



Copeland Local Plan 2021-2038

Regulation 22(1)(c) Statement of
Copeland Borough Council in
support of Copeland Local Plan
2021-2038

Copeland Borough Council

September 2022

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1. Introduction

1.1 Purpose

- 1.1.1 This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Copeland Local Plan 2021-2038 Publication Draft in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.1.2 This statement meets Regulation 22(1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) June 2020
- 1.1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted Copeland SCI 2020 can be viewed [here](#).
- 1.1.4 The Council has prepared separate Duty to Cooperate Statements of Compliance which are published on the examination webpage.

1.2 Background

- 1.2.1 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation/representations.
- 1.2.2 The Council began producing a new Local Plan for the Borough in 2019. The new Local Plan will set out the strategic vision, objectives, and spatial strategy for the Borough, as well as the planning policies which will guide future development. The Plan will look ahead to 2038, and identify the main areas for sustainable development growth. It establishes policies and guidance to ensure local development is built in accordance with principles set out in the National Planning Policy Framework (NPPF).
- 1.2.3 The Local Plan and Site Allocations will replace the adopted Core Strategy and Development Management Policies (2013), which also contained several saved policies from the Copeland Local Plan 2001-2016.
- 1.2.4 The Council's Publication Draft Version (January 2022) and Integrated Assessment¹ were published in accordance with Regulation 19 for a six-week consultation period lasting from the 10th of January 2022 to the 18th March 2022². The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents in accordance with the Statement of Community Involvement.
- 1.2.5 There were two further consultations during the Local Plan production process. The first of these was the (superseded) Regulation 19 consultation on two prospective Gypsy and Traveller allocation sites; in accordance with the requirements outlined in the [Cumbria Gypsy and Traveller Accommodation Assessment](#) (GTAA). The final regulation 19 consultation assessed these prospective Gypsy and Traveller in light of an expanded

¹ This included the HRA and the Sustainability Appraisal.

² The consultation was extended to finish on the 18th March 2022.

evidence base, including a HRA and X, and ahead of substantive revisions to policy N5 in light of the requirements engendered by Natural England’s policy of “Nutrient Neutrality”.

1.3 Structure of Statement

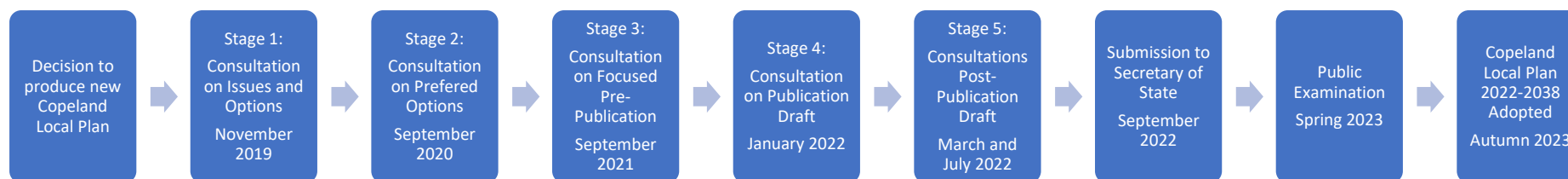
1.3.1 This statement of consultation comprises four sections:

- Section 1 is an Introduction
- Section 2 sets out the timeline which was been followed in preparing the Local Plan which is in accordance with the up to date [Copeland Local Development Scheme](#).
- Section 3 summarises the main issues raised during the course of the consultation carried out under Regulations 18/19 and how the comments received have been considered by the Council.
- Section 3 is supported by the two Appendices found at Section 4 setting out how the consultation was undertaken, the responses received at Regulation 18 and 19 stages and how the comments have been taken into account by the Council.

1.4 Plan Production Timeline

1.4.1 The timetable below illustrates the main stages in the preparation of the Copeland Local Plan up until the submission date of 16/09/1994. An account of this process, with links to key documents at each stage, can also be found on section 3 of this webpage: <https://www.copeland.gov.uk/content/copeland-local-plan>.

Figure 1: The Copeland Local Plan Process



1.5 Summary of Plan Production Process and Main Issues

Summary of the consultation process for the review of the Copeland Local Plan

- 1.5.1 Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 took place in three stages.
- 1.5.2 **Stage 1** involved an initial round of consultation on Issues and Option for the Local Plan over eight weeks between November 2019 and January 2020. Appendix 1 Schedule 1 provides links to respective consultation reports that outline how the requirements of Regulation 22(1)(c) (i) to (iv) have been met in relation to Stage 1 of Regulation 18 consultation, including which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations; and how those representations have been taken into account when producing **Stage 2**.
- 1.5.3 **Stage 2** involved consultation on a Preferred Options Draft and took place over 10-weeks between September 2020 and November 2020.
- 1.5.4 **Stage 3** involved consultation on a Focused Pre-Publication Draft and took place over 6-weeks between September 2021 and October 2021.
- 1.5.5 Appendix 1 Schedule 1 outlines how the requirements Regulation 22(1)(c) (i) to (iv) have been met in relation to **Stage 2 and Stage 3**, including which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations; and how those representations have been considered. In addition, Appendix 1 Schedule 1 also provides links to previous consultation statements for **Stage 2 and Stage 3** that provide further detail.
- 1.5.6 **Stage 4** involved the Regulation 19 pre-submission publication which took place for six weeks between January and March 2022. Appendix 2 (which includes Schedules 1 and 2) provides details of how the requirements of Regulation 22(1)(c)(v) have been met, namely the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. A Council response is also provided to the main issues raised. A high-level summary of the main issues raised at Regulation 19/20 is also given below.
- 1.5.7 **Stage 5** involved two post-Publication consultations. The first element of which was the (Superseded) Regulation-19 Gypsy and Traveller Site Allocation consultation, which following [GTAA](#) sought to ensure that a sufficient Gypsy and Traveller allocation was provided by the council. This consultation ran for six weeks between 21st March 2022 and the 3rd of May 2022. The second element of **Stage 5** was the Regulation 19 consultation on Gypsy and Traveller Allocation, considered through an expanded evidence base, and substantive revisions of policy N5 in accordance with requirements engendered through Natural England's policy of "Nutrient Neutrality".

1.6 Main Issues raised pursuant to Regulations 19/20

- 1.6.1 Two responses made no comment or raised no issue with the Publication Draft Copeland Local Plan. These were from: Design Council and Environment Agency³.
- 1.6.2 Four consultees made comments on aspects of the Sustainability Appraisal or the HRA Screening Assessment. These were Natural England, Historic England, Homes England, and Cushman Wakefield
- 1.6.3 Any representations that weren't duly made have not been considered but these responses will be forwarded to the inspector for their consideration.
- 1.6.4 By section of the Plan, the main issues raised pursuant to Regulations 19/20 are set out in Tables below.

³ There were two respondents who raised no comment during the post-publication consultations, these were Homes England and the Environment Agency.

Table 1: Main Issues Raised at Regulation 19/20 Stage – Local Plan Policies

Chapter	Main Issues Raised
1 Foreword	The foreword requires a more extensive reference to the context of Copeland’s Historic Environment (Historic England).
2 Introduction	
3 Vision & Objectives	The reference to “Built” should be deleted (Historic England). Objection on the grounds that the plan should not seek to grow Copeland’s population on the grounds of sustainability (Friends of the Lake District). Suggestion of stronger wording regarding the plan’s commitment to ecological protection (Friends of the Lake District).
4 Spatial Portrait	Suggestion of reference to the historic environment (Historic England).
5 Development Strategy	<p>The plan should highlight Council’s statutory duty to conserve and enhance the Lake District National Park (Friends of the Lake District).</p> <p><i>Reducing the impacts of development on Climate Change</i> (DS2PU) – Objection that this policy is not consistent with national policy and will undermine the viability of developments (Home Builders Federation). This policy is a statement of intent or vision rather than policy (Home Builders Federation; Savills obo The Leconfield Estate). The policy requires stronger wording to ensure that National Policy regarding net zero by 2037 is achieved (Friends of the Lake District). This policy contains replication other plan policies (Pinnacle obo Story Homes). This policy contains several elements that are likely to impact viability (Pinnacle obo Story Homes).</p> <p><i>Settlement Hierarchy</i> (DS3PU) – Issues raised regarding the placement of specific settlements within the hierarchy (Various).</p> <p><i>Settlement Boundaries</i> (DS4PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by development beyond settlement boundaries (Historic England). To align with national policy this policy requires less restrictive criteria for exceptional development settlement boundaries (Home Builders Federation; Savills obo The Leconfield Estate). Clause 3) repeats the NPPF and is therefore unnecessary (Savills obo The Leconfield Estate). This policy is not positively prepared as it restricts windfall development in Sustainable Rural Villages through excessively tight boundaries (Turley obo Persimmon Homes). The exceptions that justify development beyond settlement boundaries are too loose and undermine the purpose of a settlement boundary (Millom-Without Parish Council). This policy requires stronger</p>

Chapter	Main Issues Raised
	wording to ensure development accords with genuine need (Friends of the Lake District). Issues raised regarding the demarcations of several specific settlement boundaries (Various).
6 Development Standards	<p><i>Planning Obligations</i> (DS5PU) – The supporting evidence for the plan ought to contain specific information regarding infrastructural requirements, regarding where prospective infrastructural projects are needed (Pinnacle obo Story Homes). This policy requires further clarification on planning obligation in the following circumstances: 1) in Whitehaven; 2) regarding contrasting developer obligations of extant permission in principle sites and the Publication Draft (Homes England).</p> <p><i>Design and Development Standards</i> (DS6PU) – This policy ought out to outline the requirement for developments to complete the active design checklist produced by Sports England (Sports England). This policy ought to include the requirement that new developments are built to the optional water efficiency standard prescribed in “Building Regulations” (United Utilities). This policy should include a clause necessitating a comprehensive and coordinated approach to development including respecting existing site constraints including utilities situated within sites (National Grid). This policy ought to identify infrastructure obligations for developments, in particular regarding contributions to educational provision and the wider catchment area of West Lakes Academy (Egremont Town Council). This policy requires an additional clause to ensure that energy considerations are applied to newbuild <i>and</i> retrofit developments (Millom-Without Town Council). This policy would be strengthened through a wording amendment to ensure alignment with the national “Dark Skies” guidance (Friends of the Lake District).</p> <p><i>Reducing Flood Risk</i> (DS8PU) – This policy ought to articulate that the identification of flood risk includes a dialogue with the relevant wastewater undertaker for the area so that any flood risk can considered appropriately (United Utilities). This policy requires greater flexibility to allow development in flood risk areas should be there be difficulties in delivering the plan’s aspirations (Savills obo The Leconfield Estate).</p> <p><i>Sustainable Drainage</i> (DS9PU) – This policy ought to set out the hierarchy of drainage options for managing surface water (United Utilities). This policy ought to reference forms of flood risk beyond tidal and fluvial flooding (United Utilities). This policy should identify the importance of determining whether a new development site exists within or near a public sewer (United Utilities).</p> <p><i>Soils, Contamination and Land Stability</i> (DS10PU) – This policy requires minor wording amendments to ensure it is exhaustive (The Coal Authority).</p> <p><i>Protecting Air Quality</i> (DS11PU) – This policy would be strengthened if paragraph 6.8.4 was brought into policy (Natural England). This policy would be strengthened if it applied to existing developments (Natural England). This policy ought to implement green infrastructure as a form of mitigation in areas struggling with poor air quality (Natural England). This policy ought to consider the potential emissions, beyond air quality in isolation, of all existing and potential developments (United Utilities). This policy should articulate the necessity for new developments to provide appropriate mitigations for all potential emissions within and surrounding future developments in accordance with the NPPF (United Utilities).</p>

Chapter	Main Issues Raised
7 Copeland's Economy	<p>The plan ought to identify Climate Change as a driver for change and economic opportunity (Friends of the Lake District).</p> <p><i>Economic Growth</i> (E1PU) – The Local Plan ought to emphasise the benefits of homeworking (Public). This policy should identify the aim to relocate Sellafield's office workers to Whitehaven's office space (Public).</p> <p><i>Location of Employment</i> (E2PU) – The policy ought to indicate the mitigation measures necessary for development to protect the historic environment (Historic England). The "Appropriate Type and Scale of Development" ought to be identified as non-exhaustive (Savills obo The Leconfield Estate).</p> <p><i>Cleator Moor Innovation Quarter at Leconfield</i> (E4PU) – This policy requires a commitment to not prejudice usage of the playing field adjacent to area 2 (Sports England). The clarity of this policy is undermined by the failure to clearly state area 3 is land allocated for the Cleator Moor Innovation Quarter and the accommodation allocation for area 2 ought to be more flexible (Copeland Borough Council).</p> <p><i>Employment sites and Allocations</i> (E5PU) – Objection that this policy fails to highlight how relevant sites can be developed positively due to lack of consideration given to development constraints/contributions necessary to mediate potential harm to heritage assets (Historic England).</p> <p><i>Opportunity Sites</i> (E6PU) – Objection that this policy fails to highlight how relevant sites can be developed positively due to lack of consideration given to development considerations necessary to mediate potential harm to heritage assets (Historic England). The allocated opportunity sites in Egremont should be linked to planning policies (Egremont Town Council).</p>
8 Rural Economy	<p><i>Agricultural Buildings</i> (RE1PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by agricultural development (Historic England).</p> <p><i>Equestrian Related Development</i> (RE2PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by equestrian development (Historic England).</p> <p><i>Conversion of Rural Buildings to Commercial or Community Use</i> (RE3PU) – Objection on the grounds that this policy fails to consider the long-term impact on settlement sustainability caused by second homes and holiday rentals (Millom-Without Parish Council)</p>
9 Low Carbon and	<p><i>Large Scale Energy Development</i> (CC1PU) – Suggestion that this policy ought to outline the potential impact of lighting (Friends of the Lake District).</p>

Chapter	Main Issues Raised
Renewable Energy	<p><i>Wind Energy Developments (CC2PU)</i> – Suggestion that this policy ought to include a direct reference to Copeland’s “Outstanding Sites of Natural Beauty” -- e.g. The Lake District National Park and Hadrian’s Wall – as a planning consideration.</p>
10 Nuclear Development	<p>This chapter ought to include reference the two Community Partnerships that are taking forward the GDF siting process and the LLWR’s role as an element of nationally significant nuclear infrastructure hosted by Copeland (Nuleaf). This chapter ought to reference the community benefits of the decommissioning mission (Nuleaf). This chapter ought to provide a clear statement regarding the potential of the GDF project within Copeland (Millom-Without Parish Council; Millom Town Council). This chapter ought to state the mitigation measures expected for any significant developments of the National Grid infrastructure caused by Moorside or SMRs (Millom-Without Parish Council). The LLWR allocation requires a greater expression of contextual setting and should not be described as “White Land” (Avison Young obo Nuclear Decommissioning Agency).</p> <p><i>Supporting Development of the Nuclear Sector (NU1PU)</i> – This policy should provide more explicit support for all projects which deliver the NDA’s mission as outlined in the NDA Strategy (Avison Young obo Nuclear Decommissioning Agency). Objection to clause E) on the grounds of ambiguity, it could be interpreted that the developer is expected to provide a monetary contribution beyond that necessitated by DS5PU (Avison Young obo Nuclear Decommissioning Agency). The GDF (or any surface nuclear facility) should not be built between Ravenglass, Sellafield, and the Fells (Public).</p> <p><i>General Nuclear Energy and Associated Development and Infrastructure (NU3PU)</i> – The title and content of this policy ought to be amended to fully reflect the scope of the nuclear sector (Avison Young obo Nuclear Decommissioning Agency). Objection to wording of clause A) as it fails to facilitate development on land under the control of the NDA that does not fall within a designated employment site (Avison Young obo Nuclear Decommissioning Agency). The NDA ought to be exempt from clause A) on the grounds that “exceptional need” is established through the NDA Strategy (Avison Young obo Nuclear Decommissioning Agency).</p> <p><i>Nuclear Development at Sellafield (NU4PU)</i> – This policy should provide a broader definition of “nuclear development” that captures the range of non-nuclear development carried out on the Sellafield site (Avison Young obo Nuclear Decommissioning Agency; Sellafield). The identified Sellafield site boundary requires review as areas outside this boundary have already been developed (Avison Young obo Nuclear Decommissioning Agency; Sellafield). Nuclear development in open countryside should be covered by DS4PU (Sellafield). Objection to clause B) as it fails to clearly identify the criteria for “justifiable exception need case” for off-site non-nuclear development and the explanatory footnote (43) is not sufficient (Avison Young obo Nuclear Decommissioning Agency). The ambiguity of clause B) amplifies financial risk for the Sellafield site (Sellafield). Suggestion that clause C) ought to be deleted as the consolidation of radioactive material does not require planning permission and is therefore controlled by other regulatory processes beyond the Local Plan (Avison Young obo Nuclear Decommissioning Agency; Sellafield). Objection clause G) as the NDA operates on a principle of carbon reduction as opposed to carbon offsetting developed (Avison Young obo Nuclear</p>

Chapter	Main Issues Raised
	<p>Decommissioning Agency; Sellafield). Request an additional clause which articulates that nuclear development proposals may not comply with other policies within the local plan (e.g., biodiversity net-gain, etc) due to constraints on the Sellafield site.</p> <p><i>Nuclear Demolition</i> (NU5PU) – This policy ought to be deleted for the following reasons: 1) It introduces principles for demolition which go beyond permitted development contrary to government policy; 2) it is unclear how these principles could be considered in light of the prescribed legislative framework for determining prior approval applications; 3) it is unclear why these principles are being sought in relation to demolition activities taking place on the Sellafield site which are controlled by other means (i.e. The Wildlife and Countryside Act 1981, Environment Agency CL:AIRE protocol, and Sellafield Ltd Travel Plan); 4) Clause 4) is ambiguous regarding the meaning and intent of adverse impacts and adequate mitigation (Avison Young obo Nuclear Decommissioning Agency).</p>
11 Retail and Leisure	<p><i>Vitality and Viability of Town Centres and Villages within Hierarchy</i> (R1PU) – It is essential that public realm improvements are intrinsically linked to surface water management improvements (United Utilities).</p> <p><i>Retail and service provision in Rural Areas</i> (R5PU) - Suggestion that a direct reference is provided to the potential harm to heritage assets caused by farm diversification and rural retail schemes (Historic England). Suggestion that a wording amendment is required that emphasises the boost to viability provided by combining services and facilities.</p> <p><i>Sequential Test</i> (R7PU) – The Sellafield site requires main town centre uses (e.g., offices, welfare, canteen). As such, Sellafield requests exemption from the sequential test (Sellafield).</p> <p><i>Non-Retail Development in Town Centres</i> (R8PU) – The Retail and Leisure Impact assessment increases cost and financial risk for re-development in Egremont; the 300sqm requirement should be increased to 500sqm to ensure equal treatment of Egremont and Whitehaven (Egremont Town Council).</p>
12 Tourism	<p>The supporting text requires explicit reference to Copeland’s World Heritage Sites (Friends of the Lake District). The Tourism Gateways section would be strengthened through referencing Duddon Bridge as the southern entrance to the Lake District Coast (Millom-Without Parish Council).</p> <p><i>Tourism Development</i> (T1PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by tourism development (Historic England).</p> <p><i>Coastal Development along the Developed Coast</i> (T2PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by coastal development (Historic England).</p>

Chapter	Main Issues Raised
	<p><i>Caravans and Camping Sites for Short-Term Letting</i> (T3PU) – Suggestion that a direct reference is provided to the potential harm to heritage assets caused by Caravans and Camping Sites (Historic England).</p>
13 Housing	<p>The supporting text ought to recognise that development must be guided by environment capacity and transport sustainability; attempts to direct development towards rural area should not be pursued (Friends of the Lake District). The plan should strive for a balanced population instead of specifically seeking to grow it (Friends of the Lake District). The average household size in Copeland is 2.03; as such, there is limited need for extensive “executive housing” (Friends of the Lake District).</p> <p><i>Improving the Housing Offer</i> (H1PU) – Clause 4) should be amended to ensure that windfall sites are not limited to within settlement boundaries (Savills obo The Leconfield Estate; X). The reference to settlement boundaries ought to be removed from clause 4); as the DPA outlined in H2PU is lower than the “300 DPA considered necessary to support economic growth” (Turley obo Persimmons). This policy strives for aspirations rather than satisfying the local need of Copeland that is reflected by the standard method (Friends of the Lake District). The existing housing stock figures suggest it is difficult to justify new build developments, especially on greenfield sites as such developments would undermine the commitments to challenging climate change and supporting biodiversity (Friends of the Lake District).</p> <p><i>Housing Requirement</i> (H2PU) – This policy should facilitate a housing supply 20% higher than the requirement. This ensures flexibility and diversity within the range of sites (Home Builders Federation). The housing figure is likely higher than the figure currently proposed, as such the housing supply ought to be increased (Home Builders Federation). The policy relies on windfall development, previous competition, and extant permissions, to satisfy the housing requirement, as such it is not positively prepared (Iceni Projects Mssrs J Charlton and Son). A cap on housing requirements is inconsistent with national policy (Savills obo The Leconfield Estate; Turley obo Persimmon). The plan ought to allocate additional dwellings to ensure it plans for the 15-year minim period (Pinnacle obo Story Homes). A higher DPA is required to support and facilitate economic growth (Savills obo The Leconfield Estate; Turley Obo Persimmon; Barton Willmore obo Brookhouse Group; Pinnacle obo Story Homes).</p> <p><i>Housing Delivery</i> (H3PU) – This policy is a statement of intent rather than a policy (Home Builders Federation; Savills obo The Leconfield Estate). The plan should not be reviewed if housing delivery exceeds planned levels in sustainable rural villages and rural villages because an oversupply of houses aligns with governments commitment to boost housing supply (Home Builders Federation). A review if necessary if a settlement or tier falls <i>below</i> expectations (Turley obo Persimmon). The housing requirement should be treated as minimums rather than ceilings (Turley obo Persimmon Homes). The policy should outline that additional housing within lower tier settlements may be needed to meet an identified market need (Pinnacle obo Story Homes). The policy ought to remove all references which may act as a cap on the supply of housing in particular settlements (Pinnacle obo Story Homes). Clause 1) requires a clearer definition of what a “lack of progression” entails and how intervention can be made in a timely manner (Iceni Projects obo Mssrs J Charlton and Son). Clause 2) should include a timeline for an action plan (Iceni Projects obo Mssrs J</p>

Chapter	Main Issues Raised
	<p>Charlton and Son). Clause 3) is flawed as a higher delivery rate in one settlement may be required to offset a shortfall in another (Pinnacle obo Story Homes). While supportive of clause 4) this will require the publication of accurate monitoring data to be engaged with sufficiently (Iceni Projects Mssrs J Charlton and Son).</p> <p><i>Distribution of Housing (H4PU)</i> – The reference to development being “limited” to allocated levels ought to be removed. This position undermines the government’s commitment to boost housing supply (Home Builders Federation; Savills obo The Leconfield Estate; Turley obo Persimmon Homes; Pinnacle obo Story Homes). The housing allocation for key service centres ought to be increased to at least 200dpa (Savills obo The Leconfield Estate).</p> <p><i>Housing Allocations (H5PU)</i> – A larger allocation is required to allow this policy for more flexible housing delivery (Home Builders Federation). This policy does not allocate enough line in relation to critiques of H2PU (Turley obo Persimmon). The housing allocation profiles ought to provide more substantive site heritage analysis in order that developers can more meaningfully engage with the HIA requirements (Historic England). The housing allocation profiles ought to identify where sites affect Network Enhancement and Expansion Zones relating to the Local Nature Recovery Network (Friends of the Lake District). There is insufficient infrastructure in Egremont to support further development (Public). There is insufficient infrastructure in St Bees to support further development (Public).</p> <p><i>Housing Density and Mix (H7PU)</i> – The wording of this policy ought to amended to ensure positive wording (Friends of the Lake District). This policy focuses should prioritise genuine need over aspirations (Friends of the Lake District). The NPPF requires minimum density standards and so this policy is currently inconsistent with national policy (Pinnacle obo Story Homes).</p> <p><i>Affordable Housing (H8PU)</i> – This policy is consistent with national policy as it fails to secure a 25% proportion of all affordable homes as “First Homes” (Pinnacle obo Story Homes).</p> <p><i>Conversion and sub-division of buildings to residential uses including large HMOs (H13PU)</i> – This policy ought to be amended to support forms of subdivision beyond HMOs. This ensures the policy is consistent with the broader objective of sustainability (Friends of the Lake District).</p> <p><i>Allocated Site for Gypsies, Travellers, and Travelling Show People (H9PU)⁴</i> –An additional criterion that includes clear and consistent wording in respect of the assessment of a development’s impact on the local highway, flood risk, and linkages to sustainable transport (Cumbria County Council). A number of questions were asked which have been sufficiently answered through the FAQ sheet published by Copeland Borough Council (Public). A number of derogatory comments and/or suggestions were made that did not relate to planning matters, these have not been</p>

⁴ These representations were produced through the **Stage 5** consultations within the Local Plan process

Chapter	Main Issues Raised
	<p>included within this document but all responses will be forwarded to the Planning Inspectorate (Public). A number of technical issues were raised about the suitability of both GTW5 and GTW3 (Public).</p> <p><i>Rural Exception Sites</i> (H15PU) – Suggestion that a direct reference is provided to highlight the potential harm to heritage assets caused by Rural Exception Sites (Historic England).</p> <p><i>Replacement Dwellings outside Settlement Boundaries</i> (H18PU) – Clause 1) requires clarification regarding the definition “close to”. The policy would be strengthened through articulating that the replacement dwelling ought to closely reflecting existing dwelling in scale and floor space (Friends of the Lake District).</p> <p><i>Residential Caravans</i> (H21PU) – Suggestion that a direct reference is provided to highlight the potential harm to heritage assets caused by Residential Caravans (Historic England).</p>
14 Health, Sport & Culture	<p><i>Health and Well-Being</i> (SC1PU) – This policy should reference community plans developed via Parish Councils (Millom-Without Parish Council).</p> <p><i>Sporting, Leisure, and Cultural Facilities (excluding playing pitches)</i> (SC2PU) – The policy currently focuses on the need for a new facility and not the benefits of a new facility in relationship to the loss for an ancillary purpose, and it makes no reference to the quantity or quality of the replacement (Sports England).</p> <p><i>Playing Fields and Pitches</i> (SC3PU) – Sports England does not support one sport being ‘played off’ another. As such, it requests that exception 4) is removed (Sports England). Clause 5) of this policy should reference Copeland’s “Built Facilities Strategy” as the policy refers to playing fields and built facilities (Sports England). Clause 6) is not relevant when a proposal for development is not new playing fields or ancillary development, a separate policy should consider the impact of development on sporting facilities (Sports England).</p> <p><i>Impact of New Development on Sporting Facilities</i> (SC4PU) – The policy requires clarity regarding whether it includes playing fields.</p> <p><i>Community and Cultural Facilities</i> (SC5PU) – Clause 2) of this policy ought to be removed. As formally similar facilities may service different communities and, as such, serve different purposes (Theatres Trust). This policy ought to include an additional clause that requires shared facilities and/or co-location to have been considered as an option to improve viability (Friends of the Lake District).</p>
15 Natural Environment	<p>The definition of Biodiversity not exhaustive, it ought to reference the provision of food, water, air to breath, and soil “health and production” (Friends of the Lake District). The supporting text of this chapter ought to reference the Council’s duty to cover Network Expansion and Enhancement Networks (Friends of the Lake District). The supporting text of this chapter ought to reference indirect negative effects on</p>

Chapter	Main Issues Raised
	<p>biodiversity caused by development, including the disturbance caused via noise and lighting (Friends of the Lake District). The supporting text of this chapter ought to reiterate the requirement of larger residential and commercial development projects to include CEMPs. The supporting text regarding coastal management should include relevant excerpts from the Northwest Marine Plan (Marine Management Organisation). A distinction should be drawn between the inshore Northwest Marine Plan area and the offshore marine plan area (Marine Management Organisation). The supporting text of this chapter ought to highlight the Council’s statutory duty to conserve and enhance the setting of the Lake District National Park (Friends of the Lake District). The list of green infrastructure is not exhaustive, the plan ought to highlight that all vegetation/green space has some green infrastructure function (Friends of the Lake District).</p> <p><i>Conserving and Enhancing Biodiversity and Geodiversity (N1PU)</i> – This policy would be strengthened through utilising the “Mitigation Hierarchy” and the need for the National Sites Network to be protected (Natural England). The “avoidance” step ought to include an assessment of the genuine need for the development and the consideration of alternative, less sensitive sites (Friends of the Lake District).</p> <p><i>Local Nature Recovery Networks (N2PU)</i> – This policy ought to highlight the LNRS mapping can aid developers in selecting areas for habitat management, enhancement, restoration, or creation, and how development can contribute to nature recovery (Natural England). This policy ought to include a presumption against development that compromises areas identified as part of the Local Nature Recovery network within the Council’s planning jurisdiction (Friends of the Lake District).</p> <p><i>Biodiversity Net Gain (N3PU)</i> – This policy would be strengthened by acknowledging the Irreplaceable Habitats section of the Biodiversity Net Gain legislation (Natural England). This policy requires more flexibility based upon circumstances to ensure that it doesn’t act in detriment to procuring infrastructure investment (United Utilities).</p> <p><i>Protection of Water Resources (N5PU) (Superseded⁵)</i> – To reflect the Nutrient Neutrality legislation the local plan should include a policy explaining the necessity of protecting water quality and how the principles of Nutrient Neutrality help to achieve this. This policy should provide a description of Nutrient Neutrality, its implication for housing applications within the catchment boundary, the use of the Natural England calculator to create a nutrient budget, and how developers will have to secure mitigation (Natural England). This policy needs a greater illustration of Groundwater Source Protection Zones and Water Catchment Land (United Utilities).</p> <p><i>Protection of Water Resources (N5PU)</i> – This policy does not capture extent of government guidance (Friends of the Lake District). The policy could jeopardise the viability of developments (Home Builders Federation).</p>

⁵ Following Stage 5, this policy has been superseded.

Chapter	Main Issues Raised
	<p><i>Landscape Protection</i> (N6PU) – This policy should reference the prospective southern boundary extension of the Lake District National Park (Millom-Without Parish Council). Clause 3) ought to be amended to highlight the importance of setting to both the Lake District National Park and the Heritage Coast (Friends of the Lake District).</p> <p><i>St Bees and Whitehaven Heritage Coast</i> (N7PU) – As the extension is still in the process of being defined it should still be referred to as the “St Bees Heritage Coast” (Natural England). This policy should not restrict modern built developments within the Heritage Coast if they are appropriate, as such developments already characterise the Heritage Coast (Turley obo Persimmon). The St Bees Heritage Coast is not a designated heritage asset or landscape type, as such this policy imposes higher restricts than the NPPF and is therefore inconsistent with national policy (Turley obo Persimmon).</p> <p><i>The Undeveloped Coast</i> (N8PU) – This policy should include reference to MMO’s seascape policy NW-CSP-1 which aims to manage adverse impacts on the seascape and landscape of the northwest inshore and offshore marine plan areas (Marine Management Organisation).</p> <p><i>Green Infrastructure</i> (N9PU) – This policy requires clarification regarding whether playing fields are classified as Green Infrastructure (Sports England).</p> <p><i>Green Wedges</i> (N10PU) – This policy would be strengthened by highlighting that Green Wedges function to compliment Green Infrastructure (Friends of the Lake District).</p> <p><i>Woodlands, Trees, and Hedgerows</i> (N13PU) – This policy should provide a greater focus on planning opportunities within a productive landscape (National Farmers Union). The wording f this policy ought to be strengthened to remove unnecessary loopholes (Friends of the Lake District).</p>
16 Built and Historic Environment	<p>The supporting text of this chapter ought to illustrate the place of Millom Castle and Trinity Church within Copeland’s heritage assets (Millom Town Council). A more exhaustive list in figure 11 would better reflect the wealth of Copeland’s heritage assets (Friends of the Lake District).</p> <p><i>Heritage Assets</i> (BE1PU) – The overarching discussion of Copeland’s heritage ought to include more specific details (Historic England).</p> <p><i>Advertisements</i> (BE6PU) – The wording of this policy ought to be strengthened to increase its effectiveness (Friends of the Lake District).</p>
17 Connectivity	<p>Several factual changes are needed regarding the functional transport infrastructure of Copeland (Friends of the Lake District). The supporting text of this chapter should clearly identify the need for improvements on the A505 crossing at Duddon Bridge and the A5093 between Silecroft,</p>

Chapter	Main Issues Raised
	<p>Millom, and Barrow (Millom Town Council). The omission of the need for a cycle and footway bridge over the Duddon is needed for consistency with other key rivers on the Heritage Coast (Millom-Without Parish Council).</p> <p><i>Transport Hierarchy</i> (CO5PU) – Clause 4) requires more clarity on what defines car-sharing also it is unclear how development can promote car-sharing and, as such, it ought to be removed (Friends of the Lake District).</p> <p><i>Parking Standards and Electric Vehicle Charging Infrastructure</i> (CO7PU) – This policy ought to contain an additional commitment to developing cycle parking (Sports England). This policy is unnecessary as the provision of EVPs will become part of “Building Regulations” on the 15th of June (Savills obo The Leconfield Estate).</p>
18 Monitoring	N/A
Appendices inc Proposals Map	N/A

Table 2: Issues Raised at Reg 19/20 Stage - Employment Site Allocations

Employment Allocations	
Site	Response Summary
ES1A	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES1B	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES1C	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES2A	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES2B	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).

Employment Allocations	
Site	Response Summary
ES3	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES4	Objection to the inclusion of West Cumberland Hospital's permanent car parking land within ES4. The land is not available for further development at this time and so it cannot come forward during the plan period (Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES5	ES5 has the potential to harm heritage assets, including a grade II schedule monument. Its inclusion, without sufficient mitigation mechanisms, entails the plan is incongruent with the NPPF (Historic England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES6	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES7	Amendments should be made to the boundary of ES7. It should be expanded to the immediate south, as this land is available, suitable, and deliverable. The existing justification for its removal, on account of its flood risk 3 status, is questionable (Savills obo The Leconfield Estate); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES9	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES11	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES12	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES13	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ES14	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).
ELA2	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site (United Utilities).

Table 3: Issues Raised at Reg 19/20 Stage - Opportunity Sites

Opportunity Sites	
Site	Response Summary
OEG01	OEG01 is adjacent to the Egremont Conservation area. The HIA does include sufficient detail regarding the site's heritage contribution area. Likewise, it fails to identify sufficient mitigation measures. As such, OEG01 cannot demonstrate that development can be achieved without harm to the historic environment (Historic England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OEG02	OEG02 is adjacent to the Egremont Conservation area. The HIA does not include sufficient detail regarding the site's contribution area. Likewise, it fails to identify sufficient mitigation measures. As such, OEG02 cannot demonstrate that development can be achieved without harm to the historic environment (Historic England).
OEG03	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (Historic England).
OWH01	OWH01 affects several highly graded assets, included scheduled monuments. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm. As such, OWH01 cannot demonstrate that development can be achieved without harm to the historic environment (Historic England).
OWH02	OWH02 affects several highly graded assets, included scheduled monuments. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm. As such, OWH02 cannot demonstrate that development can be achieved without harm to the historic environment (Historic England).
OWH03	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH05	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH06	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH07	OWH07 has the potential to affect several highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm (Historic England).
OWH08	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH09	OWH09 has the potential to affect a number of highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value

Opportunity Sites	
Site	Response Summary
	and harm (Historic England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH10	OWH10 has the potential to affect a number of highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm (Historic England).
OWH11	OWH11 has the potential to affect a number of highly graded assets. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm (Historic England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OWH12	OWH12 has the potential to affect a number of highly graded assets. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm (Historic England)
OWH13	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OCL01	OCL01 should be removed due to flood risks and adjacent SSSI and SAC (Natural England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).
OMI01	Early dialogue with United Utilities will be required prior to submission of a planning application due to proximity of Millom Wastewater Treatment Works (United Utilities).

Table 4: Issues Raised at Reg 19/20 Stage - Housing Allocations

Housing Allocations	
Site	Response Summary
HWH1	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities); Objection to allocation as part of this land remains in the operational purview of the West Cumberland Hospital (Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust).
HWH2	This site has been used as a playing field in the past. Any development must replace the playing field (Sports England); Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure (United Utilities).

Housing Allocations	
Site	Response Summary
HWH3	This site is adjacent to a playing field. If developed, this would entail the playing field was surrounded by residential development. This prejudicial impact on the playing field needs to be assessed and considered as part of the planning application (and allocation) process (Sports England).
HWH4	This development would surround the playing field on three sides by residential development. If mitigation is required, this should be secured as part of planning application (Sports England).
HWH5	Request boundary is extended to include all land shown on Appendix 2 of Persimmon Document (Turley obo Persimmon Homes); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HCM1	Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HCM3	Concern about bringing site forward without assessment of impact on adjacent playing field (Sports England); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HCM4	Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site (United Utilities).
HEG1	This site has been used as a playing field in the past. Any development must replace the playing field (Sports England); HEG1 is not sound, legally compliant, nor satisfies duty to cooperate; Due to ecological and infrastructural concerns. This development would also impact on life quality of children who utilise this greenspace (Public).
HEG2	This development would impact traffic safety and efficiency on an already congested road (Public); This development will impact accessibility of existing estates (Queens Gate, Gulley Flats, and Dale View) (Public); This development will have a negative ecological effect (Public); Egremont's soft infrastructure is already at capacity (Public); The drainage system very poor within site and surrounding area and new development will exacerbate this (Public); Locals near development area should be directly written to regarding HEG2 (Public). The site allocation ought to highlighting the location as sitting upon a source protection zone (SPZ) and development will need to mitigate effects upon this (United Utilities).
HEG3	This site allocation has the potential to affect the setting of Egremont Castle. The NPPF outlines SMs to be of highest significance and harm to such assets (including via setting) should be wholly exceptional. The HIA does not identify Egremont Castle or make an assessment of it; without which the plan cannot show that development can be delivered without harm to historic environment (Historic England); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site (United Utilities).
HMI2	Questions the necessity of infrastructural commitments when developing this site (Barton Willmore obo Brookhouse Group); This site directly effects a priority habitat area and is inappropriate for development (Friends of the Lake District); Early dialogue with United

Housing Allocations	
Site	Response Summary
	Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HAR1	Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HDI2	This site directly effects a priority habitat area and is inappropriate for development (Friends of the Lake District); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HSB1	The HIA does not identify all the heritage assets that could be impacted by development, as such the plan fails to show how development can be delivered without harm to the historic environment (Historic England); village infrastructure inadequate for size of this development (Public); village character undermined by further development (Public); insufficient amenities accessible within village which inflates the carbon footprint of new developments (Public); The site is serviced by a poor footpath that lacks a walkway (Public); there is no requirement for more “executive housing” in St Bees (Public).
HSB3	HSB3 would damage Heritage Coast through its visibility and existing infrastructure unable to cope with development proposed (St Bees Parish Council); village infrastructure inadequate for size of this development (Public); insufficient amenities accessible within village which inflates the carbon footprint of new developments (Public); The site is serviced by a poor footpath that lacks a walkway (Public); there is no requirement for more “executive housing” in St Bees (Public); this development will exacerbate flood risk (Public); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site which is identified as not in use (United Utilities).
HSE2	The primary school is at capacity and Seascale is no longer within the West Lakes Academy catchment area. As such, the development is not sustainable (Seascale Parish Council); this development does not meet the needs of the village, namely, to facilitate downsizing (Seascale Parish Council); phase one flood alleviation has not progressed (Seascale Parish Council); phase one roads are not of suitable width (Seascale Parish Council); access can only be granted through culverting large sections of the beck and thus exacerbating the flood risk (Seascale Parish Council).
HMR1	This site is adjacent to a playing field. This prejudicial impact on the playing field needs to be assessed and considered as part of the planning application (and allocation) process (Sports England); Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site (United Utilities).
HMR2	Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site (United Utilities).

Housing Allocations	
Site	Response Summary
HTH1	Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site (United Utilities).
HDH2	Development will not define village edge as claimed; as this site is built on open space within it, a space that contributes to character of village (Friends of the Lake District).

Table 5: Issues Raised at Reg 19/20 Stage - Evidence documents

Evidence Document	Response Summary
Viability Assessment	Some policies have not been tested through viability assessment (Pinnacle obo Story Homes)
Infrastructure Delivery Plan	N/A

- 1.6.5 A fuller summary of the main issues raised is provided in Appendix 2 Schedule 2, along with the Council response. This process has been facilitated through Copeland Council producing a Consultation Database. This contains the full version of each response received at during the regulation-19 consultation and it will be submitted to the Planning Inspectorate alongside the Local Plan.

1.7 Conclusion

- 1.7.1 Section 3 and Appendix 1 (including Schedule 1) explain which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the Council's SCI 2020. Summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18 are provided and include an explanation of how these were taken into account in the preparation of the Copeland Local Plan, with a summary provided in Appendix 1 Schedule 2. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).
- 1.7.2 Section 3 and Appendix 2 (including Schedule 1) explain which bodies and persons were invited to make representations under Regulation 19 and how, in accordance with the plan-making Regulations and the Council's SCI 2020. Schedules 1 and 2 set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

1 Appendix 1

1.1.1 This appendix addresses the requirements of Regulation 22(1)(c) (i) to (iv) and sets out:

- (i) Which bodies and persons the local planning authority invited to make representations under Regulation 18
- (ii) How those bodies and persons were invited to make representations under Regulation 18
- (iii) A summary of the main issues raised by representations made pursuant to Regulation 18
- (iv) How any representations made pursuant to Regulation 18 have been taken into account.

1.2 Introduction

1.2.1 Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 took place in three stages.

Stage 1: Issues and Options Draft – November 2019

1.2.2 This **first draft** of the new Local Plan identified key issues facing the borough, as informed by evidence base documents. It then set out a number of alternative options for addressing these issues around a selection of key themes:

Development Strategy	Housing	Economy & Employment	Nuclear
Built Environment	Natural Environment	Healthy Communities	Tourism
Contributions	Climate & Coastal Change	Infrastructure	Transport
Heritage	Design	Retail & Leisure	Communications

1.2.3 This public consultation was active for 8-weeks between November 2019 and January 2020. 43 responses were received (3 via an on-line survey and 40 by email or post).

Stage 2: Preferred Options Draft – September 2020

1.2.4 This **second draft** of the new Local Plan was developed through the responses to the Issues and Options consultation, alongside additional evidence-based documents. This draft consulted on initial prospective policies, as divided into four themes: economy, communities, places, and connectivity. This consultation took place over 10-weeks between September 2020 and November 2020. 256 responses were received (110 via an on-line survey and 146 by email or post).

Stage 3: Focused Pre-Publication Draft – September 2021

1.2.5 This **third draft** of the new Local Plan consulted on a number of significant changes in light of responses made to the Preferred Options Draft. This draft consulted on a developed collection of policies alongside the provision of revised site allocations, settlement boundaries, and settlement hierarchies. This consultation took place over five-weeks

between September and October 2021. 59 responses were received (5 via an on-line survey and 54 by email or post).

- 1.2.6 Section 2 of this Appendix, along with Schedule 1, sets out which bodies and persons were consulted and how that was undertaken.
- 1.2.7 Section 3 of this Appendix provides links to the reports that summarise the main issues raised in response to these consultations and the response of the Council indicating how the comments were taken into account in the next stage of Plan preparation. A summary of the key changes made to the draft between Regulation 18 and Regulation 19 is included in Schedule 2.
- 1.2.8 Section 4 of this Appendix sets out a conclusion on the efficacy of the Regulation 18 consultation process.

1.3 Who was consulted under Regulation 18 and how that was undertaken?

Stage 1 – Consultation on Issues and Options (Nov 2019 – Jan 2020)

- 1.3.1 In accordance with pages 2-6 of the Council's [State of Community Involvement](#) (2015), a wide range of methods were used to raise awareness about the consultation and to encourage people to respond, particularly harder to reach groups. This included email notifications to all those on the Council's planning policy consultation database (which includes the statutory, specific, and general consultation bodies required by the regulations); letters to prospective respondents; articles in local newspapers; posters in libraries, schools, and community centres; and social media. The Copeland Borough Council's social media pages continually advertised throughout this consultation period.
- 1.3.2 The main consultation was a mixed-methods survey. Sixteen issues were identified for stakeholders to provide comments on. For each issue, a series of questions were asked. These questions were developed around known areas of debates; in response to new forms of development; in response to government guidance; and in relation to perceived policy gaps. Stakeholders were also able to identify other issues they thought should be reviewed and to make comments on the Evidence Base.
- 1.3.3 Hard copies of the consultation were made available in all Copeland libraries and Council Offices, alongside The Beacon Museum.
- 1.3.4 Schedule 1 of this appendix provides links to further information about who was contacted and how, and who, responded.

Stage 2 – Consultation on Preferred Options Draft (Sep – Nov 2020)

- 1.3.5 Alongside consultation on the Preferred Options Draft, the [Issues and Options Consultation Response Review](#) was published summarising the responses from the **stage 1** consultation and indicated how these representations had been taken into account in formulating the **stage 2** draft policies and proposals. Other supporting documents were also published for comment, including the updated evidence base.
- 1.3.6 In accordance with pages 2-6 of the Council's [Statement of Community Involvement](#), a wide range of methods were used to publicise the consultation. Emails and letters were sent to organisations and individuals on Copeland's planning policy consultation database at the start of the consultation, with follow up emails sent part-way through the consultation

period to Parish Councils. This database includes the statutory, specific, and general consultation bodies required under the 2012 plan-making Regulations. Articles publicising the consultation were placed in local and regional newspapers and on the Council's website. A [digital presentation](#) publicising and explaining the consultation was produced and Town and Parish councils were invited to further presentations outlining how the Local Plan might impact their area. The Copeland Borough Council's social media pages continually advertised throughout this consultation period.

- 1.3.7 Hard copies of the consultation were made available in all Copeland libraries and Council Offices, alongside The Beacon Museum.
- 1.3.8 The table in Schedule 1 of this appendix outlines who was contacted and who responded. Schedule 1 also provides links to further information about who was contacted, how this communication was received, and who responded.

Stage 3 – Consultation on Focused Pre-Publication Draft (Sep – Oct 2020)

- 1.3.9 Alongside consultation on the Focused Pre-Publication Draft, a [Preferred Options Consultation Response Report](#) was published indicating how the responses from the **Stage 2** consultation had been taken into account in formulating the **Stage 3** draft policies and proposals. Other supporting documents were also published for comment, including the updated Sustainability Appraisal and the evidence base.
- 1.3.10 In accordance with pages 2-6 of the Council's Statement of Community Involvement, a wide range of methods were used to publicise the consultation. Emails and letters were sent to organisations and individuals on Copeland's planning policy consultation database at the start of the consultation, with follow up emails sent part-way through the consultation period to Parish Councils. This database includes the statutory, specific and general consultation bodies required under the 2012 plan-making Regulations. Articles publicising the consultation were placed in local and regional newspapers; and on the Council's website. Town and Parish councils were invited to further presentations outlining how the Local Plan might impact their area. The Copeland Borough Council's social media pages continually advertised throughout this consultation period.
- 1.3.11 Hard copies of the consultation were made available in all Copeland libraries and Council Offices, alongside The Beacon Museum.
- 1.3.12 The table in Schedule 1 of this appendix outlines who was contacted and how, and who, responded. Schedule 1 also provides links to further information about who was contacted, how this communication was received, and who responded.

1.4 Main Issues raised in Plan order including the Council response/action.

Stage 1 - Issues and Options Draft (Nov 2019 – Jan 2020)

- 1.4.1 Section 4 of the [Issues and Options Consultation Response Report](#) gives a full account of all the responses received to the Issues and Options consultation between November 2019 and January 2020. This report also indicates how these comments were taken into account when drafting the Preferred Options Draft September 2020.

Stage 2 - Preferred Options Draft (Sep 2020 - Nov 2020)

- 1.4.2 Section 5 of the [Preferred Options Draft Response Report](#) sets out in full every comment received and the Council's response (including any changes made to the wording of the Preferred Options Draft), in Plan order organised by section of the Plan. A breakdown of the 256 respondents by demographic characteristic is provided on page 6; and an overall summary of the response to the key elements of the Preferred Options Draft is provided on pages 7-23. A summary of the key changes made between **Stage 2** and **Stage 3** in light of these comments is provided in Schedule 2 of this Appendix.

Stage 3 - Focused Pre-Publication Draft (Sep 2021 - Oct 2021)

- 1.4.3 Section 3 of the [Focused Pre-Publication Draft Response Report](#) sets out in full every comment received and the Council's response (including any changes made to the wording of the Preferred Options Draft), in Plan order organised by section of the Plan. Schedule 1 of this Appendix provides a list of who responded to this consultation and a breakdown by demographic characteristics. A summary of the key changes made to the **Stage 3** Focused Pre-Publication Draft in light of these comments, between Regulation 18 consultation in September 2021 and Regulation 19 in January 2022, is provided in Schedule 2 of this Appendix.

1.5 Conclusion

- 1.5.1 The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out on pages 2-6 of the Council's [Statement of Community Involvement](#). Links have also been provided to summaries and full reports of the main issues raised by representations made pursuant to Regulation 18, which includes an explanation of how these were taken into account in preparation of the Copeland Local Plan Publication Draft. Further detail is provided in Schedules 1 and 2 of this Appendix. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

Appendix 1 Schedule 1 : Details of the consultation undertaken under Regulation 18

For **Stage 1** of the Regulation 18 consultation, details of who was contacted, the methods and materials used and who responded are set out in Sections 3 and 4 of the [Issues and Options Consultation Response Report](#) and within this reports appendices.

For **Stage 2** of the Regulation 18 consultation, the table below lists who was contacted and who responded by type of respondent. Section 3 of the [Preferred Options Consultation Response Report](https://www.copeland.gov.uk/sites/default/files/attachments/poconsultationreport.pdf) <https://www.copeland.gov.uk/sites/default/files/attachments/poconsultationreport.pdf> gives further detail on the methods used for the consultation and the demographic characteristics of respondents to the consultation.

For **Stage 3** of the Regulation 18 consultation, the table below lists who was contacted and who responded by type of respondent. Page 4 of the [Focused Pre-Publication Draft Consultation Response Report](#) gives further detail on the methods used for the consultation and the demographic characteristics of respondents to the consultation.

1.1 Stage 2 - Preferred Options

Table 1 6: Regulation 18 Respondents – Preferred Options

Type of Respondent	Number notified on planning policy consultation data at Regulation 18	Number of responses received at Reg 18 Stage 2	Respondent to Reg 18 Stage 2.
Statutory Consultees & Government Departments		10	<ul style="list-style-type: none"> • Marine Management Organisation (PO-005) • Environment Agency (PO-045) • The Coal Authority (PO-051) • National Highways (PO-057) • Natural England (PO-074) • Lake District National Park Authority (PO-103) • Homes England (PO-138) • Industrial Minerals and MPA (PO-169) • Sports England (PO-179) • Historic England (PO-254)
Community Interest Groups		5	<ul style="list-style-type: none"> • Millom and Haverigg Civic Society (PO-149) • National Trust (PO-155) • Drigg & Holmrook Community Group (PO-164) • Friends of the Lake District (PO-170) • Theatres Trust (PO-209)
Community Representative Groups		1	<ul style="list-style-type: none"> • Frizington Rd Residents (PO-004)

Type of Respondent	Number notified on planning policy consultation data at Regulation 18	Number of responses received at Reg 18 Stage 2	Respondent to Reg 18 Stage 2.
Businesses		1	<ul style="list-style-type: none"> Port Millom (PO-008)
Business Representative Group		2	<ul style="list-style-type: none"> Country Land & Business Association (PO-009) Home Builders Federation (PO-032)
Major Employers		4	<ul style="list-style-type: none"> Cumbria Nuclear Solutions Ltd (PO-003) NHS Property Services (PO-068) NDA (PO-162) Sellafield (PO-173)
Housing Associations			
Agents and Developers		24	<ul style="list-style-type: none"> HFT Gough & Company (PO-006) Lakeland Associates (PO-025) Alpha Design (PO-031) Adams Planning (PO-033) Ken Thompson Consultants (PO-040) Planning Branch (PO-044) RET4 (PO-069) Michelle Fearon (PO-070) David & Robertson (PO-071) SRE Associates (PO-075) Arcus Consultancy Services (PO-085)

Type of Respondent	Number notified on planning policy consultation data at Regulation 18	Number of responses received at Reg 18 Stage 2	Respondent to Reg 18 Stage 2.
			<ul style="list-style-type: none"> • Arcus Consultancy (PO-108) • Heatons Planning (PO-109) • Turley obo Story Homes (PO-110) • Turley obo Persimmons (PO-111) • Turley obo Gleeson & Persimmon (PO-112) • PRK obo Mr Ellis (PO-134) • WC and J Leak and Sons (PO-137) • Brookhouse Group (PO-158) • WSP obo Land Recovery Ltd (PO-161) • Lakeland Building Design (PO-171) • MC Architecture & Design obo the Leconfield Estate (PO-178) • Fox Property (PO-219) • Hampton Investment Properties Ltd (PO-229)
Individual		179	<ul style="list-style-type: none"> • Public
Infrastructure provider		1	<ul style="list-style-type: none"> • United Utilities (PO-168)
Landowners		4	<ul style="list-style-type: none"> • Bruce Batty (PO-129) • Gordon Wilson (PO-154) • Katherine Bowe (PO-188)

Type of Respondent	Number notified on planning policy consultation data at Regulation 18	Number of responses received at Reg 18 Stage 2	Respondent to Reg 18 Stage 2.
Other Cumbria, Boroughs and Councils		15	<ul style="list-style-type: none"> • Millom Without Parish Council (PO-001) • Ponsonby Parish Council (PO-080) • Millom Town Council (PO-082) • Allerdale Borough Council (PO-100) • Drigg & Carleton Parish Council (PO-113) • St Bees Parish Council (PO-121) • Gosforth Parish Council (PO-122) • Seascale Parish Council (PO-126) • Kirksanton Parish Council (PO-150) • Ennerdale and Kinniside Parish Council (PO-153) • Egremont Town Council (PO-174) • Cumbria County Council (PO-183) • Lamplugh Parish Council (PO-195) • Drigg & Carleton Parish Council (PO-276)
Public Body			

1.2 Stage 3 - Focused Pre-Publication

Table 2 7: Regulation 18 Respondents - Pre-Publication

Type of Respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 Stage 3	Respondent to Reg 18 Stage 3
Statutory Consultees & Government Departments		9	<ul style="list-style-type: none"> • Lake District National Park Authority (PP-009) • Department for Education (PP-011) • Environment Agency (PP-020) • Historic England (PP-021) • The Coal Authority (PP-030) • Homes England (PP-033) • Natural England (PP-039) • Nuclear Decommissioning Authority (PP-041) • Ministry of Defence (PP-053)
Community Interest Groups		2	<ul style="list-style-type: none"> • Friends of the Lake District (PP-026) • The National Trust (PP-029)
Community Representative Groups		0	
Businesses		0	
Business Representative Group		1	<ul style="list-style-type: none"> • Home Builders Federation (PP-024)
Major Employers		1	<ul style="list-style-type: none"> • Sellafield (PP-037)
Housing Associations		0	
Agents and Developers		13	<ul style="list-style-type: none"> • Peter Winter obo Landowner (PP-001)

Type of Respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 Stage 3	Respondent to Reg 18 Stage 3
			<ul style="list-style-type: none"> • Glen Beattie (PP-007) • PFK obo Carlisle Diocese (PP-016) • Savills obo Leconfield Estate (PP-034) • Icen Projects obo KCS Agriculture (PP-038) • Pinnacle Planning obo Story Homes (PP-040) • Turley obo Persimmon Homes (PP-042) • NPL Group (PP-044) • SRE Associates obo St Bees School (PP-048) • STRE Associates Marisa Nutsford (PP-049) • SRE Associates obo Sunshine Properties West Coast (PP-050) • MJN Associates obo Mr R. Donnan (PP-061) • Mjn Associates obo Mr P. Graham (PP-062)
Individual		26	<ul style="list-style-type: none"> • Public
Infrastructure provider		1	<ul style="list-style-type: none"> • Wireless Infrastructure Group (PP-002)
Landowners		2	<ul style="list-style-type: none"> • Lynne Barr and Amanda Ratcliffe (PP-004) • Christopher Lamb (PP-014)
Other Cumbria Towns, Boroughs, and Councils.		6	<ul style="list-style-type: none"> • St Bees Parish Council (PP-015)

Type of Respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 Stage 3	Respondent to Reg 18 Stage 3
			<ul style="list-style-type: none"> • Millom Town Council (PP-031) • Avison Young obo Copeland Borough Council (PP-036) • Millom-Without Parish Council (PP-043) • Drigg and Carlton Parish Council (PP-054) • Cumbria County Council (PP-059)
Public Body		1	<ul style="list-style-type: none"> • NHS Property Services (PP-025)

Appendix 1 Schedule 2: Summary of key changes to the Copeland Local Plan made between Regulation 18 consultation in September 2021 (Stage 3) and Regulation 19 Publication Draft Version (Stage 4) in January 2022

Changes were made to the text of the Copeland Draft Local Plan between the versions made available for public consultation in September 2020 and September 2021 and the Publication Draft January 2022 in response to the following:

- Comments made during **Stage 2** and **Stage 3** of the Regulation 18 public consultation (See the [Preferred Options Consultation Response Report](https://www.copeland.gov.uk/sites/default/files/attachments/poconsultationreport.pdf)<https://www.copeland.gov.uk/sites/default/files/attachments/poconsultationreport.pdf> and [Focused Pre-Publication Consultation Response Report](#) for full consideration and response to the comments received)
- Recommendations made through the Sustainability Appraisal
- Changes to the NPPF, ongoing updates to national Planning Practice Guidance.
- General factual updates.

1 Appendix 2

1.1.1 This appendix addresses the requirements of Regulation 22(1)(c)(v):

- (v) If representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

1.1 Introduction

1.1.2 The Council published the Publication Draft Copeland Local Plan and Proposals Map on 10th of January 2022, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Section 2 of this Appendix, along with Schedule 1, sets out who was consulted and how that was undertaken.

1.1.3 This consultation was **Stage 4** of the Local Plan Production Process.

1.1.4 90 respondents raised 377 comments under Regulation 20. A summary of the main issues in Plan order is contained in Section 3 of this Appendix, along with Schedule 2. This includes the responses of the Council to the comments made.

1.1.5 The Regulation 19 consultation also included **Stage 5** of the Local Plan Production process. These Post-Publication Draft consultations comprised of:

- 1) The (superseded) Regulation 19 consultation on Gypsy and Traveller Site Allocation, as informed by the requirements outlined in the [GTAA](#). This consultation ran for six weeks between the 21st of March 2022 and the 3rd of May 2022. 195 respondents raised 35 unique comments.
- 2) The Regulation 19 consultation on Gypsy and Traveller Site Allocation, considered in lieu of an expanded evidence base, and substantive revisions to policy N5 considering the requirements engendered by Natural England's policy of "Nutrient Neutrality". The consultation ran 13th of July until 24th of August. 31 respondents raised 44 unique comments.

1.1.6 The representations raised by **Stage 5** are outlined in Section 3 of this Appendix, alongside Schedule 2. These representations are demarcated as appropriate.

1.1.7 Section 4 of this Appendix sets out a brief conclusion on the efficacy of the Regulations 19 publication process.

1.2 Who was consulted under Regulation 19 and how was that undertaken?

1.2.1 Upon publication on the Council's website, a formal notification email was sent to approximately 209 persons or organisations on the Council's planning policy consultation database (which includes the statutory, specific, and general consultation bodies required by Regulations and those wishing to be notified following Regulation 18 consultation) to invite them to make representation on the Publication Draft Copeland Local Plan and associated Proposals Map. with follow-up reminders sent during the six week period. In addition, a formal notification letter was sent to approximately 343 persons

- 1.2.2 This notification included a link to the Regulation 19 representation form; as well as to the web-page that included the proposed submission documents and associated supporting documents (Sustainability Appraisal Integrated Assessment Report, Habitats Regulations Assessment, Evidence Base Studies and Reports, Technical Papers, reports on the consultation undertaken under Regulation 18).
- 1.2.3 In addition, a formal notification was sent to approximately 533 persons or organisations on the Council's planning policy consultation database.
- 1.2.4 The consultation was also publicised on the Council's consultation web-page via social media, and local newspapers.
- 1.2.5 Stakeholders were advised they could submit representations using the on-line version of the form, or by post or email using the pdf version of the form provided, or through the Copeland Centre.
- 1.2.6 Hard copies of the Publication Draft Copeland Local Plan and Proposals Map, statement of representations procedure and representation forms were made available in all Copeland libraries and at the Council's main offices, along with an explanation that other supporting documents by using a computer within a library.
- 1.2.7 Schedule 1 of this Appendix provides further details of who was notified of the publication/notification materials produced.

1.3 Main Issues raised in Plan order including the Council response/action

- 1.3.1 90 respondents raised 377 comments under Regulation 20. The breakdown by a type of respondent is set in Schedule 1 of this Appendix. Schedule 2 of this Appendix summarises the main issues raised by Regulation 20 representations received in response to Regulation 19 publication. This is organised by Publication Draft Copeland Local Plan section including comments on the Proposals Map and key evidence where relevant (e.g. Infrastructure Delivery Plan). Exceptionally the Council has considered the need for potential amendments to the proposed submission plan to clarify and improve its overall content. Where justified, this is explained within the table. A separate schedule of potential changes has been prepared which has not been the subject of public consultation or sustainability appraisal. This schedule has been submitted in accordance with the approach set out in paragraph 1.5 of the Planning Inspectorate's Procedure Guide for Local Plan Examinations June 2019.

1.4 Conclusion

- 1.4.1 The summary above, in combination with Schedule 1 of this Appendix, explains which bodies and Persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations and the approach sets out on pages 2-5 of the [Council's Statement of Community Involvement 2016](#). Section 3 above and Schedules 1 and 2 of this Appendix set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

Appendix 2 Schedule 1 – Details of the consultation undertaken

Table 1: Those notified and respondents to the Regulation 19 Consultation

Types of respondent	Number notified on planning policy database	Number of representations received	Respondents unique ID number and name (including agent name where relevant)
Statutory Consultees & Government Departments	52	10	<ul style="list-style-type: none"> • The Coal Authority (PU-052) • Homes England (PU-088) • Natural England (PU-080) • Sports England (PU-069) • Historic England (PU-025) • National Highways⁶ • Cumbria County Council⁷ • Environment Agency (PU-049) • Marine Management Organisation (PU-019) • Nuleaf (PU-013)
Community Interest Groups	47	3	<ul style="list-style-type: none"> • The National Trust (PU-045) • Friends of the Lake District (PU-081) • The Theatres Trust (PU-032)
Community Representative Groups	23	1	<ul style="list-style-type: none"> • Richmond Pensioners Club (PU-301)

⁶ This representation was not duly made. It is the Planning Inspectorates prerogative to deal with this accordingly.

⁷⁷ This representation was not duly made. It is the Planning Inspectorates prerogative to deal with this accordingly.

Types of respondent	Number notified on planning policy database	Number of representations received	Respondents unique ID number and name (including agent name where relevant)
Businesses	24	1	<ul style="list-style-type: none"> • Lawrence Eden Design Studio Ltd (PU-211) • Lakeland Textiles (PU-270)
Business Representative Group	14	2	<ul style="list-style-type: none"> • National Farmers Union (PU-085) • Home Builders Federation (PU-088)
Major Employers	13	1	<ul style="list-style-type: none"> • Sellafield (PU-075)
Housing Associations	5	0	
Agents and Developers	123	16	<ul style="list-style-type: none"> • Avison Young (C/o National Grid) (PU-074) • Avison Young (obo Nuclear De-commissioning Agency) (PU-073) • Avison Young (obo Copeland Borough Council) (PU-072) • Savills obo the Leconfield Estate (PU-044) • Turley obo Persimmon Homes (PU-051) • Pinnacle Planning Ltd obo Story Homes (PU-086) • Cushman Wakefield obo Story Homes, Persimmon, Gleeson and Genesis (PU-076) • Barton Willmore obo Brookhouse Group (PU-082) • PFK obo Carlisle Diocese (PU-001) • PFK obo Landowner (PU-002) • PFK obo Landowner (PU-020) • PFK obo Landowner (PU-021) • Peter Winter Town Planning Services obo landowner (PU-056)

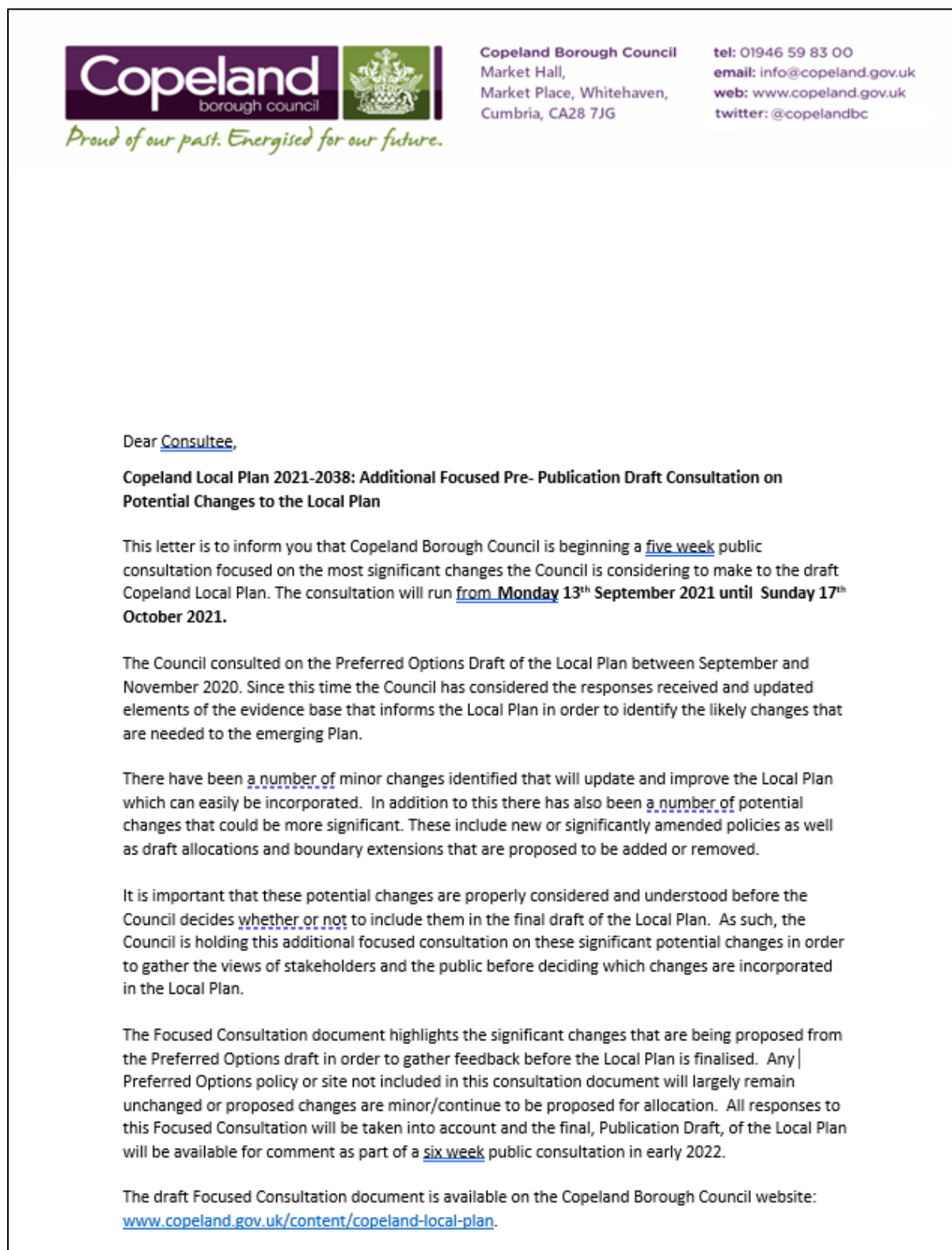
Types of respondent	Number notified on planning policy database	Number of representations received	Respondents unique ID number and name (including agent name where relevant)
			<ul style="list-style-type: none"> • Peter Winter Town Planning Services obo Landowner (PU-057) • SRE Associates obo landowner (PU-077.1) • SRE Associates obo Landowner (PU-077.2) • SRE Associates obo St Bees School (PU-077.3) • Lakeland Building Design (PU-097) • Icen Projects obo KCS agriculture (PU-017) • Whittle Jones obo Sneckyeat Industrial estate (PU-097)
Individual	137	265	<ul style="list-style-type: none"> • Public
Infrastructure provider	20	1	<ul style="list-style-type: none"> • United Utilities (PU-072)
Landowners	30	2	<ul style="list-style-type: none"> • Michael Sharp (PU-096) • Mr Graham (PU-039)
Other Cumbria Towns, Boroughs, and Councils.	23	3	<ul style="list-style-type: none"> • Ponsonby and Calderbridge Parish Council (PU-041) • Millom-Without Parish Council (PU-090) • Egremont Town Council (PU-079) • Seascale Parish Council (PU-020) • Whitehaven Town Council (PU-103) • Moresby Parish Council (PU-021) • Weddicar Parish Council (PU-209)

Types of respondent	Number notified on planning policy database	Number of representations received	Respondents unique ID number and name (including agent name where relevant)
Public Body	17	2	<ul style="list-style-type: none"> • Design Council (PU-094) • Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust (PU-042)

B – Notification materials

- Notification email
- Notification letter
- Notification poster
- Notification leaflet
- Notification social media post
- Pdf of representation form

Figure 1: Notification Email



If you have any comments on proposed changes in the draft consultation document, please complete the questionnaire online at the link above. Alternatively you can find a hard copy of our response form on our website. Please return all completed forms to Copeland Borough Council at the following address:

Strategic Planning Team
Copeland Borough Council
The Market Hall
Market Place
Whitehaven
Cumbria CA28 7JG

Or by email to: Localplanconsultation@copeland.gov.uk

For further information or advice, please contact the Strategic Planning Team on localplanconsultation@copeland.gov.uk or call 01946 598300. Please return all responses no later than **midnight on Sunday 17th October 2021**.

Yours Faithfully,

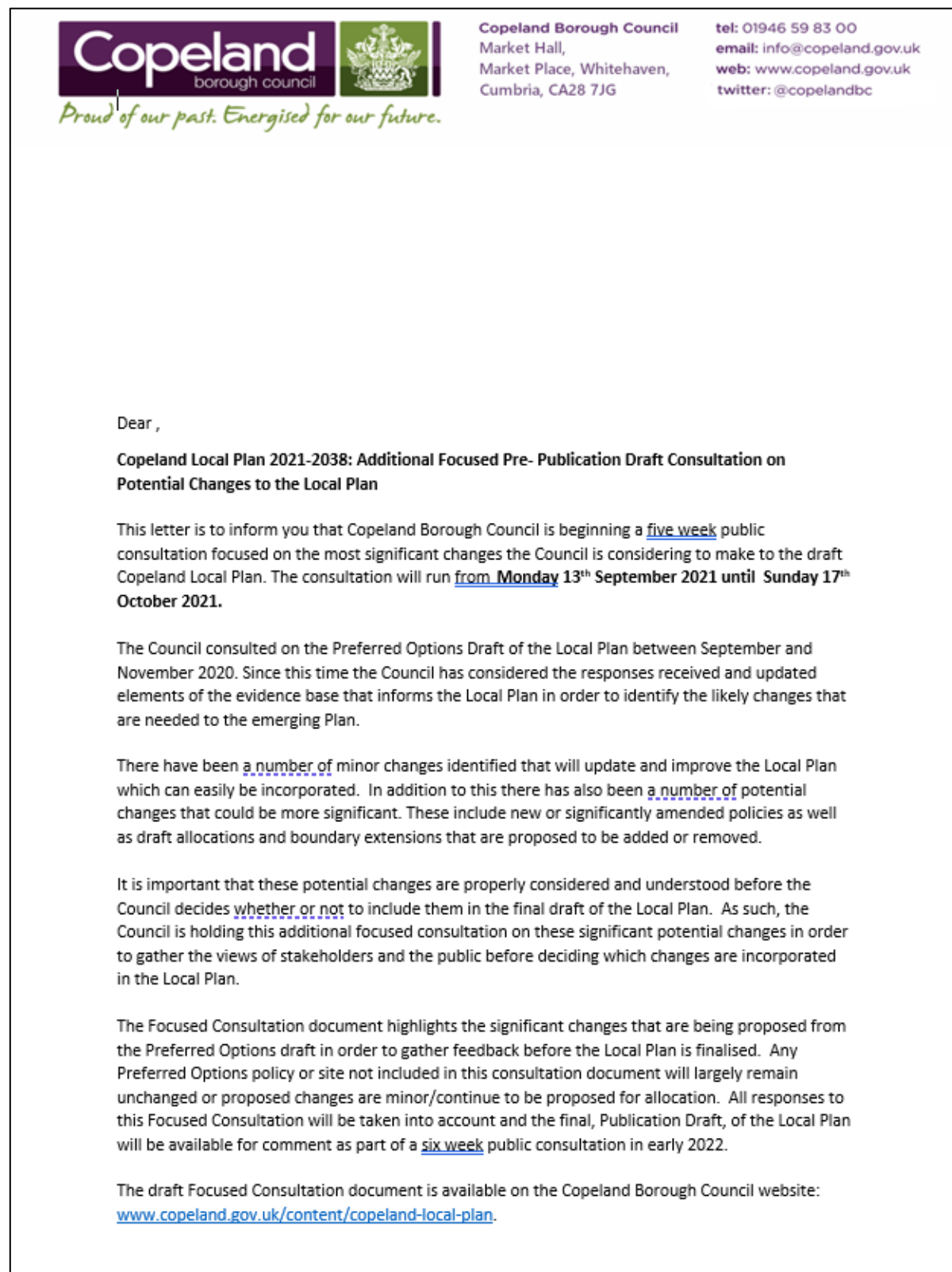


Chris Hoban
Strategic Planning Manager

Privacy Notice

A copy of the Council's privacy statement can be viewed at https://www.copeland.gov.uk/sites/default/files/attachments/privacy_notice1.pdf. Further information is also available by contacting the council's Data Protection Officer at info@copeland.gov.uk or by calling 01946 598300 and asking to speak to the Data Protection Officer.

Figure 2: Notification Letter



If you have any comments on proposed changes in the draft consultation document, please complete the questionnaire online at the link above. Alternatively you can find a hard copy of our response form on our website. Please return all completed forms to Copeland Borough Council at the following address:

Strategic Planning Team
Copeland Borough Council
The Market Hall
Market Place
Whitehaven
Cumbria CA28 7JG

Or by email to: Localplanconsultation@copeland.gov.uk

For further information or advice, please contact the Strategic Planning Team on localplanconsultation@copeland.gov.uk or call 01946 598300. Please return all responses no later than **midnight on Sunday 17th October 2021**.

Yours Faithfully,



Chris Hoban
Strategic Planning Manager

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Figure 3: Notification Poster

Your Opportunity to GET INVOLVED

Copeland Borough Council have recently produced the Local Plan Publication Draft. This is the final draft of the Local Plan which will be submitted to the Planning Inspectorate in April 2022 for examination. The Local Plan is designed to guide planning decisions in Copeland by setting out:

- **Which** areas should be protected from development
 - **Where** development should be located,
- **How much** development the Borough needs and
 - **What type** of development is required

The Local Plan affects everybody –we want to hear your views!



The Public Consultation runs from 10th January until 21st February 2022.

For further information about the consultation and next steps, please

Visit: www.copeland.gov.uk;

Market Hall, Whitehaven (On an appointment basis subject to opening hours and Covid-19 restrictions)

Email: localplanconsultation@copeland.gov.uk

Call: 01946 598300

Copeland
borough council



Proud of our past. Energised for our future.

Figure 4: Notification Leaflet



<p>The Local Plan is informed by a number of evidence documents including:</p> <ul style="list-style-type: none"> • Sustainability Appraisal • Response reports relating to previous Local plan Consultations 		<p>Copeland Borough Council have recently produced the Local Plan Publication Draft. This is the final draft of the Local Plan which will be submitted to the Planning Inspectorate in April 2022 for examination. The Local Plan is designed to guide planning decisions in Copeland by setting out:</p>		
<ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment • Strategic Housing Market Assessment • Housing Needs Assessment • Economic Development Needs Assessment 		<ul style="list-style-type: none"> •Which areas should be protected from development •Where development should be located, •How much development the Borough needs and 		
<ul style="list-style-type: none"> • Economic Land Availability Study • Infrastructure Delivery Plan • Technical assessments to support the suitability of sites for development 		<ul style="list-style-type: none"> •What type of development is required 		
<p>A full list of evidence documents, along with links to each, can be found at: www.copeland.gov.uk/planning-policy</p>		<p>The Local Plan affects everybody –we want to hear your views!</p>		<p>Copeland Borough Council Local Plan 2021-2038 Publication Draft</p>

Figure 5: Notification Social Media Post

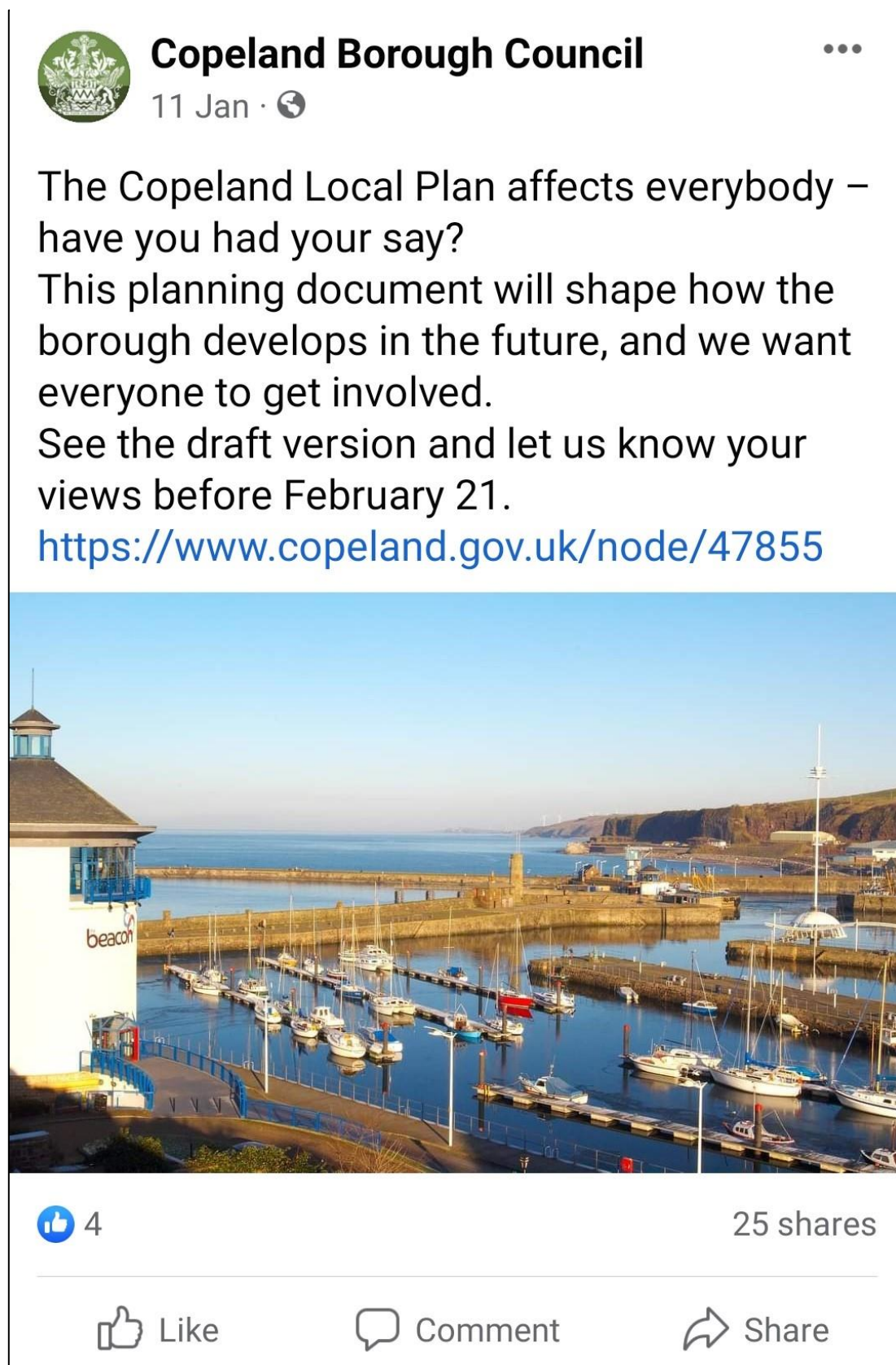



Figure 6: Representation Form



Proud of our past. Energised for our future.

Copeland Local Plan 2021- 2038

Publication Draft Consultation Response Form

For internal use:

Resp. No.

Rep. No.

Date Rec.

This Representation Form provides the opportunity to comment on the Publication Draft of the Copeland Local Plan which can be viewed at: <https://www.copeland.gov.uk/content/local-plan-2021-2038-publication-draft-consultation>. This consultation is a requirement under the Town and County Planning (Local Planning) Regulations 2012 Regulation 19.

The Publication Draft represents the Council's final draft of the Local Plan that we wish to submit to the Secretary of State for Public Examination by a Planning Inspector. Completed forms will be sent to the Planning Inspectorate for their consideration through the Examination in Public process.

Comments not submitted on the standard response form will only be considered at the Inspector's discretion

It should be noted that representations will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the Examination. Representations will be also be 'made available' in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 20, 22 and 35). This includes publication on the Council's website.

Privacy Notice

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Please complete a separate sheet for each representation you wish to make and return this form no later than 4.30pm on Monday 21st February 2022 to:

Strategic Planning
Copeland Borough Council
Market Hall
Market Place
Whitehaven
CA28 7JG

Or email: localplanconsultation@copeland.gov.uk

Appendix 2 Schedule 2: Summary of the main issues raised by the Regulation 20 representations and Council response, in Plan order.

<u>Policy, Paragraph, Annex or Table no</u>	<u>Main Issues Raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Mod IDs</u>	<u>Repre s, Unique IDs</u>	<u>Respd t, Unique IDs</u>	<u>Respondent names</u>
Section 1: Forward, Introduction, Vision, Objectives							
1.1.1	Insert reference to Historic Environment to provide more extensive context for Copeland.	The following amendment has been applied: “With our beautiful beaches, unique historic environment , stunning natural landscapes....”	Yes	MI-LP9	R-001	PU-022	Historic England
Vision	Supports the plan’s vision to enhance and promote cultural heritage	Support welcomed	No	N/A	R-002	PU-022	Historic England
Objectives	Supports the plan’s objective to conserve and enhance the built environment.	Support welcomed	No	N/A	R-003	PU-022	Historic England
Objectives	The title should read “Landscapes and Heritage”. The reference to “Built” should be deleted.	The wording has been changed to the following: “Conserve and enhance all landscapes and built heritage”	Yes	MI-LP10	R-003	PU-022	Historic England
Objectives	Population growth should not be an objective. The plan should focus on achieving a “balanced population”; suggested measures, ensuring job	The wording has been changed to the following: Increase the borough’s population to support economic growth by reducing out migration (particularly of working age people), attracting new, permanent residents and improving life expectancy	Yes	Mi-LP08	R-004	PU-076	Friends of the Lake District

<u>Policy, Paragraph, Annex or Table no</u>	<u>Main Issues Raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Mod IDs</u>	<u>Repre s, Unique IDs</u>	<u>Respd t, Unique IDs</u>	<u>Respondent names</u>
	market development and opportunities in Copeland.						
Objectives	Suggested policy wording: “Protect and enhance the rich biodiversity and geodiversity both within and outside of the borough’s many nationally and internationally designated sites, ensuring that existing habitats are extended, and effectively connected by effective wildlife corridors , the new habitats are created and that lost habitats are restored, all in ways that secure biodiversity net gain and defend against ecological collapse”	The wording has been changed to the following: “Protect and enhance the rich biodiversity and geodiversity both within and outside of the borough’s many nationally and internationally designated sites, ensuring that existing habitats are extended and effectively connected by effective wildlife corridors , that new habitats are created and that lost habitats are restored, all in ways that secure biodiversity net gain and defend against ecological collapse”	Yes	MA-LP9	R-004	PU-076	Friends of the Lake District
Objectives	Suggested wording amendments: “Conserve and enhance all landscapes and built heritage within the borough, including attaching great weight to	The wording has been changed to the following: “Conserve and enhance all landscapes and built heritage within the borough, including attaching great weight to the conservation and enhancement of the setting of the Lake District National Park, World Heritage Sites and the St Bees Head and Whitehaven Heritage Coast, in addition to the many other places and buildings of historical, cultural and archaeological importance and their settings”	Yes	MA-LP11	R-004	PU-076	Friends of the Lake District

<u>Policy, Paragraph, Annex or Table no</u>	<u>Main Issues Raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Mod IDs</u>	<u>Repre s, Unique IDs</u>	<u>Respd t, Unique IDs</u>	<u>Respondent names</u>
	the conservation and enhancement of the setting of the Lake District National Park, World Heritage Sites and the St Bees Head and Whitehaven Heritage Coast, in addition to the many other places and buildings of historical, cultural and archaeological importance and their settings.”						
Objective	Suggested wording amendments: “ Encourage development that Enables sustainable, active and low impact travel, improving access to key services and employment opportunities as well as the leisure opportunities of the coast and Lakeland fringe...”	The wording has been changed to the following: “Encourage development that Enables sustainable, active and low impact travel, improving access to key services and employment opportunities...”	Yes	MA-LP13	R-004	PU-076	Friends of the Lake District
Spatial Portrait	Insert reference to the historic environment within	The following has been added to paragraph (4.4.3):	Yes	MI-LP53	R-005	PU-022	Historic England

<u>Policy, Paragraph, Annex or Table no</u>	<u>Main Issues Raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Mod IDs</u>	<u>Repre s, Unique IDs</u>	<u>Respd t, Unique IDs</u>	<u>Respondent names</u>
	spatial portrait of Copeland.	“The borough also has a wealth of heritage assets, many of which are located within its towns and villages and provide a sense of place and civic pride. These include evidence of Roman and Viking activity such as the Roman Fort at Parton, remnants of the borough’s industrial history and examples of fine Georgian architecture in Whitehaven’s town centre”					
	Development Strategy						
2.2	Request “significant developments” within context of NDA operations are referenced.	No change considered necessary.	No	N/A	R-007	PU-013	Nuleaf
Table 1, Row 2	Sentence should highlight Council’s statutory duty to conserve and enhance setting of the Lake District; outlines that this duty does not only apply to National Park Authorities regardless of planning jurisdiction.	<p>The wording has been changed to the following: “This comes under planning remit of the Lake District National Park Authority, and therefore planning matters are out of Copeland Borough Council’s control. The Council does however have a statutory duty to conserve and enhance the setting of the Lake District National Park.”</p> <p><i>Additional wording added to paragraph 15.13.1:</i></p> <p>“The Council has a statutory duty to conserve and enhance the setting of the Lake District National Park. It is therefore important that full...”</p>	Yes	MI-LP16 MI-LP239	R-006	PU-076	Friends of the Lake District
DS1PU	Supports DS1PU in principle, as it aligns with overarching aim of	Support welcomed	No	N/A	R-008	PU-041	Savills obo the

<u>Policy, Paragraph, Annex or Table no</u>	<u>Main Issues Raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Mod IDs</u>	<u>Repre s, Unique IDs</u>	<u>Respd t, Unique IDs</u>	<u>Respondent names</u>
	sustainable development as outlined in 2021 NPPF						Leconfield Estate
DS2PU	Policy is not consistent with national policy. This policy will potentially undermine the viability of developments.	No change considered necessary. The Policy identifies measures that developers are encouraged to incorporate rather than requirements.	No	N/A	R-009	PU-011	Home Builders Federation
DS2PU	States that non-universal approach of councils will contribute to increased carbon emission.	No change considered necessary. The Policy identifies measures that developers are encouraged to incorporate rather than requirements.	No	N/A	R-009	PU-011	Home Builders Federation
DS2PU	Policy is “statement of intent or vision rather than a policy”.	No change considered necessary. The Policy identifies measures that developers are encouraged to incorporate rather than requirements.	No	N/A	R-009	PU-011	Home Builders Federation
DS2PU	Supports policy regarding the use of sustainable resources.	Support welcomed	No	N/A	R-010	PU-022	Historic England
DS2PU	Policy is “statement of intent or vision rather than a policy”.	No change considered necessary. The Policy identifies measures that developers are encouraged to incorporate rather than requirements.	No	N/A	R-011	PU-041	Savills obo Leconfield Estate
DS2PU	To achieve net zero by 2037, new developments will require a zero footprint. The approach of “encouraging” developers to consider relevant	No change considered necessary. Requiring such measures to be included within developments goes beyond what is required by the NPPF and would have potential impacts upon viability if applied universally.	No	N/A	R-012	PU-076	Friends of the Lake District

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	measures not strong enough to achieve Cumbrian and National policy.						
DS2PU	Supports policy. Requests development condition requiring that any development does not increase the flood risk of neighbouring farmland; including maintenance commitment for farmland drainage channels which receive urban water.	No change considered necessary. Flood risk is already addressed under Policies DS8 and DS9.	No	N/A	R-013	PU-078	National Farmers Union
DS2PU	What is the intention to ensure cycleways and pathways are part of holistic approach through prospective development; to ensure alignment with “Cumbria Cycle Strategy”.	Improvements to cycleways and pathways are identified as priorities under Policies CO2 and CO4. Developers are also required to put pedestrians and cyclists first under Policy CO5. Local Cycling and Walking Infrastructure Plans, produced by Cumbria County Council, are referred to in section 17.7 of the Local Plan.	No	N/A	R-015	PU-083	Millom-Without Parish Council
DS2PU	Many of these guidelines are already encouraged by other policies.	The Council feels that as Climate Change is one of the biggest issues facing us at present, it is important to list the various methods that developers can help address it upfront in the Local Plan.	No	N/A	R-014	PU-079	Pinnacle obo Story Homes
DS2PU	Several elements of this policy are likely effect viability (passivhaus	No change considered necessary. The Policy identifies measures that developers are encouraged to incorporate rather than requirements.	No	N/A	R-014	PU-079	Pinnacle obo Story Homes

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	principles. Heating and power generation, circular economic contributing towards new woodlands and local nature recovery networks).						
DS2PU	These guidelines could be interpreted as requirements.	The Council disagrees with this statement. The policy clearly states “ <i>Developers are encouraged...</i> ”	No	N/A	R-014	PU-079	Pinnacle obo Story Homes
DS2PU	The viability assessment underpinning this policy is flawed, as highlighted by the consortium evidence document.	The Council disagrees with this statement. An updated Viability Assessment which takes into consideration responses received during previous consultations has however been produced to support the Submission Draft of the Local Plan.	No	N/A	R-014	PU-079	Pinnacle obo Story Homes
DS3PU	Rheda Close, Beckstones, and Rheda Park should not be merged into Rheda Park.	The Local Plan Appendices document includes a map showing the extent of the Frizington and Rheda settlement. The settlement includes the parts of Rheda that currently benefit from planning permission.	No	N/A	R-030	PU-043	Rheda Park Residents Association (Community Group)
DS3PU	The through-road of Rheda Park is a privately maintained single track and cannot support an addition 200 plus vehicles	It is not clear where the respondent has identified that there will be an additional 200 plus vehicles. The Local Plan does not allocate any sites within Frizington and Rheda and any sites within the extended settlement boundary to include Rheda already benefits from planning permission for housing.	No	N/A	R-030	PU-043	Rheda Park Residents Association (Community Group)

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DS3PU	Rheda Park should not be included in Frizington as Rheda Park has no services.	Rheda directly adjoins Frizington and the Council has extended the settlement boundary to include areas within Rheda that currently benefit from planning permission.	No	N/A	R-030	PU-043	Rheda Park Association (Community Group)
DS3PU	The definition as a service centre will means that the boundaries of Rheda Park will be further developed.	The Council has extended the settlement boundary to include areas within Rheda that currently benefit from planning permission.	No	N/A	R-030	PU-043	Rheda Park Association (Community Group)
DS3PU	Will Rheda need its own councillor?	This is not a planning consideration.	No	N/A	R-030	PU-043	Rheda Park Association (Community Group)
DS3PU	Rheda Park and Beckstones sharing a postcode has entailed that lorries “have been left lost”	This is not a planning consideration.	No	N/A	R-031	PU-043	Rheda Park Association (Community Group)
DS3PU	The classification of Ponsonby and Calder as a Rural Village will limit necessary development:	Calderbridge has been identified as a Rural Village within the settlement hierarchy based on the level of services it contains. The reasons for this are set out in the Settlement Hierarchy and Development Strategy Paper. Policy DS3 does	No	N/A	R-027	PU-038	Ponsonby and Calder Bridge

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	e.g. hard infrastructure, housing provision, and community facilities.	allow for appropriate development to be delivered on windfall sites within the village should they come forward.					Parish Council
DS3PU	The plan focuses development and support too much on towns rather than outlying communities and villages.	The Council disagrees with this statement. Whilst the majority of development will be directed to the towns, the settlement hierarchy has been extended to include a greater number of tiers and villages than in the Core Strategy to support rural communities.	No	N/A	R-027	PU-038	Ponsonby and Calder Bridge Parish Council
DS3PU	Support for classification of Holmrook and Drigg as individual sustainable villages	Support welcomed	No	N/A	R-016 R-017 R-018 R-019 R-020 R-021 R-022 R-023 R-024 R-025	PU-002 PU-003 PU-007 PU-008 PU-009 PU-010 PU-012 PU-015 PU-019 PU-040	Public

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DS3PU	Rheda Park, “Beckstones” & Rheda Close should be called Frizington & Rheda rather than Rheda Park	The settlement is called Frizington and Rheda within the Policy. Any references to Rheda Park (eg within the housing trajectory) derive from the name linked to the relevant planning application.	No	N/A	R-032	PU-044	Public
DS3PU	“Rheda” is a more appropriate name than Rheda Park	The settlement is called Frizington and Rheda within the Policy. Any references to Rheda Park (eg within the housing trajectory) derive from the name linked to the relevant planning application.	No	N/A	R-033	PU-047	Public
DS3PU	Supports the conception of 3-tiered hierarchy of villages.	Support welcomed	No	N/A	R-023	PU-015	Public
DS3PU	Support for the classification of Frizington and Rheda as a joint local service centre.	Support welcomed	No	N/A	R-024	PU-017	Iceni Projects obo KCS agriculture
DS3PU	Supports inclusion of a settlement hierarchy as a means of organising the focus of development and its necessary limitation.	Support welcomed	No	N/A	R-029	PU-041	Savills obo the Leconfield Estate
DS3PU	It is importance to maintain flexibility within settlement boundary demarcations to ensure that needs and demands are met across Copeland. In particular, through maintaining a reflexive system that	This comment appears to suggest that the hierarchy is reviewed and amended as the number and types of services within each settlement changes over time. The Council is required to review the Local Plan 5 years after its adoption and any changes to how the settlements function will be noted and addressed where appropriate at this stage.	No	N/A	R-029	PU-041	Savills obo the Leconfield Estate

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	modifies DS3PU in accordance with significant changes to the function of settlements and the “pattern of facilitates”. In particular, within Egremont						
DS3PU	Supports this policy.	Support welcomed	No	N/A	R-035	PU-079	Pinnacle obo Story Homes
DS3PU	Supports this policy. In particular, demarcation of Millom	Support welcomed	<u>No</u>	N/A	R-036	PU-082	Barton Willmore obo Brookhouse Group
DS3PU	The Egremont boundary appears to be based on outdated planning practices and boundaries. For instance, it cuts through gardens on Brisco Rd and cuts out grazing fields near Christie Bridge.	The Council has reviewed the settlement boundary and has proposed amendments where necessary as main modifications.	Yes	MA-LP-2 MA-AP-5	R-034	PU-074	Egremont Parish Council
DS3PU	Allowing development beyond settlement boundaries will restrict investment into Egremont.	Development is allowed outside settlement boundaries in a small number of circumstances in order to reflect paragraphs 78 and 80 of the NPPF.	No	N/A	R-034	PU-074	Egremont Parish Council
DS3PU	Three proposed housing allocations have split	Comments noted. Site availability has been considered through the Strategic Housing Land Availability process. Only	No	N/A	R-034	PU-074	Egremont

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	ownership. As such, deliverability is ambiguous.	a small number of sites are within shared ownership and in all cases landowners have demonstrated that the site is available.					Parish Council
DS3PU	Support for Copeland Borough Council's decision to determine housing requirement beyond the standard measurement.	Support welcomed	No	N/A	R-034	PU-074	Egremont Parish Council
DS3PU	This policy fails to acknowledge that development beyond the settlement boundaries can harm the historic environment.	Development beyond the boundaries has the potential to harm other elements as well as the historic environment, for example landscape, biodiversity etc. It is not necessary to list potential harm here as the policy only allows development outside the boundaries in limited circumstances and the Local Plan contains a number of other policies to protect such elements for example Policy BE2.	No	N/A	R-026	PU-022	Historic England
DS4PU	Supports DS4PU consideration for supporting appropriate development outside of settlement boundaries.	Support welcomed		N/A	R-038	PU-011	Home Builders Federation
DS4PU	DS4PU requires less restrictive criteria for exceptional development beyond settlement boundaries. This is necessary to bring DS4PU into alignment with	Criterion A) has been amended to also allow development outside the smaller centres in certain circumstances. This has been achieved through the following amendment: "The site is well related to and directly adjoins the an identified settlement boundary of town or Local Service Centre; and"	Yes	MA-LP20	R-038 R-039	PU-011 PU-041	Home Builders Federation Savills obo The Leconfield Estate

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	Government's objective to boost housing supply.						
DS4PU	Supports settlement boundaries provided these limits are not "onerously tight".	Criterion A) has been amended to also allow development outside the smaller centres in certain circumstances. This has been achieved through the following amendment: "The site is well related to and directly adjoins the an identified settlement boundary of town or Local Service Centre; and"	Yes	MA-LP20	R-039	PU-041	Savills obo The Leconfield Estate
DS4PU	Criteria iii is covered by the NPPF and therefore is unnecessary.	The criteria has been included for clarity.	No	N/A	R-039	PU-041	Savills obo The Leconfield Estate
DS4PU	DS4PU is not positively prepared as it restricts windfall development in Sustainable Rural Villages through excessively tight boundaries.	Criterion A) has been amended to also allow development outside the smaller centres in certain circumstances. This has been achieved through the following amendment: "The site is well related to and directly adjoins the an identified settlement boundary of town or Local Service Centre; and"	Yes	MA-LP20	R-063	PU-048	Turley obo Persimmon Homes
DS4PU	The exceptions listed in exception development beyond the settlement boundaries are too extensive and potentially undermine the purpose of a settlement boundary.	The Council disagrees with this statement, the list conforms with exceptions listed within the NPPF.	No	N/A	R-042	PU-084	Millom-Without Parish Council
DS4PU	In DS4PU, "require" ought to be changed to "are dependent on". This will	The following wording amendment has been applied to Criterion 2):	Yes	MA-LP23	R-041	PU-076	Friends of the Lake District

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	ensure development accords with genuine need.	“Appropriate rural developments such as agricultural, forestry, farm diversification or tourism proposals which are dependent on require such a location”					
DS4PU	The boundaries of Egremont should not be extended as it requires no additional housing.	The Council disagrees with this statement, housing need is identified within the SHMA and Housing Needs Survey. Preventing additional housing within a Local Service Centre that is well served in terms of services would also be contrary to the NPPF.	No	N/A	R-040	PU-052	Public
DS4PU	The boundaries of Egremont should not be extended as it requires no additional housing <i>and</i> its existing infrastructure is inadequate.	The Council disagrees with this statement, housing need is identified within the SHMA and Housing Needs Survey. Preventing additional housing within a Key Service Centre that is well served in terms of services would also be contrary to the NPPF. The evidence supporting the Local Plan identifies where additional infrastructure or infrastructure improvements are necessary to support additional housing.	No	N/A	R-062	PU-024	Public
DS4PU	The settlement boundary of Cleator Moor ought to be changed, as highlighted in main modification table.	The Council is proposing a main modification to amend the Cleator Moor settlement boundary.	Yes	MA-LP1	R-037	PU-004	Public
DS4PU	The settlement extension to St Bees cannot be justified. The existing infrastructure of St Bees has been rendered insufficient through “extensive housing construction”.	The Council disagrees with this statement, housing need is identified within the SHMA and Housing Needs Survey. Preventing additional housing within a Local Service Centre that is well served in terms of services would also be contrary to the NPPF. The evidence supporting the Local Plan identifies where additional infrastructure or infrastructure improvements are necessary to support additional housing.	No	N/A	R-066	PU-025	Public

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DS4PU – Dh004	Supports removal of the former HDH1 from the settlement boundary	Support welcomed	No	N/A	R-044 R-045 R-046 R-047 R-048 R-049 R-050 R-052	PU-040 PU-019 PU-012 PU-010 PU-009 PU-008 PU-007 PU-005	Public
DS4PU – DH004	Rejects the removal of the former HDH1 from the settlement boundary. The claims justifying exclusion are unsound.	The Council disagrees with this statement, no change considered necessary.	No	N/A	R-051	PU-036	Public
DS4PU – DH010	The land between Smithy Banks and Groundy Croft Lane should be deemed as Protected Green Space.	No change considered necessary. The Council has undertaken an Open Space Assessment however the document did not recommend protection of the land as protected open space.	No	N/A	R-053 R-054	PU-002 PU-003	Public
DS4PU – DH010	There is not a sufficient need for housing to justify further allocations	The Council disagrees with this statement, the need for additional housing development is identified within the SHMA and Housing Needs Study.	No	N/A	R-055 R-056 R-057	PU-007	Public

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					R-058	PU-008 PU-009 PU-010	
DS4PU – DH010	The incorporation of this site harms the distinctive of the two settlements by reducing the greenspace between them.	The Settlement Landscape Character Assessment shows the gap between Drigg and Holmrook as being further down the B5344. In addition, both settlements have a settlement boundary which restricts development sprawl and will prevent them merging together.	No	N/A	R-056 R-057	PU-008 PU-009	Public
DS4PU – DH010	This greenfield site is liable to flood risks.	The site has been assessed through the SFRA and adequate mitigation will be required prior to development taking place.	No	N/A	R-058	PU-010	Public
DS4PU – DH010	This site should be maintained for agriculture.	The site has been confirmed as being available by the landowner for residential development, and is suitable for residential and therefore can contribute towards achieving housing targets.	No	N/A	R-058	PU-009	Public
DS4PU – DH010	The location is not sustainable due to poor rural public transport provision in the area.	There is a train station in Drigg with a direct pedestrian link from the site.	No	N/A	R-055 R-057	PU-007 PU-009	Public
DS4PU – EN001	Settlement boundaries are too tight surrounding Sustainable Rural Villages. This limits the opportunities for economic growth in Sustainable Villages and develop the	The Council disagrees with this statement. The Council has not identified any suitable sites on the edge of Ennerdale Bridge where the settlement boundary should be extended. The Vicarage Lane site (EN001) has been considered and has not been taken forward for the reasons set out within the Discounted Sites document.	No	N/A	R-063	PU-048	Turley obo Persimmon Homes

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	service offer they provide. In particular, Ennerdale Bridge, the boundary of which should include Vicarage Lane.						
DS4PU – Fr041	Supports the inclusion of this site within the settlement boundary by virtue of extant planning permission.	Support welcomed	No	N/A	R-064	PU-017	Iceni Projects obo KCS agriculture
DS4PU – Ha001	Supports this site being included within the Haverigg settlement boundary.	Support welcomed	No	N/A	R-065	PU-01.2	PFK obo Landowne r
DS4PU – Ks001	The boundary for Kirksanton should be extended to include the former Nursery Garden site.	The Council disagrees with this statement. The reasons for discounting the former nursery site at Kirksanton (Ki001) are set out within the Discounted Sites document.	No	N/A	R-067	PU-053.1	Peter Winter Town Planning Services obo Martyn Ross
DS4PU – Mi027	The boundary for Millom should be extended to include Crook Field	The Council disagrees with this statement. The reasons for discounting the Crook Field site are set out within the Discounted Sites document.	No	N/A	R-068	PU-053.2	Peter Winter Town Planning Services

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							obo Mr K Robinson
6.4.7	This paragraph should be expanded to highlight that conservation area design guides are not only area of significance in regard to protecting heritage.	Modification proposed to paragraph 6.4.7: “Further information regarding these Guides, and other relevant documents which should be considered when determining applications that affect the historic environment, can be found within the Built Environment chapter.”	Yes	MI-LP86	R-069	PU-022	Historic England
6.4.9	Supports the plan’s emphasis on reusing building in line with suitable design and construction.	Support welcomed	No	N/A	R-070	PU-022	Historic England
Development Standards							
DS5PU	Supports this policy. In particular, using planning obligations to engender sustainable transport solutions and community facilitates (including sports facilities and green infrastructure).	Support welcomed	No	N/A	R-071	PU-065	Sports England
DS5PU	The supporting evidence for the local plan should include specific information regarding infrastructural requirements. For instance,	No change considered necessary, such information is included in the Infrastructure Delivery Plan and the Site Profiles document.	No	N/A	R-072	PU-079	Pinnacle obo Story Homes

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	where particular infrastructural projects are needed and the intended methods of delivery.						
DS5PU	The assessment by Cushman & Wakefield highlights that some of the criteria within this policy have not been sufficiently tested for viability.	The Council does not agree with this statement. The Viability Assessment has however been updated to consider responses received to the Local Plan.	No	N/A	R-072	PU-079	Pinnacle obo Story Homes
DS5PU	The Local Plan should identify and outline the infrastructural requirements, in terms of location and method of delivery, that may be required for certain sites.	No change considered necessary, such information is included in the Infrastructure Delivery Plan and the Site Profiles document.	No	N/A	R-072	PU-079	Pinnacle obo Story Homes
DS5PU	Requests clarification on planning obligations, especially for sites located in Whitehaven. In particular, regarding contrasting developer obligations of extant permission in principle sites and the Publication Draft.	No change considered necessary, such information is included in the Infrastructure Delivery Plan and the Site Profiles document.	No	N/A	R-073	PU-081	Homes England

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6.4.4	The inclusion of active design, while supported, should include a requirement for developments to complete the active design checklist produced by Sports England.	<i>Modification proposed - Additional wording added to paragraph 6.4.4:</i> “Developers are also encouraged to use Sport England’s Active Design Checklist which is a useful way of applying active design principles to specific proposals.”	Yes	MI-LP85	R-074	PU-065	Sports England
DS6PU	Supports this policy. In particular the commitment to develop locally distinctive places.	Support welcomed	No	N/A	R-077	PU-022	Historic England
DS6PU	While supportive, this policy should include a requirement for developments to complete the active design checklist produced by Sports England.	No change considered necessary to the policy as the additional wording added to paragraph 6.4.4 will encourage applicants to consider the checklist. This cannot be made a requirement as this would go beyond what is required under the NPPF.	No	N/A	R-078	PU-065	Sports England
DS6PU	This policy should include requirement that new development is built to the optional water efficiency standard prescribed in Building Regulations; evidence to justify this approach is provided.	The following amendment has been applied to DS2: “Incorporate the higher National Housing Standard for water consumption of 110 litres per person per day in new housing developments and achieve a BREEAM rating of excellent in new non-domestic dwellings”	Yes	MA-LP14	R-081	PU-072	United Utilities

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DS6PU	To be consistent with national policy, DS6PU should include clause necessitating “a comprehensive and coordinated approach to development including respecting existing site constraints including utilities situated within sites”.	The following wording amendment has been applied additional: “Developers must take a comprehensive and co-ordinated approach to development by respecting existing site constraints including utilities infrastructure on site. Applications for major development proposals should also produce and include a Sustainable Construction Environmental Management Plan as part of their applications”	Yes	MA-LP37	R-079	PU-069	Avion Young obo National Grid
DS6PU	Infrastructure contributions ought to be identified within the local plan. In particular, regarding contributions to educational provision and the wider catchment area of West Lakes Academy.	No change considered necessary, such information is included in the Infrastructure Delivery Plan and the Site Profiles document. With regards to education provision, any need identified is set out in the Education Topic Paper.	No	N/A	R-082	PU-074	Egremont Town Council
DS6PU	A clause is required to ensure that energy considerations are applied to retrofit <i>and</i> newbuild developments.	No change considered necessary, policy DS2 encourages developers to consider measures to reduce the carbon footprint of all developments requiring planning permission. Energy considerations are also deal with through Building Regulations.	No	N/A	R-080	PU-083	Millom-Without Parish Council
DS6PU	A wording amendment is required to ensure DS6PU aligns with national policy: “...and helps maintain dark	The following wording amendment has been applied to criterion M):	Yes	MA-LP33	R-083	PU-076	Friends of the Lake District

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	skies in line with up to date dark skies guidance”	“Uses appropriate levels and types of external lighting that does not create light pollution and helps maintain dark skies in line with up-to-date dark skies guidance”					
DS6PU	This policy should include a requirement for semi-mature trees to be planted on the verge side of each property.	No change considered necessary. Whilst this would increase biodiversity and bring other benefits this would not always be possible as there may not be sufficient space to allow for future growth of the trees (both branch and root systems). Tree planting is also already addressed under Policies DS7 and NS13.	No	N/A	R-075	PU-015	Bob Curwen
DS6PU	This policy should prioritise development on brownfield sites over greenfield	No change necessary, the issue is already addressed under Policy DS2 which encourages developers to make the most efficient use of land in accordance with the NPPF paragraph 119	No	N/A	R-076	PU-015	Bob Curwen
DS8PU	This policy should provide greater flexibility to allow development in some flood risk areas should there be difficulties in delivering the plan’s aspirations.	No change considered necessary, the policy already allows this where the appropriate information has been made available to support an application.	No	N/A	R-084	PU-041	Savills obo The Leconfield Estate
DS8PU	This policy should ensure that the identification of flood risk includes a dialogue with the relevant wastewater undertaker for the area so that any flood risk can be identified and considered appropriately.	The following subtitle has been added after paragraph 6.6.6 titled “Measures to Reduce Risk”. The following additional paragraphs have been added after 6.6.6: “Where appropriate reserved matters and applications for full planning permission should provide details on the approach to foul and surface water drainage by submitting a Foul and Surface Water Management Strategy which includes details of	Yes	MI-LP96	R-085 R-086	PU-072	United Utilities

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		<p>finished floor and ground levels, details of the levels of the proposed drainage system and details of future maintenance and management regimes. The Council’s validation list sets out where this is required.</p> <p>Applicants will be expected to include details of how the approach to drainage on any phase of the development has regard to interconnecting phases within a larger site, for example, to avoid a proliferation of pumping stations.”</p>					
DS9PU	The policy ought to set out and follow the hierarchy of drainage options for managing surface water. Wherein, the public combined sewer is the least preferable option for discharging.	No change considered necessary, the policy already does this.	No	N/A	R-087	PU-072	United Utilities
DS9PU	The policy should reference all forms of flood risk to be included in addition to the already cited tidal and fluvial flooding.	<p>The following additional subtitle has been added after paragraph 6.6 which is titled: “Coastal and Fluvial Flooding”.</p> <p>The following additional subtitle has been added after paragraph 6.6.4 which is titled “Waste Water”.</p> <p>An additional paragraph with the following wording has been added after 6.6.6 :</p>	Yes	<p>MI-LP91</p> <p>MI-LP93</p> <p>MI-LP94</p>	R-087	PU-072	United Utilities

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		“Flooding can also occur when the public sewer network reaches capacity. When identifying flood risk prior to submitting a planning application, developers are encouraged to engage in early dialogue with the relevant wastewater undertaker for the area to identify whether there are any existing public sewers on or near the site which are at a risk of flooding and/or whether there is a record of previous flooding from public sewers on or near the site. This information will then be considered appropriately during the application process in accordance with national policy and guidance.”					
DS9PU	The policy should identify the importance of determining whether a new development site exists within or near a public sewer.	This matter is already covered in Policy DS9 (which has been formed through previous consultation with UU and CCC), however the addition of the above paragraph at 6.6.6 will help clarify the requirements. No change therefore required.	No	N/A	R-087	PU-072	United Utilities
DS9PU	Suggests following addition: We wish to recommend the following additional policy wording shown in blue as part of Policy DS9PU: ‘All applicants will be expected to design sustainable drainage in accordance with the four pillars of	This matter is already covered in Policy DS9 (which has been formed through previous consultation with UU and CCC), however the addition of the above paragraph at 6.6.6 will help clarify the requirements. No change therefore required.	No	N/A	R-087	PU-072	United Utilities

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	sustainable drainage. These are water quantity, water quality, amenity and biodiversity. As such, landscaping and biodiversity proposals will be expected to be integrated with the strategy for surface water management. This can include hard and soft landscaping to reduce the volume and rate of surface water discharge (for example permeable surfaces and bioretention areas). Applicants will be expected to incorporate site drainage as part of a high quality green and blue environment with multifunctional spaces. Unless a below ground infiltration system is proposed for the management of surface water, applicants will be expected to manage						

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	<p>surface water through sustainable drainage features with multi-functional benefits as opposed to a reliance on underground conventional piped and tanked storage systems. Any sustainable drainage system should be designed in accordance with 'Ciria C753 The SuDS Manual' or any subsequent replacement guidance. All applications should be supported by strategies for foul and surface water. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is mimicked. On previously-developed land, applicants will be expected to follow the surface water hierarchy. Thereafter, any proposal based on a proposed reduction in</p>						

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	<p>surface water discharge from a previously-developed site should be in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA (or any replacement national standards) which target a reduction to greenfield run-off rate. Thereafter a minimum reduction will be required of 30% on previously developed sites and 50% on previously developed sites in any critical drainage area identified through the SFRA. In order to demonstrate any reduction in the rate of surface water discharge, applicants should include clear evidence of existing operational connections from the site with associated calculations on rates of discharge.</p>						

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	Applications for new development and proposals for public realm improvements will be required to be supported by a foul and surface water management strategy to protect water resources. The hierarchy for the management of surface water should be followed and surface water will only be allowed to discharge to the public sewer as a last resort. The approach to drainage for new development proposals and as a result of public realm improvements should be informed by a comprehensive strategy for drainage for the area which identifies linkage opportunities between development proposals and public realm improvements. Drainage will be required to be						

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	<p>considered early in the design process and linked to any strategy for landscaping, biodiversity and public realm improvements. Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable drainage and flood resilient solution is achieved. Applications for detailed approval will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any drainage schemes. Applications should also be supported by foul water drainage strategies. At the</p>						

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	detailed stage, this should include details of ground levels and finished floor levels so that the resilience of a site layout to flood risk can be assessed. For any development proposal which is part of a wider development site, it will be necessary to ensure foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. Applicants will be expected to include details of how the approach to drainage on any phase of development has regard to interconnecting phases within a larger site. A comprehensive, site-wide infrastructure strategy shall						

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	be submitted as part of any planning application for any strategic allocation. Infrastructure should be sized having regard to interconnecting phases and demonstrate how the site delivers sustainable drainage as part of interconnecting phases. Drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development. When necessary, the infrastructure strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.”						
DS10PU	Requests minor factual changes.	The following wording amendments have been applied:	Yes	MA-LP48	R-088	PU-049	The Coal Authority

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		<p>“Contamination and Land Stability</p> <p>The Council will proactively work with developers and other partners to identify opportunities to remediate contaminated and unstable sites.</p> <p>Development sites likely to have caused detriment to land quality will need to be risk assessed. Some sites will be more sensitive due to the location of sensitive environmental and human health receptors e.g. flood risk areas, surface waters, vulnerable aquifers, housing, schools, hospitals, children’s play areas.</p> <p>It is the developer’s responsibility to secure safe development and provide the necessary information at the time of the application. The minimum information that should be provided by an applicant is the report of a Preliminary Investigation (desk study, site reconnaissance and preliminary risk assessment) or Coal Mining Risk Assessment, where necessary. The findings of this assessment should determine if further investigation is needed....”</p>					
6.8.4	The policy of DS11PU would be improved if 6.8.4 was brought into policy.	<p>Proposed Minor Modification: <u>6.8.5</u> <i>Additional sentence after bulletpoints:</i> Where air quality monitoring identifies a decrease in air quality in residential areas or designated sites the Council will work with partners to mitigate impacts, for example</p>	Yes	MI-LP10 1	R-090	PU-075	Natural England

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		through increasing green infrastructure in those areas where possible and appropriate.					
DS11PU	DS11PU would be strengthened if applied to existing developments.	As above	No	N/A	R-090	PU-075	Natural England
DS11PU	<p>DS11PU should consider the potential emissions, beyond air quality in isolation, of all existing and potential developments.</p> <p>New developments should provide appropriate mitigation in accordance with the NPPF for all potential emissions within and surrounding future development.</p> <p>Suggests wording: “Development proposals will only be granted planning permission where there will be suitable mitigation included as part of a masterplan to respond to surrounding</p>	CBC disagrees with the suggested wording which lacks clarity and is unnecessary as the Local Plan already contains to ensure harmful effects are mitigated. No change proposed.	No	N/A	R-089	PU-072	United Utilities

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	development which may already be an existing source of emissions including but not limited to noise and odour.”						
Copeland’s Economy							
7.4	Climate Change ought to be identified as a driver for economic opportunity and change.	An additional bullet point (7.4.1) has been added: “Recognition of the severity of climate change, the creation of Copeland’s Climate Change Panel and the opportunities available for new renewable technologies in the borough”	Yes	MI-LP103	R-091	PU-076	Friends of the Lake District
7.4	Paragraph 7.4 ought to outline the link between the economy and climate change, e.g., proposals for economic growth ought to have mutually beneficial links for addressing environmental issues.	Comments noted	No	N/A	R-091	PU-076	Friends of the Lake District
E1PU	The local plan should emphasise the benefits of homeworking.	No change considered necessary, There are benefits and dis-benefits to homeworking and neither need to be identified within the Local Plan.	No	N/A	R-092	PU-015	Public
E1PU	E1PU should stipulate the aim to relocate Sellafield Officer workers to Whitehaven’s office spaces.	No change considered necessary, this is already identified in Policy NU2.	No	N/A	R-092	PU-015	Public

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E1PU	Planning policies need to allow farmers to adapt their business to deal with contemporary economic challenges and take opportunities. As such, farmers should not have planning induced “unreasonable conditions” placed upon them.	The Council does not believe that the Local Plan places unreasonable conditions on farmers. It also supports farm diversification schemes, subject to certain criteria being met, under policies DS4, E1, R5, T1 and T3.	No	N/A	R-093	PU-078	National Farmers Union
E2PU	E2PU ought to indicate that the historic environment requires development to present mitigation measures.	An additional bullet point has been added: “Impact on the historic environment and heritage assets.”	Yes	MA-LP51	R-094	PU-022	Historic England
E2PU	The table ought to be reframed as not exhaustive e.g., that each site and associated planning application be measured on individual merits <i>beyond</i> use-values indicated.	<p>The following wording amendment has been applied to paragraph 69: “Small scale economic opportunity opportunities linked to including”</p> <p>An additional row for “Rural Villages” has been added to the policy table: <u>“Rural Villages</u></p> <p>Small scale economic opportunities including:</p> <ul style="list-style-type: none"> • Expansion of existing businesses 	Yes	MA-LP52	R-095	PU-041	Savills obo The Leconfield Estate

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		<ul style="list-style-type: none"> Re-use of existing buildings Diversification of existing buildings that provide economic opportunity suitable to the role of a Rural Village” 					
E3PU	Supports E3PU and the commitment for development of ancillary use-values within WSTP.	Support welcomed	No	N/A	R-096	PU-015	Public
7.7.13	E4PU is undermined due to a lack of precision and clarity within 7.7.13. This policy requires a clear statement that area 3 is allocated land for E4PU.	Area 3 is not allocated at this time, it is considered to be a suitable location for the future growth of the Leconfield Estate. It is expected that area 3 will only be used for development once the existing site has been fully redeveloped, or when the existing site can no longer meet the requirements of businesses seeking to occupy the site.	No	N/A	R-097	PU-068.1	Avison Young obo Copeland Borough Council
E4PU	E4PU requires a commitment that this development does not prejudice the use of playing field adjacent to area 2.	No change considered necessary. The site is Council owned and any future planning applications on Area 2 will be submitted by the Council who are aware of the adjacent playing field and will give it due consideration at application stage. The development would have to comply with Policy SC4PU (Impact of new development on sporting facilities) before permission could be granted.	No	N/A	R-098	PU-065	Sports England
E4PU	Flexibility is required planning demarcation for area 2 regarding accommodation. Specifically, a “Hotel	An application for “Hotel” usage would be judged upon its own merits, should a planning application be submitted. It is not appropriate to incorporate “Hotel” usage in this policy.	No	N/A	R-099	PU-068.1	Avison Young obo Copeland Borough Council

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	Accommodation” model may be required to support business interests.						
E5PU	Appendices F ought to contain employment allocation profiles. In particular, regarding development considerations and potential conflicts with maintaining heritage. Currently E5PU fails to highlight how relevant sites can be developed positively.	New wording added to paragraph 7.8.5: “Developers should take into account the Council’s Heritage Impact Assessment that supports the Local Plan. This document identifies where there may be harm caused to nearby heritage assets through development and proposes mitigation measures. Where there is likely harm identified, developers will be required to build upon this document with a detailed site specific HeIA in accordance with Policy BE1PU. It should be noted that a project level HRA may be required for development proposals in order to comply with Policy E2PU.”	Yes	MI-LP113	R-101	PU-022	Historic England
E5PU	The inclusion of ES7 is a positive for the town.	Noted	No	N/A	R-120	PU-074	Egremont Town Council
E5PU – ES1B	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site	New wording added prior to para 7.8.7: “Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site”	Yes	MI-LP115	R-177	PU-072	United Utilities
E5PU – ES2B	Early dialogue with United Utilities will be required prior to submission of a	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine	Yes	MI-LP115	R-119	PU-072	United Utilities

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	planning application due to presence of utilities infrastructure and land interests within the site	where there might be a public sewer or utilities infrastructure present on the site					
E5PU – ES2B	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-119	PU-072	United Utilities
E5PU – ES2B	Any development of ES3 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-119	PU-072	United Utilities
E5PU – ES1C	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure and land interests within the site	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-117	PU-072	United Utilities
E5PU – ES2A	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-118	PU-072	United Utilities

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	infrastructure and land interests within the site						
E5PU – ES3	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-105	PU-072	United Utilities
E5PU – ES3	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-105	PU-072	United Utilities
E5PU – ES3	Any development of ES3 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-105	PU-072	United Utilities
E5PU – ES4	Objection the inclusion of West Cumberland Hospital's permanent car parking land within ES4. The land is not available for further development at this time and so it cannot come	The allocation does not prohibit the current car park usage as this benefits from planning permission.	No	N/A	R-103	PU-039	Summit Town Planning obo North Cumbria Integrated Care NHS

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	forward during the plan period.						Foundation Trust
E5PU – ES5	ES5 has potential impact heritage assets, including a grade II schedule monument. Its inclusion, without sufficient mitigation mechanisms, entails the plan is incongruent with the NPPF	This has been addressed through the updated HRA which Historic England have confirmed the approach of.	No	N/A	R-102	PU-022	Historic England
E5PU – ES6	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-115	PU-072	United Utilities
E5PU – ES7	Amendments should be made to the boundary of ES7. It should be expanded to the immediate south, as this land is available, suitable, and deliverable. The existing justification for its removal, on account of its flood risk 3 status, is questionable.	CBC disagrees with this comment as sites within flood risk zone 3 are considered to be undevelopable.	No	N/A	R-104	PU-041	Savills obo The Leconfield Estate

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E5PU – ES11	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-116	PU-072	United Utilities
E5PU – ES12	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-107	PU-072	United Utilities
E5PU – ES13	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-109	PU-072	United Utilities
E5PU – ES13	Early dialogue with United Utilities will be required prior to submission of a planning application due to proximity of Millom Wastewater Treatment Works. As such, the site may need an appropriate impact assessment.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-109	PU-072	United Utilities

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E5PU – ES1a	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-114	PU-072	United Utilities
E5PU – ES1a	Any development of ES1a should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-114	PU-072	United Utilities
E5PU – ES4	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-113	PU-072	United Utilities
E5PU – ES5	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-112	PU-072	United Utilities
E5PU – ES7	The existing public sewer passing through this site may increase the flood risk	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-110	PU-072	United Utilities

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	and, as such, limit development.						
E5PU – ES7	Any development of ES7 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-110	PU-072	United Utilities
E5PU – ES9	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-111	PU-072	United Utilities
E5PU – ES14	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-106	PU-072	United Utilities
E5PU – ES14	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-106	PU-072	United Utilities

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E5PU – ES14	Any development of ES14 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-106	PU-072	United Utilities
E5PU – ELA2	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.8.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-108	PU-072	United Utilities
E6PU	Developers are not given enough guidance on how to develop “Opportunity Sites” sustainably in accordance with the requirement to protect heritage.	New wording added (Paragraph 7.9.5): “Developers should take into account the Council’s Heritage Impact Assessment that supports the Local Plan. This document identifies where there may be harm caused to nearby heritage assets through development and it proposes mitigation measures. Where there is likely harm identified, developers will be required to build upon this document with a detailed site specific HeIA in accordance with Policy BE1PU. Development proposals Developers should also take account of the Conservation Area Design Guide SPD and Whitehaven Town Centre and Harbourside SPD where relevant. Also, a project level HRA may be required for development proposals on Opportunity Sites to ensure any potential effects are avoided or mitigated.”	Yes	MI-LP118	R-121	PU-022	Historic England

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E6PU	Individual opportunity sites lack a sufficient historical impact assessment.	See comment above.	No	N/A	R-121	PU-022	Historic England
E6PU – OEG03	Opportunity sites in Egremont should be linked back to planning policies as they are in Whitehaven.	Policy E6PU relates to opportunity sites across the borough.	No	N/A	R-141	PU-074	Egremont Town Council
E6PU – OEG01	OEG01 is adjacent to the Egremont Conservation area. The HIA does include sufficient detail regarding the site's contribution area. Likewise, it fails to identify sufficient mitigation measures. As such, OEG01 cannot demonstrate that development can be achieved without harm to the historic environment.	The HIA has since been updated and agreed by Historic England.	No	N/A	R-122	PU-022	Historic England
E6PU – OEG01	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-123	PU-072	United Utilities
E6PU – OEG02	OEG01 is adjacent to the Egremont Conservation area. The HIA does not	The HIA has since been updated and agreed by Historic England.	No	N/A	R-124	PU-022	Historic England

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	include sufficient detail regarding the site's contribution area. Likewise, it fails to identify sufficient mitigation measures. As such, OEG02 cannot demonstrate that development can be achieved without harm to the historic environment.						
E6PU – OEG03	Supports the inclusion of this opportunity site.	Support welcomed	No	N/A	R-141	PU-074	Egremont Town Council
E6PU – OEG03	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-140	PU-072	United Utilities
E6PU – OEG03	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-140	PU-072	United Utilities
E6PU – OEG03	Any development of OEG03 should be conducted through engagement with United Utilities before	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-140	PU-072	United Utilities

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	master planning and a sequential approach may be required.						
E6PU – OWH01	OWH01 affects several highly graded assets, included scheduled monuments. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm. As such, OWH01 cannot demonstrate that development can be achieved without harm to the historic environment.	The HIA has since been updated and agreed by Historic England.	No	N/A	R-125	PU-022	Historic England
E6PU – OWH02	OWH02 affects several highly graded assets, included scheduled monuments. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm. As such,	The HIA has since been updated and agreed by Historic England.	No	N/A	R-126	PU-022	Historic England

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	OWH02 cannot demonstrate that development can be achieved without harm to the historic environment.						
E6PU – OWH03	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP11 5	R-128	PU-072	United Utilities
E6PU – OWH05	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP11 5	R-129	PU-072	United Utilities
E6PU – OWH05	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP11 5	R-129	PU-072	United Utilities
E6PU – OWH05	Any development of OWH05 should be conducted through engagement with United Utilities before master	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP11 5	R-129	PU-072	United Utilities

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	planning and a sequential approach may be required.						
E6PU – OWH06	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-130	PU-072	United Utilities
E6PU – OWH06	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-130	PU-072	United Utilities
E6PU – OWH06	Any development of OWH06 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-130	PU-072	United Utilities
E6PU - OWH07	OWH07 has the potential to affect a number of highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies the significance and proposed mitigation	The HIA has since been updated and agreed by Historic England.	No	N/A	R-131	PU-022	Historic England

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	measures as identical for each asset despite distinction in potential value and harm.						
E6PU – OWHO8	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	Noted	No	N/A	R-132	PU-072	United Utilities
E6PU – OWHO8	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-132	PU-072	United Utilities
E6PU – OWHO8	Any development of OWH06 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	Noted	No	N/A	R-132	PU-072	United Utilities
E6PU – OWH09	OWH09 has the potential to affect a number of highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies	The HIA has since been updated and agreed by Historic England.	No	N/A	R-133	PU-022	Historic England

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	the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm.						
E6PU – OWH09	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	Noted	No	N/A	R-134	PU-072	United Utilities
E6PU – OWH10	OWH09 has the potential to affect a number of highly graded assets, including scheduled monuments alongside Grade I and II buildings. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm.	The HIA has since been updated and agreed by Historic England.	No	N/A	R-135	PU-022	Historic England
E6PU – OWH11	OWH11 has the potential to affect a number of highly graded assets. The HIA identifies the significance	The HIA has since been updated and agreed by Historic England.	No	N/A	R-136	PU-022	Historic England

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	and proposed mitigation measures as identical for each asset despite distinction in potential value and harm.						
E6PU – OWH11	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-137	PU-072	United Utilities
E6PU – OWH11	Any development of OWH06 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	noted	No	N/A	R-137	PU-072	United Utilities
E6PU – OWH12	OWH12 has the potential to affect a number of highly graded assets. The HIA identifies the significance and proposed mitigation measures as identical for each asset despite distinction in potential value and harm.	The HIA has since been updated and agreed by Historic England.	No	N/A	R-138	PU-022	Historic England
E6PU – OWH13	Early dialogue with United Utilities will be required	noted	No	N/A	R-139	PU-072	United Utilities

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	prior to submission of a planning application due to presence of utilities infrastructure.						
E6PU – OWH13	The existing public sewer passing through this site may increase the flood risk and, as such, limit development.	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-139	PU-072	United Utilities
E6PU – OCL01	OCL01 should be removed due to flood risks and adjacent SSSI and SAC.	No change considered necessary. The site is a previously developed site in a prominent and key location within Cleator Moor. Identifying it as an Opportunity Site will prevent it from coming forward as separate smaller windfall developments as a masterplan will be required for the whole site. The site has been considered through the Local Plan HRA process and paragraph 7.9.5 reminds developers that a project level HRA may be required on Opportunity Sites.	No	N/A	R-143	PU-075	Natural England
E6PU – OCL01	Early dialogue with United Utilities will be required prior to submission of a planning application due to presence of utilities infrastructure.	noted	No	N/A	R-142	PU-072	United Utilities
E6PU – OCL01	The existing public sewer passing through this site may increase the flood risk	New wording added prior to para 7.9.5: Early engagement with United Utilities will be required prior to the submission of a planning application to determine where there might be a public sewer or utilities infrastructure present on the site	Yes	MI-LP115	R-142	PU-072	United Utilities

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	and, as such, limit development.						
E6PU – OCL01	Any development of OCL01 should be conducted through engagement with United Utilities before master planning and a sequential approach may be required.	noted	No	N/A	R-142	PU-072	United Utilities
E6PU – OMI01	Early dialogue with United Utilities will be required prior to submission of a planning application due to proximity of Millom Wastewater Treatment Works.	noted	No	N/A	R-144	PU-072	United Utilities
E6PU – OMI01	The nature of this site will require a submission of a planning application that secures an acceptable level of amenity for potential future users/occupiers of the site.	Noted	No	N/A	R-144	PU-072	United Utilities
Rural Economy							
RE1PU	Agricultural development can harm historic heritage, as such a direct reference	The following wording amendment has been applied: “The building is of a scale, form and design which is appropriate to the location and will not result in adverse	Yes	MA-LP59	R-146	PU-022	Historic England

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	to this condition is necessary within RE1PU.	visual impacts, or unacceptable adverse harm to the landscape character or heritage assets.”					
RE2PU	Equestrian development can harm historic heritage, as such a direct reference to this condition is necessary within RE2PU.	The following wording amendment has been applied: “All development must be of a scale, form and design appropriate to the location and will not result in adverse visual impacts or unacceptable adverse harm to the landscape character or heritage assets.”	Yes	MA-LP59	R-147	PU-022	Historic England
RE3PU	RE3PU fails to consider the cumulative impact on long-term sustainability caused by second homes and holiday rentals.	The following text has been added to paragraph 12.4.4: “The Council will monitor the number of holiday homes/lets in the borough as there are concerns that large concentrations within rural villages can reduce community cohesion and increase property values to the detriment of local residents. Unfortunately, this issue cannot be addressed through local planning policy at present.”	Yes	MI-LP178	R-148	PU-083	Millom-Without Parish Council
Low Carbon and Renewable Energy							
CC1PU	Supports CC1PU.	Support welcomed	No	N/A	R-149	PU-022	Historic England
CC1PU	Supports CC1PU provided such proposals do not impact upon other development opportunities (e.g. housing and employment) and landscape assets.	Support welcomed.	No	N/A	R-150	PU-041	Savills obo The Leconfield Estate

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CC1PU	The consideration of lighting should be added to this policy.	The following wording amendment has been applied to criterion M) of DS6: “Uses appropriate levels and types of external lighting that does not create light pollution and helps maintain dark skies in line with up-to-date dark skies guidance ”	Yes	MA-LP33	R-151	PU-076	Friends of the Lake District
CC1PU	Planning is too often an obstacle for utilising farmland for Large Scale Energy Developments.	The Council disagrees with this comment. Such uses will be supported where they accord with the Development Plan.	No	N/A	R-152	PU-078	The National Farmers Union
CC2PU	This policy should include a direct reference to “Outstanding Sites of Natural Beauty” (e.g. The Lake District and Hadrian’s Wall) as a planning consideration for CC2PU.	An additional bullet point has been added: “The Outstanding Universal Value of the English Lake District World Heritage Site and the Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage Site.”	Yes	MA-LP63	R-153	PU-022	Historic England
CC2PU	The development of wind-turbines on catchment land which is also deep peat should be avoided.	The following amendment has been applied to D10: “Avoid development that results in the loss of best and most versatile agricultural land or areas of deep peat where possible”	Yes	MA-LP47	R-154	PU-072	United Utilities
CC2PU	Planning is too often an obstacle for utilising farmland for Wind Energy Developments.	The Council disagrees with this comment. Such uses will be supported where they accord with the Development Plan.	No	N/A	R-155	PU-078	The National Farmers Union
CC2PU	Requests criterion “ • Water resources and water quality (including catchment land for public	An additional bullet point has been added to the list: “Water resources and water quality (including catchment land for public water supply purposes)”	Yes	MA-LP68	R-154	PU-072	United Utilities

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	water supply purposes) + In cases of wind energy proposals on catchment land used for public water supply purposes, the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process in accordance with Policy N5PU.”						
Nuclear Development							
10	Commends the Local Plan’s inclusion of a comprehensive chapter dedicated to nuclear development.	Support welcomed.	No	N/A	R-157	PU-013	Nuleaf

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10	Suggests reference the two Community Partnerships that are taking forward the GDF siting process.	<p>Modification proposed - additional new paragraphs and subtitle after 10.8.2</p> <p>“The LLWR at Drigg has been in operation since 1959 and is an important facility that manages and disposes of low level waste generated throughout the UK. Developments at the LLWR are currently dealt with by Cumbria County Council.</p> <p>Copeland is currently host to two Community Partnerships in mid and south Copeland that are working on the siting process for a Geological Disposal Facility (GDF) for the borough. This is a nationwide search for a willing community and a suitable location for the safe and secure disposal of higher- activity radioactive waste. The siting of a GDF facility in Copeland could provide significant economic investment and job creation in the borough, although if successful, it is likely that this will fall outside of the Local Plan period. CBC will continue to work closely as part of the Community partnerships to engage with the local community and identify potentially suitable locations for the siting of a GDF facility.”</p>	Yes	MI-LP145	R-158	PU-013	Nuleaf
10	Suggests reference to the provision of community benefits to be provided as part of the decommissioning mission.	No change considered necessary.	No	N/A	R-159	PU-013	Nuleaf

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10	Suggests reference to the LLWR as part the nationally significant nuclear infrastructure hosted by Copeland.	<p>Modification proposed - additional new paragraphs and sub-title after 10.8.2</p> <p>The LLWR at Drigg has been in operation since 1959 and is an important facility that manages and disposes of low level waste generated throughout the UK. Developments at the LLWR are currently dealt with by Cumbria County Council.</p> <p>Copeland is currently host to two Community Partnerships in mid and south Copeland that are working on the siting process for a Geological Disposal Facility (GDF) for the borough. This is a nationwide search for a willing community and a suitable location for the safe and secure disposal of higher- activity radioactive waste. The siting of a GDF facility in Copeland could provide significant economic investment and job creation in the borough, although if successful, it is likely that this will fall outside of the Local Plan period. CBC will continue to work closely as part of the Community partnerships to engage with the local community and identify potentially suitable locations for the siting of a GDF facility.</p>	Yes	MI-LP145	R-160	PU-013	Nuleaf
10	This chapter requires a clear statement regarding the potential of the GDF project within Copeland.	<p>The following subtitle has been added after paragraph 10.8.2: “Nuclear Waste Management”.</p> <p>The following new paragraphs have been added after the above:</p>	Yes	MI-LP145	R-164 R-161	PU-083 PU-028	Millom-Without Parish Council

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		<p>“The LLWR at Drigg has been in operation since 1959 and is an important facility that manages and disposes of low level waste generated throughout the UK. Developments at the LLWR are currently dealt with by Cumbria County Council.</p> <p>Copeland is currently host to two Community Partnerships in mid and south Copeland that are working on the siting process for a Geological Disposal Facility (GDF) for the borough. This is a nationwide search for a willing community and a suitable location for the safe and secure disposal of higher- activity radioactive waste. The siting of a GDF facility in Copeland could provide significant economic investment and job creation in the borough, although if successful, it is likely that this will fall outside of the Local Plan period. CBC will continue to work closely as part of the Community partnerships to engage with the local community and identify potentially suitable locations for the siting of a GDF facility.”</p>					Millom Town Council
10	Moorside and SMR's may have a significant impact on power grid infrastructure. This chapter ought to state the councils expectations regarding landscape mitigation measures.	<p>Such impacts will not be known until there are further details regarding the proposal.</p> <p>Landscape protection is addressed under policy N6.</p>	No	N/A	R-164	PU-083	Millom-Without Parish Council
10	LLWR allocation should not be considered as “White	The Council disagrees with this statement. As there are no Local Plan policies specific to LLWR, Moorside or the Clean	No	N/A	R-163	PU-068.2	Avison Young obo

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	Land” in the sense of being analogous to “Open Countryside”.?	Energy Park they do not need to be identified on the Proposals Map.					NDA
10	LLWR requires a similar contextual setting as provided for Moorside, Cumbria Clean Energy park, and the Industrial Solutions Hub.	<p>The following subtitle has been added after paragraph 10.8.2: “Nuclear Waste Management”.</p> <p>The following new paragraphs have been added after the above:</p> <p>“The LLWR at Drigg has been in operation since 1959 and is an important facility that manages and disposes of low level waste generated throughout the UK. Developments at the LLWR are currently dealt with by Cumbria County Council.</p> <p>Copeland is currently host to two Community Partnerships in mid and south Copeland that are working on the siting process for a Geological Disposal Facility (GDF) for the borough. This is a nationwide search for a willing community and a suitable location for the safe and secure disposal of higher- activity radioactive waste. The siting of a GDF facility in Copeland could provide significant economic investment and job creation in the borough, although if successful, it is likely that this will fall outside of the Local Plan period. CBC will continue to work closely as part of the Community partnerships to engage with the local community and identify potentially suitable locations for the siting of a GDF facility.”</p>	Yes	MI-LP145	R-163	PU-068.2	Avison Young obo NDA

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NU1PU	<p>Policy NU1PU should explicitly support all projects which deliver the NDA’s mission as outlined in the NDA Strategy (2021). Requests changes to 3rd and 4th paragraphs:</p> <p><i>“Proposals that deliver the NDA’s Mission will be supported. Proposals that deliver the Sellafield will also be supported where they meet the criteria of in Policy NU4PU”</i></p> <p><i>“The Council will work proactively with the Nuclear Decommissioning Authority, Cumbria County Council and Sellafield site operators in the development and management of nuclear and associated facilities/infrastructure including offsite highway works and necessary areas</i></p>	<p>Modification proposed to criterion a): Proposals that deliver the Sellafield mission and the NDA’s mission will be supported where they meet the criteria in Policy NU4PU</p> <p>Paragraph 4 to be deleted as it is a statement of intent rather than a policy requirement.</p>	Yes	MA-LP70	R-165	PU-068.2	Avison Young obo NDA

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	<i>of land required for construction of projects”</i>						
NU1PU	Clause e) is ambiguous and could be interpreted in a manner that entails the developer is expected to provide a monetary contribution <i>beyond</i> DS5PU.	The following paragraph (10.9.2) has been added: “Policy NU1 requires that all nuclear sector related development makes a proportionate and meaningful contribution to the local economic, social and environmental strategies/priorities. This could be through the production of Social Impact Strategies and/or through S106 contributions where these are required to mitigate any negative impacts and make the proposal acceptable. Development by Sellafield Ltd within the Sellafield site boundary will be exempt from this requirement as existing provisions are already in place.”	Yes	MI-LP14 6	R-165 R-166	PU-068.2 PU-070	Avison Young obo NDA Sellafield
NU1PU	The GDF (or any surface facility) should not be built between Ravenglass, Sellafield, and the Fells.	The GDF is a nationally Significant Infrastructure Project and therefore does not fall under the planning jurisdiction of the Council.	No	N/A	R-156	PU-008	Public
NU1PU	While LLWR has been justifiably left out of chapter 10. It is important to note the increasing local interest in LLWR and the NDA nuclear waste management subsidiary.	The following subtitle has been added after paragraph 10.8.2: “Nuclear Waste Management”. The following new paragraphs have been added after the above:	Yes	MI-LP14 5	R-169	PU-040	Public

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		<p>“The LLWR at Drigg has been in operation since 1959 and is an important facility that manages and disposes of low level waste generated throughout the UK. Developments at the LLWR are currently dealt with by Cumbria County Council.</p> <p>Copeland is currently host to two Community Partnerships in mid and south Copeland that are working on the siting process for a Geological Disposal Facility (GDF) for the borough. This is a nationwide search for a willing community and a suitable location for the safe and secure disposal of higher- activity radioactive waste. The siting of a GDF facility in Copeland could provide significant economic investment and job creation in the borough, although if successful, it is likely that this will fall outside of the Local Plan period. CBC will continue to work closely as part of the Community partnerships to engage with the local community and identify potentially suitable locations for the siting of a GDF facility.”</p>					
NU3PU	The title of this policy ought to be amended to fully reflect the scope of the nuclear sector.	The following wording amendment has been applied: “Nuclear Sector and associated development at Sellafield”	Yes	MA-LP72	R-167	PU-068.2	Avison Young obo NDA
NU3PU	Recommends amendment: “The Council support the nuclear (-energy-) sector... for a range of nuclear related (+projects+)...”	The following wording amendments have been applied to the policy: “The Council will support nuclear energy sector development and associated infrastructure projects by working with potential developers to identify suitable sites for range of	Yes	MA-LP73	R-167	PU-068.2	Avison Young obo NDA

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		nuclear related support activities projects and activities including, production, decommissioning, innovation, storage, supply chain operations, research and development, worker accommodation, transport, logistics, provision of energy for existing assets and other relevant uses. The development of such sites will be supported where the following criteria are met...”					
NU3PU	The NDA ought to be exempt from clause a); through the “exceptional need” established through the NDA Strategy 2011.	<p>The Council disagrees with this statement. There may be developments, such as office developments that don’t need to be located on the Sellafield site, that could and should be located within a settlement boundary or on an allocated employment site rather than on NDA land. This would ensure the development is as sustainable as possible in terms of access to public transport etc. It also provides add the on benefits such developments can bring to services within towns and villages through an increase in footfall.</p> <p>Criterion A (alongside Policy DS4) recognises that nuclear related development may be required outside of such areas, for example on the Sellafield site, and both policies would support such uses where an exceptional need case can be made.</p>	No	N/A	R-168	PU-068.2	Avison Young obo NDA
NU3PU	Recommends amendment to clause a) “The development is sited on a designated employment site, (+land under control of the NDA+), or suitable...”	See comment above.	No	N/A	R-168	PU-068.2	Avison Young obo NDA

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NU4PU	Local awareness of the LLWR and the NDA's purchase of agricultural land beyond Drigg & Carleton Parish is growing.	Comments noted.	No	N/A	R-169	PU-040	Public
NU4PU	Suggests a broader definition of "nuclear development". The current wording fails to capture the range of non-nuclear activities carried out on the Sellafield site. Suggested amendment: "... and (+ any non-nuclear development and enabling works requiring planning permission shall be sited within the existing Sellafield +).	<p>The following wording amendment has been applied to the policy title: "Nuclear and associated non-nuclear development"</p> <p>The following wording amendment has been applied to criterion A): "All Nuclear development (other than monitoring, maintenance and investigatory work necessarily done off-site) and any associated development and enabling works requiring planning permission shall be..."</p>	Yes	MA-LP77 MA-LP78	R-170 R-174	PU-068.2 PU-070	Avison Young obo NDA Sellafield
NU4PU	The Sellafield site boundary requires review as areas outside of this boundary have already been developed.	The boundary included within the Local Plan relates to the nuclear licence site boundary. We have not received sufficient evidence to amend the boundary to include additional pieces of land.	No	N/A	R-170 R-174	PU-068.2 PU-070	Avison Young obo NDA Sellafield
NU4PU	Criterion b) is unclear regarding the criteria for "justifiable exception need case" for off-site non-	This issue has been explored through the statement of common ground and several meetings with Sellafield. The two parties have been unable to find suitable alternative wording to deal with this concern.	No	N/A	R-175	PU-068.2	Avison Young obo NDA

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	nuclear development. The additional footnote (43) does not provide sufficient clarity nor is it aligned with the weight of NDA Strategy (2021).						
NU4PU	Criterion c) ought to be deleted. The consolidation of radioactive material is not development requiring planning permission and is therefore controlled by other regulatory processes. This clause conflicts with national strategy for nuclear low-level waste management and the duties of nuclear regulators.	Criterion C) has been deleted.	No	N/A	R-172 R-176	PU-068.2 PU-070	Avison Young obo NDA Sellafield
NU4PU	Clause g) is unsound. The NDA operate through principles of carbon reduction as opposed to carbon offsetting.	The following wording amendment has been applied to criterion G): Proposals shall include measures for carbon offsetting via off site/other agreed compensatory means where it has been demonstrated that they cannot be achieved on site	Yes	MA-LP83	R-173 R-177	PU-068.2 PU-070	Avison Young obo NDA Sellafield
NU4PU	The ambiguity of clause b) amplifies financial risk.	See comment above re criterion b	No	N/A	R-175	PU-070	Sellafield
NU4PU	Nuclear development in open countryside should be	See comment above re criterion b	No	N/A	R-174	PU-070	Sellafield

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	covered by DS4PU. However, DS4PU is also reliant on ambiguous definition of exceptionality.						
NU4PU	Requests additional criterion that articulates that nuclear development proposals may not comply with other policies within the local plan (e.g. biodiversity net-gain, landscaping, flooding, SUDS, design, etc) due to constraints on Sellafield Site, safety, security, mission delivery and value to the UK taxpayer.	No change considered necessary as the suggested criterion may cause confusion. It is for the Case Officer, as advised by the Policy Team, to determine whether a policy is relevant to an application or not. Also in their role as consultee, Sellafield would have the opportunity to state, when responding to an application, if they felt the application of a policy would have a negative impact on nuclear safety and/or security.	No	N/A	R-178	PU-070	Sellafield
NU5PU	Policy NU5PU introduces 'principles' for demolition which go beyond the permitted development / prior approval process contrary to government policy.	Policy N5 has been deleted.	Yes	MA-LP84	R179	PU-70	Sellafield
NU5PU	It is unclear how these additional principles would be reasonably considered when taking account of the	Policy N5 has been deleted.	Yes	MA-LP84	R179	PU-70	Sellafield

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	prescribed legislative framework for determining prior approval applications.						
NU5PU	It is also unclear as to why these additional principles are being sought purely in relation to demolition activities taking place on the Sellafield site (and not other demolition projects taking place elsewhere within the borough) which are controlled by other means i.e. The Wildlife and Countryside Act 1981, Environment Agency CL:AIRE protocol and the Sellafield Ltd Travel Plan	Policy N5 has been deleted.	Yes	MA-LP84	R179	PU-70	Sellafield
NU5PU	Principle 4 is imprecise and ambiguous with regard to the meaning and intent of “other adverse impacts [to be] adequately mitigated”. Again, this is beyond the scope of the permitted development rights afforded to the site in respect of demolition	Policy N5 has been deleted.	Yes	MA-LP84	R179	PU-70	Sellafield

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	activities and therefore conflicts with the legislative framework.						
NU5PU	For these reasons, Policy NU5PU should be deleted.	Policy N5 has been deleted.	Yes	MA-LP84	R179	PU-70	Sellafield
Retail and Leisure							
11	Supports the opportunities outlined for Town Centres	Support welcomed	No	N/A	R-180	PU-015	Public
R1PU	Public realm improves must be intrinsically linked to surface water management improvements. Request that all applicants consider relevant opportunities.	No change considered necessary, the matter is already addressed under Policy DS9.	No	N/A	R-181	PU-072	United Utilities
R3PU	Supports this policy	Support welcomed	No	N/A	R-183	PU-022	Historic England
R3PU	Improved links between Whitehaven Town Centre & the Harbourside will merge the degraded area of King Street. With the appeal of the Harbour.	Comments noted	No	N/A	R-182	PU-015	Public
R4PU	Supports this policy	Support welcomed	No	N/A	R-184	PU-022	Historic England
R5PU	Farm diversification and retail schemes can harm heritage assets. R5PU	The following wording amendment has been applied: “The development would not lead to unacceptable harm to biodiversity assets or heritage assets ”.	Yes	MA-LP89	R-185	PU-022	Historic England

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	requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.						
R5PU	Suggests amendment that emphasises combining services and facilities to boost viability as a criteria to minimise the loss of services and/or facilities.	The following wording amendment has been applied: “Its continued use as a village shop, post office or public house is no longer feasible, having had regard to appropriate marketing (over twelve months and at a price which reflects its use, condition and local market values), the demand for the use of the sites or premises its usability and the identification of a future occupier. Applicants must demonstrate that full consideration has been given any opportunities available to retain the existing use as part of a shared/combined service in order to improve viability. ”	Yes	MA-LP88	R-186	PU-076	Friends of the Lake District
R7PU	Sellafield requires main town centre uses on the Sellafield site; e.g. offices, welfare, canteen, etc. As such, Sellafield ought to be exempt from sequential test.	The following paragraph (11.9.6) has been added: “Policies E3 (Westlakes Science and Technology park) and E4 (Cleator Moor Innovation Quarter) both allow for some small scale town centre uses where these are ancillary in nature and support the primary uses of the site. This could include restaurant/canteen facilities etc. Such uses could also be required at the Sellafield site and Clean Energy Park in the future to support their operations and reduce the need to travel. Such facilities may be permitted without requiring a sequential test to be submitted.”	Yes	MI-LP163	R-187	PU-070	Sellafield
R8PU	The Retail and Leisure Impact assessment	The Council disagrees with this statement. The requirement for a Retail and Leisure Impact Assessment is to ensure that	No	N/A	R-188	PU-074	Egremont

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	increases cost and doubt for re-development in Egremont.	developments that are located outside of town centres do not harm their vitality and viability.					Town Council
R8PU	The 300sqm requirement should be increased to 500sqm to ensure equal treatment of Egremont and Whitehaven	The Council disagrees with this statement. The threshold is based upon evidence within the Retail Study and reflects the different sizes of the centres.	No	N/A	R-188	PU-074	Egremont Town Council
Tourism							
12	Supports the recognition of Whitehaven's tourist potential.	Support welcomed	No	N/A	R-189	PU-015	Public
12	Planning policy should support rural development wishing to support Copeland's tourist market.	Comments noted. The Local Plan contains a number of policies to support rural development subject to certain criteria.	No	N/A	R-191	PU-078	National Farmers Union
12.1	Factual correction, "Scafell Pike" should be corrected to "Scafell Pike".	Typo corrected	Yes	MI-LP16 6	R-192	PU-076	Friends of the Lake District
12.1	Suggest reference to Borough's World Heritage Sites under the Tourism Headlines.	<p>The following wording has been amended in the Strength box:</p> <p>"Two thirds of Copeland is situated within the Lake District National Park World Heritage Site, the most visited park in the UK"</p> <p>The following wording has been added in the Strength box:</p> <p>"Location for part of the Hadrian's Wall World Heritage Site"</p>	Yes	<p>MI-LP16 4</p> <p>MI-LP16 5</p>	R-192	PU-076	Friends of the Lake District

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12.2.6	Duddon Bridge should be added to this list due to its link as the southern entry point to the Heritage Coast.	The following wording has been amended: “A505 (including Duddon Bridge) – southern entrance to Lake District Coast”	Yes	MI-LP170	R-193	PU-083	Millom-Without Parish Council
12.2.7	Silecroft ought to be included as a potential hub due to its planned new café supported by the Heritage Coast Fund.	Silecroft falls outside the Local Plan area.	No	N/A	R-194	PU-083	Millom-Without Parish Council
12.3.6	This chapter should contain a clearer statement about the impact of the Town Deal Board Fund for Millom and specifically the tourism strategy associated with the Iron Line Project.	The Local Plan supports town deal projects including those within Millom and this is mentioned throughout the document including in paragraphs 11.2.7, 11.6.2, 11.6.11. The ironline project is specifically identified as a tourism opportunity in the tourism headlines on page 122.	No	N/A	R-190	PU-028	Millom Town Council
T1PU	Tourist development can harm heritage assets. T1PU requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.	The following wording amendment has been applied: “All tourism development must be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets (including landscapes, heritage assets and biodiversity) or the character of the area.”	Yes	MA-LP91	R-195	PU-022	Historic England
T1PU	Supports this policy and highlights the importance of “place-bound asset” of Keekle Head.	Support welcomed	No	N/A	R-196	PU-090	Lakeland Building Design

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T2PU	Coastal development can harm heritage assets. T2PU requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.	The following wording amendment has been applied: “In all circumstances development should be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets including landscapes, heritage assets and biodiversity. ”	Yes	MA-LP99	R-197	PU-022	Historic England
T3PU	Caravan and camping site development can harm heritage assets. T3PU requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.	A new criterion has been added: “ Not result in unacceptable harm to heritage assets ”	Yes	MA-LP100	R-198	PU-022	Historic England
Housing							
13.1	Development must be guided by environmental capacity and transport sustainability; directing developments towards rural areas should not be an aim.	The following wording has been amended: “Opportunity to direct (-more-) an appropriate scale of additional development to more rural villages.”	Yes	MI-LP176	R-199	PU-076	Friends of the Lake District
13.2.2	The plan should strive for a more balanced population instead of specifically seeking to grow it. This commitment will result in	The following wording has been amended To Copeland’s Communities objective 5: Increase the borough’s population to support economic growth by reducing out migration (particularly of working	Yes	MA-LP8	R-200	PU-076	Friends of the Lake District

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	greater demand for housing and infrastructure development.	age people), attracting new, permanent residents and improving life expectancy					
13.8	The proposed development at Bransty was bequeathed by Lord Lonsdale for grazing land.	Comment noted.	No	N/A	R-212	PU-037	Public
13.10.9	The average household size in Copeland is 2.03. As such, there is a limited need for larger homes. This suggests “executive housing” isn’t delivered to meet genuine local needs.	The Council’s Housing Needs Study and SHMA identify a need for larger executive homes.	No	N/A	R-300	PU-076	Friends of the Lake District
H1PU	Supports this policy.	Support welcomed	No	N/A	R-201	PU-011	Home Builders Federation
H1PU	Suggest rewording for clause d). In particular, so that appropriate windfall sites are not limited to within settlement boundaries. This will support the vitality of rural communities.	The Council disagrees with this proposal. Rewording as proposed could lead to isolated development in the open countryside which would be contrary to the NPPF.	No	N/A	R-202 R-203	PU-041 PU-048	Savills obo The Leconfield Estate Turley obo Persimmons
H1PU	Reference to settlement boundaries ought to be removed from clause d). As	The Council disagrees with this proposal. Rewording as proposed could lead to isolated development in the open countryside which would be contrary to the NPPF.	No	N/A	R-203	PU-048	Turley obo Persimmons

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	the DPA outlined in H2PU is lower than the “the 300 DPA considered necessary to support economic growth”. H1PU inhibits the development of windfall sites in “sustainable” locations.	The housing requirement and growth figures of 146 and 200 dwellings per annum are based upon evidence contained within the SHMA. There is no robust evidence to support a figure of 300dpa and such a requirement would be undeliverable.					
H1PU	H1PU ought to meet genuine local need not aspirations. The genuine local need of Copeland is reflected by the standard method.	The Council disagrees with this statement. Evidence supporting the housing requirement is included within the SHMA, Housing Needs Survey and Five Year Housing Land Supply documents.	No	N/A	R-204	PU-076	Friends of the Lake District
H1PU	The housing stock figures suggest it is difficult to justify new build developments, especially on greenfield sites (such developments would undermine commitments to climate change and biodiversity).	The Council disagrees with this statement. Evidence supporting the housing requirement is included within the SHMA, Housing Needs Survey and Five Year Housing Land Supply documents. Whilst the Local Plan encourages brownfield development, there are insufficient brownfield sites across the borough to meet identified needs.	No	N/A	R-204	PU-076	Friends of the Lake District
H1PU	Supports this policy	Support welcomed	No	N/A	R-205	PU-079	Pinnacle obo Story Homes

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H2PU	Supports decision to justify policy through aspirational housing figure.	Support welcomed	No	N/A	R-206	PU-011	Home Builders Federation
H2PU	It is necessary to facilitate a housing supply 20% higher than the requirement. This ensures flexibility and diversity within the range of sites.	The Local Plan already does this. It identifies sufficient sites to deliver at least 200 dwellings per annum over the plan period. This is in excess of the annual housing requirement for 146 dwellings.	No	N/A	R-206	PU-011	Home Builders Federation
H2PU	The housing requirement is likely higher than the figure currently proposed. As such, the housing ought to increase proportionality.	The Council disagrees with this statement. The evidence supporting the housing requirement is contained within the SHMA.	No	N/A	R-206	PU-011	Home Builders Federation
H2PU	200 DPA ought to be utilised when calculating the 5-year housing land supply. This is because relying upon future windfall development, previous competition, and extant permissions, to satisfy housing requirements increases risk and entails the plan is not positively prepared.	The Council disagrees with this statement. The evidence supporting the housing requirement is contained within the SHMA.	No	N/A	R-207	PU-017	Iceni Projects obo KCS Agriculture

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H2PU	A “restrictive cap” on housing requirements is inconsistent with national policy.	<p>The following wording amendment has been applied: “The Housing requirement is for a minimum of 2,482 2628 net additional dwellings (an average of 146 dwellings per annum) to be provided between 2021 and 2038 2039. This figure will be used when calculating the five-year supply of deliverable housing sites in the borough.</p> <p>In order to plan positively and support employment growth over the Plan period, the Plan identifies a range of attractive allocated housing sites, which when combined with future windfall development, previous completions and extant permissions, will provide a minimum of 3,400 3600 dwellings (an average of 200 dwellings per annum) over the Plan period.”</p>	Yes	MA-LP101	R-208 R-209	PU-041 PU-048	Savills obo The Leconfield Estate Turley obo Persimmon
H2PU	A single figure of 200 dpa is more appropriate than dividing between baseline and aspirational figures.	The Council disagrees with this statement. The evidence supporting the housing requirement and the more aspirational growth figure is contained within the SHMA.	No	N/A	R-208	PU-041	Savills obo The Leconfield Estate
H2PU	A failure to provide flexibility and choice within housing sites will increase out-migration, reduce employment opportunities, and exude a detrimental	Comments noted. The Local Plan identifies a range of different types of site to provide flexibility and choice.	No	N/A	R-208	PU-041	Savills obo The Leconfield Estate

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	impact on existing supply of local services and facilities.						
H2PU	Supports the councils' positive approach in identifying the need to calculate housing requirement beyond the standard method.	Support welcomed	No	N/A	R-209	PU-048	Turley obo Persimmon
H2PU	The 143 dpa is "demographic led" and does not include consideration for supporting future employment growth. Therefore, the current dpa is not positively prepared in relation to Copeland's objective needs.	The Council disagrees with this statement. The evidence supporting the housing requirement and the more aspirational growth figure is contained within the SHMA.	No	N/A	R-209	PU-048	Turley obo Persimmon
H2PU	The minimum housing figure ought to be 300 dpa as this figure is informed by "employment led growth". As justified by "Housing Needs Report" in Appendix 1 provided by Persimmon.	The Council disagrees with this statement. The evidence supporting the housing requirement and the more aspirational growth figure is contained within the SHMA. A figure of 300 would be undeliverable and would only be required if all of the specific employment projects identified in paragraph 7.5.3 and Table 9 were delivered over the plan period. This is highly unlikely. This position can be reviewed at Local Plan Review stage.	No	N/A	R-209 R-210	PU-048 PU-079	Turley obo Persimmon Pinnacle obo Story Homes

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H2PU	The higher SHMA figure of 200dpa ought to be adopted to support economic growth.	The Council disagrees with this statement. The evidence supporting the housing requirement and the more aspirational growth figure is contained within the SHMA.	No	N/A	R-211	PU-082	Barton Willmore obo Brookhouse Group
H2PU	If Local Plan not adopted by the end of 2023, then Copeland's Local Plan will only look forward for 14 years rather than the 15 year minimum required by the NPPF. As such, the plan ought to allocate for additional dwellings.	<p>The following wording amendment has been applied: "The Housing requirement is for a minimum of 2,482 2628 net additional dwellings (an average of 146 dwellings per annum) to be provided between 2021 and 2038 2039. This figure will be used when calculating the five-year supply of deliverable housing sites in the borough.</p> <p>In order to plan positively and support employment growth over the Plan period, the Plan identifies a range of attractive allocated housing sites, which when combined with future windfall development, previous completions and extant permissions, will provide a minimum of 3,400 3600 dwellings (an average of 200 dwellings per annum) over the Plan period."</p>	Yes	MA-LP101	R-210	PU-079	Pinnacle obo Story Homes
H3PU	If housing delivery exceeds planned levels in sustainable rural villages and rural villages then the plan should not be reviewed. This is because	The Council disagrees with this statement. Housing delivery within each tier of the hierarchy will be monitored over the plan period. Whilst targets are not ceilings and additional housing will be accepted where it meets Local Plan policies, should delivery significantly exceed targets this may undermine the Local Plan strategy.	No	N/A	R-213	PU-011	Home Builders Federation

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	an oversupply of houses aligns with governments commitments to boost housing supply.						
H3PU	H3PU is a statement of intent rather than a policy.	The Council disagrees with this statement.	No	N/A	R-213	PU-011	Home Builders Federation
H3PU	A “lack of progression” ought to be defined in clause 1). This ensures intervention can be made in a timely manner.	No change considered necessary.	No	N/A	R-214	PU-017	Iceni Projects obo KCS agriculture
H3PU	A timeline for an action plan ought to be advanced in clause 2)	No change considered necessary.	No	N/A	R-214	PU-017	Iceni Projects obo KCS agriculture
H3PU	A clearer definition of “exceeded expectation” is required in clause 3); so that developers and local authority can plan accordingly.	No change considered necessary.	No	N/A	R-214	PU-017	Iceni Projects obo KCS agriculture
H3PU	While supportive of clause 4) this will require the publication accurate monitoring data to engage with sufficiently.	The Council publishes a Five Year supply Statement annually and will continue to do so throughout the plan period.	No	N/A	R-214	PU-017	Iceni Projects obo KCS agriculture

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H3PU	H3PU is a statement of intent rather than a policy. As Local Plan Reviews at least every five years are a legal requirement.	The Council disagrees with this statement. Councils are able to review their plans more frequently where required.	No	N/A	R-215	PU-041	Savills obo The Leconfield Estate
H3PU	The housing requirement in H2PU and the housing distribution in H4PU should be treated as minimums and not ceilings.	Policies H2 is clear that figures are not ceilings. The third paragraph from the policy will be deleted and the word “minimum” will be removed from the top three tiers for consistency.	Yes	MA-LP106	R-216	PU-048	Turley obo Persimmon Homes
H3PU	Exceeding the minimum housing target should not impede further developments in other locations or other tiers. Therefore, a review is not necessary if one settlement or settlement tier exceeds expectations.	The Council disagrees with this statement. Housing delivery within each tier of the hierarchy will be monitored over the plan period. Whilst targets are not ceilings and additional housing will be accepted where it meets Local Plan policies, should delivery significantly exceed targets this may undermine the Local Plan strategy.	No	N/A	R-216	PU-048	Turley obo Persimmon Homes
H3PU	A review is necessary if a settlement or tier falls <i>below</i> expectations; in particular, sustainable rural villages and rural villages: “where housing pressure, and in particular affordable	This will be considered through a plan review	No	N/A	R-216	PU-048	Turley obo Persimmon Homes

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	housing need, is most acute”.						
H3PU	Supports the principle of policy to maintain housing delivery.	Support welcomed	No	N/A	R-217	PU-079	Pinnacle obo Story Homes
H3PU	Settlements have different needs which development above and beyond the housing requirement may be able to meet.	Policies H2 and H4 make it clear that the housing requirement is not a ceiling and additional development will be accepted where it accords with the Development Plan.	No	N/A	R-217	PU-079	Pinnacle obo Story Homes
H3PU	Clause 3) is flawed as a higher delivery rate in one settlement might be needed to offset a shortfall in another, e.g., to ensure sufficient development in the borough overall.	The Council disagrees with this statement. The Local Plan identifies sufficient sites to deliver the housing requirement and provide a significant level of additional housing to support economic growth. Housing delivery on allocated sites will be monitored under the first two criteria within the policy and action will be taken if it does not progress as anticipated.	No	N/A	R-217	PU-079	Pinnacle obo Story Homes
H3PU	Additional housing within lower tier settlements may be needed to meet an identified market need (including within the lowest tiers of the settlement hierarchy).	<p>The following wording amendment has been applied to H4:</p> <p>The following wording amendment has been applied: “The amount of housing identified within the Sustainable Villages and Rural Villages, required to support economic growth, is limited to the amount shown.</p> <p>1360 minimum</p>	Yes	MA-LP10 6	R-217	PU-079	Pinnacle obo Story Homes

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		1020 minimum 578 minimum					
H3PU	Policy should remove references which may act as a cap on the supply of housing in particular settlements.	The Policy does not put a cap on development in particular settlements.	No	N/A	R-217	PU-079	Pinnacle obo Story Homes
H4PU	References to development being “limited” to allocated levels ought to be removed. This position undermines governments commitment to boost housing supply.	The following wording amendment has been applied: “ The amount of housing identified within the Sustainable Villages and Rural Villages, required to support economic growth, is limited to the amount shown. 1360 minimum 1020 minimum 578 minimum ”	Yes	MA-LP106	R-218 R-220	PU-011 PU-041	Home Builders Federation Savills obo The Leconfield Estate
H4PU	Supports this policy.	Support welcomed	No	N/A	R-219	PU-017	Iceni Projects obo KCS agriculture
H4PU	Supports assertion that distribution of housing will be broadly in line with DS3PU	Support welcomed	No	N/A	R-220	PU-041	Savills obo The Leconfield Estate
H4PU	As H2PU outlines a low figure, then it entails that	The Council disagrees with this statement. The evidence supporting the housing requirement and the figures within	No	N/A	R-220	PU-041	Savills obo

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	the housing figure in H4PU for key service centres should be increased; to at least 200dpa.	this policy can be found within the SHMA and Settlement Hierarchy and Development Strategy documents.					The Leconfield Estate
H4PU	Supports this policy	Support welcomed	No	N/A	R-222	PU-082	Barton Willmore obo Brookhouse Group
H4PU	The “Settlement Hierarchy and Development Strategy Paper Update (2022)” notes that targets quoted are not ‘ceilings’ and that additional development within those settlements should be supported when appropriate. The figures within H4PU should reflect this.	<p>The following wording amendment has been applied: “The amount of housing identified within the Sustainable Villages and Rural Villages, required to support economic growth, is limited to the amount shown.</p> <p>1360 minimum</p> <p>1020 minimum</p> <p>578 minimum”</p>	Yes	MA-LP106	R-221	PU-079	Pinnacle obo Story Homes
H5PU	More sites that required ought to be allocated to act as a buffer. This will allow for H5PU to be more flexible and positively prepared.	The Council disagrees with this statement. The Local Plan identifies sufficient sites to deliver the housing requirement and provide a significant level of additional housing to support economic growth.	No	N/A	R-266	PU-011	Home Builders Federation

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H5PU	While supportive of HIA within allocation profiles, more information must be provided so that developers can engage with these requirements meaningfully.	Additional wording has been added to the site profiles to extricate the significance of the HIA. Additional wording has been added to paragraph 13.7.11: “Developers should <u>take into account</u> the Council’s Heritage Impact Assessment that supports the Local Plan. This document identifies where there may be harm caused to nearby heritage assets through development and proposes mitigation measures. Where there is likely harm identified developers will be required to build upon this document with a detailed site specific HIA in accordance with policy BE1PU”	Yes	MI-LP113	R-232	PU-022	Historic England
H5PU	Support for further housing allocations coming if it improves the existing footpath connection in Egremont.	Support welcomed, developers will be required to ensure new housing development is well connected to existing settlements.	No	N/A	R-288	PU-074	Egremont Town Council
H5PU	Wilton and Haile could be considered rural villages to support very limited growth as both are well connected to Egremont and Sellafield.	The Council disagrees with this statement. Wilton and Haile are poorly connected to services within the borough as set out in the Settlement Hierarchy and Development Strategy document.	No	N/A	R-288	PU-074	Egremont Town Council
H5PU	As H2PU should be increased to 300 dpa, the local plan does not allocate enough sites. Suggestion to add further land, as cited.	The Council disagrees with this statement. The Local Plan identifies sufficient sites to deliver the housing requirement and provide a significant level of additional housing to support economic growth. A figure of 300 would be undeliverable and would only be required if all of the specific	No	N/A	R-242	PU-048	Turley obo Persimmons

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		employment projects identified in paragraph 7.5.3 and Table 9 were delivered over the plan period. This is highly unlikely. This position can be reviewed at Local Plan Review stage.					
H5PU	Where sites affect Network Enhancement and Expansion Zones relating to the Local Nature Recovery Network, this should be identified on specific site profiles.	This will be done through biodiversity technical paper	No	N/A	R-289	PU-076	Friends of the Lake District
H5PU	St Bees does not need more housing, due to lacklustre infrastructure and Copeland's falling population.	The Council disagrees with this statement. Housing need is identified in the SHMA and Housing Needs Survey. The infrastructure required to support new development is set out in the Housing Allocation profiles, the Infrastructure Delivery Plan and supporting documents.	No	N/A	R-248 R-249	PU-050 PU-051	Public
H5PU	Insufficient hard and soft infrastructure for further development in Egremont.	The infrastructure required to support new development is set out in the Housing Allocation profiles, the Infrastructure Delivery Plan and supporting documents.	No	N/A	R-250 R-251 R-253 R-256 R-262	PU-054 PU-055 PU-057 PU-060 PU-067	Public

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H5PU	Insufficient hard and soft infrastructure for further development in unspecified area.	The infrastructure required to support new development is set out in the Housing Allocation profiles, the Infrastructure Delivery Plan and supporting documents.	No	N/A	R-297 R-298	PU-084 PU-085	Public
H5PU – HWH1	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.”	Minor modification proposed the addition of this to the site allocation profiles	Yes	MI-LP11 5	R-273	PU-072	United Utilities
H5PU – HWH1	Object to inclusion as housing allocation as part of this land remains in the operational purview of the West Cumberland Hospital.	<p>Proposed modification to allocation:</p> <p>5.27 hectares x 1.9 hectares 127 46 dwellings</p> <p>The southern part of the site is currently protected open space in Core Strategy (WE001). Whilst the Open Space Assessment does not propose this protection is carried forward into the new Local Plan the Council would expect a well designed development that incorporates high quality and useful open space.</p> <p>The southern section of this site has been used as a playing field in the past although this use has lapsed and there are no pitches marked out at present. In order to bring the site forward for development there would need to be mitigation</p>	Yes	MA-AP11 MA-AP12 MA-LP11 0	R-240	PU-039	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust

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		in place to replace the playing field and comply with paragraph 97 of the NPPF and Sport England's Playing Fields policy.					
H5PU – HWH2	This site has been used as a playing field in the past. Any development must replace the playing field.	Policy SC4PU would apply to any application for development on this site. The presence of an adjacent pitch is highlighted in the Site Profiles document which appends the Local Plan.	No	N/A	R-263	PU-065	Sports England
H5PU – HWH2	Requests addition: Requests addition: "Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site. A comprehensive strategy for foul and surface water drainage infrastructure at this site shall be required. Any proposals must have full regard to the topographical and hydrogeological conditions of this steeply sloping site. Such steeply sloping sites can suffer	No change proposed – the planning application on the site is already at an advanced stage and UU have been engaged in the application process.	No	N/A	R-275	PU-072	United Utilities

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	from sub-soil drainage issues. These steeply inclined sites have existing ground water problems due to underground springs. Such issues must be considered when designing a proposed surface water system. There is a risk that groundwater / overland flow could overload the drainage system that is designed as a result of illegal connections being made as an afterthought by individual residents if their plots are not drained effectively. Therefore careful consideration will need to be given to land drainage to ensure there are no future misconnections to the public sewer."						
H5PU – HWH2	Supports the housing allocation of land at 'Red Lonning and Harras Moor'	Support welcomed	No	N/A	R-295	PU-081	Homes England

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	and the associated indicative yield of 370 dwellings set out within Strategic Policy H5PU: Housing Allocations which align with the Agency's live outline planning application ref. 4/18/2287/001.						
H5PU – HWH2	Supports the annual delivery assumptions for site HWH2 which have been used to demonstrate deliverability of the Local Plan's Housing Requirement, upon which Strategic Policy H2PU is based	Support welcomed	No	N/A	R-295	PU-081	Homes England
H5PU – HWH3	This site is adjacent to a playing field. If developed, this would entail the playing field was surrounded by residential development. This prejudicial impact on the playing field needs to be assessed and considered as part of the planning	Policy SC4PU would apply to any application for development on this site. The presence of an adjacent pitch is highlighted in the Site Profiles document which appends the Local Plan.	No	N/A	R-264	PU-065	Sports England

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	application (and allocation) process.						
H5PU – HWH4	Supports inclusion of HWH4	Support welcomed	No	N/A	R-243	PU-048	Turley obo Persimmon
H5PU – HWH4	This development would surround the playing field on three sides by residential development. If mitigation is required, this should be secured as part of planning application	Support welcomed	No	N/A	R-265	PU-065	Sports England
H5PU – HWH5	Supports inclusion of HWH5	Support welcomed	No	N/A	R-243	PU-048	Turley obo Persimmon
H5PU – HWH5	Request boundary is extended to include all land shown on Appendix 2 of Persimmon Document.	The Council disagrees with this statement, the allocation only extends to the Waggon Way to avoid conflict with the Whitehaven and St Bees Heritage Coast.	No	N/A	R-243	PU-048	Turley obo Persimmon
H5PU – HWH5	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP7	R-282	PU-072	United Utilities

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H5PU – HCM1	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP8	R-272	PU-072	United Utilities
H5PU – HCM3	Concern about bringing site forward without assessment of impact on adjacent playing field.	Policy SC4PU would apply to any application for development on this site. The presence of an adjacent pitch is highlighted in the Site Profiles document which appends the Local Plan.	No	N/A	R-266	PU-065	Sports England
H5PU – HCM3	Request addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP9	R-276	PU-072	United Utilities
H5PU – HCM4	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure and land interests present on site. CBC will carry out ongoing engagement, including at planning	Yes	MI-APP10	R-278	PU-072	United Utilities

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	the presence of utilities infrastructure and land interests within the site.”	application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”					
H5PU – HEG1	This site has been used as a playing field in the past. Any development must replace the playing field. This development would also impact on life quality of children who utilise this greenspace.	Policy SC3PU would apply to any application for development on this site. The presence of a pitch on site is highlighted in the Site Profiles document which appends the Local Plan.	No	N/A	R-267	PU-065	Sports England
H5PU – HEG1	Argument that allocation HEG1 is not sound, legally compliant, nor satisfies duty to cooperate. Due to ecological and infrastructural concerns. This development would also impact on life quality of children who utilise this greenspace.	The Council disagrees with this statement. An ecology assessment has been carried out on the site and further assessments may be required at planning application stage. Any infrastructure required to support the delivery of the site has been identified in the Site Profiles document and Infrastructure Delivery Plan. The Site Profiles document also identifies that the existing protected greenspace would need to be replaced.	No	N/A	R-236 R-237	PU-030 PU-031	Public
H5PU – HEG2	Supports allocation of HEG2	Support welcomed	No	N/A	R-241	PU-044	Savills obo The Leconfield Estate
H5PU – HEG2	This development would impact traffic safety and	Transport impacts have been identified through the Transport Improvements Study. If significant impacts have been	No	N/A	R-252 R-253	PU-056	Public

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	efficiency on already congested road.	identified then mitigation measures will be required through a planning application, most likely in the form of developer contributions.			R-254 R-255 R-256 R-257 R-258 R-259 R-260 R-261	PU-057 PU-058 PU-059 PU-060 PU-061 PU-062 PU-063 PU-064 PU-066	
H5PU – HEG2	This development will impact accessibility of existing estates (Queens Gate, Gulley Flats, and Dale View)	Transport impacts have been identified through the Transport Improvements Study. If significant impacts have been identified then mitigation measures will be required through a planning application, most likely in the form of developer contributions.	No	N/A	R-254	PU-058	Public
H5PU – HEG2	This development will have a negative ecological effect.	The site has undergone HRA and ecology assessments. Any identified impacts will be required to be mitigated against.	No	N/A	R-252 R-258 R-261	PU-056 PU-062	Public

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						PU-066	
H5PU – HEG2	Egremont's soft infrastructure is already at capacity.	This infrastructure is considered through the Infrastructure Delivery Plan. This document outlines where improvements are necessary to support new development.	No	N/A	R-252 R-255 R-256 R-258 R-260 R-261 R-262	PU-056 PU-059 PU-060 PU-062 PU-064 PU-066 PU-067	Public
H5PU – HEG2	The drainage system very poor within site and surrounding area and new development will exacerbate this.	This has been identified through the allocation profile document. Early engagement with United Utilities and CCC as the Lead Local Flood Authority will be required at an early stage to ensure impacts are not exacerbated.	No	N/A	R-252 R-254 R-255 R-258 R-260 R-261 R-262	PU-056 PU-058 PU-059 PU-062 PU-064	Public

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						PU-066 PU-067	
H5PU – HEG2	Any development on this site will need a commitment to modern drainage system.	As above	No	N/A	R-252	PU-056	Public
H5PU – HEG2	Egremont needs further employment opportunities rather than further housing.	Comment noted. The housing allocations have been developed based on the identified housing needs across the borough as set out in the Development Strategy. Employment land has also been allocated in Egremont.	No	N/A	R-254 R-260	PU-058 PU-064	Public
H5PU – HEG2	Locals near development area should be directly written to regarding HEG2.	The Council has carried out extensive consultation on the Local Plan. Writing directly to every resident within close proximity to an allocation would not be the best use of Council resources.	No	N/A	R-258	PU-062	Public
H5PU – HEG2	Suggests addition: “ Located in groundwater source protection zones (SPZ) (1, 2 and 3). Partially located in groundwater Source Protection Zone (SPZ) 1 immediately adjacent to Gulley Flats Borehole. Given this, a quantitative and qualitative risk assessment and	Wording amendments have been proposed to the allocation profiles document to address this concern	Yes	MI-APP1 1	R-284	PU-072	United Utilities

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	mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping						

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	stations and attenuation features). A Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters. Within and adjacent to Source Protection Zone SPZ 1, and in any other locations identified by the aforementioned risk assessment, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided. Careful masterplanning will be required to mitigate the risk of pollution to public water supply and the water						

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	environment. For example, open space can be located so that it is closest to the boreholes in order to minimise the potential impact on groundwater. In addition, an appropriate management regime will be required for open space features in a SPZ”						
H5PU – HEG3	Supports allocation of HEG3	Support welcomed	No	N/A	R-241	PU-044	Savills obo The Leconfield Estate
H5PU – HEG3	This site allocation has the potential to affect the setting of Egremont Castle. The NPPF outlines SM to be of highest significance and harm to such assets (including via setting) should be wholly exceptional. The HIA does not identify Egremont Castle or make an assessment of it; without which the plan cannot show that development can	The HIA has since been amended and agreed by Historic England	No	N/A	R-233	PU-025	Historic England

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	be delivered without harm to historic environment. As such, Opposes HEG3 as contrary to NPPF regarding historic environment.						
H5PU – HEG3	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure and land interests present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP1 2	R-283	PU-072	United Utilities
H5PU – HMI2	Supports inclusion of HMI2	Support welcomed	No	N/A	R-296	PU-082	Barton Willmore obo Brookhouse Group
H5PU – HMI2	Questions the necessity of infrastructural commitments?	Allocation profile sets out the key site constraints and necessary considerations for allowing development to go ahead on a site. Given that planning permission has not been granted on this site, it is considered appropriate that a full analysis of the site is included in the allocation profiles.	No	N/A	R-296	PU-082	Barton Willmore obo Brookhouse Group

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H5PU – HMI2	This site directly effects a priority habitat area and is inappropriate for development. This factor should be recorded on relevant sites' site profiles.	Where a site is located within an area of priority habitat, or is affected by a Network Enhancement and Expansion Zone this will be identified in the Biodiversity Technical Paper. All housing sites have undergone a site specific ecology assessment that also identifies mitigation required to allow development to commence – the summary is included within the Site Profiles document	No	N/A	R-289	PU-076	Friends of the Lake District
H5PU – HMI2	Requests addition: "Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site."	The following wording amendment has been applied: "No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision"	Yes	MI-APP13	R-280	PU-072	United Utilities
H5PU – HAR1	Requests addition: "Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site."	The following wording amendment has been applied: "No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure and land interests present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision."	Yes	MI-APP14	R-277	PU-072	United Utilities
H5PU - HDI2	This site is inappropriate for development due to it effecting priority habitat.	Where a site is located within an area of priority habitat, or is affected by a Network Enhancement and Expansion Zone this will be identified in the Biodiversity Technical Paper. All housing sites have undergone a site specific ecology	No	N/A	R-289	PU-076	Friends of the Lake District

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	This should be recorded on site profiles	assessment that also identifies mitigation required to allow development to commence – the summary is included within the Site Profiles document					
H5PU – HDI2	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP15	R-274	PU-072	United Utilities
H5PU - HSB1	This Allocation has the potential to affect a large number of heritage assets; including highly graded ones: Church St Mary and St Bega, Chancel to priory Church of St Mary and St Bega, Pow Bridge. The NPPF considers substantial harm to Grade II heritage asset (including setting) should be exceptional. The HIA does not identify all potential heritage assets mentioned above; without which the plan cannot show that development can	The HIA has since been updated and agreed by Historic England.	No	N/A	R-234	PU-025	Historic England

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	be delivered without harm to historic environment.						
H5PU - HSB1	Village infrastructure inadequate for size of this development.	CBC disagrees with this comment. Village Services Survey has identified that the infrastructure in St Bees is sufficient to accommodate additional development. Any highways impacts will require mitigation. Please see Housing allocation profile for more detail.	No	N/A	R-235 R-239 R-238	PU-026 PU-035 PU-033	Public
H5PU - HSB1	Village character undermined by further housing development.	Settlement Landscape Character Assessment has identified no significant character impacts in this area. High quality landscape buffer will be required and development should not encroach into strong upland setting to the north of site.	No	N/A	R-235	PU-026	Public
H5PU - HSB1	Insufficient amenities* within village and residents already too reliant on Whitehaven and Egremont; which undermines principle of net-zero.	The criteria outlined in the Development strategy and Settlement Hierarchy has identified that St Bees has sufficient services to accommodate a small amount of additional growth. St Bees is well connected to Whitehaven by train, which ensures that people are not reliant on a private vehicle to travel between the two.	No	N/A	R-238	PU-033	Public
H5PU - HSB1	Abbey Rd in particular jeopardised from further traffic due to lack of walkway.	There is a pavement along Station Road, which is likely to be the main walking route for people accessing goods and services within the main part of the village.	No	N/A	R-238	PU-033	Public
H5PU - HSB1	No requirement for more “executive housing	The allocation does not specify the type of housing which will be permitted on site. This is something which will be dealt	No	N/A	R-238	PU-033	Public

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		with through a planning application, and will need to be informed by the SHMA and Housing needs assessment.					
H5PU - HSB1	The landowners support the inclusion of this site.	Support welcomed	No	N/A	R-292	PU-077.3	SRE Associates :
H5PU – HSB3	No comments other than to reinforce those put forth at previous consultation. HSB3 would damage Heritage Coast through its visibility and existing infrastructure unable to cope with development proposed. Parish Council therefore rejects change to settlement boundary.	<p>The Settlement Landscape Character Assessment has not identified the site as being harmful to the Heritage Coast. In any case where potential harm may be present, mitigation will be required, for example through the use of landscape buffers.</p> <p>The infrastructure in St Bees is appropriate for small scale development, as demonstrated through the IDP and the Settlement Hierarchy.</p>	No	N/A	R-227	PU-016	St Bees Parish Council
H5PU – HSB3	Argues that village infrastructure inadequate for size of this development	CBC disagrees with this response- see the Development Strategy and Settlement Hierarchy paper for more information	No	N/A	R-235	PU-026	Public
H5PU – HSB3	Insufficient amenities* within village and residents already too reliant on Whitehaven and Egremont; which undermines principle of net-zero.	The criteria outlined in the Development strategy and Settlement Hierarchy has identified that St Bees has sufficient services to accommodate a small amount of additional growth. St Bees I well connected to Whitehaven by train, which ensures that people are not reliant on a private vehicle to travel between the two.	No	N/A	R-238	PU-033	Public

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H5PU – HSB3	Abbey Rd in particular jeopardised from further traffic due to lack of walkway.	There is a pavement along Egremont Road, which is likely to be the main walking route for people accessing goods and services within the main part of the village.	No	N/A	R-238	PU-033	Public
H5PU – HSB3	No requirement for more “executive housing”.	The allocation does not specify the type of housing which will be permitted on site. This is something which will be dealt with through a planning application, and will need to be informed by the SHMA and Housing needs assessment.	No	N/A	R-238	PU-033	Public
H5PU – HSB3	Further development will cause more flooding.	Site is not within Flood risk zone 2 or 3 and therefore is not considered unsuitable for development. The site has been considered through the SFRA, which identifies that a Flood Risk Assessment will be required prior to any development taking place. Ongoing engagement with United Utilities will also be necessary.	No	N/A	R-239	PU-035	Public
H5PU – HSB3	The owner would look to bring the site forward with the adjoining landowner following initial discussions. State residential development would have no substantive negative impact.	Support welcomed	No	N/A	R-290	PU-077.1	SRE Associates :
H5PU – HSB3	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site which are not currently in use.	Yes	MI-APP16	R-281	PU-072	United Utilities

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	planning application due to the presence of utilities infrastructure within the site which is identified as not in use. The status of this asset will require confirmation with United Utilities.”	CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”					
H5PU - HSE2	Primary school at capacity and Seascale no longer within WLA catchment.	IDP has not identified the primary school as being at capacity.	No	N/A	R-268	PU-020	Seascale Parish Council
H5PU - HSE2	Argues that development must meet the needs of the village; namely, a range of smaller properties to allow people to downsize and free up family houses.	Housing development will be required to consider the Housing Neds assessment and SHMA and take into consideration the housing needs in the area.	No	N/A	R-268	PU-020	Seascale Parish Council
H5PU - HSE2	Phase one flood alleviation scheme has not progressed; leading, parish argues, to near miss flooding incidents. Phase one roads not of highway width entailing parking unsuitable for vans and HGVs	The site has been considered through the SFRA and it has been confirmed as suitable for development, subject to a flood risk assessment. The site has been considered through the TIS, which states that there may be opportunity to widen the route to enable development to go ahead.	No	N/A	R-268	PU-020	Seascale Parish Council

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H5PU - HSE2	Creating access would require culverting large section of beck and thus exacerbating flooding risk upstream and to proposed site.	The TIS has identified that suitable access can be achieved to the site. Any development proposal will require a flood risk assessment to ensure impacts are not exacerbated.	No	N/A	R-268	PU-020	Seascale Parish Council
H5PU - HSE2	Supports HSE2 and proposed alteration of the settlement boundaries to include site in urban area.	Support welcomed	No	N/A	R-244	PU-048	Turley obo Persimmon Homes
H5PU - HSE2	This site is adjacent to a playing field. This prejudicial impact on the playing field needs to be assessed and considered as part of the planning application (and allocation) process.	Comment noted. This has been incorporated into the allocation profile document.	No	N/A	R-268	PU-065	Sports England
H5PU - HMR1	This site is adjacent to a playing field. This prejudicial impact on the playing field needs to be assessed and considered as part of the planning	Comment noted. This has been incorporated into the allocation profile document.	No	N/A	R-269	PU-065	Sports England

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	application (and allocation) process.						
H5PU - HMR1	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land interests within the site.”	The following wording amendment has been applied: “No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure and land interests present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision”	Yes	MI-APP18	R-286	PU-072	United Utilities
H5PU – HMR2	The owner would look to bring the site forward with the adjoining landowner following initial discussions. This residential development would have no substantive negative impact.	Comment noted	No	N/A	R-291	PU-072.2	SRE Associates
H5PU – HMR2	Requests addition: “Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure and land	<i>Modification proposed:</i> No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Early engagement with United utilities required due to utilities infrastructure, including existing public sewers present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and	Yes	MI-APP19	R-291	PU-072	United Utilities

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	interests within the site. Existing public sewers pass through this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding that affects part of the site. If a decision is taken to allocate the site, the existence of any flood risk from the public sewer may limit the capacity of the development site. We would request that policy requires the applicant to engage with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of sewer flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing	Cadent Gas to ensure that future development does not have an adverse impact on utility provision					

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	circumstances to ensure the most flood resilient solution is achieved. Given the existence of flood risk, applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals could increase flood risk. It may be necessary to apply the sequential approach as outlined in national policy subject to the detail of the proposal that is brought forward"						
H5PU - HTH1	Requests addition: "Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site."	The following wording amendment has been applied: "No utility issues have been highlighted in relation to this site through consultation with utility providers. However, Utilities infrastructure present on site. CBC will carry out ongoing engagement, including at planning application stage, with United Utilities, Electricity North West, Northern Gas and Cadent Gas to ensure that future development does not have an adverse impact on utility provision"	Yes	MI-APP17	R-279	PU-072	United Utilities

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H5PU – HDH2	Development will not define village edge as claimed; as this site is built on open space within it, a space that contributes to character of village.	Disagree with this comment. The site is on the edge of the village and the Settlement Landscape Character Assessment identified an opportunity to better define the edge. No change proposed.	No	N/A	R-289	PU-076	Friends of the Lake District
H5PU - HDH3	Supports development of HDH3 the brownfield site.	Support welcomed	No	N/A	R-225	PU-009	Public
H5PU	A map for additional proposed allocations in Millom has been provided.	The piece of land marked as 3 has been considered through the SHLAA and is undevelopable. The other piece marked as 2 has not undergone the necessary assessments to be an allocated site and therefore will not be allocated through the Plan.	No	N/A	R-299	PU-089	Public
H6PU	Supports policy	Support welcomed	No	N/A	R-301	PU-017	Iceni Projects obo Mssrs J Charlton and Sons
H7PU	Suggests wording amendment. The phrase “consideration should be given” ought to be more positively worded e.g., “development proposals should clearly demonstrate that”.	No change proposed – H7 appears strong enough as worded	No	N/A	R-302	PU-076	Friends of the Lake District

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H7PU	The focus ought to be on genuine need rather than desires and aspirations.	No change proposed – H7 appears strong enough as worded	No	N/A	R-302	PU-076	Friends of the Lake District
H7PU	The NPPF requires minimum density standards. The plan should be adapted to ensure it is consistent with national policy.	It is felt that applying policies which are too prescriptive can make it difficult for a developer to meet specific identified housing needs and therefore the policy has been given a level of flexibility.	No	N/A	R-303	PU-079	Pinnacle obo Story Homes
H8PU	The Council will need to consider how this will work with where the affordable housing target is 10% and the proposed tenure split is 40% affordable home ownership and 60% affordable / social rent. If the Council does not intend to meet the 10% affordable home ownership requirement, then this will need to be evidenced.	This will be dealt with in the housing technical paper	No	N/A	R-304	PU-011	Home Builders Federation
H8PU	The council will need to ensure that developments site remain viable in light of H8PU.	All sites have undergone thorough assessment through the Viability Assessment	No	N/A	R-305	PU-041	Savills obo The Leconfield Estate

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H8PU	Supports the commitment to redevelop empty homes.	Support welcomed	No	N/A	R-306	PU-076	Friends of the Lake District
H8PU	Supports the flexibility within which allows for a lower proportion of affordable housing, and/or a different tenure split, to be agreed at the application stage, in circumstances where viability is challenging.	Support welcomed	No	N/A	R-308	PU-081	Homes England
H8PU	The First Homes PPG requires a minimum of 25% of all affordable housing to be secured through developer contributions to be “First Homes”. Currently, H8PU does not reflect this sufficiently.	<p>The following amendment has been applied:</p> <p>“The following tenure split should be applied to affordable housing developments developments that provide affordable housing:</p> <p>25% First Homes 15% 40% discounted market sales housing, starter homes or other affordable home ownership routes⁸ (25% of these must meet the definition of First Homes). 60% affordable or social rented.”</p>	Yes	MA-LP119	R-307	PU-079	Pinnacle obo Story Homes
H9PU*	Support for this policy	Noted	No	N/A	R-575	PU-267	Public

⁸ As defined in the NPPF Glossary

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H9PU*	No objections to raise	Noted	No	N/A	R399	PU-081	Homes England
H9PU*	Unspecified objection.	Noted	No	N/A	R503	PU-192	Public
H9PU*	Criticism of unspecified location	Noted	No	N/A	R571	PU-263	Public
H9PU*	The policy title ought to be changed to: “‘Strategic Policy H9PU: Allocated Site for Gypsies, and Travellers’”.	Noted. Change made	N/A	Adden	R520	PU-207	Cumbria County Council
H9PU*	The Council considers that both prospective sites are, in principle, acceptable for development.	Noted.	No	N/A	R520	PU-207	Cumbria County Council
H9PU*	To ensure the full consideration of technical considerations, paragraph 13.12.4 should be amended to include, “...and is seeking views from Cumbria County Council as the Lead Local Flood Authority and Local Highways Authority.		No	N/A	R520	PU-207	Cumbria County Council
H9PU*	Request for an additional policy criterion that includes clear and consistent wording in	Covered elsewhere in plan	No	N/A	R520	PU-207	Cumbria County Council

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	respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes or that that this policy cross-references DS6PU.						
H9PU – GTW3	This site does not harm the historic environment.	Noted	No	N/A	R-387	PU-022	Historic England
H9PU – GTW3	No objections to raise	Noted	No	N/A	R-390 R-393 R-394	PU-046 PU-069 PU-065	Environment Agency Sports England National Grid
H9PU – GTW3	There is a recorded mine activity on this site, of which no treatment details are held. The Coal Authority is of the opinion that building over, or within close proximity, to this mine activity should be avoided wherever possible.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-391	PU-049	The Coal Authority

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H9PU – GTW3	United Utilities have drainage infrastructure assets within this site. This may entail a lack of support regarding development in close proximity.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-396	PU-072	United Utilities
H9PU – GTW3	A number of questions were asked which have been sufficiently answered through the FAQ sheet published by Copeland Borough Council.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-400 R-401 R-410 R-411 R418- R501 R502 R504- 512 R513 R514 R516 R517 R522 R570 R577 R581 R584	PU-93 PU-101 PU-102 PU-109- PU-192 PU-191 PU-193- 200 PU-201	public

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					R585 R586 R587	PU-203 PU-204 PU-208 PU-262 PU-269 PU-273 PU-276 PU-277 PU-278 PU-279	
H9PU – GTW3	A number of derogatory comments and/or	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R408 R409	PU-99	public

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	suggestions were made that did not relate to planning matters, these have not been included within this document but all responses will be forwarded to the Planning Inspectorate for their reference.				R410 R411 R418- R501 R504- 512 R513 R514 R522 R577 R581 R586 R587	PU- 100 PU- 101 PU- 102 PU- 109- PU- 192 PU- 193- 200 PU- 201 PU- 208 PU- 269 PU- 273	

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						PU-277 PU-278 PU-279	
H9PU – GTW3	There is insufficient access to the site.	The site has been assessed through the Site Access Assessment and it has been demonstrated that suitable access can be achieved.	No	N/A	R408 R516 R522 R524 R577 R579 R407	PU-99 PU-203 PU-208 PU-210 PU-269 PU-271 PU-98	Public
H9PU – GTW3	This development would cause unacceptable ecological harm	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-579	PU-271	Public
H9PU – GTW3	A site further from existing settlements would be more appropriate.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-412 R-516 R-517	PU-103	Whitehaven Town Council

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					R-522 R-568 R-584	PU-203 PU-204 PU-208 PU-260 PU-276	
H9PU – GTW3	This allocation would exacerbate traffic issues.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-585 R-407	PU-276 PU-98	Public
H9PU – GTW3	Whitehaven has insufficient soft infrastructure for further residents.	Comment relates to GTW3- no longer relevant due to not allocating site.	No	N/A	R-584	PU-276	Public
H9PU – GTW5	This site does not harm the historic environment.	noted	No	N/A	R-387	PU-022	Historic England
H9PU – GTW5	There is insufficient evidence upon which to determine a Gypsy and Traveller allocation.	The proposed Gypsy and Traveller allocation has undergone the same level of assessment as other allocated sites within the Local Plan. This includes sustainability appraisal and Habitats Regulations Assessment. All sites have also undergone a Heritage Impact Assessment, Landscape Assessment, Ecology Assessments and Site Access Assessments to ensure deliverability . All sites have been assessed by Cumbria County Council in their capacity as Highways Authority and Lead Local Flood Authority. Key statutory consultees, including utility providers, Historic	No	N/A	R-582 R-515 R-523 R-580	PU-274 PU-202 PU-209 PU-272	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust

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		England, National Highways and Natural England, among others, have also been consulted on the preferred sites, which would flag up any potential concerns in these areas which would need to be addressed.					Public Weddicar Parish Council
H9PU – GTW5	The land is protected open space.	The site has been identified as protected open space through the Open Space Assessment. However, Whitehaven has an oversupply of this type of open space and therefore the use as a Gypsy and Traveller allocation would not be detrimental to open space supply in the settlement.	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust
H9PU – GTW5	The land is used as a walking location for residents.	The Open Space Assessment identifies this site as a protected open space, under policy N11PU a replacement open space would need to be provided.	No	N/A	R-515 R-525 R-516 R-517 R-582	PU-202 PU-211 PU-203 PU-204 PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust Public
H9PU – GTW5	The land is used as a playing location for local children.	There is a recreation ground and play area in close proximity to the site, which scores higher in terms of quality and value and has Local Green Space protection.	No	N/A	R-566	PU-216	Public

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H9PU – GTW5	A Gypsy and Traveller site is not suitable near an industrial development.	Noted. It is not anticipated that these neighbouring uses will result in any amenity impacts.	No	N/A	R-582 R-406 R-578 R-583	PU-274 PU-97 PU-270 PU-275	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust Public
H9PU – GTW5	A Gypsy and Traveller site not suitable near a 24-hour carpark (Hospital).	It is not anticipated that these neighbouring uses will result in any amenity impacts.	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust
H9PU – GTW5	The Gypsy and Traveller site may impact hospital staff being able to access the car park.	The Council disagrees with this comment	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS

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							Foundation Trust
H9PU – GTW5	The site may result in unacceptable impacts for the existing commercial users.	Noted. It is not anticipated that these neighbouring uses will result in any amenity impacts.	No	N/A	R-582 R-406 R-525 R-578	PU-274 PU-97 PU-211 PU-270	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust Public
H9PU – GTW5	There is insufficient access to the site.	The site has undergone assessment under the Site access Assessment process and it has been determined that suitable access can be achieved.	No	N/A	R-406 R-525 R-516 R-517 R-522	PU-97 PU-211 PU-203 PU-204 PU-208	Public
H9PU – GTW5	Brick and Mortar homes would not be allowed on this site, as such neither should Gypsy and Traveller dwellings.	The site is developable and therefore, in theory would also be suitable for residential development.	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated

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							Care NHS Foundation Trust
H9PU – GTW5	There is insufficient information regarding ecology; potential impact and prospective mitigation.	The site has undergone a Habitats Regulation Assessment and Ecological Assessment, which highlight any potential ecology impacts of development and the required mitigation measures.	No	N/A	R-582 R-525	PU-274 PU-211	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust Public
H9PU – GTW5	There is insufficient information regarding the management of “development creep”.	This is not considered to be an issue as the site is within the settlement boundary. If a proposal came forward to extend the site past the boundary, the potential impact of development creep would be considered to a greater extent.	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust
H9PU – GTW5	The allocation is not sufficiently connected to Whitehaven.	The Council disagrees with this statement.	No	N/A	R-582	PU-274	Summit Town Planning obo North Cumbria Integrated

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							Care NHS Foundation Trust
H9PU – GTW5	There is no street lighting along much of the access road.	It will be the responsibility of the developer to ensure that the access road has safe vehicular and pedestrian access, including appropriate levels of street lighting.	No	N/A	R-582	PU-213.1 PU-214- PU-245 PU-274	Summit Town Planning obo North Cumbria Integrated Care NHS Foundation Trust Public
H9PU – GTW5	This site lies within the Development Low Risk Area and there are no coal mining features recorded at surface or shallow.	Comment noted.	No	N/A	R-392	PU-049	Coal Authority
H9PU – GTW5	A water main passes through this site. United Utilities will not allow building over or in close proximity to a water main.	Comment noted, this will be taken into consideration at planning application stage.	No	N/A	R-397	PU-072	United Utilities
H9PU – GTW5	Any surface water should discharge to the most sustainable option in	Comment noted, this will be taken into consideration at planning application stage.	No	N/A	R-397	PU-072	United Utilities

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	accordance with the hierarchy for the management of surface water outlined in the national planning practice guidance.						
H9PU – GTW5	It is not clear whether this site has readily available alternatives to the public sewer for the management of surface water. This should be investigated further to understand what options may exist.	Comment noted, this will be taken into consideration at planning application stage.	No	N/A	R-397	PU-072	United Utilities
H9PU – GTW5	There is insufficient soft infrastructure in Whitehaven for the Gypsy and Traveller site	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-402 R-566	PU-094 PU-216 PU-264	Public
H9PU – GTW5	The Gypsy and Traveller site would lower house prices	This is not a planning consideration.	No	N/A	R-502	PU-094	Public
H9PU – GTW5	Copeland Borough Council has been paid by the British Government to produce this Gypsy and Traveller allocation	This statement is incorrect, the Council has a duty under the Planning Policy for Traveller Sites (2015) to ensure a five-year supply of housing sites for travellers.	No	N/A	R-502	PU-094	Public

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H9PU – GTW5	There are not enough Gypsies and Travellers in Copeland to warrant this allocation.	The Council disagrees with this statement, the need for Gypsy and Traveller sites in Copeland is outlined in the Cumbria Gypsy and Traveller study.	No	N/A	R-502	PU-094	Public
H9PU – GTW5	The Gypsies and Travellers have been sent here from elsewhere in the country.	The Council disagrees with this statement, the need for Gypsy and Traveller sites in Copeland is outlined in the Cumbria Gypsy and Traveller study.	No	N/A	R-502	PU-094	Public
H9PU – GTW5	The allocation is too close to the West Cumberland Hospital	The Council disagrees with this statement, all residents require access to Public Services.	No	N/A	R-405 R-416 R-567	PU-096 PU-107 PU-259	Public
H9PU – GTW5	There is insufficient site access	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-405 R-414 R-415 R-416 R-514 R-523 R-529 R-533:R-565 R-576 R-582 R-516 R-517 R-522	PU-096 PU-105 PU-106 PU-107 PU-202 PU-209 PU-213	Public Weddicar Parish Council

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						214-PU-245 PU-268 PU-274 PU-203 PU-204 PU-208	
H9PU – GTW5	The development of the site may engender the pollution of a livestock flow of water.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-576 R-583	PU-268 PU-275	Public
H9PU – GTW5	The existing footpath is a private path maintained at the expense of existing residents.	The site is currently owned by Copeland Borough Council. These informal arrangements would be considered at any prospective point of purchase.	No	N/A	R-529 R-533: R-565	PU-213.1 PU-214-245	Public
H9PU – GTW5	The increased traffic caused by the allocation will cause significant harm to the local road network.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see:	No	N/A	R-529 R-533:	PU-213.1	Public

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		https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library			R-565	PU-214-245	
H9PU – GTW5	A pavement would be necessary along the proposed entrance/exist of the industrial estate; alongside double yellow lines to prevent the current parking issue.	This would be considered if a planning application was taken forward.	No	N/A	R-529 R-533: R-565	PU-213.1 214- PU-245	Public
H9PU – GTW5	The legacy of the former refuse site inhibits development.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-414 R-415 R-416 R-515 R-523 R-566 R-572 R-573 R-574 R-583 R-580	PU-105 PU-106 PU-107 PU-202 PU-209 PU-216 PU-264 PU-265 PU-266	Public Weddicar Parish Council

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						PU-275 PU-272	
H9PU – GTW5	The remediation of contaminated land inhibits the deliverability of the site within a 5 year timeframe.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R527 R-533: R-565 R-580	PU-213 PU-214-245 PU-272	Public
H9PU – GTW5	The insufficient drainage inhibits development.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-414 R-415 R-416 R-514 R-523 R-580	PU-105 PU-106 PU-107 PU-202 PU-209 PU-272	Public Weddicar Parish Council
H9PU – GTW5	The development of this site will increase the flood risk of adjacent land.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see:	No	N/A	R-528 R-533:	PU-213	Public

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		https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library			R-565	PU-214-245	
H9PU – GTW5	The contaminated land inhibits SUDS.	Policy DS9 (Sustainable Drainage) requires SUDs where appropriate, whether SUDs are appropriate are not would be determined at planning application stage.	No	N/A	R-528 R-533: R-565	PU-213.1 PU-214-245	Public
H9PU – GTW5	The allocation would impact upon listed buildings.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-414 R-415 R-416 R-518 R-523 R-582 R-583	PU-105 PU-106 PU-107 PU-205 PU-209 PU-274 PU-275	Public Weddicar Parish Council
H9PU – GTW5	The allocation would severely impact visual.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see:	No	N/A	R-525	PU-211	Public

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		https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library					
H9PU – GTW5	The allocation would have unacceptable impact upon biodiversity and ecology.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-531 R-533: R-565	PU-213.1 PU-214- PU-245	Public
H9PU – GTW5	A site further away from existing settlements would be more appropriate.	This would be contrary to the NPPF position on “Sustainable Development”.	No	N/A	R-405 R-515 R-531 R-533: R-565 R-567 R-572 R-573 R-574 R-412	PU-96 PU-202 PU-213 PU-214- PU-245 PU-259 PU-264 PU-265 PU-266 PU-103	Public Whitehaven Town Council

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H9PU – GTW5	A greater utilisation of empty homes would open-up extant housing allocations to be used for Gypsy and Traveller allocations.	Policy H8PU encourages the re-use of empty homes. The Council already attempts to re-develop the maximum amount of empty homes.	No	N/A	R-530 R-533: R-565	PU-213 PU-214-245	Public
H9PU – GTW5	One of the employment allocations or opportunity sites would be more appropriate for the Gypsy and Traveller allocation.	The Council feels that employment allocation are more suited for commercial uses. However, policy E5PU outlines that alternative uses would be considered	No	N/A	R-531 R-533: R-565	PU-213 PU-214:245	Public
H9PU – GTW5	A site south of Egremont should be considered.	See, Gypsy and Traveller potential site assessment. This outlines the decision making process for site identification.	No	N/A	R-415	PU-106	Public
H9PU – GTW5	The search for sites had insufficient range.	See, Gypsy and Traveller potential site assessment. This outlines the decision making process for site identification.	No	N/A	R-518 R-531 R-533: R-565 R565 R578 R516 R517	PU-205 PU-213 PU-214:245 PU-215 PU-270	Public

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						PU-203 PU-204	
H9PU – GTW5	One of the discounted sites would be more suitable, for multiple reasons based upon the site in question.	See, Gypsy and Traveller potential site assessment. This outlines the decision making process for site identification.	No	N/A	R-531 R-533: R-565	PU-213.1 PU-214- PU-245	Public
H9PU – GTW5	The allocation conflicts with policy DS10PU; which states that it is the developers responsibility to provide information regarding contamination and remediation at application stage.	A planning application is not in process.	No	N/A	R-527 R-533: R-565	PU-213 PU-214- 245	Public
H9PU – GTW5	A number of derogatory comments and/or suggestions were made that did not relate to planning matters, these have not been included within this document but all responses will be forwarded to the Planning	N/A	No	N/A	R-405 R-417 R-525 R-578	PU-96 PU-108 PU-211 PU-270	Public

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	Inspectorate for their reference.						
H9PU – GTW5	A number of questions were asked which have been sufficiently answered through the FAQ sheet published by Copeland Borough Council.	N/A	No	N/A	R-526 R-578 R-516 R-517 R-570	PU-212 PU-270 PU-203 PU-204 PU-262	Public
H9PU – GTW5	A number of small sites would be more appropriate than one large site.	The requirements of the site have been derived from the Cumbria Gypsy and Traveller study. As such, several small sites would not be appropriate.	No	N/A	R-406	PU-97	Public
H9PU – GTW5	The prospective site at Greenbank (GTW3) would be a more appropriate location.	Noted.	No	N/A	R-406	PU-97	Public
H9PU – GTW5	Support for the allocation	Support welcomed	No	N/A	R-404	PU-95	Public
H9PU – GTW5	The consultation has had insufficient publicity.	The Council disagrees, the requirements of the Statement of Community involvement have been fulfilled.	No	N/A	R-518 R-530 R-533: R-565	PU-205 PU-213	Public

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						PU-214:245	
H9PU – GTW5	The allocation is not necessary as the applicant is not a Gypsy or Traveller in accordance with case-law.	The Cumbria Gypsy and Traveller assessment identifies the need for 12 pitches, this allocation has met this need.	No	N/A	R-532 R-580	PU-213.2 PU-272	Public
H9PU – GTW5	The consultation has not satisfied the requirements of the duty to co-operate.	The Council disagrees.	No	N/A	R-531 R-533: R-565 R:530	PU-213 PU-214-245 PU-272	Public
H10PU	United Utilities recommends that the wording of criterion G) should be strengthened to ensure that surface water is drained in the most sustainable manner and via a sustainable drainage system	This is covered by DS9PU.	No	N/A	R-398	PU-072	United Utilities
H10PU	United Utilities reiterates several comments made	These issues have been addressed through the previous consultation process.	No	N/A	R-398	PU-072	United Utilities

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	throughout the previous consultation.						
H9PU – GTW5*	It is assumed that the sites proposed for allocation in Policy H9 have been assessed against the provided GIS data and on this basis the Planning team at the Coal Authority have no specific comments to make.	Noted.	No	N/A	R-589	PU-049	Coal Authority
H9PU – GTW5*	Sports England raise no objections	Noted.	No	N/A	R-590	PU-065	Sports England
H9PU – GTW5*	We recommend that future applicants are made aware of site constraints as soon as possible.	Noted.	No	N/A	R-591	PU-072	United Utilities
H9PU – GTW5*	Comments made regarding GTW5 at previous consultation remain outstanding.	Noted.	No	N/A	R-591	PU-072	United Utilities
H9PU – GTW5*	No comments	Noted.	No	N/A	R-592	PU-075	Natural England Public
H9PU – GTW5*	The site is not deliverable in a 5-year timespan.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see:	No	N/A	R-598 R-603 R-604	PU-213 PU-231	Public

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		https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library				PU-272	
H9PU – GTW5*	The site may be used as a commercial operation after the land is sold.	Any use on the site would require planning permission.	No	N/A	R-609	PU-281.5	Public
H9PU – GTW5*	The interested party already owns land, why is this not utilised for the Gypsy and Traveller allocation.	No privately held land was put forward for consideration following the Council's Call for Sites. See, Gypsy and Traveller potential site assessment. This outlines the decision making process for site identification.	No	N/A	R-609	PU-281.5	Public
H9PU – GTW5*	The search for sites had insufficient range.	See, Gypsy and Traveller potential site assessment. This outlines the decision making process for site identification.	No	N/A	R-619	PU-291	Public
H9PU – GTW5*	The legacy of the former refuse site inhibits development.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-595 R-630 R-628 R-629 R-624 R-623 R-622 R-621 R-607	PU-106 PU-301 PU-299 PU-300 PU-295 PU-294 PU-293 PU-292	Public Richmond Pensioners Club

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						PU-281.3	
H95PU – GTW5*	The poor site access inhibits development	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-595 R-628 R-622 R-600 R-603 R-604	PU-106 PU-299 PU-293 PU-213 PU-231 PU-272	Public
H95PU – GTW5*	The poor drainage inhibits developments.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-595 R-599 R-603 R-604	PU-106 PU-213 PU-231 PU-272	Public
H95PU – GTW5*	The development would have an unacceptable impact on heritage assets.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-595	PU-106	Public

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H95PU – GTW5*	The site has insufficient infrastructure.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-618	PU-290	Public
H95PU – GTW5*	The development would conflict with existing uses of adjacent space.	The Council disagrees with this statement.	No	N/A	R-624 R-612	PU-295 PU-284	Public
H95PU – GTW5*	The site may result in unacceptable impacts for the existing commercial users.	The Council disagrees with this statement.	No	N/A	R-627 R-623 R-622 R-621 R-615 R-608	PU-298 PU-294 PU-293 PU-292 PU-287 PU-281.4	Public
H95PU – GTW5*	A site further away from existing settlements would be more appropriate.	The Council disagrees with this statement.	No	N/A	R-628 R-623 R-611	PU-299 PU-294 PU-283	Public

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H95PU – GTW5*	Whitehaven has insufficient soft infrastructure to support additional residents.	The Council disagrees with this statement.	No	N/A	R-622	PU-293	Public
H95PU – GTW5*	This development would cause traffic safety issues.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-600 R-603 R-604	PU-213 PU-231 PU-272	Public
H95PU – GTW5*	This development does not have sufficient footpaths and associated lighting.	The evidence supporting the local plan demonstrates that the site is deliverable and sustainable, and that any constraints identified can be mitigated. Please see: https://www.copeland.gov.uk/content/local-plan-2021-2038-examination-library	No	N/A	R-600 R-603 R-604	PU-213 PU-231 PU-272	Public
H95PU – GTW5*	This consultation has had insufficient engagement with the public.	The Council disagrees with this statement.	No	N/A	R-601 R-603 R-604	PU-213 PU-231 PU-272	Public
H95PU – GTW5*	The site selection process is biased and corrupt.	The Council disagrees with this statement.	No	N/A	R-602	PU-213.2	Public
H95PU – GTW5*	GTW5 is not acceptable as it is considered public open space.	The Open Space Assessment identifies this site as a protected open space, under policy N11PU a replacement open space would need to be provided.	No	N/A	R-602	PU-213.1	Public

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H95PU – GTW5*	This consultation has not satisfied the duty to cooperate.	The Council disagrees with this statement.	No	N/A	R-602	PU-213	Public
H95PU – GTW5*	A number of derogatory comments and/or suggestions were made that did not relate to planning matters, these have not been included within this document but all responses will be forwarded to the Planning Inspectorate for their reference.	N/A	No	N/A	R-630 R-627 R-626 R-620 R-615 R-624 R-612 R-611 R-610	PU-301 PU-298 PU-297 PU-292 PU-287 PU-286 PU-284 PU-283 PU-282	Public Richmond Pensioners Club
H95PU – GTW5*	A number of questions were asked which have been sufficiently answered through the FAQ sheet published by Copeland Borough Council.	N/A	No	N/A	R-630 R-629 R-620 R-619 R-613 R-609 R-605	PU-301 PU-300 PU-292	Public Richmond Pensioners Club

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						PU-291 PU-285 PU-281.5 PU-281.1	
H95PU – GTW5*	The consultation has insufficiently engaged with the public	All consultation has been carried out in accordance with the Copeland Statement of Community Involvement, which is available on the CBC website.	No	N/A	R-629 R-628 R-623 R-622	PU-300 PU-299 PU-294 PU-293	Public
H95PU – GTW5*	The consultation should be extended.	The consultation has been held for six weeks, which is the length of time required under the Town and County Planning Act	No	N/A	R-628 R-624 R-606	PU-299 PU-295 PU-281.2	Public
H95PU – GTW5*	Support for the allocation	Support welcomed	No	N/A	R-617	PU-289	Public
H9PU – GTW5*	The policy title should be amended to “H9: Allocated Site for Gypsies and Travellers”	Comment noted. Suggested name change has been proposed as a modification.	No	N/A	R-596	PU-207	Cumbria County Council

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H9PU – GTW5*	No objection to proposed changes to policy and supporting text.	Noted	No	N/A	R-596	PU-207	Cumbria County Council
H9PU – GTW5*	The “Cumbria Coastal Community Forest” is in close proximity to GTW5. This should be considered at application stage.	This would be considered at planning application stage.	No	N/A	R-596	PU-207	Cumbria County Council
H10PU*	The policy wording should be amended to the following: “Planning applications for the development of new or the extension of existing gypsy and traveller sites will be supported where they accord with the Development Plan and meet the following criteria: etc”	The following wording amendment has been applied: “Planning applications for the development of new or extensions of existing Gypsy and Traveller sites will be supported where it they accords with the Development Plan and meets the following criteria:...”	Yes	MA-LP12 2	R-596	PU-207	Cumbria County Council
H10PU*	The policy criterion should be amended to include clear and consistent wording in respect of the assessment of a development’s impact on the local highway, flood risk	The Council feels this change is unnecessary as this requirement is already covered by other planning policies in the Local Plan.	No	N/A	R-596	PU-207	Cumbria County Council

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	and linkages to sustainable transport and active travel modes or that there is a specific policy in the Development Standards section or revisions to Policy DS6PU: Design and Development Standards which are cross referenced.						
H10PU*	Criterion f) should be amended to the following: "Pitch size, type and parking is designed in accordance with national guidance;"	The following wording amendment has been applied: "Pitch size, type and parking provision will be are designed in accordance with national guidance..."	Yes	MA-LP123	R-596	PU-207	Cumbria County Council
H11PU	Supports H11PU reference to empty homes.	Support welcomed	No	N/A	R-309	PU-076	Friends of the Lake District
H13PU	Supports this policy. However, H13PU requires amendments to align the policy with the broader objectives and sustainable development goals of the plan. H13PU should highlight types of subdivision beyond HMOs.	The Council does not feel this change is necessary, other examples are listed in 13.15.1.	No	N/A	R-310	PU-076	Friends of the Lake District

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H15PU	Rural exception sites can harm heritage assets. H15PU requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.	The following wording amendment has been applied: “The development must not result in a significant unacceptable adverse harm on the character of the area, the surrounding landscape, heritage assets or biodiversity.”	Yes	MA-LP124	NA	PU-022	Historic England
H18PU	Clause a) requires clarification of what constitutes “close to”. Suggests wording “the replacement dwelling is to be sited on, or should closely reflect, the footprint of the existing dwelling to be replaced, unless there are clear and demonstrable reasons why an alternative siting or footprint will deliver a more appropriate scheme”	The following wording amendment has been applied: “The replacement dwelling is to be sited on, or close directly adjacent to the footprint of the existing dwelling to be replaced, unless there are clear and demonstrable reasons why an alternative siting or footprint will deliver a more appropriate scheme. ”	Yes	MA-LP129	R-311	PU-076	Friends of the Lake District
H18PU	Suggests further clause requiring a replacement dwelling to closely reflect the existing dwelling in size scale. Suggests a maximum percentage increase in floor space.	The following wording amendment has been applied: “The erection of a replacement dwellings outside of identified settlement boundaries will be permitted where: ...b) the replacement dwelling (including any curtilage development) should be no larger in scale, size or massing that the existing dwelling to be replaced and curtilage	Yes	MA-LP130	R-311	PU-076	Friends of the Lake District

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		development is of a scale, form and its design must be appropriate to the location... “					
H21PU	Residential caravans can harm heritage assets. H21PU requires a direct reference to planning considerations regarding impact upon and mitigation of heritage assets.	The following wording amendment has been applied: The siting of the caravan will not result in unacceptable adverse impacts upon the landscape, heritage assets , or biodiversity or cause visual harm	Yes	MA-LP13 2	R-312	PU-022	Historic England
Health, Sport, and Culture							
14	Supports commitment to improve sports facilities.	Support welcomed. The following wording addition has been applied to SC1PU: “ The Council will seek developer contributions where appropriate towards new or improved sports, recreational and community facilities taking into account needs identified within its Sports and Playing Pitch Strategies and other relevant documents. ”	Yes	MA-LP14 1	R-313	PU-015	Public
SC1PU	Supports this policy	Support welcomed	No	N/A	R-314	PU-065	Sports England
SC1PU	This policy should reference community plans developed via Parish Councils	Covered under paragraph 2.1.9	No	N/A	R-315	PU-083	Millom-Without Parish Council
SC1PU	Will this statement be undertaken when Nationally Significant	NSPs are not under the planning remit of Copeland Borough Council. The Council is likely to be a statutory consultee and	No	N/A	R-315	PU-083	Millom-Without

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	Projects are proposed within the borough?	would refer to relevant planning policies in response to any application.					Parish Council
14.3	Supports use of playing pitch calculator	Support welcomed	No	N/A	R-316	PU-065	Sports England
SC2PU	The policy as presented covers the need for a new facility and not the benefits of a new facility, is sacrifices a loss if it is for an ancillary purpose, for which it is very unclear what this means, and it makes no reference to the quantity or quality of the replacement.	<p>The following wording amendment has been applied:</p> <p>Applicants must demonstrate that:</p> <ul style="list-style-type: none"> a) The loss is required to in order to provide alternative sport or leisure provision and the needs for the new facility clearly outweigh the loss; The development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current or former use or b) An assessment has been undertaken which clearly shows the existing facility is surplus to requirements; or c) The land in question only forms an ancillary use and its loss would not affect overall public usage of the facility; or <p>c) The facility would be replaced by equivalent or better provision in terms of quantity and quality, with equivalent or better access and management arrangements within a suitable location</p>	Yes	MA-LP14 3	R-317	PU-065	Sports England
SC3PU	Exception IV ought to be removed. Sports England does not support one sport	<p>The following wording amendment has been applied to criterion (4):</p> <p>Where the loss of the pitch for one sport will result in better provision for other sports which are in greater demand and</p>	Yes	MA-LP14 4	R-318	PU-065	Sports England

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	being “played off” against another.	the loss is therefore outweighed by the benefits of the proposal; or					
SC3PU	Exception V should reference councils “Built Facilities Strategy” because the policy refers to playing fields and built facilities.	The following wording amendment has been applied to criterion (5): The development proposes an alternative indoor or outdoor sports facility to meet a strategic need as set out in the Council’s Playing Pitch Strategy or Built Facilities study...	Yes	MA-LP14 5	R-318	PU-065	Sports England
SC3PU	Reference to prejudicial impact (f) is not relevant when developed proposed is not for new playing fields or ancillary development. Suggests a separate policy to consider the impact of development on sporting facilities.	This has been covered under SC4	No	N/A	R-318	PU-065	Sports England
SC4PU	Seeks clarity that policy playing fields.	The following wording amendment has been applied to the policy title: “Impact of new development on sporting facilities (including playing fields and playing pitches) ” The following wording amendment has been applied: “New development must not prejudice the use of existing sports facilities, including pitches , within the vicinity...”	Yes	MA-LP14 7 MA-LP14 8	R-319	PU-065	Sports England

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SC5PU	Clause B) ought to be removed. As formally similar facilities may service different community and, as such, serve different purposes.	It would be difficult to monitor and enforce this in a meaningful manner.	No	N/A	R-320	PU-029	Theatres Trust
SC5PU	Suggests including criterion requiring “share facilities/co-location to have been considered as an option to improve viability”.	The following wording amendment has been applied: “Its continued use as a community or cultural facility is no longer feasible, having had regard to appropriate marketing that has been undertaken . Evidence should be provided to show that the building premises/site has been marketed over a 12-month period through recognised agents and inline platforms appropriate to the nature of the facility at a price which reflects its use, condition and local market values}, the demand for the use of the site or premises, and its usability and the identification of a potential future occupier . Applicants must demonstrate that full consideration has been given any opportunities available to retain the existing use as part of a shared/combined service in order to improve viability. Applicants must also identify the proposed future occupier of the site to avoid speculative applications.”	Yes	MA-LP149	R-321	PU-076	Friends of the Lake District
Natural Environment							
15.2.1	This list is not exhaustive. Requests reference to provision of food, water, air to breath, and soil “health and production”.	The following wording amendment has been applied: “It supports life on earth and provides (-the following-) multiple benefits, including the following... <ul style="list-style-type: none">• Important for soil health and production Provision of food, water, air to breathe”	Yes	MI-LP219	R-322	PU-076	Friends of the Lake District

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15.3.9	Walkmill County Woodland ought to be included as a county wildlife site.	This is not under the jurisdiction of CBC	No	N/A	R-324	PU-021	Moresby Parish Council
15.3.10	Should reference Council's duty to cover Network Expansion and Enhancement networks.	The following wording amendment has been applied: "The Cumbria Biodiversity Action Plan 2001 identifies protected species within the borough, many of which may be found on sites which are not protected habitats. These Priority species are those identified as being the most threatened and requiring conservation action. The Council has a duty under the Natural Environment and Rural Communities (NERC) Act 2006 to conserve biodiversity when exercising its functions. The Action Plan contains..."	Yes	MI-LP22 1	R-325	PU-076	Friends of the Lake District
15.3.10	Should reference Council's duty to cover Network Expansion and Enhancement networks.	The following paragraph (15.9.4) has been added: " The Pilot LNRS has been informed by Natural England's National Habitat Network Maps⁹. These identify Existing Habitats and Network Expansion and Enhancement Zones. The LNRS Map should be considered by developers at the earliest stage when determining the best location for off-site biodiversity net gain (see Policy N3PU). Focus should be on those areas identified for habitat management, enhancement, restoration and creation. "	Yes	MI-LP22 7	R-325	PU-076	Friends of the Lake District
15.5.2	Should reference indirect effects including disturbance via noise and lighting.	The following wording amendment has been applied: "Development can result in a direct loss of habitats and disturbance to species but can also have indirect effects through-increasing pollution (including noise and light	Yes	MI-LP22 2	R-326	PU-076	Friends of the Lake District

⁹ https://magic.defra.gov.uk/Metadata_for_magic/Habitat%20Network%20Mapping%20Guidance.pdf

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		pollution), disturbance through human activity and accelerating the effects of climate change.					
15.6.1	Supports inclusion of requirement for developers to carry out HRA when required.	Support welcomed	No	N/A	R-327	PU-075	Natural England
15.7.1	Welcome inclusion of CEMP section. Suggests reiterating requirement of larger residential and commercial development projects to include CEMPs in Housing/Site allocation policies.	Support welcomed	No	N/A	R-328	PU-075	Natural England
15.11.5	Suggests inclusion of several excerpts from North West Marine plan to support policies N4PU and N8PU.	The following sentence has been added (15.11.7): “Those policies considered to be the most relevant to development in the Copeland area relate to water quality, infrastructure, renewables, employment, climate change resilience and adaptation. Landscape and seascape, marine protected areas (including geodiversity), biodiversity, heritage assets, tourism and recreation.”	Yes	MI-LP234	R-329	PU-014	Marine Management Organisation
15.11.5	This interpretation of the North West Marine Plan is incomplete. It requires reference to Water Quality, Infrastructure, renewables, employment, climate	See above	No	N/A	R-329	PU-014	Marine Management Organisation

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	change resilience and adaptation, landscape and seascape, marine protected areas (including geodiversity), biodiversity, heritage assets, tourism and recreation.						
15.11.6	Suggests a distinction should be drawn between the inshore Northwest Marine Plan area, which to 12nm, and the offshore marine plan area to the maritime borders with Scotland, Wales, and the Isle of Man.	The following wording amendment has been applied: “... the area from mean high water spring tide to 12nm (the inshore north-west marine plan area extends to 12nm and he offshore marine plan area to the maritime borders with Scotland, Wales, and the Isle of Man) ”	Yes	MI-LP23 3	R-330	PU-014	Marine Management Organisation
15.12.1	The active angling associations at Wath Brow, Egremont and Millom all own fishing rights on the rivers Ehen, Irt and Esk and provide eg. recreational opportunities for local and visiting anglers and also act as a valuable primary source of historical information. This information has often been	New footnote added: “ Game Angling is popular in Copeland with associations at Cleator Moor (Wath Brow), Egremont and Millom ”	Yes	MI-LP23 5	R-386	PU-088	Public

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	used by the Environment Agency when used to inform conservation decisions. Also the anglers, as 'eyes on the ground' (or rivers in this case) are usually the first members of the community to report pollution incidents or other illegal activities eg. poaching.						
15.13	Requests sentence added here to highlight the Council's statutory duty to conserve and enhance the setting of the LDNP, to qualify the point in table 1 about having no planning jurisdiction the Park itself.	The following wording amendment has been applied: "The Council has a statutory duty to conserve and enhance the setting of the Lake District National Park, it is therefore important that full..."	Yes	MI-LP239	R-331 R-332	PU-076	Friends of the Lake District
15.13.7	Suggests adding in explanation of the relevance for the LDNPA; i.e, in areas where the LDNPA landscape types extend beyond the LDNP boundary and into Copeland Plan area.	Footnote (100) modified: "For example, (-where the proposal-) due to the scale of landscape types some may extend beyond the LDNP boundary and into the Copeland Local Plan area and/or may affect the setting of the Lake District National Park"	Yes	MI-LP241	R-333	PU-076	Friends of the Lake District

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15.15.4	Indicate that this list is not exhaustive; all vegetation/green space has some GI function however small. In addition, all green corridors are corridors.	The following wording amendment has been applied: “... types of green infrastructure within the borough as listed below (please note there are also other forms of GI and this list is not exhaustive) ”	Yes	MI-LP244	R-334	PU-076	Friends of the Lake District
N1PU	Supports the use of the mitigation hierarchy within this policy and the need for National Sites Network to be protected.	Support noted	No	N/A	R-336	PU-075	Natural England
N1PU	Requests that the “avoidance” step includes an assessment of the genuine need for the development and consideration of alternative, less sensitive sites.	This would be contrary to the NPPF.	No	N/A	R-337	PU-076	Friends of the Lake District
N2PU	Supports inclusion of LNRS policy within the Local Plan.	Support welcomed	No	N/A	R-338	PU-075	Natural England
N2PU	Suggests highlighting that LNRS mapping can aid developers in selecting areas for habitat management, enhancement, restoration, or creation, and how	The following wording amendment has been applied: “The Pilot LNRS has been informed by Natural England’s National Habitat Network Maps. These identify Existing Habitats and Network Expansion and Enhancement Zones. The LNRS Map should be considered by developers at the earliest stage when determining the best location for off-site biodiversity net gain (see Policy N3PU). Focus should be on	Yes	MI-LP227	R-338	PU-075	Natural England

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	development can contribute to nature recovery.	those areas identified for habitat management, enhancement, restoration and creation.”					
N2PU	Suggests including a presumption against development that compromises areas identified as part of Local Nature Recovery network.	This would be contrary to the NPPF, as mitigation could be provided when harm is caused.	No	N/A	R-339	PU-076	Friends of the Lake District
N2PU	Suggests rewording of paragraph one has the plan has no jurisdiction over networks beyond the extent of the borough’s boundaries.	The following wording amendment has been applied: “The Council will support the identification, and implementation, protection and enhancement of Local Nature Recovery Networks that extend beyond the borough’s boundaries and provide... ”	Yes	MA-LP15 2	R-339	PU-076	Friends of the Lake District
N3PU	Supports policy and ambition to encourage developers beyond the 10% minimum.	Support welcomed	No	N/A	R-341	PU-075	Natural England
N3PU	Policy could be strengthened by acknowledging the Irreplaceable Habitats sections of the BNG legislation.	The following paragraph (15.10.14) has been added: “The following policy does not apply to certain “Irreplaceable Habitats” that are protected from development. These include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen, in accordance with the National Planning Framework Glossary and the Conservation of Habitats and Species Regulations (2017).”	Yes	MI-LP23 0	R-341	PU-075	Natural England

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N3PU	Suggests the Local Plan could assist with ensuring there is available net gain sites to be used by developers when developing the site allocations put forward in this local plan.	The Council is likely to consider a call for sites following Local Government Reorganisation. We will also recommend that the new Council considers a call for sites for Biodiversity Net-Gain.	No	N/A	R-341	PU-075	Natural England
N3PU	The small site metric is a useful tool for developers/residential applicants to be aware of.	<p>The following paragraph (15.10.11) has been added: “A simplified Small Sites net gain metric is available. This can be used on the following sites:</p> <ul style="list-style-type: none"> - residential developments where the number of dwellings to be provided is between one and nine inclusive on a site having an area of less than one hectare; - residential developments where the number of dwellings to be provided is not known the site area is less than 0.5 hectares; - For all other development types where the site area is less than 0.5hectares or less than 5,000sqm. <p>In order to use the small sites metric net gain must be provided on site and there must be no priority habitats</p>	Yes	MI-LP228	R-341	PU-075	Natural England

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		present within the development area (excluding hedgerows and arable margins)."					
N3PU	Requests policy to include flexibility based upon circumstances of a proposal and a site. In particular, BNG could be detrimental to the availability of land for infrastructure investment to support "environmental drivers and growth needs".	The requirement for 10% biodiversity net-gain is outlined in the Environment Act. The Policy is flexible in that it allows off-site contributions.	No	N/A	R-340	PU-072	United Utilities
N4PU	Supports reference to Marine Plan and advice that applicants may require appropriate licence from MMO.	The Council does not believe this is required as 15.11.6 already outlines the requirements of the inshore North-West marine plan area.	No	N/A	R-342	PU-014	Marine Management Organisation
N5PU	To reflect Nutrient Neutrality, the local plan should include policy explaining necessity to protect water quality and the principles of how NN can help mitigate any potential impacts. The policy should provide description of NN, its	<p>This comment has been addressed through the addendum document.</p> <p>Additional paragraphs (15.12.7 – 15.12.14) have been inserted to support CBC commitment to Nutrient:</p> <p>"Nutrient pollution is harming our water environment, particularly in many of the country's freshwater habitats and estuaries. Pollution comes from a number of sources including waste-water from development and certain</p>	N/A	N/A	R-344	PU-075	Natural England

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	<p>implications for housing applications within the boundary of the catchment, and the use of the calculator to create a nutrient budget. It should also cover how developers will have to secure mitigation.</p>	<p>agricultural practices. It has an adverse effect on biodiversity by increasing the growth of invasive plants which disrupts the natural cycle by reducing the amount of oxygen in the water and therefore water quality.</p> <p>The Derwent and Bassenthwaite Lake SAC is a protected Habitat Site under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) which supports a number of habitats and species. Part of the SAC catchment area is located within the north of the borough and covers around 3.6% of the Copeland Local Plan area. The Conservation Objectives for the SAC states there is a need to ‘restore stable nutrient levels appropriate for lake type’ and that ‘the natural nutrient regime of the river should be protected, with any anthropogenic enrichment above natural/background concentrations should be limited to levels at which adverse effects on characteristic biodiversity are unlikely’. Nitrogen and phosphorus levels are a particular problem within the catchment area.</p> <p>Guidance was produced by the Government in March 2022 relating to nutrient neutrality. The guidance requires that local planning authorities carefully consider the nutrient impacts of any new plans or projects on Habitat Sites through the Habitats Regulations process.</p>					

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		<p>Where adverse impacts on the integrity of a Habitats Site are identified then mitigation must be considered. Nutrient neutrality is the term used for such mitigation.</p> <p>Before granting any new planning permissions, the Council¹⁰ will need to be confident that the development in question does not require nutrient neutrality to be acceptable under the regulations or that nutrient neutrality is secured, as part of the proposal.</p> <p>Developers will therefore be required to submit a Habitats Regulations Assessment which assesses the impact of nutrient pollution caused by particular developments¹¹ located within the catchment area of the Derwent and Bassenthwaite Lake SAC. The HRA Screening stage will need to identify whether the development will have adverse effects upon the integrity of the Habitat Site through the use of a nutrient budget calculator. If adverse effects are identified an Appropriate Assessment will be required to identify the most appropriate solutions to ensure there are no residual effects following mitigation. This would also apply if additional catchments are identified as being affected by nutrient neutrality in the future.</p>					

¹⁰ Taking into consideration advice from Natural England

¹¹ Those that create additional overnight accommodation such as housing developments etc.

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		<p>As the issue of nutrient neutrality is new to the Copeland area, at present there are no mitigation solutions in place or readily available and in order to demonstrate nutrient neutrality a number of different solutions may be appropriate. This could include nature-based solutions such as new wetlands, woodlands or riparian buffer strips or hard solutions such as improvements to existing waste-water treatment</p> <p>works. In many cases a combination of both hard and nature-based solutions will be required and these will usually secured through a Section 106 or unilateral agreement with the developer. We appreciate that it may take time for applicants to secure mitigation, particularly where additional land outside the application site needs to be sourced.</p> <p>The Council has updated its validation list to help developers navigate the process by setting out what information will be required to support a planning application. We will also work with partners and developers to identify the most appropriate solutions.</p> <p>DEFRA have published a policy paper on the subject which can be found here: Nutrient pollution: reducing the impact on protected sites - GOV.UK (www.gov.uk)</p> <p>Policy N5 relates to “affected developments”. At present, this means all development that creates overnight</p>					

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		accommodation within the catchment area. The Government have stated that nutrient neutrality is only an interim solution and further developments such as industrial developments may also be required to follow the same procedure in the future. The Policy will therefore also relate to any such development that is referred to within the Government's nutrient neutrality policy."					
N5PU	Continued.	<p>The following additional wording has been added: "Water Quality New development must seek to protect or improve the quality of surface and groundwater water resources, including designated coastal Bathing Waters and Shellfish Waters downstream. Proposals should follow the hierarchy for wastewater treatment with foul drainage connected to mains sewer wherever possible. New development should not be operational or occupied until such time as adequate waste water infrastructure has been provided.</p> <p>Where an affected development within the catchment of the Derwent and Bassenthwaite Lake SAC (or any other catchment identified by the Government as being affected by nutrient neutrality in the future) this must not result in adverse impacts on the integrity of the SAC through the creation of nutrient pollution, unless suitable solutions are identified through an Appropriate Assessment to ensure no residual harm remains following mitigation.</p>	N/A	N/A	R-344	PU-075	Natural England

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		<p>The possibility of contamination from former uses on any application site and its effects on the water environment and human health needs to be considered and remediated where it is present.</p> <p>Proposals will be required to support the objectives of the Water Framework Directive, including the objectives for Protected Areas (such as Bathing Waters and Shellfish Waters) as set out in the North-West River Basin Management Plan.</p> <p><u>Water Supply</u></p> <p>New development should ensure there is sufficient water resource available to meet current and future needs, without putting the environment at risk. Wherever possible development should include water efficiency and saving measures.”</p>					
N5PU	<p>Suggests policy needs greater illustration of Groundwater Source Protection Zones. Suggests the following:</p> <p>“In consultation with the council and relevant statutory bodies, applicants will be required to consider</p>	<p>This comment has been addressed through the addendum document.</p> <p>The following paragraphs have been added after 15.12.6:</p> <p>“The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to</p>	N/A	N/A	R-343	PU-072	United Utilities

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	<p>the potential impacts on water quality resulting from the design, construction and operation of proposed development. Where necessary, development proposals should include measures to reduce any risk to the water environment and aim to protect and improve water quality. Development proposals within Groundwater Source Protection Zones must accord with the latest national guidance on Groundwater Protection. New development within Groundwater Source Protection Zones will be expected to conform to the following.</p> <p>i) RISK ASSESSMENT - a quantitative and qualitative</p>	<p>drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction.</p> <p>There is one Groundwater Source Protection Zone in the Copeland Local Plan area. Where possible, new development sites should be appropriately located away from locations which are identified as sensitive groundwater protection areas especially land within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive.</p> <p>Where development within a Groundwater protection zone is unavoidable, development must accord with the latest national guidance on groundwater protection and developers will be expected to submit a risk assessment, masterplan to mitigate any risk to the public water supply and water environment and construction management plan.”</p>					

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	<p>risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development</p>						

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	and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches,						

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	<p>manholes, pumping stations and attenuation features).</p> <p>ii) MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space can be located so that it is closest to the boreholes in order to minimise the potential impact on groundwater. In addition, an appropriate management regime will be required for open space features in a groundwater source protection zone.</p> <p>iii) CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all</p>						

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	construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.”						
N5PU	<p>N5PU needs greater acknowledgement of Water Catchment Land; in particular regarding allocations for wind energy identified in Appendix D. Suggests the following:</p> <p>“Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are located on catchment</p>	<p>The following wording amendment has been applied to CC1: “Water resources and water quality (including catchment land for public water supply purposes).”</p>	Yes	MA-LP64	R-343	PU-072	United Utilities

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	land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.”						
N5PU*	No comments to raise.	Noted.	No	N/A	R592	PU-075	Natural England
N5PU*	The extant wording that NN only applies to developments that generate overnight stays is incorrect. The text should be correct to reflect this; e.g. it should highlight that the policy does not exclusively relate to housing developments and developments that generate an overnight stay.	The supporting text of the policy acknowledges that the type of effected developed is under review nationally. The current position allows for adaptation to legal requirements.	No	N/A	R593	PU-078	Friends of the Lake District

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N5PU*	It is not appropriate that N5 aims for developers to improve water quality, it should only require developments to maintain current levels.	Comment noted.	No	N/A	R593	PU-078	HBF
N5PU*	The HBF is concerned this policy, alongside its intertwinement with the HRA, will engender viability issues.	Comment noted. The policy follows government guidance.	No	N/A	R593	PU-078	HBF
N5PU*	The policy should reflect the ministerial statement regarding the increased responsibility of water companies for nutrient recovery.	The Council is limited in its prerogative regarding development at waste-water treatment works.	No	N/A	R593	PU-078	HBF
N5PU*	This policy should refer to other Water resources in Copeland that are European Areas of Conservation; this includes the River Ehen and it's subsidiaries.	This policy only refers to the protected sites that are currently in an unfavourable condition.	No	N/A	R-625	PU-296	Public
N6PU	Farmers and land managers are essential to unlock ambitions of N6PU. This must be balanced with	Comment noted.	No	N/A	R-345	PU-078	NFU

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	their need to produce food and this dynamic should be approached collaboratively.						
N6PU	Suggests inclusion of note regarding southern boundary extension proposal of LDNP.	The extension to the LDNP has not yet been agreed by Natural England.		N/A	R-346	PU-083	Millom-Without Parish Council
N6PU	Requests amendments to clause c) to highlighted importance of setting to both the LDNP and the Heritage Coast: suggests “impact on <i>their</i> settings”.	The following wording amendment has been applied: “Ensuring development proposals demonstrate that their location, scale, design and materials will conserve and where possible enhance the natural beauty, wildlife and cultural heritage of the Lake District National Park and Heritage Coast where proposals could impact on its their setting...”	Yes	MA-LP15 4	R-347	PU-076	Friends of the Lake District
N6PU	Suggests wording amendment: “at the earliest stage” -> “ <i>from</i> the earliest stage”.	The following wording amendment has been applied: “Consideration must be given to Development proposals must be informed by the Council’s Landscape Character Assessment, Settlement Landscape Character Assessment, and the Cumbria Landscape Character Guidance and Toolkit and where appropriate, the Lake District National Park Landscape Character Assessment at from the earliest stage”	Yes	MA-LP15 5	R-347	PU-076	Friends of the Lake District
N6PU	Suggests wording amendment: “consideration must be given to” -> “development proposals must be informed by”	See above.	No	N/A	R-347	PU-076	Friends of the Lake District

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N7PU	Supports this policy and the extension area agreed in 2019.	Supports policy	No	N/A	R-348	PU-042	National Trust
N7PU	Supports this policy.	Supports policy	No	N/A	R-350	PU-075	Natural England
N7PU	Notes that as the extension is yet to be defined the heritage coast in Copeland is still called the “St Bees Heritage Coast”.	Significant progress has been made towards the definition of the Heritage Coast. The extension will have been defined fully by the time the Local Plan is adopted.	No	N/A	R-350	PU-075	Natural England
N7PU	Supports this policy.	Supports policy	No	N/A	R-351	PU-076	Friends of the Lake District
N7PU	As the Heritage Coast setting is already characterised by built development, including modern built developments, further developments in these areas should not be restricted if appropriate.	The landscape impacts upon the heritage coast will be considered during the determination of planning application.	No	N/A	R-349	PU-048	Turley obo Persimmon
N7PU	N7PU should weight the impact of development proposals against benefits resulting from development; including “improvements to public	All planning application are determined on their own merits.	No	N/A	R-349	PU-048	Turley obo Persimmon

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	access/enjoyment/understanding of the Heritage Coast”.						
N7PU	As St Bees Heritage Coast is not a designated heritage asset or landscape type. As such, N7PU imposes higher restrictions on the NPPF and is therefore inconsistent with national policy.	The extended heritage coast will be defined by the time the Local Plan is adopted. The policy aligns with the NPPF, this is identified in footnote 7.	No	N/A	R-349	PU-048	Turley obo Persimmon
N8PU	Suggests that policy N8PU includes reference to MMO’s seascape policy NW-SCP-1. This policy aims to manage s adverse impacts on the seascape and landscape of the northwest inshore and offshore marine plan areas.	Modification MI-LP223 makes reference to relevant policies in the North-West Marine Plan.	Yes	MI-LP223	R-352	PU-014	Marine Management Organisation
N8PU	Supports this policy.	Support welcomed	No	N/A	R-353	PU-075	Natural England
N8PU	Suggests section of this land could be used as biodiversity net-gain sites.	This would be considered when reviewing land, and the identification of space for bio-diversity net-gain.		N/A	R-353	PU-075	Natural England

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N9PU	Requests clarity on whether playing fields are classified as Green Infrastructure	<p>The following amendment has been applied to the policy wording: “....open countryside, green wedges, protected green spaces, local green spaces, playing fields...”</p> <p>The following bullet point has been added to page 207 (FIND PARAGRAPH): “Playing Fields: Playing fields have been identified within the Council’s Playing Pitch Strategy and are protected under Policy SC3...”</p>	Yes	MA-LP157	R-354	PU-065	Sports England
N9PU	Supports this policy.	Support welcomed	No	N/A	R-355	PU-075	Natural England
N9PU	Suggests BNG investment from off-site net gain sites can fund green infrastructure implementation.	Noted.	No	N/A	R-355	PU-075	Natural England
N9PU	Highlights that Natural England has produced GI standards which can assist in producing a certain set of objects and design codes for Copeland.	Comments noted, these documents will be considered when considering the Green Infrastructure Strategy.	No	N/A	R-355	PU-075	Natural England

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N10PU	Green wedges also function complement N9PU. Suggests following wording amendments: add “the green infrastructure functionality” and after second bullet-point “where the green infrastructure functionality and the special characteristics and quality of the landscape are conserved and enhanced”.	The following wording amendment has been applied: “Where its functionality and the special characteristics and quality...”	Yes	MA-LP158	R-356	PU-076	Friends of the Lake District
N11PU	As shown on the emerging Local Plan Proposals Map (North); the entirety of site ref. HWH2 is proposed to be allocated for housing development. Accordingly, we query the inclusion of sites 72 and 179 shown as ‘amenity green space’ within the 2021 Open Space Assessment and its 2022 Addendum, reflected in the Settlement Map as ‘Protected Open Space’ designations shown on	As part of any future planning application, the loss of any open space on site would need to be replaced elsewhere.	No	N/A	R-358	PU-081	Homes England

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	<p>page 12 of the Publication Draft Appendices (January 2022). We consider this could cause confusion with the Proposals Map, which should be the single source of information regarding land use allocations within the Local Plan. As per outline planning application ref. 4/18/2287/001, it is Homes England's intention to deliver integrated amenity green space within the application site (in accordance with existing policy requirements) which will be more accessible and of better use and quality for local people than isolated amenity green space in fixed locations. Notwithstanding the above query about inclusion of open space designations within the site, Homes England requests confirmation that the open</p>						

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	space within the HWH2 site will be confirmed by a planning consent, and not arbitrarily fixed to locations shown as 'amenity greenspace' as described above.						
15.15.10	Requests clarity regarding typology of playing fields.	The following additional bulletpoint has been added: "Playing Fields: Playing fields have been identified within the Council's Playing Pitch Strategy and are protected under Policy SC3."	Yes	MI-LP24 5	R-335	PU-065	Sports England
N13PU	Highlights the opportunity to improve the management of woods which are already on farms.	Noted.	No	N/A	R-359	PU-078	National Farmers Union
N13PU	A greater focus should be placed on planting opportunities beyond woodland e.g., within a productive landscape.	The following wording amendment has been applied to paragraph (15.15.5): "...increase the amount of GI provision across the borough over the plan period, including within a productive landscape where possible , and development that..."	Yes	MI-LP24 6	R-359	PU-078	National Farmers Union
N13PU	Supports this policy.	Support welcomed	No	N/A	R-360	PU-076	Friends of the Lake District
N13PU	Suggests wording amendments: remove references "where possible" and "where	These phrases are necessary to provide flexibility.	No	N/A	R-360	PU-076	Friends of the Lake District

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	possible and appropriate". These phrases create an unnecessary loophole.						
N13PU	Suggests wording amendment: the word "additional" after the "incorporate".	The following amendment has been applied: "Developers should are encouraged to incorporate additional tree planting and hedgerows into new developments where possible and appropriate."	Yes	MA-LP159	R-360	PU-076	Friends of the Lake District
N13PU	Suggests wording amendment: "where possible" should be replaced by "unless demonstrably inappropriate or unviable. Off-site provision will then be required".	The following amendment has been applied to criterion 2): "Replacement trees should be planted on site and with native species should be used where possible. Where this is inappropriate or unviable, off site provision and/or alternative species will then be required. "	Yes	MA-LP160	R-360	PU-076	Friends of the Lake District
N14PU	Supports this policy	Support welcomed	No	N/A	R-361	PU-083	Millom-Without Parish Council
Built and Historic Environment							
16	The heritage triangle between Millom Castle and Trinity Church ought to be given more articulation within discussions of Copeland's heritage assets.	The following additional bulletpoint has been added to 12.3.6: "Heritage based projects, such as the Millom Heritage Triangle project based around prominent Grade 1 Listed buildings (Millom Castle and Holy Trinity Church)."	Yes	MI-LP171	R-362	PU-028	Millom Town Council

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16.3	Additions to figure 11 would better reflect Copeland's heritage assets. The text and policies map will require updating to reflect these changes.	The following wording amendment has been applied paragraph (16.3.2): "Copeland contains a wealth of heritage assets, including the Lake District National Park World Heritage Site (this lies outside the Plan area but {-adjoining-} the Plan area adjoins it and contains its setting), elements of Hadrian's Wall Frontiers of the Roman Empire World Heritage Site, the St. Bee's and Whitehaven Heritage Coast , 483 listed buildings, 120 scheduled ancient monuments (SAMs) and 8 conservation areas, Heritage assets are identified on the Proposals Map, with WHSs, the Heritage Coast , Conservation Areas and SAMs also shown in Figure 11 below"	Yes	MI-LP255	R-363	PU-076	Friends of the Lake District
BE1PU	The overarching policies regarding Copeland's heritage ought to include more specific details. These are: "Evidence of Roman and Viking activity; Remnants of Copeland's industrial heritage related to the mining of coal and iron ore; The Georgian architecture of Whitehaven's town centre and the maritime architecture of its quay; The former track beds of the wagonways; The	The following wording has been added to paragraph 16.2.1: "Whitehaven was Britain's first post-renaissance planned town, with its town centre set out in a grid iron pattern. The oldest streets in the planned town are King Street and Chapel Street, which were laid out in the 1640s. The Georgian architecture of the town centre and the maritime architecture of the quay contribute to its unique historic environment. There are also a number of historic Wagonways, including one which runs along the coastline on the edge of the town and links to the St Bees Heritage Coast. " The following wording has been added to paragraph 16.2.4: The built form of Copeland's rural villages is described within the Settlement Landscape Character Assessment. This varies from linear villages built along a main road to more rounded,	No	N/A	R-364	PU-022	Historic England

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	historic farm buildings and rural villages and hamlets; The important churches and places of worship including that of the Priory at St Bees; Key cultural assets encompassing parklands, woodlands, landscapes, and riversides, museums, libraries, art galleries, public art, food and drink, customs and traditions.”	<p>nucleated villages with a central core. The rural areas also contain many historic farm buildings.</p> <p>The following paragraph (16.2.5) has been added: Copeland’s towns and rural areas provide evidence of Roman and Viking activity and also contain remnants of our industrial heritage relating to the mining of coal and iron ore.</p> <p>The following policy wording amendment has been applied: Particular attention will be paid to the conservation of those elements which contribute most to the borough’s distinctive character and sense of place, several of which are listed in paragraphs 16.2.1 to 16.2.5.</p>					
BE6PU	Suggests following wording amendment: “considered” -> “demonstrably”	The following wording amendment has been applied to criterion 4): “Where illumination is proposed it is considered demonstrably necessary and is sensitively designed...”	No	N/A	R-365	PU-076	Friends of the Lake District
Connectivity							
17	The ‘American’ “Train Station” should be replaced within the ‘British’ “Railway Station”.	This wording has now been applied throughout the plan.	No	N/A	R-366	PU-043	Rheda Park Residents Association
17	Supports this commitment.	Support welcomed	No	N/A	R-367	PU-065	Sport England

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17.1	Factual edit required: Carlisle airport has no public transport links and does not operate as a public airport.	The following wording amendment has been applied: “Copeland has a 7 day rail service along the coastline, as well as regular indirect train links to airports at {-Carlisle-}, Manchester and Newcastle.”	Yes	MI-LP262	R-368	PU-076	Friends of the Lake District
17.1	More could be added regarding walking routes and the England Coast path	The following wording amendment has been applied: “A number of pedestrian and cycle links to the Cumbrian coastline, Lake District National Park and further afield including the England Coastal Path. ”	Yes	MI-LP263	R-368	PU-076	Friends of the Lake District
17.4	Requests clearer intention of improvements to the A505 crossing at Duddon Bridge	Additional wording has been added to CO2PU criterion (g): “Improvements to the local cycle and walking network, including pedestrian links across the Duddon estuary, to encourage active travel.”	Yes	MI-LP170	R-369	PU-028	Millom Parish Council
17.4	Requests clearer recognition of need to improve A5093 between Silecroft, Millom, and Barrow.	This has been added to policy CO2	Yes	MA-LP166	R-370	PU-028	Millom Parish Council
17.6	Direct replacement with electric vehicles will not be affordable for many and may not be in the best interests of the environment.	The drive for EV charging points reflects national guidance.	No	N/A	R-371	PU-083	Millom-Without Parish Council
17.6	The plan should include reference to potential for EV sharing clubs.	This is not something that can be implemented through planning policy.	No	N/A	R-371	PU-083	Millom-Without Parish Council

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17.7.4	Highlights the omission of the need for a cycle and footway bridge over the Duddon, for consistency with other key rivers on the Heritage Coast.	Additional wording has been added to CO2PU criterion (g): “Improvements to the local and strategic cycle and walking network, including pedestrian links across the Duddon estuary , to encourage active travel.”	Yes	MA-LP166	R-372	PU-083	Millom-Without Parish Council
CO2PU	Supports this policy.	Support welcomed	No	N/A	R-373	PU-065	Sports England
CO2PU	This policy places cycle and walking lower in the hierarchy than other road users.	The Council disagrees with this statement	No	N/A	R-374	PU-083	Millom-Without Parish Council
CO4PU	Supports this policy.	Support welcomed	No	N/A	R-375	PU-065	Sports England
CO5PU	Requests amendment to clause D) that more readily identifies actual car sharing e.g., more nuanced than any car ‘facilitating’ car sharing.	See below:	No	N/A	R-376	PU-076	Friends of the Lake District
CO5PU	Questions whether development can promote car-sharing. Suggests removal of car-sharing as a category.	The following wording amendment has been applied: “Where appropriate, new developments should promote the following hierarchy of users (highest priority first): a) Pedestrians b) Cyclists	Yes	MA-LP172	R-376	PU-076	Friends of the Lake District

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		<p>c) Public and community transport users</p> <p>d) Vehicles that facilitate car sharing</p> <p>e) d) All other vehicles</p> <p>Developments should be designed to maximise the use of transports modes towards the top of the hierarchy...”</p>					
CO7PU	Requests additional commitment to cycle parking.	The following amendment has been applied: “Proposals for new development will be required to provide adequate parking provision, including cycle parking and accessible parking bays in accordance with...”	Yes	MA-LP174	R-377	PU-065	Sports England
CO7PU	It is not necessary for local plan to specify provision for EVPs because part S of “Building Regulations” takes effect on the 15 th of June.	This has been added for clarity.	No	N/A	R-378 R-379	PU-041 PU-011	Savills obo The Leconfield Estate Home Builders Federation
Other							
	States involvement throughout the development of the Copeland Local Plan. State satisfaction that comments have been taken	Support welcomed	No	N/A	R-380	PU-046	Environment Agency

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	into consideration as plan produced. Satisfied that plan is both legally compliant and sound.						
	Publication period has not been sufficiently publicised; claim that town councillors unaware.	The Council disagrees with this statement. The consultation that has been undertaken is set out within this document.	No	N/A	R-384	PU-080	Public
	Due to resourcing constraints the Design Council are unable to provide any substantive feedback.	Noted.	No	N/A	R-385	PU-087	Design Council
	References to 'net zero by 2030' have been replaced by 'net zero carbon by 2037' in most cases. Whilst this is helpful clarification, for consistency, all instances should be changed. Another option would be, at the first reference to 'net zero by 2037', to include a footnote to make clear that it is net zero carbon that is being	This wording has now been applied throughout the plan.	No	N/A	R-838	PU-076	Friends of the Lake District

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	referred to in such references throughout the document.						
Discounted Housing Sites							
BI002a	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	Development of the broader site is likely to result in an unacceptable intrusion into the open countryside. The access to the site is also unlikely to be suitable for development of this scale.	No	N/A	R-230	PU-018.2	PRK obo Mr S Ellis
WS008a	Removal of SHLAA reference WS008a, subject to detailed planning permission, part of HWH3, not justified.	The site benefits from planning permission.	No	N/A	R293	PU-079	Pinnacle obo Story Homes.
En001	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R-247	PU-048	Turley obo Persimmon Homes
Eg003	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R-246	PU-048	Turley obo Persimmon Homes
Eg003	This site is sustainable and deliverable. As such, it ought to be added into the	See discounted site profile	No	N/A	R-223	PU-001.1	PFK obo Carlisle Diocese

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	settlement boundary and allocated for housing.						
Wh015	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R-245	PU-048	Turley obo Persimmon Homes
Wn006	This site has flooding issues and should not be considered for housing.	See discounted site profile	No	N/A	R-224	PU-006	Elaine Sherwen
Fr008	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R229	PU-018.1	PFK obo Mr Cranston
Fr009	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R229	PU-018.1	PFK obo Mr Cranston
Fr036	This site is sustainable and deliverable. As such, it ought to be added into the settlement boundary and allocated for housing.	See discounted site profile	No	N/A	R229	PU-018.1	PFK obo Mr Cranston
Fr049	This site is sustainable and deliverable. As such, it ought to be added into the	See discounted site profile	No	N/A	R228	PU-017	Iceni Projects obo Mssrs

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	settlement boundary and allocated for housing.						J Charlton and Sons
Glossary							
Glossary	The term “Protected Open Space” is not defined in the glossary.	The phrase “Protected Open Space” has been defined as the following: “Protected Open Space: sites within settlement boundaries protected under policy N11 and considered through the Open Space Assessment supporting the Local Plan”	Yes	MI-LP28 2	R357	PU-021	Moresby Parish Council
Monitoring							
CC1	The term net zero carbon is more appropriate.	Following wording amendment applied: “... to support the Cumbria target of net zero carbon by 2037”	Yes	MI-LP27 8	R383	PU-076	Friends of the Lake District
CC2	The term net zero carbon is more appropriate.	Following Wording amendment applied: “... contributing towards the Cumbria target of net zero carbon by 2037 target.”	Yes	MI-LP27 9	R383	PU-076	Friends of the Lake District
Appendix G – Nature Designations in Copeland							
233	Copeland has a unique supply of Freshwater Pearl and Salmon.	Following wording addition: “Freshwater Pearl Mussel and Atlantic Salmon”	Yes	MI-APP2 7	R386	PU-088	Public
234		Following wording addition: “Further information regarding the conservation objectives can be found here: http://publications.naturalengland.org.uk/category/45820268845880320”	Yes	MI-APP2 6	R386	PU-088	Public