a larger number of small projects.	Noted. As far as the future is concerned, this will be a matter for decision at the time; at present (by way of illustration and precedent) it is a matter for the panel overseeing the Low Level Waste–related community benefit fund, a large part of which has already been earmarked for one major project.
P164/51	Sellafield Ltd	At this stage, it is not clear what the Council’s view is of infrastructure needs. Given the clear preference for continuing the practice of negotiating planning obligations on a case by case in the short to medium term, we would seek further clarity and indeed the opportunity to comment and shape both the “Infrastructure Plan” and proposed “Planning Obligations Supplementary Planning Document” going forward.	No change, but the point is supported. This will be an important consideration in considering the Development Consent Order and any related planning applications.
P196/38	Cumbria County Council	ST4 would benefit from providing more information on the infrastructure needed for the borough’s development. ST4 could have a separate policy that makes it more explicit what contributions are necessary to support additional schools, roads, open space etc. The need for flood prevention should be made more explicit in the policy so that subsequent policies can be seen to be joined up in a robust way.	This is provided in the evidence base (Infrastructure Deficit Report) and the Strategy for Infrastructure. Work on nuclear new build is still at an early stage. The need for an additional policy is not accepted. The principles are agreed, but this level of detail is more appropriate for the SPD.
P196/38	Cumbria County Council	ST4 needs to make explicit reference to the importance of highways and transport infrastructure. It would be appropriate for travel planning and transport infrastructure to be included in the S106/Planning Obligations SPD.	Agreed in part; this is mentioned in the preamble to ST4, covered in some detail in the Strategy for Infrastructure, and will be taken forward in the SPD.
P196/38	Cumbria County Council	Insisting on planning obligations for smaller scale developments in areas where there is market failure may prevent much needed development taking place. It is proposed that some flexibility is required in these circumstances.	The principle is valid but no change here. The SPD will take viability into account and this is likely to include thresholds in some instances.
P196/38	Cumbria County Council	The supporting text to Policy ST4 refers to nuclear new build as an example where the Borough Council will need to work with the Infrastructure Planning Commission to agree a “Community Offset Package”. Whilst this is supported, it is suggested that the short-term housing needs and their location arising from temporary construction workers, for example, should be taken into account at this drafting stage of the Core Strategy.	Noted - this is an important point which requires a great deal of consideration. Locations for temporary accommodation will be identified at the same time as new housing allocations (in preparation for the Site Allocations DPD).
P197/38	Cumbria County Council	The references in paragraph 3.5.2 to Green Infrastructure as part of Policy ST4 is welcomed and supported.	Support noted. In order to make the pre submission draft of the Core Strategy more concise, this paragraph has been removed but green infrastructure is covered in the Infrastructure Deficit report and the Infrastructure Plan, both of which are evidence base documents and available to view on the Councils website.
P198/38	Cumbria County	Reference should be made to wildlife rich areas and wildlife corridors in para 3.5.4	Agreed, albeit included in the ST4 preamble under Green Infrastructure.

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P355/13	Environment Agency	The Infrastructure Plan should be produced prior to the Core Strategy submission so that it is informed by it (reference is made to UU ability to provide sufficient water supply). It is important that the Core Strategy is deliverable. The West Cumbria Water Resource Zone is forecast to go into deficit from 2014/15 onwards i.e. where demand will be greater than supply in dry weather. United Utilities plan to develop a new suite of boreholes near Egremont, to reduce leakage and to promote water efficiency in West Cumbria in order to restore a healthy supply-demand balance from 2014/15 onwards. This may not have taken into account increased demand from growth and that is why it is important to investigate this through your Infrastructure Plan.	The infrastructure planning process has informed the published Core Strategy and the relevant evidence base document (Strategy for Infrastructure, based on the Infrastructure Deficit Report) has been supplied to the Agency and statutory undertakers for comment.
P371/34	United Utilities	Cleator Moor, The Green and Drigg Waste Water Treatment Works all have performance problems and have caused flooding and pollution. There are also flooding and capacity issues at Cleator Moor. These issues may not be resolved until the AMP 2015-20. This does not necessarily mean that development could not be serviced but surface water should not enter the combined sewer without causing further flood risk and pollution.	No change here, but noted in the Strategy for Infrastructure and will be a consideration in the Site Allocations DPD regarding allocation of sites and, potentially, phasing of their development. United Utilities will be fully involved in that process.
P373/9	Regen North East Copeland	The policy as written will have no bearing on the investment decisions by utility companies and accordingly appears irrelevant	The purpose of the policy is to give a basis for levying or negotiating contributions from developers. The background work (particularly, the Strategy for Infrastructure) will be a factor considered by statutory undertakers (who have been consulted on this) in their asset management planning, as will the Local Development Framework itself. The policy thus serves a legitimate purpose and is valid as it stands.
P447/20	Natural England	Paragraph 3.5.2: We welcome the inclusion of green infrastructure in this paragraph. However, we consider that it should also make reference to biodiversity alongside open space within the green infrastructure bullet point. Biodiversity is an essential component of green infrastructure and there will be opportunities for creating, connecting and enhancing habitats.	Agreed. The policy preamble now includes a reference to green infrastructure as a biodiversity factor, and the Developer Contributions SPD will make provision for it.
P448/20	Natural England	We note the intention to prepare a Supplementary Planning Document on Planning Obligations and Agreements. In view of the comments above, the SPD should of course include contributions to the full range of green infrastructure which is needed.	Agreed. The SPD will address this.

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

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P020/11	NWDA	ER1, ER2 and ER3 - The Agency broadly welcomes the inclusion of draft policies on Planning for the Nuclear Sector, Renewable Energy sector and Infrastructure for the Energy Coast.	Support noted
P275/70	RWE npower	ER1 – The Core Strategy should not identify Sellafield as the preferred site for nuclear new build.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P104/32	Cumbria Wildlife Trust	ER1 – Nuclear new build at Kirsanton would cause immense environmental damage to the Duddon and Morecambe Bay Natura 2000 sites.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P199/38	Cumbria County Council	ER1 – Accommodating new processing within the current Sellafield boundaries could require an expansion of the licensed area. The implications of this need to be fully considered as part of the Core Strategy.	It is not accepted that the Core Strategy should allow for expansion of the Sellafield licensed area boundary. At present the Council's view is that reprocessing activities should be accommodated in the existing site and other contingencies are too hypothetical to be accounted for at this stage in the Core Strategy. Any such proposal would be dealt with on its own merits under Nationally Significant Infrastructure planning process, or the Core Strategy as adopted, or considered in a future review or alteration of the strategy.
P199/38	Cumbria County Council	ER1 – There is some duplication between this policy and ST3. The two policies could be merged, making the Core Strategy simpler and clearer.	Not accepted. It is important to have a policy that deals exclusively with nuclear development as this has unique characteristics, as well as being one of the most significant types of development that is likely to take place in the borough during the plan period, with enormous implications for the economic future of Copeland.
P199/38	Cumbria County Council	ER1 – There may be problems with local opinion about the appropriateness of moving waste from the existing site and the effects that this might have on local communities.	There may well be local opinion about waste transfer, but no change is needed here, as such concerns would be properly taken into account at the planning application stage or as part of any other regulatory process involved.
P321/39	National Trust	ER1 – B and C should be deleted from this policy as they do not state an intention in respect of development but rather a need to consider the implications of development. A criteria based policy may be more appropriate.	Not accepted. Criterion C (B has been deleted, being out of date) is considered to be important as marking the Council's policy in negotiating with major infrastructure (nuclear) developers and making representations to the Major Infrastructure Planning Unit. The Council considers that this policy goes as far as is appropriate in expressing a view on matters which will be under the jurisdiction of the MIPU.
P359/13	Environment Agency	ER1 C – should include biodiversity and environment as well as residents, business and image.	Agreed; 'environment' inserted, encompassing biodiversity.
P359/13	Environment Agency	ER1 C – Delete 'full safety case' and replace with 'appropriate safety case'	Agreed in part; phrase deleted but different wording inserted.
P165/51	Sellafield Ltd	ER1 G – Sellafield Ltd may have legitimate reasons for keeping employees working on site and would prefer to have a	Agreed. The policy is not intended to suggest that this could be achieved without dialogue, and now makes this more

		dialogue with Copeland with a view to agreeing on a practical application of this policy which does not impact on the business.	clear.
P199/38	Cumbria County Council	ER1, DM1 – It is recommended that Copeland should reflect the views of the County Council on the nominated sites at Braystones and Kirksanton.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P057/26 P058/26 P069/26 P071/26	Highways Agency	ER1, ER3, DM1, DM5 - Consideration may need to be given to the specific transport issues and challenges associated with delivering growth in the nuclear sector, including potential impact during the construction phases.	No change, but the point is accepted. This will be worked on when the power station Development Consent Order is applied for, during any other such processes, and in work on the Site Allocations DPD.
P441/20 P440/20 P439/20 P438/20	Natural England	ER1-3 and Section 4.2 - In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	No change needed in this section. Production of the Core Strategy has taken place in full awareness of the importance of these natural assets. They are protected by national and transnational legislation which does not need to be repeated here, and their continuing protection has been considered in the Habitats Regulations Assessment. The Core Strategy takes them into account implicitly throughout and explicitly, where the Council has felt the need to make a specific strengthening reference. The criteria within the supporting development management policy (DM2), together with other policies in the Core Strategy should provide sufficient policy protection as requested.
P441/20	Natural England	ER3A should also make reference to avoiding ot mitigating potential impacts on biodiversity and geodiversity as well as landscape.	Agreed; 'natural environment' inserted.
P441/20	Natural England	4.2 - In terms of the National Grid upgrades it is too soon (i.e. with no route agreed yet) to be specific about potential impacts. However, we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity, and opportunities to access and enjoy the countryside.	Point noted, no change indicated.
P158/48	Ponsonby Parish Council	4.2.5 – Who has identified the borough as a potential host for the geological repository? No consultation is taking place with the parishes surrounding the Sellafield site.	Agreed that the Preferred Options text is potentially misleading. The Council has merely expressed an interest in discussing the proposal, and consultation is taking place under the Managing Radioactive Waste Safely process. The text now reflects this more precisely.
P250/14 P255/67	Moresby Parish Council Parton Parish Council	4.2.5 – The borough has not been identified but has expressed a ‘without commitment interest’ in talking to Government about the potential for hosting a repository.	Agreed that the Preferred Options text is potentially misleading. The Council has merely expressed an interest in discussing the proposal, and consultation is taking place under the Managing Radioactive Waste Safely process. The text now reflects this more precisely.
P364/13	Environment Agency	4.2.5 – At the start of the paragraph delete “storage sites” insert “disposal of higher-activity radioactive wastes”	Agreed; text amended accordingly.
P365/13	Environment Agency	4.2.6 - To represent the British Geological Survey’s work accurately, amend the first sentence to read, “...screening to rule out any area of the Borough that is unsuitable for repository siting, and will publish a final report.” Then delete the second sentence.	Agreed in part; text amended, but reference to consultation retained.
P366/13	Environment Agency	4.2.7 - amend the middle of the second sentence to read, “...locating a facility if a safety case meets the requirements of the relevant regulators and full...”	Agreed; text amended accordingly.
P082/31 P200/38	4NW Cumbria County Council	ER2 – It is recommended that the County’s Renewable Energy Study is recognised in the LDF process and that the Council develops an evidence base and targets for renewable energy. LDFs could set ‘stretch targets’ for renewable energy to demonstrate how regional targets could be exceeded. A renewable energy study will e taking place in 2010/11which will help to provide an evidence base. Reference should be made to Cumbria County Councils Technical Paper 6 – “Planning for Renewable Energy Development in Cumbria (2004)” which identified the potential for renewable energy in the borough (although now out of date).	Taken on board, although it was felt that a guide for renewable energy capacity by type together with an overall aspiration for delivery was more appropriate than specific targets (explained in paras. 4.3.7 to 4.3.9).
P083/31 P201/38	4NW Cumbria County Council	ER3 – Further work is required to identify the housing needs of the temporary construction workers as well as extra school places etc.	Noted. Existing text has been amended to reflect the Nationally Significant Infrastructure Project process, but retains the guidance that the Council will negotiate for such provision to be made in accordance with the Core Strategy. It has been too early during Core Strategy production to go further in estimating numbers. Much of the planning work would be done under the NSIP process. It is not anticipated that a large proportion of the construction workforce will bring families with them, but more detailed consideration will include that.
P036/25	English Heritage	ER3 A - include 'and heritage assets' after 'landscapes'.	Agreed; text amended.
P322/39	National Trust	ER3 A – There is no specific reference to the impact on designated or locally important assets. Also the wording should be strengthened to ensure that transmission infrastructure is located having regard to such potential impacts.	Agreed in part; reference now made to assets, but further change risks making the policy unnecessarily convoluted when it is already clearly implicit, and supported by other policies locally and nationally, that infrastructure would be expected to have such regard.
P360/13	Environment Agency	ER3 A – this policy should be (at least) minimising the impacts on biodiversity as well as landscapes, health and amenity.	Agreed; text amended.
P265/16	Allerdale Borough Council	ER3 B – It is important to ensure that further education facilities are encouraged that complement existing establishments such as Enerqus and University of Cumbria.	The point is supported, and the policy encompasses such provision. See also ER11. No change needed here, but there is already considerable joint working on this.
P166/51	Sellafield Ltd	ER3 C – Thought needs to be given to how any temporary housing options will impact on current Sellafield traffic flows and travel plans.	Noted: traffic modelling is, and will remain, an integral part of planning for development.

P105/32	Cumbria Wildlife Trust	Para 4.2.14 – Undergrounding 400kV electricity cables is not a panacea for the landscape impact of pylons. The work disturbs an area of land 30-50m wide and necessitates large transformer stations where the cables enter and exit the ground. This level of disturbance would be very harmful where it intersects designated sites. This damage needs to be factored in when considering lengths of cabling suitable for undergrounding.	No change, but the point is valid. National Grid is preparing to consult stakeholders on the matter of undergrounding cables. The decision will not be taken by Copeland but the Council will be part of the decision making process.
P147/46	GONW	4.2.16 – It is not clear whether the accommodation for temporary construction workers will form part of the overall borough housing requirement that will exist as part of the housing offer after the workers have left the borough.	No change. The mix of permanent and temporary housing to be provided remains to be determined. The Council is satisfied that it can demonstrate enough land supply (SS2 and supporting evidence) to provide a sizeable component of permanent housing which will eventually if not immediately form part of the housing stock, and sites (ER3 – economic development land supply and/or ‘opportunity sites’) which would be suitable for temporary accommodation.
P264/16	Allerdale Borough Council	4.2.16 – If the temporary workers are to be accommodated in the main towns of Copeland, this needs to be supported by evidence showing that there is sufficient capacity in each of these locations. A greater understanding of the makeup of the workforce is required in terms of numbers, over what period and whether local people, once trained, are likely to make up the workforce. This information would help to clarify whether Allerdale has a supporting role to play and how far that would extend.	The mix of permanent and temporary housing to be provided remains to be determined. The Council is satisfied that it can demonstrate enough land supply (SS2 and supporting evidence) to provide a sizeable component of permanent housing which will eventually if not immediately form part of the housing stock, and sites (ER3 – economic development land supply and/or ‘opportunity sites’) which would be suitable for temporary accommodation. Allerdale is involved in these discussions. No change to policy needed here as joint working is continuing and will do in response to the Development Consent Order(s)
P027/11	NWDA	DM1 - As drafted, the policy identifies the matters that the Council will ask the IPC to take into account when making decisions on nuclear new build. Does this need to be set out in a policy; it may be more appropriate to incorporate this in the supporting text to policy ER1.	No change, except clarification in supporting text. DM1 goes further than Nationally Significant Infrastructure Projects, and in any case has value as a statement of the Council’s planning policy which will support its approach to negotiating with the developer and making representations to the Major Infrastructure Planning Unit.
P368/13	Environment Agency	DM1 - With regard to New Build Nuclear Proposals, we would like to refer to our position on new nuclear power and our existing advice to DECC on the siting of new nuclear power stations.	Comment noted, though the location decision has now been taken and the Development Consent process is not within the Council's jurisdiction.
P113/32	Cumbria Wildlife Trust	DM1 – Nuclear energy generation proposals should be considered against the same environmental criteria that renewable energy generation is in DM2 E.	No change. The requirement for an Environmental Assessment, which would not apply to a lot of projects under DM2, covers this, along with other policies in the LDF.
P233/38	Cumbria County Council	DM1 - The County Council’s recent response to the consultation on the Draft National Policy Statement (February 2010) for Nuclear Power Generation supported the nomination of the Sellafield site, but was not convinced of the case for the nominated sites at Braystones and Kirksanton and was minded not to support them. It is recommended that the Borough Council reflects the County Council’s position on this matter.	Comment no longer relevant as Sellafield has been accepted as the sole nuclear new build location in the Borough.
P279/70	RWE npower	DM1 D – The wording in para D that relates to community benefits is ambiguous. This paragraph should be linked to Circular 05/2005.	Whilst it is of course accepted that Circular 05/05 should govern planning obligations, the Borough Council does not accept that the same restrictions need apply to 'community benefits packages', which by their nature would be negotiable as agreements outside the scope of planning legislation, and thus do not need to be bound by the requirements applied to Section 106 agreements.
P043/25	English Heritage	DM1 D - should include environmental alongside economic and social regeneration.	Agreed: text amended.
P459/20	Natural England	DM1, DM2 & DM5 - In relation to nuclear energy, offshore renewables and onshore renewables we would wish to avoid significant impacts particularly on protected landscapes, nationally and internationally ecologically designated sites and biodiversity and access. In addition, we would wish to avoid significant impacts on the St. Bees Heritage Coast	Noted, but no change needed. Proposals will be dealt with according to the Habitats Regulations and relevant Core Strategy and Development Management policies.
P341/39	National Trust	DM2 – an overt reference to the assessment of the cumulative impacts of multiple developments should be made in the policy statement itself.	Cumulative impacts - taken on board.
P028/11	NWDA	DM2 - The policy’s opening sentence should be ‘Proposals for renewable energy development in the Borough will be supported where they satisfy the following criteria:’	The support is given in policy ER2.
P005/7	The Coal Authority	DM2 - Large scale wind farm developments can have a significant impact on mineral resources. If Copeland wants to promote major wind farm development then the Coal Authority would like to see the policy criteria including an assessment of the effect development might have on minerals. Additional text is suggested.	Taken on board - this has been incorporated into policy DM11 rather than DM2 as it can apply to other developments as well as renewables.
P341/39	National Trust	DM2 – PPS22 is pro-renewables and the way that the start of this policy is worded would suggest that Copeland is not particularly positive about it. It is suggested that the introduction is more positively couched.	The support is given in policy ER2.
P341/39	National Trust	DM2 B - the landscape impacts could make specific reference to spatially important considerations in the Copeland context – i.e. “including the St Bees Heritage coast and its setting, and the setting of the Lake District National Park”	The statement as it is includes these areas and is a blanket approach. There are obviously important landscapes in the borough but all landscapes have the potential to be important to the people that live in them.
P266/33	RSPB	DM2 D & E – These criteria need to be underpinned by the importance of the protection of a population of internationally important over wintering Hen Harriers in the Cleator Moor Locality.	Not Accepted. The Borough Council considers that a direct reference to the area's importance for hen harriers should not be included in the text in on the grounds of maintaining security of biodiversity.
P341/39	National Trust	DM2 E - there should be a specific reference to the settings of heritage assets	Not agreed. The Council believes that the criteria B and C deal with this issue adequately, protecting a much larger area than just the settings of heritage assets.
P168/51	Sellafield Ltd	DM5 – An explicit reference in this policy to ‘clean up’ in terms of Copeland’s view regarding potential new development (plants) associated with decommissioning activities would be useful.	E deals with new development within the Sellafield site and A states that there should be no development outside of the licenced site other than that relating to monitoring, maintenance and investigatory work.
P168/51	Sellafield Ltd	DM5 - decommissioning may drive the requirement to use land adjacent to the site for nuclear or non-nuclear support activities. Would be helpful if the policy gave guidance should this scenario arise sometime in the future. Sellafield Ltd would not wish to see options closed off should operational necessities or national nuclear policy issues change over time.	DM5 A has now been changed to state that there should be no development outside of the licenced site other than that relating to monitoring, maintenance and investigatory work. The Preferred Options policy did not allow for any development outside the boundary.

P280/70	RWE npower	DM5 - RWE npower support policy DM5 in terms of its location preference for processing and waste management sites.	Support noted.
P254/14 P259/67	Parton Parish Council Moresby Parish Council	DM5 - It needs to be made clear that the current storage facilities at Sellafield and Drigg would not necessarily be appropriate for long term storage of highly active waste. It would be better if there were two distinct policies.	It is not accepted that this policy needs to be split. These are planning policies and the regulation of nuclear waste is not a matter for the Core Strategy. The Drigg site is licensed for low level waste only. Reference is already made in DM5C to the best practicable environmental option as regards Sellafield, and the long term position on finding a new means of disposing of high level waste.
P367/13	Environment Agency	DM5 A – Drigg LLWR do carry out some activities outside the boundary e.g. sinking boreholes, maintenance works and monitoring etc. This must be recognised as necessary for safety reasons.	Agreed - text amended.
P367/13	Environment Agency	DM5 D – This statement may be unnecessarily restrictive on future waste management options e.g. some sorting or treatment of LLW that is acceptable, safe and the Best Practicable Environmental Option.	Agreed. The Council considers that deletion of the word ‘processing or other’ removes some ambiguity on this.

Space for Economic Development: Policies - ER4, DM3

Ref. No.	Respondent	Preferred Options Consultation Comment	Council' Response
P021/11 P148/46	NWDA GONW	ER4 – This policy is currently unsound as it does not quantify an amount of employment land allocated or the timescale over which it will be provided. This is required to provide a clear framework for (i) the identification of employment sites in the Allocations DPD and (ii) the release of poorer quality sites to alternative uses.	Agreed in part. There is no requirement for a Core Strategy policy to quantify the land supply, which will be done in detail on the Site Allocations DPD. The supporting text and evidence base (research studies and the Economic Development Topic Paper which summarises them) now demonstrate that Copeland will be able to meet forecast demand and provide for growth.
P059/26	Highways Agency	ER4 – Need for employment land should have a robust evidence base and be linked to any infrastructure improvements which may be required to deliver the proposed economic development.	No change needed, but the point is accepted. The evidence base (employment land research and Strategy for Infrastructure) provides the foundation to deal with this via the site allocation process.
P202/38	Cumbria County Council	ER4 – Caution should be exercised when considering the de-allocation of employment sites on the basis of numerical over-allocation. Sites allocated for development must be genuinely available, and the de-allocated sites must be no longer fit for purpose or incapable of being made so.	Agreed. The supporting text now addresses this point, as explained in more depth by the employment land topic paper, and will guide the site allocation process.
P323/39	National Trust	ER4 A – locational considerations need to be explicit in this policy rather than having such an open-ended approach. The simplest way to do this would be by cross-reference to Policies ST2 and ER6.	Agreed. Although the policies of the plan should be read together, the link in this instance is appropriately strengthened by a reference in supporting text.
P106/32	Cumbria Wildlife Trust	ER4 B – Sites at risk of flooding or that are environmentally sensitive should be included in the reasons for de-allocation	No change needed, on grounds of keeping the policy concise. These factors would tend to make an undeveloped site suitable for consideration for de-allocation, and will be considered in the site allocation process.
P179/61	Port Millom Ltd	ER4 B - Strong objection to any proposal that would prevent the continued use of Millom Pier as an industrial facility. <i>(Comment also made in relation to para 8.6.9)</i>	Objection noted. This land has been identified as suitable for tourism-related development (Copeland Local Plan 2006), and the Employment Land and Premises Study recommends that it be de-allocated; this may be debated during the production of the Site Allocation Plan. There is no proposal in the Core Strategy to de-allocate it for industrial use and nothing in the Core Strategy which prevents its continuing in its present use.
P009/8	Cumbria Tourism	4.3.5 – It is asked that the Council includes an assessment and suggestions as to which ‘employment’ sites could be appropriate for tourism development.	Agreed, and the text now makes specific reference to tourism; otherwise this will be addressed in the site allocation process.

Quality of Employment Space – ER5

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

Location of Employment: Policies ER6, DM4

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P010/8	Cumbria Tourism	We note a presumption in favour of employment development in the Principle Town and Key Service Centres and those employment proposals elsewhere, other than those involving 10 employees or fewer, will be required to demonstrate why they could not appropriately be so located. We support this qualification, which will assist small-scale rural employment development and encourage entrepreneurs and ‘micro’ enterprises outwith the main settlements, many of which may be tourism related.	Support noted, though please note that this wording has been modified to make it less absolute.
P022/11	NWDA	The Agency welcomes draft policy ER6 on the location of employment, in particular, its reference to the continuing development of the Westlakes Science and Technology Park as a knowledge campus of international significance.	Support noted.

P022/11	NWDA	ER6 - Suggestion to include the following text in the Core Strategy (supporting text): ‘Westlakes is intended to build on and strengthen a nationally important concentration of energy related research and development and manufacturing. The strategic regeneration site will: - Act as a flagship for University research and inward investment; - Attract knowledge based industry, with special emphasis on technology related to nuclear power and decommissioning; and - Assist in the creation of a centre of excellence for the energy industry.’	Agreed; text included in supporting text (para 4.6.6 of Pre Submission Draft)
P061/26	Highways Agency	ER6 – Where employment development is proposed outside of existing centres e.g. Westlakes, consideration should be given to ensuring that the transport impacts are mitigated through provision of sustainable transport and use of travel plans.	Agreed but no policy change needed though supporting text has been modified to make reference to transport impact mitigation; policy DM22 also addresses this.
P061/26	Highways Agency	ER6 - The Highways Agency are unable to assess the impact of proposals until it knows the details of the scale and location of employment development. If such evidence is not available to support the Core Strategy then the document should state that the evidence will be in place to support the Site Allocations DPD.	Noted. The Council is satisfied that the identified supply, compared to current demand, offers enough flexibility for detailed consideration to be dealt with in the site allocation process. In the meantime, emerging knowledge about the implications of nuclear new build, informed by the Strategy for Infrastructure, will be the subject of discussions to which the Highways Authority and the Agency will be party. This will be informed by modelling work to be done by the County Council.
P084/31 P203/38	4NW	ER6 – consideration should be given to giving an indication of the amount of employment land needed, in hectares, for the plan period.	Supporting text and evidence base documents address this but the emphasis is on flexibility in a time of uncertainty. The site allocations DPD will provide a more detailed framework for the management of the land supply..
P276/70	RWE npower	ER6 – objection to the wording of ER6 in that it does not specifically mention that 3 sites have been identified for potential nuclear development outside of the town centres. The policy should state that the 3 proposed NNB sites are amongst the preferred locations for employment related to the nuclear industry.	Not accepted. The Council considers that, read together as they should be, ER1, ER3 and ER6 are clear as they stand.
P324/39	National Trust	ER6 B – There are concerns about the impact of this statement on the landscape character, biodiversity and heritage of areas outside the settlement boundaries. Also how will the impact on residential amenity be assessed?	Agreed. ER6B now includes matters referred to. Residential amenity impact would be assessed as for any other development proposal; the merits of the proposal, along with the applicant’s design and access statement judged through the development control process.
P324/39	National Trust	ER6 A & B – The exclusion of developments involving 10 employees or less should be removed and that B should set out a list of criteria that such proposals should be tested against.	Agreed; ER6B amended to make more explicit the criteria for consideration. The yardstick of ten employees is now in supporting text, as guidance rather than strict policy.
P404/27	Richard Mulholland	Fig 4.1 - requires particular attention to increase the existing low base Cleator Moor employment figures, to bring it in line with other centres with a similar or smaller number of residents (comment made in relation to para 8.3.10.)	
P029/11	NWDA	DM4 - is supported on the basis that it is generally consistent with the draft purposes identified for Westlakes.	Support noted. The policy is unchanged in the pre submission draft of the document.
P070/26	Highways Agency	DM4 – The potential impact of individual and cumulative development and the requirement of supporting infrastructure and sustainable transport improvements, particularly at Westlakes, should be determined as part of the evidence base.	Noted. The Strategy for Infrastructure identifies transportation issues, and further modelling work will be undertaken as the site allocation plan proceeds, along with continuing work on the implications of nuclear new build. It should be noted in this context that very little new employment land has been identified during the planning process.

Developing Town Centres and Other Centres: Policies ER7, DM6, DM7

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

Whitehaven Town Centre: ER8

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P037/25	English Heritage	ER8 - The need for additional characterisation and urban design analysis to support and successfully implement this policy should be considered.	A characterisation analysis has already been completed in 2008 by Paul Butler Associates. The publication is available to view on the Council's website.

P063/26	Highways Agency	ER8 - improvements to sustainable connections between Whitehaven, the key service centres and out of centre strategic locations should also be considered, given that future development is to be focused in these locations	Not accepted. Policy T1 B safeguards land for transport priorities within Whitehaven including links to out of centre strategic locations, and Policy T1 C i) promotes sustainable connections between Whitehaven, key employment sites, service centres and transport hubs.
P205/38	Cumbria County Council	ER8 – Some of the policy statements in ER8 might be better placed within the Development Management Policies section. Additional reference could be made to improving Whitehaven’s tourism offer particularly in relation to serviced accommodation, improved visitor facilities and access to the coast.	Partially accepted. DM6 and DM7 provide greater detail on appropriate uses and concentrations of uses acceptable within the Primary Frontages Area in Whitehaven and defined town centre areas, whilst ER8 sets out as a broader policy framework for the protection and enhancement of Whitehaven Town Centre as Principal Town. Policy ST2 and the settlement hierarchy in Table 3.1 provide general principles but do not provide the level of guidance and detail set out in ER8 and DM6 and 7. However the text of ER8 has been amended to include a reference to improving Whitehaven's tourism offer, particularly in relation to serviced accommodation, improved visitor facilities and access to coast, under part E.

The Key Service Centres, Local Centres and other smaller centres: Policies ER9

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

Tourism Renaissance: Policies ER10, DM8, DM9

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P012/8	Cumbria Tourism	ER10 - Pleased to see the support given to the tourism sector. Generally support the stance that recognises the potential for further growth and the need to improve the range, quality and integration of facilities with the National Park.	Support noted.
P012/8	Cumbria Tourism	ER10 – It does not appear that the location specific recommendations of the Cumbria West Coast Tourism Study in Millom and Haverigg have been taken on board.	Hodbarrow is the Haverigg Tourism Opportunity Site mentioned in ER10 C(i)
P023/11	NWDA	ER10 is broadly supported. In particular we welcome its reference to the expansion of tourism outside the Lake District National Park in ways which complement and take pressure off the National Park's busiest locations.	Support noted
P064/26	Highways Agency	ER10 - supportive of the approach to ensure that accommodation and attractions are well connected, particularly by public transport, walking and cycling.	Support noted.
P207/38	Cumbria County Council	ER10 – This policy is expressed in negative terms, using words like ‘allow’, ‘permit’, rather than ‘encourage’. The policy would benefit if it were expressed in more positive language.	Accepted. Policy wording modified.
P207/38	Cumbria County Council	ER10 – There is a need to encourage complementary investment in public realm, upgrade attractions and improve food and drink provision. The policy could mention these requirements too.	Accepted. Policy modified with the addition of D.
P285/71 P296/72	Cleator Moor Town Council Cllr J Hully	ER10 – Cleator Moor is ideally placed within the cycle network to be the hub for active tourism and therefore tourism should be promoted here. ‘Accommodating modest scale development’ is not positive enough.	Policy wording modified.
P325/39	National Trust	ER10 – ‘Renaissance through Tourism’ would be better title for this policy – it is actually seeking a significant contribution from tourism to the renaissance of Copeland.	Accepted. Title changed to Renaissance through Tourism.
P374/9 P398/27	Regen North East Copeland Mr R Mulholland	ER10 B – The policy wording should be more supportive of large scale tourism development in Whitehaven and development in the Key Service Centres and Local Centres.	Not accepted, the suggested text allows a more dispersed pattern of development and therefore goes against sustainability principles.
P399/27	Mr R Mulholland	ER10 C – The Ehen Valley TOS2 should be made continuous	Noted - consideration will be given to the designation of parcels of land during the preparation of the Site Allocations DPD.
P325/39	National Trust	ER10 C(iii) – Objection is raised to the possibility of ‘large-scale tourist activities’ on the Whitehaven coastal fringe. 4.9.6 talks about controlling where such activities should generally be located, but it is unclear what these controls will be. They need to be identified at this stage. The current local plan gave a lot of background information on this matter with regards to sustainable design and protecting the qualities and character of the undeveloped coast. This is missing	ER10 C and 4.10.7 in the Pre-submission draft have been revised to take this into account.

		in the Core Strategy. Para 4.9.6 fails to acknowledge the Colourful Coast work that has been done already and the most appropriate forms of tourism activity. Part C should be amended to refer in general to appropriate forms of tourist development, and in respect of site C iii should make specific reference to development here “according with the principles of sustainable development, and not compromising the special qualities and character of the undeveloped coast or public access thereto”. More detailed information should be included in the supporting text.	
P342/39	National Trust	9.2.24 – There is no reference to a “Tourism Renaissance” in Policy ST1 – the reference at B i) is to supporting tourism.	We consider 'Tourism Renaissance' to be a commonly used phrase and consider it acceptable to use in this instance.
P343/39	National Trust	DM8 - The approach set out here is supported and appropriate to the circumstances of Copeland. The recognition of the need for a different approach to ‘place-bound’ assets is especially apt and welcomed.	Support noted.
P236/38	Cumbria County Council	DM9 – the policy could be improved by making it clear about the possibility of granting planning permission for new caravan/chalet sites in rural areas. PPS4 offers greater flexibility for such development in appropriate locations where identified needs are not being met. It is suggested that the Preferred Options Policy DM9 should be consistent with the approach in PPS4 and with Saved JSP Policy EM16 and the SRSpS.	Policy wording modified.
P344/39	National Trust	DM9 - the caveats in the first paragraph are themselves somewhat loose and make no specific reference to issues such as: landscape character assessment work, setting of the National Park, the Heritage Coast, including views to and from it, the undeveloped coast, nature conservation assets and heritage assets and their settings. It is requested that more detailed guidance encompassing these specific features is included, and that it is made clear that it also applies to “rural holiday homes, caravans, chalets, camping sites and beach-chalets”.	Policy wording and text modified to provide greater clarity.

Developing Enterprise and Skills: ER11

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P326/39	National Trust	ER11 - The approach is appropriate and supported. It is noted that recreational initiatives such as the Colourful Coast also play an important role in improving people’s life skills both directly and indirectly	Support noted.
P107/32	Cumbria Wildlife Trust	ER11 – The policy should include training in the land management and forestry sector e.g. managing upland bog will ensure that it continues to be a carbon sink, traditional walling and hedging skills to maintain the appearance of the landscape and therefore of benefit for tourism. The policy seems to be very urban based despite Copeland being a rural borough.	Accepted. Wording revised in 4.11.4 to include training for land management / skills relating to the rural environment.
P208/38	Cumbria County Council	ER11 - the criteria should be made more specific to land-use activities and development as they are not currently useful for essentially land-use development management purposes.	Accepted - policy wording modified.
P286/71 P297/72	Cleator Moor Town Council Cllr J Hully	ER11 – Developments like the Phoenix Centre should be promoted in Cleator Moor. An increase in educational opportunities and facilities would help promote the town, support local business and bridge the gap that losing Ehenside school has created.	Noted. Policy ER11 - F, policy wording modified to focus employment training and initiatives in Whitehaven, the 3 Key Service Centres, the Westlakes Science and Technology Park and the Sellafield site.
P065/26	Highways Agency	ER11 F – The strategic objectives should be carried through to this policy which identify that the most appropriate locations would be within Whitehaven or the key service centres or in locations linked to key employment opportunities.	Areas with good access to the SRN are: Whitehaven, the 3 Key Service Centres, the Sellafield site and Westlakes Science and Technology Park. These are the areas where employment training facilities will be focussed. Wording revised in F to provide more clarity.
P375/9 P400/27	Regen North East Copeland Mr R Mulholland	ER11 G - Replace: Ensuring that the benefits of regeneration in Whitehaven, provide a catalyst for change in the communities living nearby, by improving connectivity, including transport links and targeting training and employment agreements With: Ensuring that the benefits of regeneration in the Borough, provide a catalyst for change in the communities, by improving connectivity, including transport links and targeting training and employment opportunities	Policy wording modified, however it should be noted that the key regeneration sites, as identified in ST3, are mostly in Whitehaven.

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

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

P345/39	National Trust	DM11 - The approach to sustainable construction is a key aspect in reducing emissions and addressing the impacts of climate change. It is considered that the requirements advanced in this Preferred Policy are appropriate and they are supported accordingly.	Support noted.
P425/13	Environment Agency	DM11 – With regards to increasing water efficiency within Copeland it is considered that Code Level 4 is the lowest standard we would be willing to accept in Copeland and suggest a policy is added to Section 7 Environmental Protection and Enhancement to achieve this. Policy wording is suggested. – This policy is best placed in DM11 along with the other sustainable development standards.	Agreed in principle, but with detail in supporting text and not reproducing exactly what is requested. In view of the commercial marginality of much developable land in the Borough, the Council will encourage high standards of sustainable design, but does not wish to insist in policy that the evolving standards in Building Regulations are exceeded.
P072/26	Highways Agency	DM11 - generally supportive of focusing higher density housing development within existing centres and in locations that are in close proximity to major transport nodes and along major public transport corridors.	Noted
P237/38	Cumbria County Council	DM11 – This policy should mention that by 2016 it is expected that all new dwellings will be built to Code Level 6; i.e. zero net carbon emissions.	In view of the commercial marginality of much developable land in the Borough, the Council will encourage high standards of sustainable design, but does not wish to insist in policy that the evolving standards in Building Regulations are exceeded. Code for Sustainable Homes targets exist independently of the Copeland LDF and it is not necessary to repeat them.
P282/70	RWE npower	DM11 – The policy should acknowledge that new nuclear power operators will invest significantly in infrastructure which is dedicated to the provision of low carbon energy. Under these circumstances it is unreasonable to expect additional contributions to renewable energy.	No change. It is agreed that nuclear generation is a special contribution that Copeland can make to carbon emissions reduction, but the expansion of renewable generation is a national policy aim which the Council supports (and is, anyway, obliged to follow).
P427/47	Mr G Garrett	DM11 - The council should encourage quality modern projects, new ideas and unusual developments e.g. Green Housing, Factory units with their own wind turbines, or solar gain & heating or even American style developments like housing around golf courses – Marchon Site being the ideal site for such a development should be encouraged and could potentially draw into the area National Construction Firms.	No change, but the point is supported and the supporting text explicitly encourages innovative design. The point about the Marchon site (and, implicitly, other large sites) is noted and this may be taken forward in the more detailed policies of the Site Allocations plan.
P382/9 P407/27	Regen North East Copeland Mr R Mulholland	DM11 C – This policy statement should be replaced with ‘Requiring renewable energy generating technology preferably on site with a target of 10% generated on site in developments of 10 or more dwellings or 1,000m2 non-residential development	Not accepted. The Council sympathises with the intention and will seek inclusion of renewable energy generation, but the policy is intended to be interpreted flexibly, rather than risk imposing requirements which may discourage development.
P383/9 P408/27	Regen North East Copeland Mr R Mulholland	DM11 F – roof water recycling should be included in this policy statement.	Agreed; ‘rain water re-use’, to conform with the terminology of the Environment Agency, inserted.
P461/20	Natural England	DM12 - we recommend that our Accessible Natural Greenspace Standards are taken into account in determining open space policies.	Noted. This is being taken into consideration in the development of an approach towards green infrastructure, is covered in the Strategy for Infrastructure and will be a factor in the Developer Contributions SPD. The Borough is already well favoured in this respect, being predominantly rural and with the assets of the coast and the Lake District National Park close by.
P118/40	Story Group	DM12 – Standard distances between dwellings can result in a poorer development layout. These standards are not appropriate in every case and therefore the policy should be that these standards should be adhered to unless there are appropriate design reasons to vary them.	No change. The point has some validity but the Council prefers to retain a clear standard in policy. The incorporation of a more detailed approach allowing for some flexibility will be a matter for the Design SPD, under production in 2012.
P354/19	Taylor and Hardy	DM12 - Minimum separation distances are inappropriate for a Core Strategy. Similar conclusions were reached by the Carlisle Local Plan Inspector (Policy CP05 pp58/59). The minimum distances are out of step with guidance in "Manual for Streets". Distance between gable walls is subject to separate party wall legislation.	No change. This is a development management policy and although it is contained in the same document as the Core Strategy it forms part of the Development Management Policies DPD. The point about minimum distances has some validity but the Council prefers to retain a clear standard in policy. The incorporation of a more detailed approach allowing for some flexibility will be a matter for the Design SPD, under production in 2012.
P387/9 P410/27 P424/76	Regen North East Copeland Mr R Mulholland Mr B Riley	DM14 – add F: It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities.	No change. The concern is valid but flood risk, as far as new buildings are concerned, is dealt with in policies ENV1 and DM24 (as well as national policy) and the Council wishes to avoid undue duplication in policies. The approach in built-up areas has to be based on improved protection rather than blighting existing properties by banning their re-use or redevelopment.
P046/25	English Heritage	DM14 B – statement should refer to conserving the character of a building rather than retaining it. Annex 2 of PPS5 defines "conservation" as "the process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance" and would seem to be the right term here.	Agreed; text amended.

Sustainable Housing Growth: SS2, DM10 - 20

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P066/26	Highways Agency	SS2 – Housing targets should be based on robust evidence which ensures that the scale of housing provision brought forward is commensurate with an identified level of need and is supported by any required infrastructure. The primary concern for the Highways Agency is that new housing development will not detrimentally impact on the operation or safety of the SRN.	Noted. The Core Strategy’s main purpose in this regard is to demonstrate that there is a supply which can meet forecast need. The Strategy for Infrastructure addresses the transport infrastructure needed by the Borough, and this, and any modelling needed, will be key inputs to the site allocation process.

P024/11	NWDA	SS2 - At this stage in the Strategy's development we would expect to see future housing provision expressed as a single figure rather than as a range of alternatives. For monitoring purposes, the policy should also specify the timescale to which the target relates.	Accepted in part. Copeland's circumstances mean that, whilst the base position must be to ensure that forecast need can be met, it is also sensible to incorporate an allowance for the growth which will arise if developments, currently uncertain, proceed. However, it is agreed that the previous range was too vague and the policy, as expressed and explained, is now sharper.
P087/31 P210/38	4NW Cumbria County Council	SS2 - it will be necessary to provide a justification for these figures beyond simple reference to RSS policy. It is suggested that there should be greater clarification within the Policy about how the sliding scale of housing provision will be managed. It would be preferable to have a stepped approach from the baseline of 230 units to 300 units per annum identified at specific time period intervals to respond to changing economic and social need. It is considered that an annualised dwelling requirement of 300 units per annum should be the minimum that should be achieved over the long-term. Policy SS2 could therefore set out how the requirement to have a 5-year supply of housing land will be reviewed and managed i.e. allocated sites will have to be reviewed regularly to make sure they are still deliverable and if not further greenfield sites should be allocated to stimulate the market. The Policy could be also improved by reference to monitoring to ensure against either an under- or over-supply. Likewise reference could also be made for the phasing of new development. It would also be helpful to refer to other means of assisting the delivery of new housing (particularly affordable housing) where there is an under-supply.	Agreed. The provision is now justified in itself and clarified on the basis of evidence as summarised in the Housing Topic Paper, and illustrated by a trajectory. The results, as well as being backed by evidence, are within the range of what has been consulted upon during production of the strategy; thus nothing new has been introduced in the published strategy. Monitoring is a 'given' which is dealt with in the Implementation and Monitoring Framework.
P149/46	GONW		
P209/38	Cumbria County Council	SS2 – This policy could be improved by making reference to the settlement hierarchy in ST2.	Not accepted. ST2 is implicit throughout the strategy and will also guide the site allocation process. It is not necessary to have a cross reference here.
P313/73	Leconfield Estates	SS2 - a further review of housing growth figures as informed by the SHLAA, SHMA and economic growth is sought. 50% of new housing development on 'brownfield' sites is considered to be excessive.	Agreed. The Core Strategy is now expressed in terms of the completed conclusions of the documents referred to, and the examination undertaken in 'Spatial Implications'.
P313/73	Leconfield Estates	SS2 - 50% of new housing development on 'brownfield' sites is considered to be excessive.	Agreed in part. The Council wishes to retain the target as an aspiration, and in the event of brown field land emerging during the site allocation process or later in the plan period. The text now makes it clearer that the target is not likely to be achieved as things stand.
P449/20	Natural England	SS2 - Sustainable Housing Growth: We support the aim to minimise the development of greenfield land. However, brownfield sites often contain biodiversity interest and where they are developed care should be taken to ensure that biodiversity is protected and, where possible, new habitat created within the site.	Agreed; the text now refers to this.
P149/46	GONW	SS2 A – The Core Strategy should contain a housing trajectory. There is reference to 'residual' requirements without specifying what these are. The Core Strategy will only contain the rules governing the allocation of sites at the submission stage i.e. these will have not previously been consulted upon.	Agreed. The provision is now justified in itself and clarified on the basis of evidence as summarised in the Housing Topic Paper, and illustrated by a trajectory. The results, as well as being backed by evidence, are within the range of what has been consulted upon during production of the strategy; thus nothing new has been introduced in the published strategy.
P376/9 P401/27	Regen North East Copeland Mr R Mulholland	SS2 B – The existing text should be replaced with 'Allocations will be made in accordance with the following housing targets: i) Labour Force No Change (i.e. 598 per annum) para 2.2.9 pg15 supports	Not accepted. The strategy has now been refined to include a 'baseline' and an 'aspirational' target, the latter being as much as the supply is likely to be able to sustain, as well as being in excess of what the Borough has achieved in the past. The scenario referred to is now regarded as unrealistic
P353/19	Taylor and Hardy	SS2 C - adopts a minimum density for housing which is now out of step with the revised PPS3. Alternative text is suggested.	Accepted in part. Revisions to PPS3 mean that the national requirement is lifted, not that the target is invalid. The Council still regards a target of 30 dwellings per hectare as desirable, but the text now gives more explicit guidance on when lower densities might be considered appropriate.
P108/32	Cumbria Wildlife Trust	Para 5.3.5 - Cumbria Wildlife Trust supports the recognition of biodiversity as a constraint on development of brownfield sites.	Support noted. The paragraph (now 5.3.9) however, no longer uses the word 'constraint' but states that where land has acquired biodiversity value the Council will encourage the retention of enough natural habitat to make a viable contribution to local green infrastructure in accordance with policies SS5 and ENV3.
P386/9	Regen North East Copeland	DM13 - Add: "F - It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities"	No change. The concern is valid but flood risk is dealt with in policies ENV1 and DM24 and the Council wishes to avoid undue duplication in policies.
P387/9 P409/27	Regen North East Copeland Mr R Mulholland	DM14 - Add: "F - It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities"	No change. ENV1 and DM 24 require that regard must be given to flood risk, and it is not necessary to duplicate that here.
P421/76	Mr Bob Riley	DM13 - Proposals for the conversion of suitable non-residential buildings or subdivisions of large houses to provide new residential accommodation should only be permitted if it is not in a high risk flood zone.	No change. The concern is valid but flood risk, as far as new buildings are concerned, is dealt with in policies ENV1 and DM24 (as well as national policy) and the Council wishes to avoid undue duplication in policies. The approach in built-up areas has to be based on improved protection rather than blighting existing properties by banning their re-use or redevelopment.
P462/20	Natural England	DM13 - Rural buildings may provide places for bats or owls or other species. The impact on protected species should therefore be considered in relation to this policy. We recommend the inclusion of a paragraph highlighting the requirements of protected species in the planning process.	No change. The point is of course accepted but policy DM25 covers this and duplication is not needed.
P045/25	English Heritage	DM13 D - should refer to "conservation" not "retain". Annex 2 of PPS5 defines "conservation" as "the process of	Agreed: policy text amended.

		maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance" and would seem to be the right term here.	
P422/76	Mr B Riley	DM15 - I have close friends that were devastated from the last floods, and building any new form of dwellings will only make matters worse.	The Council is keenly aware of the need to minimise this kind of suffering and policies ENV1 and DM24 are intended to ensure that new homes are not built in places vulnerable to flooding. No change is needed here as policies are read together.
P463/20	Natural England	DM15 - Rural buildings may provide places for bats or owls or other species. The impact on protected species should therefore be considered in relation to this policy. We recommend the inclusion of a paragraph highlighting the requirements of protected species in the planning process.	No change. The point is of course accepted but policy DM25 covers this and duplication is not needed.
P388/9 P411/9	Regen North East Copeland Mr R Mulholland	DM15 - Add: I - It is not in an area of significant chance of flooding which may have an adverse effect on residents of the development and other communities	No change. The concern is valid but flood risk is dealt with in policies ENV1 and DM24 and the Council wishes to avoid undue duplication in policies.
P346/39	National Trust	DM15 – It would add clarity if the introductory sentence made it clear if all of the criteria A to H needed to be complied with or if it is an ‘either/or’ statement.	Agreed; policy amended.
P238/38	Cumbria County Council	DM15 A – This policy does not fully embrace PPS7. It is considered that the policy could be more flexible. There is also no policy to deal with the conversion of rural buildings to economic or commercial use in accordance with national planning policy contained in PPS4 and PPS7.	Agreed; the policy has been amended to make clear that its main provisions cover conversion of any rural building to residential use, whilst also containing a provision for conversion of agricultural and other buildings for commercial or community use.
P047/25	English Heritage	DM15 D - should refer to "conservation" not "retain".	Agreed: policy text amended.
P048/25	English Heritage	DM16 - There are places where buildings in conservation areas do not make a positive contribution and may therefore be appropriate for replacement. In addition there may be non-designated but locally important buildings which should be retained.	No change. The Council prefers to maintain a presumption against demolition in Conservation Areas, with statements as to what might be replaceable left to Conservation Area Appraisals and /or Supplementary Planning Documents.
P384/9	Regen North East Copeland	DM17 – the phrase ‘is not suitable for meeting other housing needs’ should be replaced with ‘is not suitable for meeting special housing needs’.	The point is accepted. Whilst the term ‘special housing needs’ has particular connotations and is not considered to be appropriate here, the policy and supporting text have been amended to be less ambiguous.
P417/75	Copeland Flood and Coastal Defence Engineer	DM19 - This section doesn’t mention Beach Bungalows, except in the title. The building of permanent structures should not be permitted under any circumstance as development in these locations is clearly unsustainable.	The policy states that new beach bungalows are unacceptable. The supporting text has now been amended to make it more explicit that their long term retention is undesirable.
P049/25	English Heritage	DM20 B - could refer to designated heritage assets and their settings rather than listing the asset types.	In this context the Council considers it preferable to be explicit as to the locations where caravan sites are unacceptable in principle.

Housing Needs, Mix and Affordability: Policies SS3, DM20

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P117/40	Story Group	SS3 - We support the Council in its aims of providing for a balanced housing market, particularly in the aim of executive and family housing for Whitehaven.	Support noted.
P025/11	NWDA	SS3 - We welcome the Council's intention, as set out in draft policy SS3, to work with partners to deliver a range and choice of good quality and affordable housing including executive and family housing in areas where there is proven need and demand. This is likely to be a key factor if Copeland is to secure economic growth, especially in nuclear and other knowledge based industries.	Support noted.
P088/31 P211/38	4NW Cumbria County Council	SS3 – It would be useful if the Core Strategy made reference to some of the key findings of the three interim Copeland Housing Market Area Assessments (Whitehaven, West Lakes, and Millom).	The Core Strategy will be able to make reference to the forthcoming full Housing Market Assessment, due to be published in the coming months.
P287/71 P298/72	Cleator Moor Town Council Cllr J Hully	SS3 – assurance is sought that Cleator Moor will not be excluded in the provision of "executive housing" and that consideration of affordable housing and provision of accommodation for the elderly.	No change needed as these policies refer to the whole of the Borough. The Town Council can be assured that improving housing choice, including those types referred to, will be pursued in Cleator Moor; the locality strategy refers to this, and the Site Allocation plan may set out requirements as to housing mix on specific sites or in specific localities.
P393/74	West Cumbria Land LLP	SS3 – Whitehaven in particular has an over-supply of affordable housing and an under supply of higher and executive housing. A greater emphasis should be given to the importance of a balanced housing market and planned housing supply that will meet the aspirations for economic growth. Having executive housing as a ‘special needs group’ significantly understates the importance of this part of the housing market.	Agreed. The policy is now more explicit on this and treats executive housing as a specific objective rather than ‘special’ need.
P381/9	Regen North East Copeland	SS3 F – This statement should be deleted and replaced with ‘The borough has a duty to supply a gypsy and traveller transit site in the most appropriate location.’	Not accepted. The paragraph which considers the implications of Policy SS2 on Cleator Moor has been amended to incorporate the most up to date information on housing numbers. Partially accepted. The text has been updated to include a reference to SS3 (iii) which proposes that the 3 smaller towns may include sites for executive homes which will require attractive locations and high quality building standards.

			Gypsy and traveller provision: No change needed here. The point is accepted, to the extent that such a statement is now incorporated in the text accompanying development management policy DM20.
P184/63	Mr R Curwen	Section 5.4 - Support the objective of affordable housing being a prime objective as stipulated to reduce the outward migration.	Support noted.
P185/63	Mr R Curwen	5.4.6 - Support all comments associated with rural exception guidelines.	Support noted.
P150/46	GONW	5.4.7 - The Core Strategy should contain a policy on Gypsies and Travellers	Not accepted. As the Core Strategy explains, there is no identified need for the Borough, and therefore no need to allocate a site; development management policy DM20 provides a criteria-based approach to deal with any demand which may emerge in the future. Circular 01/2006 requires that there be a policy in a DPD, not necessarily in the Core Strategy.
P001/4	Friends, Families and Travellers	DM20 B – The Council should identify land through site allocations to meet any identified needs for Gypsies and Travellers. The criteria for judging applications seem to be too tightly drawn and go beyond advice contained in Circular 01/06 which states that local landscape and nature conservation designations in themselves should not be used to refuse planning permission.	Accepted in part. DM20B demonstrates that the Council is willing to countenance providing for gypsies and travellers, but the evidential work done indicates that there is no significant demand in Copeland and West Cumbria. This work will be reviewed, and evidence of emerging demand can be dealt with either in the site allocation process or in a future review of the Core Strategy. The criterion relating to landscape reflects the special quality of much of the landscape in the Borough (and thus legitimately reflects to in paragraph 54 of the circular). The intention of the policy is that the same approach would be taken as to any other residential development. However, it is accepted that this criterion is too wide-reaching, and it has been sharpened.
P001/4	Friends, Families and Travellers	DM20 F - given the negative views held by much of the settled population of Gypsies and Travellers as it stands this criterion opens the door to NIMBY objections. Revision is required and we suggest that the word ‘unacceptably’ is inserted before ‘adversely affect..’.	Agreed, except that ‘significantly detrimental’ is less absolute, and probably easier to assess in the development control process, than ‘unacceptably’.

Community Facilities and Services: Policies SS4, DM21

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P067/26	Highways Agency	SS4 - generally supportive of this policy, particularly regarding the provision of services and facilities which are accessible by public transport, walking and cycling.	Support noted.
P450/20	Natural England	SS4 - We very much support the provision of greenspace, and making facilities accessible to people by public transport, cycling or on foot. We support the aim in A to maximise the opportunities for people to improve their health and wellbeing. Access to good quality green spaces is an important element in maintaining and improving health and wellbeing.	Support noted. The Council has also added a new policy SS5: Provision and access to Open Space and Green Infrastructure. (The principles of this new policy were previously included in policy ENV6, which now exclusively deals with access to the countryside.
P212/38	Cumbria County Council	SS4 – The policy could be improved by mention of adult social care and education provision and how these might be delivered through S106.	Accepted in part. The preamble to the policy explains what it covers, including a full range of adult social care; the word ‘adult’ has been added to the education bullet point. The Developer Contributions SPD will explore in more detail how s.106 and/or CIL can be used.
P075/29	The Theatres Trust	SS4 - The title could be amended to make it more precise to ‘Community Services and Social Facilities’.	No change. The present title is preferred as being more open, and not vulnerable as to argument over whether a facility is ‘social’ or commercial.
P212/38	Cumbria County Council	SS4 - The policy would also benefit if it gave recognition to the aging population and the need to have more accessible accommodation.	No change. The policy is based on meeting needs, whatever they are, and however the population evolves. The point relates also to matters which are catered for under policy SS3 and may be taken forward in the site allocation process. Policy DM14 covers the development of residential institutions including C2 uses.
P212/38	Cumbria County Council	SS4 - The education needs of the borough should be made more explicit in the document so that new developments are planned hand in hand with educational infrastructure. (Detailed information is provided in the County Council’s response.)	This is implicit in the entire strategy and will be a factor in site allocation as well as being covered by the SPD on developer contributions.
P130/45	Sport England	SS4 C - The level of protection offered to sports facilities / playing fields in this section is considerably weaker than that offered by paragraphs 10 and 15 of PPG17. A sports hall could therefore be lost to say a post office or a library. Playing fields appear to be treated in the same way as any other community / sports facility. In PPG17 playing fields are considered separately.	Agreed in part. No change to SS4 - SS4 c(ii) stipulates that lost provision should be compensated for by alternative provision. Support has been strengthened by making it clear that DM21, which resists loss of community facilities, applies to sports facilities. The new policy SS5 applies to open air sports facilities, protecting them additionally as green infrastructure. The Strategy for Infrastructure makes it clear that there are deficiencies in sports provision across the Borough.
P212/38	Cumbria County Council	SS4C - it might be difficult to find alternative uses for some former County Council-owned community facilities, which are either Listed Buildings or those in Conservation Areas.	Noted. The re-use of such facilities would be a consideration in dealing with planning applications. The revised policy DM15 covers conversions in rural areas.
P129/45	Sport England	5.5.2 – This section highlights the fact that sports and recreation facilities can appear under one or more categories or classifications. Would a playing field be protected by policy SS4, or as an open space typology by policy ENV6?	The new policy SS5 sets recreational open space firmly in the context of community facilities whilst recognising that they are a part of the Borough's green infrastructure. This should make it clear that the dual contribution of open space gives them dual policy protection, rather than being a potential source of confusion.
P074/29	The Theatres	5.5.2 - Mention of the borough’s one ‘unique and charming’ theatre in the introduction to Community Facilities and	Agreed; text amended, though we are sadly unable to accept charm as a material planning consideration

	Trust	Services (page 66)	
P131/45	Sport England	5.5.6 - A PPG17 compliant study needs to be completed to highlight the need for sports facilities provision before any decision is taken to allocate recreational land for another use. It is expected that the PPG17 study will be underpinned by an up to date Playing Pitch Strategy. Also the paragraph reads as though it pre-judges the outcome of the assessment in that the assessment “... will support the Council’s preferred policy”.	The study, which was under way at the time, is completed and informs the policy as well as the Strategy for Infrastructure and work on the Developer Contributions SPD.
P239/38	Cumbria County Council	DM21 - it might be difficult to find alternative uses for some former County Council-owned community facilities, which are either Listed Buildings or those in Conservation Areas.	Noted. The question of viability of continued use would be a consideration in dealing with planning applications. Additionally, the revised policy DM15 covers conversions in rural areas.
P076/29	The Theatres Trust	DM21 - for consistency we suggest that the title to this policy should reflect Policy SS4 – Community Services and Facilities or more precisely Community Services and Social Facilities.	Agreed in part; title amended to be the same as the (unamended) title of SS4.
P140/45	Sport England	DM21 - This policy appears to give considerably weaker protection to sports facilities than exists in PPG17. In essence, a sports facility is given the same level of protection as say a local shop.	The premise is not accepted - a shop is also worthy of protection. However, changes made to SS4, SS5 and DM21 are intended to strengthen the specific policy protection given to sports facilities.

Improving Accessibility and Transport: Policies - T1, DM22

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P451/20	Natural England	T1 - We welcome that the Council’s preferred option is to support transport improvements that will maximise accessibility by foot, cycle and public transport as well as by car.	Support noted.
P068/26	Highways Agency	T1 - to ensure sustainable growth is delivered, improvements in sustainable transport provisions and infrastructure will be necessary to support and mitigate the impact of development and the cumulative impact of multiple development proposals, to ensure the efficient and safe operation of infrastructure.	Noted
P068/26	Highways Agency	T1 - With regards to the physical improvements proposed, these should be supported by evidence in accordance with the principles set out in PPS12, including identifying the needs, costs and funding sources to ensure that such infrastructure improvements can be delivered. This is particularly pertinent for infrastructure improvements which are required to enable the delivery of major development proposals or strategic sites.	Noted.
P089/31	4NW	T1 – It may be worthwhile to specifically recognise Sellafield and Westlakes Science Park as the key out of town centre employment sites, to which sustainable transport access should be explicitly encouraged.	Accepted, wording in 6.1.2 and 6.2.3 modified to include reference to Sellafield and Westlakes Science and Technology Park as key out of town centre employment sites.
P167/51	Sellafield Ltd	T1 - It is not clear how developers could deliver improvement to the Cumbrian Coast railway as this is managed by Network Rail. If CIL is proposed then further consultation would be expected. With regards to green travel plans at Sellafield further clarity would be welcome as to how such requirements would apply to any development on the existing Sellafield licensed site.	Noted. No change needed to policy. This and other policies will apply to development at the Sellafield site.
P327/39	National Trust	T1 – Arguably it would be sensible, given the emphasis on sustainable transport, to remove the words ‘and car’ from the end of the first sentence.	Policy wording modified in 1st paragraph.
P213/38	Cumbria County Council	T1 A – Sustainable transport should be actively promoted at Sellafield and Westlakes as well as Lillyhall through travel planning.	Accepted, wording in 6.1.2 and 6.2.3 modified to include reference to Sellafield and Westlakes Science and Technology Park as the key out of town centre employment sites.
P213/38	Cumbria County Council	T1 B – The Whitehaven Town Centre Enhancements Scheme should be added to the list in B. The Pow Beck Spine Road is not currently envisaged to be an LTP3 identified scheme.	Wording modified. The situation relating to the Pow Beck Spine Road is noted.
P327/39	National Trust	T1 B - The principle proposals under B, with one exception are all road based – a more overt approach to ensuring accessibility on foot, bicycle and by public transport is needed.	Wording modified to give greater emphasis to more sustainable modes of transport in part B.
P327/39	National Trust	T1 C – C(ii) calls for a host of road improvements without regard to social, environmental and economic implications and is silent on how the proposals will be delivered.	
P213/38	Cumbria County Council	T1 D – The terminology ‘Green Travel Plans’ is now superseded by ‘Travel Plans’ – ensuring that all travel is more efficient, less costly and safer.	Noted - wording amended.
P068/26	Highways Agency	T1 D - The Agency is particularly supportive of part D, which seeks developer contributions for improvements to public transport services and walking and cycling routes.	Support noted.
P213/38	Cumbria County Council	T1G - reference should be made to the need to ensure that all major developments are enabled for Next Generation Access (NGA) broadband.	Policy DM23 has been modified to include requirement for all major new developments to be enabled for NGA Broadband.
P214/38	Cumbria County Council	6.2.1 - Policy ST1 is the Spatial Development Principles, whereas Policy ST2 is the Spatial Development Strategy, and not the other way round.	Accepted - amendment made.
P327/39	National Trust	6.2.5 – This paragraph does not provide adequate justification for part C. It is unclear that geographic remoteness would be significantly reduced (let alone removed) and potentially could have as great an impact in terms of the drain of resources away from Copeland.	
P215/38	Cumbria County	6.2.6 - The terminology ‘Green Travel Plans’ is now superseded by ‘Travel Plans’	Accepted - amendment made.

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P215/38	Cumbria County Council	6.2.6 – It might be useful to define what is meant by ‘major developments’.	Accepted - definition of major development provided.
P216/38	Cumbria County Council	6.2.8 – It is important that the Core Strategy recognises the interaction of the parking Strategy with sustainable transport i.e. over provision of free parking undermining sustainable transport strategy.	Noted.
P217/38	Cumbria County Council	6.2.9 – It is unclear how this paragraph links with policy T1. It could be useful to make reference to technologies reducing the need to travel.	New policies created for Information and Communications Technology (T2 and DM23), reference to reducing the need for travel included in 6.3.1.
P073/26	Highways Agency	DM22 - The Agency is generally supportive of this policy, particularly with regards to development responding positively to existing public transport and other sustainable modes of transport. In respect of the need for a Transport Assessment and Travel Plan, the Agency would wish to be consulted on any development proposal that has the potential to cause a material impact on the safe and efficient operation of the SRN as defined in the DfT’s ‘Guidance on Transport Assessment’.	Noted.
P240/38	Cumbria County Council	DM22 – it might be useful to define what is meant by accessible from a Development Management point of view. This could be achieved using an accessibility checklist or defined accessibility criteria.	The principles of what is deemed accessible is outlined in Ai, ii) and iii).

Chapter 7 – Environmental Protection and Enhancement

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P356/13	Environment Agency	<p>The North West River Basin Management Plan is not considered within the Preferred Option Core Strategy. The River Basin Management Plans are statutory documents to which local authorities must have regard when developing their plans. They were published by us in December 2009 and are a tool used to implement the Water Framework Directive whose over all objectives are to</p> <p>a. Prevent deterioration of all surface freshwater bodies (including lakes, streams and rivers), groundwater, estuaries and coastal waters</p> <p>b. Ensure all designated water bodies attain good ecological status/potential.</p> <p>The River Basin Management Plans include details of the classification of water bodies; pressures and reasons for failure; and the measures or actions that need to be undertaken to deliver improvements. (Information on these classifications was provided to Copeland to form part of their Infrastructure Plan).</p> <p>The Water Framework Directive is particularly important for Copeland, as it is a requirement to deliver improvements to protected areas, including Bathing Waters. Compliance with the current and revised Bathing Water Directive is a priority for the North West. Much work has already been undertaken to deliver significant improvements under the current directive. Further work will be required to ensure appropriate standards are achieved under the revised Bathing Water Directive, which will be first reported on in 2015.</p> <p>Spatial planning bodies can help to prevent deterioration and help to achieve “good ecological status” by implementing policies that require the following.</p> <p>Suggested Policy Wording</p> <p>To ensure that development in the Borough is increasing protection for and enhancing water quality all new developments must assess and suggest appropriate mitigation for:</p> <ul style="list-style-type: none">• Existing capacity for sewage treatment; and• The potential environmental impacts discharges of treated effluent might have on receiving water bodies.	<p>Whilst the Core Strategy does not make reference to the Water Framework Directive or the North West River Basin Management Plans, Copeland is mindful of the potential for development to impact on water quality in the Borough. As such the following statements are included in the document:</p> <p>Strategic Objective 19 - Safeguard and where possible enhance the natural resources in the borough and address the impacts of former land uses.</p> <p>ST1 C (vi) - Ensure development minimises air, ground and water pollution.</p> <p>ST4 A - Development that generates demand for physical infrastructure will be permitted if the relevant infrastructure is either already in place or there is a reliable mechanism in place to ensure that it will be provided when and where required.</p> <p>ENV1 - Supporting measures to address the constraints of existing drainage infrastructure capacity and avoiding development in areas where the existing drainage infrastructure is inadequate.</p> <p>DM11 - Ensuring surface water is managed appropriately, with the inclusion of sustainable drainage systems where possible.</p> <p>DM25 - Development will not be permitted where there is an unacceptable risk of flooding or the development would increase the risk of flooding elsewhere.</p>

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

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P288/71 P299/72	Cleator Moor Town Council Cllr J Hully	ENV1 – The policy should contain assurances that no development should be permitted on flood plains.	No changes have been made - Policy DM24 states that development will not be permitted in areas where there is an unacceptable risk of flooding. Flood plains would almost certainly fall into this category.
P413/75	Flood and Coastal Defence Engineer - CBC	ENV1 A – the words ‘without increasing flood risk elsewhere’ should be added to the end of the sentence.	The change has been made.
P328/39	National Trust	ENV1 B – This policy could prevent the change of use of an existing building to a more appropriate use in flood risk	The wording of ENV1 B has been revised as suggested.

		terms, or prevent finding a re-use for heritage asset meaning that it became ‘at risk’ and could ultimately be lost altogether. It is suggested that the word “development” is replaced by “new build development”.	
P414/75	Flood and Coastal Defence Engineer - CBC	ENV1 C – add the following words to the end of the sentence: ‘where sustainable drainage systems are practical, where they are not this should be achieved by other means’.	Additional text has been added but instead of saying ‘this should be achieved by other means’ the policy asks for ‘improvements to drainage capacity’.
P415/75	Flood and Coastal Defence Engineer - CBC	ENV1 D - add the following words to the end of the sentence: ‘and avoiding development in areas where the existing drainage infrastructure is inadequate’.	The additional text has been added.
P132/45	Sport England	ENV1 E - flood defence measures could have implications for any future Playing Pitch Strategy. In other areas where this has been a problem a surplus of pitches is maintained to cope with playing fields being used to store water.	The Playing Pitch Strategy for Copeland (April 2011) identified that there are ‘sufficient pitches to meet existing demand for games at peak times, with a margin to spare.’
P416/75	Flood and Coastal Defence Engineer - CBC	ENV1 E - Support for new flood defence measures to protect against both tidal and fluvial flooding in the Borough Comment: Although this can be grant funded by DEFRA, where there is existing properties at risk from tidal or fluvial flooding, funding is based on national priorities.	Noted
P328/39	National Trust	ENV1 E - It is most unlikely that all possible flood events can be protected against by building new/higher defences. Soft measures, managed re-alignment, taking a catchment-wide approach that includes appropriate land management will all have an important role to play as part of an integrated approach. It is also clear that building new and improved flood defences everywhere under threat will not be deliverable having regard to available resources.	Planting trees helps to create a physical barrier to water, supporting the soil structure and soaking up water. The following text has been added to ENV1E: including appropriate land management as part of a catchment wide approach.’
P154/46	GONW	DM23 - This appears to be inconsistent in both not permitting development which would increase the risk of flooding elsewhere, and also permitting it in certain circumstances.	Swapped some of the text round to make it clear that when a proposal for a site that is likely to be at risk of flooding comes in – it is to be accompanied by a FRA and that if this finds that there is an unacceptable flood risk, that the development will not be permitted.
P419/75	Flood and Coastal Defence Engineer - CBC	DM23 - This section looks ok as it is.	Noted.
P283/70	RWE npower	DM23 – there is a possibility that nuclear new build may lead to loss of access to watercourses and this policy fails to take that into account. Mitigation measures may, however, make development acceptable.	Looking at the site boundary of the nominated site as shown on the Sellafield sub-locality diagram there would not be an issue with loss of access to the River Ehen and the revised site boundary should not take in more of the River Calder than it currently does. (The problem of loss of access relates to the need to carry out essential maintenance works to the watercourse.) Any access arrangements could be made at the planning application stage.
P423/76	Bob Riley (Resident)	DM23 - Where a development is sanctioned in a flood risk area then the developer MUST be held accountable and cover all costs, including upgrading & maintenance for the provision of additional flood defences and mitigation works.	This was already in the text of DM23 (now DM24)
P293/71 P304/72	Cleator Moor Town Council Cllr J Hully	DM23 - In addition to A, B, C and D - "development will not be permitted on designated flood plains" should be included.	Policy DM24 (previously DM23) states that development will not be permitted in areas where there is an unacceptable risk of flooding. Flood plains would almost certainly fall into this category.
P369/13	Environment Agency	DM23 – There needs to be careful consideration of the management of surface water generated through the regeneration of the Rhodia site as this could drain into Pow Beck and Sandwith Beck. If flood storage, conveyance and SUDs can be planned into large regeneration projects, significant flood risk benefits could be achieved. Suggested policy wording is offered – ‘All development will be expected to demonstrate that they are reducing flood risk by reducing surface water run-off. Developments should aim to achieve greenfield run off rates or as a minimum no increase from the existing run off rate.’	Sustainable drainage systems are dealt with in DM11. No change has been made.
P218/38	Cumbria County Council	ENV1 - This policy is broadly welcomed and supported but could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	This is dealt with in ENV6.
P389/9 P412/27	Regen North East Copeland, Richard Mulholland	DM23 – The last sentence in the policy statement should be replaced with: “Where a development requires the provision of additional flood defence and mitigation works, any costs, including upgrading & maintenance in perpetuity, will be met by the developer.”	DM24 A & B together provide more protection than the suggested alternative for DM23 A. Therefore no changes have been made to the existing text.

Coastal Management: Policies ENV2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P013/8	Cumbria Tourism	ENV2 - Welcome the promotion of the coastal assets and maximising opportunities along the undeveloped coast for tourism and outdoor recreation. Concur with the view that the developed coast is where the majority of coast-related tourism should be focussed, particularly in Whitehaven and Millom and that the policy for the undeveloped coast is to enable opportunities for appropriate outdoor recreation and tourism. A management plan for St Bees Head Heritage	Support noted.

		Coast is very sensible and Cumbria Tourism / West Coast Tourism Partnership would be happy to work with partners on this.	
P219/38	Cumbria County Council	ENV2 – could be expanded to recognise the need to manage the undeveloped coast in a way that reflects the landscape character.	ENV2 has been expanded to cover offering some protection to the landscape from energy development but this is also dealt with in DM2 (with particular regard to renewable energy generation). DM1 also states that the Council will seek a package of community benefits that will mitigate the impacts of the development on the environment, amongst other things. Removed reference to allowing energy developments along the coast. This is now in ENV2D instead.
P090/31 P219/38	4NW Cumbria County Council	ENV2 – should make reference to the North West Coastal Trail and should also reflect the need to support Open Coastal Access.	Added a reference to the North West Coastal Trail and the Colourful Coast project.
P277/70	RWE npower	ENV2 and para 7.3.3 – The policy or its supporting text should state that new nuclear development sites will also be supported in coastal locations provided that environmental impacts are acceptable.	The text of 7.3.3 has been altered to include nuclear developments.
P417/75	Flood and Coastal Defence Engineer - CBC	ENV2 – Add another statement: E - Ensuring that development is located outside areas at risk of coastal erosion. Could also include wording: Temporary development can be permitted in areas that are at risk from coastal erosion if the permitted lifetime of the development is less than the expected residual life of the land before being lost to erosion. National Coastal Erosion Information Project (I believe it is called now) is due to be rolled out March 2011.	ENV2F has been altered to include the statement above i.e. that no new development will be allowed in areas at risk of erosion. (Policy DM19 states that new beach bungalows are unacceptable. The supporting text has now been amended to make it more explicit that their long term retention is undesirable.)
P432/77	Ramblers’ Association	ENV2 – It is hoped that the LDF will support the English Coastal Route (ECR) and that it will make provision for it to be considered as planning gain when applications are being considered. <i>(This comment is also made under ENV 6 – Access to Open Space and the Countryside)</i>	Policy ENV2 aims to maximise access to the Coast through support for the North West Coastal Trail and Colourful Coast Projects. The Coastal Path is considered to be part of the green infrastructure for the borough. Financial contributions to the creation/maintenance of the coastal path will be dealt with in the Developer Contributions Framework SPD.
P038/25	English Heritage	ENV2 B - refers to historic assets, in order to reflect PPS5 this should be changed to heritage assets.	Comment taken on board – the amendment will be made in the next draft of the document.
P219/38	Cumbria County Council	ENV2 B – Consideration should be given to widening this statement out to include possible tidal energy development at the mouth of estuaries as well as along the coast. Suggested text is offered.	ENV2 B has been changed and the reference to energy generating development moved to ENV2 D.
P329/39	National Trust	ENV2 B – tourism development in this instance needs to be appropriate and necessary to an undeveloped coast location. With regards to renewables the wording here does not reflect the supporting text which is based upon “allowing for renewable energy development which requires a coastal location”. Alternative text is suggested – ‘Maximise opportunities along the undeveloped coast for tourism and outdoor recreation and appropriate tourism development, and exceptionally for energy generating developments that require a coastal location, whilst conserving and enhancing its natural and historic assets.’	Whilst the wording of the policy does not state what kind of tourism will be permitted on the undeveloped coast. Para 7.3.5 states that it will be important to conserve and enhance biodiversity, the landscape and historic assets along the undeveloped coast whilst enabling an appropriate level of outdoor recreation and tourism. It is felt that this will provide the protection needed.
P090/31 P219/38 P220/38	4NW Cumbria County Council	ENV2 B & 7.3.5 - could provide a more positive approach to maximising the opportunities for the natural resources. In particular consideration should be given to potential for managed re-alignment and increasing the area of managed natural habitat.	ENV2 C is a new policy statement aiming to support the management of more of the undeveloped coast for biodiversity. The importance of managing the undeveloped coast for biodiversity is also mentioned in para 7.3.5.
P452/20	Natural England	ENV2 C - The intention to protect the St Bees Head Heritage Coast may be more clearly expressed as ‘protect the character and quality of the St Bees Head Heritage Coast...’	This text has not been altered as the principle is expanded upon in the supporting text and this effectively says the same thing.
P453/20	Natural England	Para 7.3.6 - we welcome the intention that a management plan be prepared for this area of Heritage Coast.	Support noted.
P329/39	National Trust	7.3.6 – There is concern over the text here and its reference to ‘balancing’ protection against encouraging visitor enjoyment – such an approach is not compatible with sustainable development as advanced in PPS1. An integrated approach would ensure not only protection but also enhancement of the Heritage Coast and its wider setting.	The wording of this paragraph has been altered to be more positive about the possibility of coming up with a management plan that will be able to protect the natural assets of the St Bees Heritage Coast and encourage more visitors to the area.

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

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P091/31	4NW	ENV3 - This policy could be strengthened by a commitment to developing a more detailed representation of the RSS Indicative Biodiversity Resource and Opportunity Diagram and the development of functional ecological frameworks, which address habitat fragmentation and species isolation, identifying and targeting opportunities for habitat expansion and species isolation.	Reference is made to the regional Biodiversity Resource and Opportunity Diagram. A more detailed Cumbria version would be useful. Para 7.4.6 now states that the Council will discuss the possibility of carrying out this work with partners.
P096/32	Cumbria Wildlife Trust	ENV3 – As the RSS has now been revoked, the relevant parts should now be incorporated into the Core Strategy policy, particularly policy EM1(B).	ENV3 and its supporting text is aligned with policy EM1(B) now, seeking to protect, enhance, connect and create areas of biodiversity importance.
P110/32 P454/20	Cumbria Wildlife Trust Natural England	ENV3 – The first sentence should tackle habitat fragmentation and loss of habitat and species and degradation of habitats.	The first sentence has been changed substantially. It does not refer to degradation of habitats but rather aims to contribute to the implementation of the Cumbria BAP which of course deals with loss of habitats and species as well as degradation of habitats.
P110/32 P222/38	Cumbria Wildlife Trust	ENV3 – Somewhere in the document there needs to be a description of the various designated sites that are present in the borough.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as

P358/13	Cumbria County Council Environment Agency		well as biodiversity sites.
P110/32 P222/38	Cumbria Wildlife Trust Cumbria County Council	ENV3 - County Wildlife Sites and RIGS should be specifically mentioned within the text of the Core Strategy to ensure their protection within the planning process and to prevent confusion over what is meant by “designated site”.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as well as biodiversity sites.
P110/32	Cumbria Wildlife Trust	ENV3 – There should be an extra bullet ‘G’ - “Ensure development supports and strengthens existing ecosystem services to ensure the resilience of the natural environment in the face of climate change and other human pressures.”	The importance of ecosystem services is mentioned in the introduction to the policy. If biodiversity is protected and enhanced and habitats restored and recreated it is felt that this will support and strengthen existing ecosystem services.
P186/63	Mr R Curwen (Resident)	ENV3 – This policy should mention the Bathing Waters Directive (is this applicable to planning matters?)	The overall objective of the Bathing Waters Directive is to protect public health and not biodiversity so this would not be an appropriate place to mention it. Strategic Objective 19 aims to safeguard and where possible enhance the natural resources of the borough. This includes water resources.
P222/38	Cumbria County Council	ENV3 – This policy uses non-standard terminology. It needs to use the same terminology as that in PPS9.	The policy now uses the words protect, enhance, extend and restore.
P222/38	Cumbria County Council	ENV3 - The Core Strategy should not have specific policies to protect internationally (and arguably nationally) important sites and species, because they have their own legislation, the explanatory text should, however, state that they are material to the assessment of planning applications and decisions. ODPM Circular 6/2005 explains the obligations of planning authorities in this respect.	Para 7.4.4 makes reference to the different sorts of designated biodiversity and geodiversity sites in the borough including international and national sites. Policy DM25 is the more detailed policy giving protection to sites of local importance.
P222/38	Cumbria County Council	ENV3 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities. However it should be acknowledged that some previously developed land can be recognised as being of high biodiversity value.	ENV3 B states that 'development should incorporate measures to protect, enhance and build on any biodiversity interest' and the supporting text to policy SS2 makes reference to the importance of retaining natural habitat on sites where there is biodiversity interest.
P110/32 P222/38 P454/20	Cumbria Wildlife Trust Cumbria County Council Natural England	ENV3 A – This statement needs to identify whether it means statutorily designated or locally designated sites. These sites need to be defined (e.g. Natura 2000 sites, SSSIs, County Wildlife Sites, Local Geological Sites (formerly known as RIGS). In our view, the list should include County Wildlife Sites and Local Geological Sites to ensure their protection within the planning process and to prevent confusion over what is meant by ‘designated site’.	The policy now states that international, national and local sites should be protected. A table listing all the different designations has also been added. This will perhaps form an appendix in the final draft and should include RIGS sites as well as biodiversity sites.
P110/32 P222/38 P454/20	Cumbria Wildlife Trust Cumbria County Council Natural England	ENV3 B – as well as protecting, measures should enhance and add to biodiversity.	Agreed - this part of the policy now aims to protect and enhance.
P330/39	National Trust	ENV3 B – This policy statement might be amended to read “Ensure that development incorporates measures to protect, and wherever possible enhance, any biodiversity interest”.	Agreed – ENV3 B now states 'Ensure that development incorporates measures to protect, enhance and build on any biodiversity interest’.
P110/32	Cumbria Wildlife Trust	ENV3 C – the word “improve” has connotations of agricultural improvement which is damaging to biodiversity. This should be replaced by ‘enhance and extend priority habitats’.	Agreed. The policy now says 'Enhance, extend and restore' instead of 'Improve and extend'.
P358/13	Environment Agency	7.4 - The legal requirement to ascertain that the integrity of a SAC or SPA will not be adversely affected by a development alone or in combination with other plans or projects can also be very important in planning terms. The impacts on a SAC &/or SPA should be considered in-combination and not in isolation. The Energy coast is an example where there are separate developments and separate policies ER1 and ER3 for different parts of the whole.	The requirement to carry out a HRA is referred to in the supporting text to DM25 - the Development Management policy dealing with biodiversity.
P221/38	Cumbria County Council	7.4.1 – This paragraph should refer to the value of climate change adaptation and other ecosystem services.	Agreed - paragraph 7.4.1 now mentions the importance of ecosystem services.
P109/32 P221/38	Cumbria Wildlife Trust Cumbria County Council	7.4.1 – Ecosystem services remain unacknowledged. The Core Strategy needs to recognise the economic benefits accrued from biodiversity as well as recognising the intrinsic value of habitats and species.	Agreed - the paragraph has been altered to reflect the importance of ecosystem services in providing economic benefit..
P111/32 P222/38 P357/13 P455/20	Cumbria Wildlife Trust Cumbria County Council Environment Agency Natural England	7.4.4 – The Core Strategy should also refer to the UK BAP as this covers more habitats than the Cumbria BAP and habitats of Principal Importance as laid out in the NERC Act (2006).	The response from Cumbria County Council (para 1.116) stated that the CBAP now includes UKBAP species and habitats. Therefore, no change has been made.

P464/20	Natural England	DM24 - the first sentence could be reworded to say ‘development affecting ...either directly or indirectly..’	DM24 , now DM25 B states that 'developments that would cause a direct or indirect effect' on local sites will not be permitted unless: etc.
P094/31 P241/38 P464/20	4NW Cumbria County Council Natural England	DM24 - To bring this policy closer to RSS EM1, it could provide additional reference to enhancement, as required by PPS9 paragraph 14, and it should also cover wider features of importance to biodiversity such as wildlife corridors. The Cumbria Waste and Minerals Development Framework does this well.	Agreed - the enhancement and connection of wildlife habitats is now incorporated into the text of DM25 (was DM24)
P114/32	Cumbria Wildlife Trust	DM24 – again types of designated sites need to be set out in the supporting text.	The text of DM24 (now DM25) has been extensively altered and the types of designated sites given protection are named. A list of all the different types of sites has been inserted in the supporting text of ENV3.
P114/32	Cumbria Wildlife Trust	DM24 - Mitigation and compensation measures secured though planning obligations should come with a management plan and with enough funding to provide management in the long term to implement its biodiversity aims.	Management Plans - DM25 B(ii) now states that a 'long-term management plan will be sought' to provide to provide prevention, mitigation and compensation measures as appropriate.
P241/38	Cumbria County Council	DM24 - The Core Strategy should not have specific policies to protect internationally (and arguably nationally) important sites and species, because they have their own legislation	Agreed. Policy DM25 B specifically protects sites of local importance and para 1.5.4 (in DM policies document) makes reference to European and International sites and the importance of carrying out the Habitats Regulations Assessment (HRA).
P464/20	Natural England	DM24 - In our view, to make clear the requirements for the different levels of protection, and avoid repetition of the legal provisions, the policy needs to be comprehensively reframed, and may in fact need to be reframed in separate policies to bring out the different requirements for, for example, international sites, SSSIs and local sites.	The text of this policy has been comprehensively changed. DM25 B makes specific reference to sites of local importance DM25 F deals with the requirement for a HRA - for Natura 2000 and Ramsar sites. The types of designated sites are listed in a table in the supporting text for policy ENV3. (This may later be an appendix to the main Core Strategy document.
P241/38	Cumbria County Council	DM24 – This policy should cover UK BAP as well as CBAP species and habitats.	The response from Cumbria County Council (para 1.116) stated that the CBAP now includes UKBAP species and habitats. Therefore, no change has been made.
P241/38	Cumbria County Council	DM24 - It is suggested that reference should be made to mitigation and/or compensation in the section on protection of sites and habitats. Hence it would appear at the moment that if the tests are satisfied, then damage can occur without mitigation and/or compensation.	Agreed. DM25 B(ii) makes reference to mitigation and compensation.
P241/38	Cumbria County Council	DM24 - the Habitats Directive requires member states to maintain European habitats at ‘favourable conservation status’ (range, extent, structure, function and conservation status of typical species). This would cover European habitats outside of European Sites, and would provide an argument for identifying those habitats in the Core Strategy, along with the UK priority habitats.	Agreed. DM25 A (iii) makes reference to protecting the European habitats that lie outside European designated sites. The need for an Indicative Opportunity Map is referred to in the supporting text to ENV3.
P241/38	Cumbria County Council	DM24 - There should be reference to the identified need (as required by RSS EM1 (B)) for the development of a more detailed representation of the RSS Indicative Biodiversity Resource and Opportunity Diagram and the development of functional ecological frameworks, which address habitat fragmentation and species isolation, identifying and targeting opportunities for habitat expansion and species isolation.	Agreed. The need for an Indicative Opportunity Map is referred to in the supporting text to ENV3.
P347/39 P361/13	National Trust Environment Agency	DM24 – add another statement – “D: Appropriate mitigation and compensation measures can be provided that would be more than equivalent to the loss that would occur.” It should also be made clear that all the criteria apply – they are not either/or.	Agreed. The text of DM24 (now DM25) has been substantially changed. It is clear that all parts of the policy apply - it is not a case of either/or.
P466/20	Natural England	DM27 - The policy is welcomed.	Support noted.
P350/39	National Trust	DM27 - The approach is considered to be proportionate, appropriate to the circumstances of Copeland and to comply with national guidance – it is welcomed and supported.	Support noted. DM27 has been renumbered DM28. The text of the policy is unchanged from the Preferred Options draft of the document.
P095/31	4NW	DM27 - This could be strengthened by reference to the North West Regional Forestry Framework and to expanding tree and woodland cover – as promoted by RSS policy EM1.	Although no reference is made to the North West Regional Forestry Framework there is emphasis on increasing the tree cover in the borough.

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

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P224/38	Cumbria County Council	ENV4 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	The potential for improving access to open space through the decontamination and reclamation of derelict land is stated in ENV6.
P039/25 P224/38 P294/72 P331/39	English Heritage Cumbria County Council Cllr Joan Hully National Trust	ENV4 – The policy should refer to PPS5 and not PPG15 (and this should be reflected in the Policy Context box.) There may be a need to review the policy in the light of this.	Agreed – The policy context box now refers to PPS5 and not PPG15.
P039/25	English Heritage	ENV4 - The reference to "other townscape and rural features" would need definition and supporting evidence.	Para 7.5.3 refers to listed structures such as doorways, piers, lighthouses etc.
P039/25	English Heritage	ENV4 - It would help to refer to heritage assets as defined in Annex 2 of PPS5.	Agreed - Heritage assets are referred to in the context of heritage led regeneration.
P039/25	English Heritage	ENV 4 - the document makes no reference to that part of the Hadrian’s Wall WHS in the Borough.	Hadrian’s Wall World Heritage Site is now mentioned in the introduction to the section and protection is given to this in

			ENV4A.
P460/20	Natural England	DM10 - We welcome the requirement that existing landscape, topographical and characteristic local styles of buildings and materials should be incorporated in the design of developments. This might be strengthened by requiring that developments conserve and enhance the character and quality of the landscape and retain or provide habitat for biodiversity.	Agreed. This was the intention of the policy which has been reworded slightly to make it clearer. Biodiversity and habitats are catered for by policy DM24.
P006/7	The Coal Authority	DM10 – An additional policy criteria should be included: “...Incorporate appropriate remediation measures to ensure that the development is not at risk from ground instability arising from mining legacy or other former uses;”	Agreed; however, it is felt that this clause sits more appropriately in DM 11, Sustainable Development Standards, rather than DM10 which is about design.
P281/70	RWE npower	DM10 F - There is no justification in policy terms for seeking blanket contributions of this nature for public art. It should be at the Area Action Plan stage that the requirement for works of public art is considered and properly debated. Development contributions of this nature should be assessed against the tests set out in Circular 05/05 on the need for planning obligations.	Agreed as far as the policy text is concerned. 'Per cent for art' is commonly applied across the country; the approach to negotiating such contributions will be governed by the SPD on developer contributions. It is intended that negotiations would be informed by viability considerations and would be applied flexibly - the Council might accept less than 1% in the case of a nuclear power station, for instance. The operative word in the Core Strategy is now 'encouraged', in supporting text.
P044/25	English Heritage	9.3.7 – Reference should be to PPS5 and specifically Policy HE6	The amendment will be made in the next draft.
P349/39	National Trust	DM26 – The policy will need to be supplemented to set out the approach to other heritage assets (i.e. those that, whilst not designated, are locally important). This should include how these will be identified and the approach to be taken to development proposals that impact directly or indirectly upon them.	Para 10.5.11 deals with the matter of locally important heritage features.
P050/25	English Heritage	DM26 is supported.	DM26 is now DM27, although largely unchanged in content. Support noted.
P466/20	Natural England	DM27 – This policy is welcomed.	Support noted.
P351/39	National Trust	DM28 - It is agreed that a policy on advertisements is needed having regard to the adverse impacts of clutter and ill-designed signage, these can significantly detract from rural or urban locations. The policy is welcomed and supported.	DM28 has been renumbered DM29, although the text remains the same as that in the Preferred Options draft.
P243/38	Cumbria County Council	DM28 - should be simplified and made clearer as to what circumstances advertisement consent would be granted in Areas of Special Advertisement Control in the Borough. The current wording is considered ambiguous, and the Policy could be written in plainer English.	

Landscape: Policies ENV5, DM25

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P040/25	English Heritage	ENV5 – The policy should refer to the Cumbria Historic Landscape Characterisation.	Agreed. The supporting text (para 7.6.3) now refers to the Historic Landscape Characterisation.
P092/31 P225/38 P248/66 P332/39 P456/20	4NW Cumbria County Council Friends of the Lake District National Trust Natural England	ENV5 – The policy should be widened to reflect the integrated, character based approach to landscapes set out in RSS policy EM1, along with the European Landscape Convention and Natural England’s approach to ‘all landscapes matter’. The Core Strategy should move away from ‘Landscapes of County Importance’ and ‘Local landscape’ designation	The reference to reviewing designations of landscape importance has been removed. The policy now states that all landscapes will be protected from inappropriate change. Policies ENV5 and DM26 now refer to Landscape Character Assessment (LCA) and this will be fully applied across the Copeland plan area as soon as the more detailed version of the LCA is complete. Pending this, the Council will continue to use Landscapes of County importance in the decision making process.
P225/38	Cumbria County Council	ENV5 – Any detailed landscape character assessment would need to be carried out by Copeland Borough Council.	DM26 states that the Council will continue to use Landscapes of County Importance until a more detailed landscape Character Assessment can be carried out for the borough. This is likely to be completed in 2012.
P225/38	Cumbria County Council	ENV5 – Reference should be made the Cumbria Landscape Classification (1995)	The Cumbria Landscape Character Assessment Guidance and Toolkit is now the most recent document and this is what the Core Strategy and Development Management Policies refers to.
P278/70	RWE npower	ENV5 – The conflict between protecting and enhancing the landscape and nuclear new build (NNB) should be recognised in the policy statement or its supporting text. It should acknowledge that complete mitigation will not be possible when it comes to large structure on NNB sites.	ENV5 B now states that 'where the benefits of the development outweigh the potential harm', the impact on the landscape should be minimised through adequate mitigation, preferably on site. Nuclear new build would likely fall into this category and the impact is only required to be minimised. Mitigation is not required to be complete.
P332/39	National Trust	ENV5 – The title should be changed to ‘Protecting, Enhancing and restoring the Borough’s Landscapes’.	
P332/39	National Trust	ENV5 A – should be replaced with ‘Reviewing designations of all landscapes importance through landscape character assessments’	ENV5 A has been removed so that there is no longer any mention of Landscapes of County Importance in the text of the policy itself. The supporting text refers to the Cumbria Historic Landscape Characterisation and the Cumbria Landscape Character Assessment (LCA) Guidance and Toolkit. Pending a more detailed Copeland plan area LCA the Council will continue to use Landscapes of County importance in the decision making process.
P332/39	National Trust	ENV5 B – should be replaced with ‘Protecting, enhancing and where necessary restoring the defined areas of landscape character importance by rejecting inappropriate change, and by ensuring that development does not threaten or detract from their distinctive characteristics but makes a positive contribution that enhances and reinforces landscape character.	Policy DM26 also deals with landscape issues - it states that development proposals will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character and mitigate against any adverse effect.
P242/38	Cumbria County	DM25 - should be expanded to ensure that new development is designed and sited to be compatible with local landscape	Policy DM26 (previously DM25) now states that developers should design their particular development to be

P249/66	Council Friends of the Lake District	character. It should refer to the need to use character assessments or the need for new development to be compatible with landscape character (and the elements that form this) in accordance with saved JSP Policy E37. Text for inclusion in DM25 is suggested – ‘Proposals will be assessed in relation to: Locally distinctive natural or built features, visual intrusion or impact, scale in relation to the local landscape and features, the character of the built environment, public access and community value of the landscape, historic patterns and use, biodiversity features, ecological networks, and semi natural habitats, and openness, remoteness and tranquillity.	congruent with the surrounding landscape character. The first paragraph of DM26 asks that developers refer to the Cumbria Landscape Character Assessment (LCA) and the Cumbria Historic Landscape Characterisation and design their development accordingly. The second paragraph mentions that, in time, a more detailed Copeland version of the LCA will be available. Policy DM26 has been expanded to include most of the aspects listed here. Biodiversity and green networks are dealt with in policies ENV3 and DM25.
P141/45	Sport England	DM25 - only appears to relate to landscaping schemes rather than minimum open space standards as suggested in ENV6.	DM12 now states the minimum requirement for open space within residential developments (this was an error in the Preferred Options document). ENV6 in the new draft of the Core Strategy only refers to access to the countryside. New policy SS5 deals with provision of, and access to open space and green infrastructure.
P348/39	National Trust	DM25 - It is suggested that “reinforce” might be a more appropriate word than “reflect”.	DM26 (formerly DM25) now uses the word 'reinforce' rather than 'reflect'.
P465/20	Natural England	DM25 - This policy, which requires schemes to retain existing landscape features and reflect local landscape character, is welcomed. A requirement to conserve and enhance the character and quality of the landscape would be a stronger and welcome requirement.	On the advice of the National Trust the word reflect has been replaced with reinforce so that the statement now reads: 'Development proposals, where necessary, will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character and mitigate against any adverse visual impact.' It is felt that this is a stronger statement.

Countryside Access: Policies ENV6

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P333/39	National Trust	ENV6 - Access is a key consideration, including in ensuring that everyone is able to get to important areas of countryside (and coast) including for refreshment and health benefits.	Noted.
P093/31	4NW	ENV6 – the policy could be enhanced by greater explicit reference to green infrastructure and its benefits. Reference should be made to RSS policy EM3 as regards elements that should be included in the policy. Also see the North West Green Infrastructure Guide	Protecting green infrastructure within settlements is now dealt with in new policy SS5. All the recommendations here have been taken into account in both the new policy and the supporting text.
P121/45	Sport England	ENV6 - PPG17 states that existing open space, sports and recreational buildings and land should not be built upon unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements. Sites which have been identified as having potential to meet employment or housing land requirements might themselves need replacement provision, and that land requirements for such replacement provision should be made explicit.	These issues are now dealt with in policy SS5 - The supporting text to this policy explains that a PPG17 compliant assessment has now been completed and shortfalls have been identified in the Strategy for Infrastructure which will form part of the evidence base for seeking developer contributions in the future. Policy SS5A states that where it is necessary to build on existing green infrastructure sites then equivalent replacement provision should be made.
P133/45	Sport England	ENV6 - Further clarity is needed to fully understand the scope of this policy. Specifically, does open space refer to some or all of the typologies of open space set out in PPG17. As it stands, it is unclear whether for example a playing field is covered by ENV6, SS4 or both.	Open space is dealt with comprehensively now in new policy SS5.
P226/38	Cumbria County Council	ENV6 - could be enhanced if reference is made to the opportunities offered through decontaminating and reclaiming derelict and underused land, in order to improve the environment and provide for future development activities.	Agreed. ENV6 now includes a statement to this effect.
P457/20	Natural England	ENV6 - we recommend that reference is made to our Access to Natural Greenspace Standards (ANGSt standards). These can be accessed and downloaded from our website at www.naturalengland.org.uk .	Access to Open Space is now dealt with in new policy SS5. Supporting text paragraph 5.6.4 refers to Natural England's ANG Standards.
P457/20	Natural England	ENV6 D - The detailed location and plans for a community forest, including landscape and habitat, will of course need to be carefully considered and we would be pleased to be consulted further on this.	Noted

Key Diagram – Figure 8.1

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

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

The Localities in Copeland – Section 8.1

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

Whitehaven Locality: Section 8.2

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P335/39	National Trust	Fig. 8.2 - The Trust objects to the area defined as the ‘undeveloped coast’ having regard to the representations made elsewhere regarding Policy ER10 and Figure 8.1.	This detail will be checked and amended if necessary.
P336/39	National Trust	8.2.1-8.2.5 – No reference is made to the significant progress that has been commenced and is continuing with the “Colourful Coast” initiative. This is a major partnership project with which the local population is fully engaged and is adding considerably to the quality of life of Whitehaven residents.	Accepted. The text has been amended to incorporate more detail on the achievements of the "Colourful Coast" initiative.
P260/67	Parton Parish Council	8.2.4 - It is not correct to state that Parton is bypassed by Copeland's first dual carriageway road. Lowca and Distington may be so described but not Parton.	Accepted. The reference to the dual carriageway has been removed from the text.
P151/46	GONW	8.2.8 – The document could provide more clarity as to whether the strategic portfolio of development sites are designated as strategic in the context of PPS12 and if so why they are considered to be central to the achievement of the strategy. There are more and smaller sites included than one would normally expect. In each case the document will need to indicate the site boundary, what will be delivered, when, by whom, and at what cost. The key diagram and the Whitehaven Key diagram are currently not detailed enough. There is no explanation included within the text for including a site on the above mentioned diagrams (Lillyhall) which is outside the Borough boundary.	Accepted. Text amended and sites referred to as a "strategic portfolio of Regeneration Priority Sites". The pre-submission draft of the Core Strategy does not seek to allocate any sites. It merely refers to sites that have already been allocated in the current Local Plan. The rationale for including Lillyhall in the 2 key diagrams has been set out in the supporting text for ER6 and the text for the Whitehaven Locality Today section has been amended to include a reference to Lillyhall. All the key diagrams have been amended and updated in consultation with the Localities Team.
P187/63	Mr R Curwen	8.2.8 – 8.2.15 - Is positive that the Planning Dept have had the conviction to identify various run down sites & dwellings, all of which require improvement.	Support noted.
P161/49	Rhodia UK Ltd	8.2.11 – does not reflect the considerable amount of work already undertaken on the Rhodia site and the relatively small amount of remediation work still to be done as agreed with the EA. Alternative text is suggested – ‘.....This latter area has also been the subject of regeneration projects already and whilst a small amount of work is still needed at the former Rhodia/ Huntsman chemical complex to comply with part IIA, further remediation would be required to make space available for public participation funded through development to rationalise the balance of uses and built area in West Whitehaven generally.’	Partially accepted. The text has been amended to incorporate reference to the progress made on the regeneration of the Coastal Fringe but the revised text also reflects the Council's understanding that further remediation is required to deal with contamination from previous activities to make areas safe for new development and the provision of public open space.
P377/9 P402/27	Regen North East Copeland, Richard Mulholland	8.2.13 – The use of brownfield and greenfield described in this paragraph should apply to all the key centres.	Accepted. The Council will consider applying the principle to other key centres.
P370/13	Environment	8.2.13-14 - The Ufex and Hutbank landfill sites could not be integrated into any scheme for open space as they are still	Noted. The proposed SPD and Site Allocations SPD will provide further detail on constraints and opportunities for a

	Agency	being regulated under environmental permits. The Marchon tip should be assessed for its impact to human health and from a structural stability perspective.	range of appropriate uses.
P162/49	Rhodia UK Ltd	8.2.14 – again does not reflect the remediation work already completed. Alternative text is again suggested – ‘8.2.14 - Remediation measures to deal with contamination from previous chemical and coaling activities at the former Rhodia/ Huntsman or “Marchon” site have been submitted by the landowner and approved by the Environment Agency under part IIA. There is opportunity for mixed use development on site.’ The suggested text also omits the section of the paragraph that talks about the potential layout of any new development on the site.	Partially accepted. The text has been amended to incorporate reference to the progress made on the regeneration of the Coastal Fringe but the revised text also reflects the Council's intention to produce an SPD to guide development of the area for a mix of appropriate uses in accordance with the Core Strategy and Site Allocations DPD.
P229/38	Cumbria County Council	8.2.14 – The type of development sought for the Rhodia site needs to be clarified as part of the Core Strategy. The policy is not currently precise enough and could be enhanced to guide future investment decisions. An SPD could be prepared to assist.	Partially accepted. The Core Strategy sets out a range of appropriate uses for the site, and advises that further detail will be provided in an SPD and the Site Allocations DPD.
P337/39	National Trust	8.2.14 - there needs to be a clearer understanding of the location, extent and scale of the proposals that might be contemplated and how new development will ensure the safeguarding and enhancement of the undeveloped coast. There is particular potential to improve the relationship with the Colourful Coast and ensure that views and habitats are enhanced. Discussions between the National Trust, the Land Trust and the Council are sought.	Accepted. Discussions with the partners from the Colourful Coast initiative have taken place as part of the development of the Core Strategy and are ongoing.
P338/39	National Trust	8.2.16 - The discussion of major energy infrastructure has failed to consider the implications for the intrinsic qualities of landscapes, biodiversity and heritage assets. It is requested that reference to the requirement to do so is included in this reference.	Accepted. The text has been amended to include a reference to the need for all decisions around the provision for major energy infrastructure to consider the implications for the intrinsic qualities of the Locality's landscapes, biodiversity and heritage assets.
P160/49	Rhodia UK Ltd	8.2.18 – Support for the text of paragraph 8.2.18 provides the ability to offer quality employment development at the former “Marchon” site enhancing the potential for wider mixed use development and regeneration to be realised at this location for the benefit of West Whitehaven.	Support noted.
P229/38	Cumbria County Council	8.2.23 – A phasing policy for housing in the settlements would be useful giving the number of unimplemented planning permissions still outstanding at Distington and Moresby Parks.	Not accepted. A phasing policy will be considered in the Site Allocations DPD.
P152/46	GONW	8.2.25 - Policy on housing mix/affordability should be set in the core strategy rather than in a non-statutory development brief.	Core Strategy Policy SS3 and the supporting text set out the Borough Council's requirements and approach to Housing Needs, Mix and Affordability. Development briefs will be guided by Policy SS3 and the Site Allocations DPD and will allow for a flexible approach in response to the constraints imposed and opportunities offered by each site.
P134/45	Sport England	8.2.26 - it is unclear how an improvement in sports provision has been identified as a need given that the Community Infrastructure and Open Space assessment has not been completed.	Not accepted. The need is identified in Chapter 6 of the Playing Pitch Strategy April 2011 and the Leisure Needs Assessment April 2011 – Chapter 1 and also Appendix 4
P261/68	Howgate Distington Partnership	8.2.27 – this paragraph does not specifically mention junction improvement on the A595. The locality board of Howgate and Distington are concerned about this.	Accepted. A595 junction improvements have been added to the list of transport priorities.
P339/39	National Trust	8.2.28 - The approach set out here is supported, and in particular the comments in the third bullet point in respect of the ‘Colourful Coast’ area. As already offered the National Trust would be pleased to continue its involvement in discussions about this area.	Support noted.
P159/49	Rhodia UK Ltd	8.2.28 – This paragraph potentially restricts development on the Marchon site. Alternative text is offered that defines the area for reclamation to that of the appropriate seaward areas of the Marchon site, rather than the whole Marchon site.	Partially accepted. The text has been amended to incorporate the principle elements of the suggested wording provided.

Cleator Moor Locality – Section 8.3

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Response
P230/38	Cumbria County Council	8.3.3 – This paragraph mentions that Kangol site amongst a number of other employment sites in Cleator Moor. However, the future of the site does not appear to have been dealt with in the document.	The Kangol site has been allocated in the current Local Plan as an employment site. The new draft of the Core Strategy does not mention the site.
P362/13	Environment Agency	8.3.4 - should mention the River Ehen due to the high quality and international importance of this river that flows straight past Cleator Moor.	Accepted. The text of the Cleator Moor Spatial Portrait has been amended to include a reference to the River Ehen. (para 8.4.12)
P378/9 P403/27	Regen North East Copeland, Richard Mulholland	8.3.8 – Delete the following sentence – ‘Development outside of these locations will be restricted, and will predominantly be for employment/accommodation related to agriculture or forestry, affordable housing, renewable energy developments that are location specific (e.g. wind, wave, tidal, hydro).’	Not accepted. The existing wording is more appropriate given the more rural character of the Cleator Moor area.
P290/71 P301/72	Cleator Moor Town Council Cllr J Hully	8.3.10 - Paragraph 8.4.9 states "The Bridge End Industrial Estate is regarded as a key employment facility, where expansion and improvements will be encouraged." The Town Council would like to see the same wording applied to Leconfield Industrial Estate at Cleator Moor.	Accepted - the text in the Cleator Moor Locality Chapter referring to Leconfield Industrial Estate has been amended.
P379/9 P404/27	Regen North East Copeland Mr R	8.3.10 – The last sentence of this paragraph should be deleted and the paragraph should end with ‘Leconfield Street is also a strategic target and key employment facility where expansion and improvement will be encouraged.’	Partially accepted. The wording of the paragraph has been amended to include a reference to the Council regarding Leconfield industrial estate as a key employment facility, where expansion and improvement are encouraged.

	Mulholland		
P291/71 P302/72	Cleator Moor Town Council Cllr J Hully	8.3.12 – The Council need to make provision for an increase in shopping floorspace in Cleator Moor. There are vacant shop premises at the moment, but should business in the town revival there should not be limitations placed upon any possible increase in requirements in the future.	Not accepted. The 2009 Retail Study suggests that there is unlikely to be justification for an increase in shopping floorspace in Cleator Moor and this text has been retained in the final draft.
P380/9 P405/27	Regen North East Copeland, Richard Mulholland	8.3.12 - This paragraph should start: ‘It will be important to enhance and protect the vitality and viability of Cleator Moor Town Centre.....’	Accepted. The text has been amended.
P292/71 P303/72 P381/9 P406/27	Regen North East Copeland, Richard Mulholland Cleator Moor Town Council Cllr J Hully	8.3.13 – There is support for the importance of affordable housing but a balance should be created between affordable and "executive" to encourage a blend of residents to the area.	Partially accepted. The text has been updated to include a reference to SS3 (iii) which proposes that the 3 smaller towns may include sites for executive homes which will require attractive locations and high quality building standards.
P135/45	Sport England	8.3.14 - it is unclear how an improvement in sports provision has been identified as a need given that the Community Infrastructure and Open Space assessment has not been completed	Not accepted. The need is identified in Chapter 6 of the Playing Pitch Strategy April 2011 and the Leisure Needs Assessment April 2011 – Chapter 1 and also Appendix 4.
P266/33	RSPB	8.3.17 – The area described in this chapter supports internationally important numbers of wintering Hen Harriers. The importance of this needs to underpin policy DM2 criteria D and E.	Not Accepted. The Borough Council considers that a direct reference to the area's importance for hen harriers should not be included in the text in on the grounds of maintaining security of biodiversity.

Egremont Locality – Section 8.4

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

Mid Copeland Locality – Section 8.5

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

South Copeland Locality – Section 8.6

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P232/38	Cumbria County Council	8.6.3 – It is a matter for Copeland and the County to address jointly regarding what transport improvements are proposed to overcome these disadvantages. Those improvements related to transport infrastructure directly related to large scale energy related projects through the ‘community benefits package’ should be made more explicit.	No change. As stated, the Locality Plan has identified these shortcomings and their remediation would be pursued through the normal processes. ‘Community benefit’ will be subject to negotiation and the Core Strategy, along with the Locality Plan and Strategy for Infrastructure, will inform that.
P112/32 P363/13	Environment Agency Cumbria Wildlife Trust	8.6.4 - The status of the ecological designations of the Duddon Estuary needs to be clarified. The Duddon Estuary is a SSSI, Special Protection Area and Ramsar. It is also part of the Morecambe Bay Special Area of Conservation.	This section (which has been extensively redrafted to make it more concise) describes simply how the strategy will operate in South Copeland; it is not necessary to go into exhaustive detail about multiple designations, which are or will be given adequate recognition elsewhere (including the Proposals Map).
P232/38	Cumbria County Council	8.6.7 - References to ‘minor development’ for Haverigg - a Local Centre - should be amended to reflect the Cumbria SRSpS (see comments above on Policy ST2 (Spatial Development Strategy)), which requires a ‘small-scale’ of development in these types of locations.	The wording of this section has been altered, and the phrase ‘reflecting its scale and function’ is now used. This is compatible with the sub-regional strategy terminology.
P179/61 P188/64	Port Millom Ltd Cllr D Wilson	8.6.9 – Strong objection to any proposal that would prevent the continued use of Millom Pier as an industrial facility.	Noted. This land has been identified as suitable for tourism-related development (Copeland Local Plan 2006), and the Employment Land and Premises Study recommends that it be de-allocated; this may be debated during the production of the Site Allocation Plan. There is no proposal in the Core Strategy to de-allocate it for industrial use and nothing in the Core Strategy which prevents its continuing in its present use.
P340/39	National Trust	8.6.9 - It is unclear if the statements made here are intended to be ‘policy’ and in particular what the evidence base is to support specific projects. Of particular concern are the environmental implications of potential developments such as a nuclear power station at Kirkstanton and of a barrage across the Duddon Estuary. The potential adverse impacts of the latter on landscape quality, on nature conservation interests, on the setting of the National Park and on the fine coastal areas nearby should be acknowledged, together with the likely knock-on impacts upon the attractiveness to visitors and the tourist economy.	This section is descriptive of policy and does not add to it. Text revisions now make this clearer. The Kirksanton proposal has now been abandoned. The Duddon barrage proposal has not reached a stage where it is appropriate to give it specific coverage here. If it emerges as a feasible, designed project, policies ER2, ER3 and relevant development management policies would apply, along with other relevant Core Strategy policies on protecting the environment.
P138/45	Sport England	8.6.12 - does not reference sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	Agreed. Although this section merely describes the local impact of Core Strategy policy and has no policy status in itself, there is now a reference to the need to develop sports provision (also covered in the Strategy for Infrastructure). This will be taken forward in implementing the Core Strategy via the Strategy for Infrastrcture and developer contributions, as well as being the basis for funding bids.
P169/52	Mr Powe	8.6.14 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies, road closures and repairs and improve Cumbrian Coast Railway.	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points and emergency access will be a consideration in the light of nuclear new build.
P340/39	National Trust	8.6.16-17 – The possibility of a Kirksanton power station and Duddon barrage and their impacts on the environment fail to appear in these paragraphs.	This section is descriptive of policy and does not add to it. Text revisions now make this clearer. The Kirksanton proposal has now been abandoned. The Duddon barrage proposal has not reached a stage where it is appropriate to give it speciific coverage here. If it emerges as a feasible, designed project, policies ER2, ER3 and relevant development management policies would apply, along with other relevant Core Strategy policies on protecting the environment.

The Sellafield Sub-Locality Area –Section 8.7

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P139/45	Sport England	8.7.10 - The sustainable settlement section for this section does not reference sports provision in contrast to some of the other localities. However, as the Community Infrastructure and Open Space assessment has not been completed there could be a need for such facilities in the locality.	The Sellafield Locality section has been removed from the document.
P169/52	Mr Powe	8.7.12 - Major improvements needed to A595, alternative routes needed south of Whitehaven for general use and for emergencies, road closures and repairs and improve Cumbrian Coast Railway.	No change here, but the Council agrees and this will continue to be pursued. The Strategy for Infrastructure picks up some of these points and emergency access will be a consideration in the light of nuclear new build.
P458/20	Natural England	8.7.13 - There will also be a need for Habitats Regulations Assessment screening to determine whether there is likely to be any significant effect on any European Designated ecological conservation site.	DM25F and supporting text(para 10.5.5) covers the need for HRA

Monitoring and Implementation: Section 10

Ref. No.	Respondent	Preferred Options Consultation Comment	Council’s Response
P115/32	Cumbria Wildlife Trust	Fig 10.1 - An additional indicator which could be used to monitor ENV3 is the NI197 LAA indicator which identifies those Local Sites (County Wildlife Sites and RIGS) in Copeland which are in positive management.	This is a useful suggestion and the redeveloped Monitoring Framework includes that indicator.
P153/46	GONW	Fig 10.1 - Monitoring and Implementation have not thus far been adequately addressed as it appears that the indicators only cover the period leading up to adoption of the core strategy. Adoption is the starting point rather than the end point. All LDF policies require targets and monitoring arrangements.	The Monitoring Framework has been substantially redrafted and is based on indicators suitable to measure achievement of the Core Strategy's objectives.

P244/38 P245/38	Cumbria County Council	Fig 10.1 – The indicators currently are not compatible with the National Indicators. It is suggested that they should be in order to ensure consistency with agreed National Government targets for Cumbria.	The Monitoring Framework has been substantially redrafted and is based on indicators suitable to measure achievement of the Core Strategy's objectives. These include the Core Indicators which will continue to be used for annual reporting. The National Indicators have now been scrapped. The monitoring framework as redrafted, and linked to the annual monitoring process, should serve as a full guide to performance in the fulfilment of the Core Strategy's objectives.
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Glossary:

Ref. No.	Respondent	Preferred Options Consultation Comment	Council's Initial Response
P030/11	NWDA	The NWDA is identified (incorrectly) as the Regional Planning Body	The correction has been made.
P077/29	Theatres Trust	There should be a glossary entry for the term 'community facilities'. Suggested description: 'community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community.'	Community facilities is defined in paragraph 5.5.2
P247/38	Cumbria County Council	There should be a glossary entry for the term 'green infrastructure'.	Green infrastructure is defined in paragraph 5.6.2
P247/38	Cumbria County Council	The definition of 'habitat' should be revisited.	Where 'habitat' is referred to in the Core Strategy, it is with specific regards to biodiversity and as per the existing definition i.e. the natural environment of a plant or animal etc.
P247/38	Cumbria County Council	Greenspace or open space should be included in the definition of 'Infrastructure'	
P247/38	Cumbria County Council	There should be a glossary entry for 'Special Area of Conservation'	Accepted. This has been added to the glossary.
P223/38	Cumbria County Council	There should be a glossary entry for 'designated sites'.	

List of Reference Documents:

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