

# Contents Page

<b>Respondent ID</b>	<b>Name</b>	<b>Page No</b>
16	St Bees Parish Council.....	1
20	Seascale Parish Council.....	2
21	Moresby Parish Council.....	8
74	Egremont Parish Council.....	10
83	Millom Without Parish Council.....	13

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



The Clerk to St Bees Parish Council

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

T [Redacted]  
Email [pc\\_clerk@stbees.copeland.gov.uk](mailto:pc_clerk@stbees.copeland.gov.uk)

28 February 2022

Dear Sir,

St Bees Parish Council has considered the Publication Draft of the Local Plan 2021-2038.

The Parish Council has no comments to make other than to reinforce the comments put forward in response to the earlier consultation. The Parish Council continues to consider that the site adjacent to Fairladies (HSB3) is not suitable for housing development as it would be clearly visible from the Heritage Coast and the infrastructure is not able to cope with the further development proposed. As a consequence, the Parish Council does not support a change to the settlement boundary to include this site.

Yours sincerely

[Redacted signature]

Clerk to St Bees Parish Council



# **Seascale Parish Council**

**Reference: Local Plan Publication Draft Consultation 2021 -2035**

## **Seascale Parish Council Formal Response**

### **BACKGROUND**

Seascale is a large village that is classed as a service centre. It has a wide range of amenities that support the village and wider community.

The new primary school is currently at capacity and Seascale is no longer in the catchment area for West Lakes Academy which would be a concern for families looking to move to Seascale.

Seascale does have a railway station, but public transport is limited as there is no bus service. This is a problem for our young people, the elderly, and the less mobile residents. The population of the village is made up of 60% retired people, the majority of which are living in three- and four-bedroom houses. A survey carried out some years ago showed that most would like to stay in the village and downsize but there are very little options for them to do this.

The Parish Council do not want to see the village over developed but would support developments that meet the needs of the village, and we believe a range of smaller properties to allow people to downsize is what is needed and would free up large properties for families.

### **Proposed site HSE2**

Seascale Parish Council Strongly Object to this site been taken forward.

Seascale Parish Council supported the residents in the objections when this was brought forward a number of years ago and only the phase one was developed.

The site is outside the village development boundary and the Parish would not want so to see any further extensions to the north end of the village. A well-used public footpath crosses the site diagonally and links the playing field with the upper part of the village including the school. The playing field adjoins the south end of the proposed site and includes football with the nets only three meters from the boundary with balls regularly landing inside the proposed area. To the west side is the Golf Club driving range, which also raises problems with balls often landing in the proposed area.

## FLOODING

When phase one was developed there was to be a flood alleviation scheme to use attenuation tanks upstream to reduce volume before arriving at the development, but this has not been progressed. Since then there have been numerous near miss flooding events threatening the new properties adjacent to the water course and required actions by the residents. One resident has increased the height of the beck side to protect their property this now does increase the flooding of the proposed access to the land. Please see accompanying photo.

## ACCESS

Access to this site is also a problem as it can only be reached via The Banks road on to The Fairways and then through Links Crescent, this has already caused many issues during the development of phase one. These roads are not of highway width and with the large numbers of cars that are parked are totally unsuitable for large vans and HGVs to get access. Photos showing the parking congestion in this area also accompany this response. The only entrance to the site is shown as the very bottom corner, crossing the water course diagonally. This would require culverting a large section of the beck and would exacerbate the flooding risk to the property's upstream and the proposed site.

Seascale Parish Council are supportive of the other proposals within the plan.













ID20





[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 March 2022 20:05  
**To:** Local Plan Consultation  
**Subject:** Re: Reminder: Copeland Local Plan Publication Draft Consultation

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Moresby Parish Council

[REDACTED]

I am sorry I wasn't clear about paragraph ( a )

The map on page 32 of the appendices shows a block between Dent Road and Moresby Parks Road hatched in light green as "protected open space" (a term not in the glossary). This area is an old brown field site which at one time was listed for sale by Copeland B C who we believe are still the owners of the site. We contend that the area should be designated as available for housing development It is within the settlement boundary and much to be preferred for housing allocation than speculative proposals in green field sites outside the settlement boundary  
Regards

[REDACTED]

Parish Clerk

**From:** Local Plan Consultation  
**Sent:** Thursday, March 10, 2022 12:53 PM  
**To:** [REDACTED]  
**Subject:** Re: Reminder: Copeland Local Plan Publication Draft Consultation

Good afternoon Chris,

We have just been going through some of our consultation responses and had a query about the first point you have raised here. We are not sure which piece of land you are referring to, as there does not seem to be any allocations or boundary extensions for 98 houses in Moresby Parks.

If possible, would it be possible to show us on a map the land you are referring to, or if it is something you have seen in one of our documents, just let us know where you have seen it? Any additional information would be much appreciated and will help us to look into your comments more thoroughly.

Kind regards,

Ellie Church  
Strategic Planning Team  
Copeland Borough Council

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**From:** Chris Shaw [REDACTED]  
**Sent:** 06 March 2022 11:11

**To:** Local Plan Consultation <localplanconsultation@copeland.gov.uk>  
**Subject:** Re: Reminder: Copeland Local Plan Publication Draft Consultation

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Moresby Parish Council

There are two points the council wishes to make.

- a) In Moresby Parks land beside Walkmill bungalows to what is still described as houses 98 etc Moresby Parks is described as open green field It is not It is an old brown field site and should be available for housing development
- b) Walkmill country woodland should be shown as a county wildlife site

Chris

Moresby Parish Council

**From:** Local Plan Consultation  
**Sent:** Thursday, February 24, 2022 2:51 PM  
**To:** Local Plan Consultation  
**Subject:** Reminder: Copeland Local Plan Publication Draft Consultation

Dear Parish Clerk,

This email is to remind you that the Strategic Planning Team are currently consulting on the Publication Draft of the Copeland Local Plan 2021-2038. This will end on **18<sup>th</sup> March 2022** and all details can be found here:  
<https://www.copeland.gov.uk/content/local-plan-2021-2038-publication-draft-consultation>.

We will consider all representations over the coming weeks, and they will then be sent to the Planning Inspector as part of the examination process. If you have any questions about the Local Plan or the consultation process, please do not hesitate to get in touch.

Kind regards,

The Strategic Planning Team

Copeland Borough Council

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Information Classification - UNCLASSIFIED



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# EGREMONT TOWN COUNCIL

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

5<sup>th</sup> March 2022

Dear Sir/Madam

Egremont Town Council would like to thank you for the opportunity to make further comments on the Draft Copeland Local Plan and herewith the Council's comments.

Inclusion of ES7 as an employment site is a real positive for the town and we suspect it will be a very attractive location for businesses looking to relocate to Egremont as they will benefit from excellent transport links with accessibility to the A595. We would ask though that any future planned development needs, do not disrupt the existing connectivity between Egremont and Thornhill with the footpath/cycle way adjacent the A595 being used by many.

Egremont Town Council welcomes the inclusion of the old East Road garage being included as an opportunity site OEG03. This is a visible brownfield site and it needs to be developed and re-occupied by a business/service as soon as possible to ensure it doesn't become a prominent eye sore. Councillors suspect it will be a very attractive location for businesses that need that visibility and quick access onto the A595. It is noted however that the opportunity sites do not seem to be linked back into any planning policies for Egremont whereas they do when relating to Whitehaven, Councillors do not understand this differentiation, can you please clarify the reasoning behind this omission?

As reported previously, Councillors disagree with Policy R8PU which would restrict possible redevelopment opportunities on the edge of town sites in Egremont such as the above. A Retail and Leisure Impact Assessment adds more cost and doubt to potential investment into our town when considering redeveloping sites such as the East Road garage if the floor space is more than 350m<sup>2</sup>, (especially in light of the fact that the NPPF sets the threshold at 2500m<sup>2</sup>). The Local Plan proposes a threshold of 500m<sup>2</sup> but 300m<sup>2</sup> for Egremont and other Key Service Centres. As set out previously why would the Council want to complicate the possible redevelopment of a site like East Road garage when its redevelopment could actually improve the functioning of the town centre too? Councillors feel that this policy will put off potential investors looking at sites across Copeland but particularly Egremont, therefore we request you to reconsider the setting of this limitation and as a minimum, make it (500m<sup>2</sup>), the same as Whitehaven.



The proposed settlement boundary is very restrictive and appears to be from an era of development control rather than development management. It cuts through people's gardens on Brisco Road for example and it even cuts out a small grazing field near Christie Bridge at East Road near to the cycle track. Councillors request that this is reconsidered as it appears to be based on planning practice and the boundaries of Egremont from over 30 years ago. In essence the settlement boundary is in conflict with the Council's justification on 5.5.7.

The Council proposes that residential development outside the settlement boundary will only be suitable under certain circumstances with one of the requirements being that the Council does not have a 5 year land supply. This effectively rules out suitable windfall residential development until the government changes its south east biased algorithm to deliver 300,000 houses across the UK which somehow suggests that 30 odd homes a year is enough for Copeland. We all know this is wrong and that Copeland aspires to deliver approximately 150 homes a year. More housing is needed to sustain our existing population as well as to reach the County's economic ambitions. Egremont Town Council supports sustainable residential development that is outside of the proposed settlement boundary if that development is sustainable but fears this policy will restrict investment in the town once more. Our concern is exacerbated by the fact that the three proposed housing allocations are owned by two parties and therefore, these sites will only come forward if both landowners agree to sell to a developer or develop the sites themselves and history has shown us that this does not happen.

Potential sites have not become available in Copeland (including Egremont) perhaps due to potential developers not having sufficient prior knowledge of the site constraints or whether a financially viable development can be achieved bearing in mind the build cost, site constraints and projected revenues based on the local housing market.

National planning policy guidance encourages that expected infrastructure contributions are set out in the local plan, if this continues to be absent, Councillors would expect that it will be requested by the Planning Inspectorate. Egremont, Bigrigg and Moor Row (due to being in the catchment area of the oversubscribed West Lakes Academy), should have their allocated sites checked for viability against projected build costs, site constraints and likely contributions towards supporting the growth of the school. Councillors fear however that these proposed housing allocations will never come forward as possible developers will either be put off by the unknown or provide housing in Cleator Moor and Whitehaven where the students just commute to the town, this is not sustainable and prevents investment into our town and villages. Consideration needs to be given to proposed housing allocations in St Bees, Beckermest and Thornhill too which are also common locations for students of Westlakes Academy.

Egremont Town Council would support housing allocations coming forward if they also improved our existing footpath network particularly HEG3 in Egremont which could provide an opportunity for a better footpath connection towards the River Ehen on the south side of the town as the landowner owns all of the land to the east of the proposed housing allocation. Wilton and Haile could also be considered as other rural villages to support very limited growth as both villages are very attractive to home owners and are well connected to Egremont and Sellafield.



It is vital that the plan is supportive of the ambitions of Egremont and its surrounding areas and in the main it is, however if Egremont Town Council's comments are adopted, Councillors feel that it will give the extra support needed to reach the Council's ambitions as listed in this document and we therefore request that our recommendations are given the due attention they warrant and we look forward to hopefully reading them in the final plan.

Again thank you for the opportunity.

Yours faithfully

A redacted signature consisting of two horizontal red bars. The top bar is longer and more irregular, while the bottom bar is shorter and more uniform in width.

Town Clerk

**Leanne Parr**

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**From:** [REDACTED]  
**Sent:** 18 March 2022 18:29  
**To:** Local Plan Consultation  
**Cc:** millom withoutparishcouncil; [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** MWPC Submission - Local Plan  
**Attachments:** MWPC Copeland Plan - 18th March 22 -master copy - March 22 - issue 1.docx.pdf

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Good afternoon

Please find attached the submission to the final consultation of the Copeland Local Plan.

This submission requests that a number of outstanding clarifications are resolved as they have been left unanswered from previous consultation submissions.

Can you kindly confirm receipt of this email and clarify how the outstanding issues will be addressed?

Regards

[REDACTED]  
Chair  
MWPC





## Millom Without Parish Council

Clerk: [REDACTED]

Chair: [REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

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[REDACTED]

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Website: millomwithoutparishcouncil.com

Email: [REDACTED]

17<sup>th</sup> March 2022

Dear Sir/Madam,

**Ref: Copeland Local Plan 2021- 2038 Focused Pre- Publication Draft Changes Consultation January 22**

Please find detailed below the comments and observations relating to the above consultation.

Millom Without Parish Council have made two separate submissions - produced in November 20 and October 21. We have noted that comments raised do not appear to have been addressed. There are new comments to reflect additional policies that have emerged in this final draft.

**Can we kindly ask for a response to the matters raised in this submission?**

<p><b>2.5.2 Evidence Documents</b></p>	<p>In our original submission (dated November 20), the following was highlighted and we remain concerned this has not been addressed in the evidence of documents:</p> <p><b>Lack of inclusion of the 2019 submission to extend the southern boundary of the Lake District National Park to Natural England in June 2019:</b>  <a href="https://www.friendsofthelakedistrict.org.uk/southern-boundary-extension">https://www.friendsofthelakedistrict.org.uk/southern-boundary-extension</a>  <b>Significant development for South Copeland in terms of landscape assessment and potential impact on planning and environmental protection.</b></p>
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	<p><b>This is also supporting the potential Tourism Economy for the area.</b></p>
<p><b>Policy DS2PU: Reducing the impacts of development on Climate Change</b></p>	<p>Welcome the elements of this policy.</p> <p>Some points to note:</p> <p>The policy is silent in seeking developers to ensure cycleways (aligned to the Cumbria Cycle Strategy) and pathways are part of a joined-up approach with a proposed development.</p> <p>Has the policy commitments been reviewed since the completion of COP22?</p>
<p><b>Policy DS4PU: Settlement Boundaries</b></p>	<p>The exceptions listed in the potentially permitted development outside settlement boundaries are extensive and undermine the purpose of a settlement boundary. It needs to better defined on the list of exceptions.</p>
<p><b>Policy DS6PU: Design and Development Standard</b></p>	<p>The policy states that ‘The Council will expect all new development to meet high-quality standards of design’ and should include an additional clause to require developers to ensure that energy efficiency performance consistent with the climate crisis is applied to all retrofit and newbuild</p>
<p><b>RE3PU: Conversion of rural buildings to commercial or community use</b></p>	<p>The Policy does not consider the cumulative impact on a community’s long-term sustainability and well-being where a proposed development of such buildings is for the specific purpose of being a second home or holiday rental.</p> <p>Rural communities thrive on fully occupied housing and potential developments should be prioritised towards local occupancy.</p>
<p><b>Nuclear Development – NU1-NU5</b></p>	<p>This section sets out the Council’s position on a number of nuclear developments within the Borough.</p> <p>There appears to be no reference to a potential GDF and how the Council will position its policy to address this significant development, with a potential off-shore option, which will fall outside the scope of the Borough, noting this is designated as Crown Property.</p> <p>The development of Moorside and potential SMR’s may have a significant impact on the power grid infrastructure. Given this impact and lessons learned from the first Moorside Transmission proposal led by the National Grid, there is an opportunity for the Borough Council to state its expectations to a developer on addressing landscape impact and mitigation measures</p>



<p><b>Tourism Gateways – section 12.2.6</b></p>	<p>The recent Town Deal for Millom (£20.6M) is predicated on encouraging a more vibrant visitor offer. The omission of Duddon Bridge from this list is somewhat confusing given its link as southern entry point to the Heritage Coast.</p>
<p><b>Tourism Hubs section 12.2.7</b></p>	<p>Silecroft with the planned new café supported by the Heritage Coast Fund needs to be included as a potential hub, noting its link to the English Coastal Path.</p>
<p><b>Policy H4PU Distribution of Housing</b></p>	<ul style="list-style-type: none"> <li>• <b>We have raised concerns as to the alignment of this policy and DS3PU (settlement boundaries)</b></li> <li>• <b>The settlement boundary for The Green has been defined, whereas not for Hallthwaites. Why is this the case?</b></li> <li>• <b>Both The Green and Hallthwaites are identified in DS4PU as a Rural Village.</b></li> <li>• <b>These two close neighbours will each be expected to take its share of new dwellings which may range from 10 to 15.</b></li> <li>• <b>Hallthwaites scoring must be questionable against the definition set out in DS3PU, with no clarity of what services are referred to in this analysis, to underpin the actual scoring.</b></li> </ul>
<p><b>Policy SC1PU: Health and Well-being</b></p>	<p>As set out in MWPC October 21 submission, the following comments were presented with no response to the points raised.</p> <p><b>Welcome the intention of this policy and the commitment to work at a local level to improve health and wellbeing.</b></p> <p><b>To strengthen the Policy, it would be appropriate to make reference to community plans developed via Parish Councils</b></p> <p><b>For clarification will the following statement be undertaken where Nationally Significant Projects are proposed within the Borough:</b></p> <p><b>Producing a Health Impact Assessment and Equalities Impact Assessment to support the Local Plan which identifies the impacts of the policies within it on health and inequality;</b></p>
<p><b>Policy N6PU– Landscape Protection</b></p>	<p>With reference to 2.5.2 – the opportunity to note the southern boundary extension proposal of the National Park is missing from the scope of this policy.</p>
<p><b>Policy N14PU – Community Growing Spaces</b></p>	<p>This is a welcomed Policy with opportunity to develop such places</p>

<p><b>Strategic Policy COP2PU</b></p>	<p>The presentation of this Policy puts Cycle and walking lower in the hierarchy than other road users which appears inconsistent with recent changes to the Highway Code - <b>see policy CO5PU</b></p>
<p><b>17.6 Sustainable transport</b></p>	<p>Direct replacement of petrol/diesel vehicles with electric vehicles will not be affordable for many or in the best interest of the environment (taking account of the environmental impact of battery production in particular). The plan should include reference to the potential for EV sharing clubs which address both these points.</p>
<p><b>Active Travel 17.7.4 (5)</b></p>	<p>The presented list has omitted the need for a cycle and footway bridge over the Duddon, consistent with other key rivers on the Heritage Coast</p>

We hope you take the above comments into account in making your determination for the Local Plan.

Yours sincerely,



Chair – Millom Without Parish Council

17<sup>th</sup> March 22