



Copeland Local Plan 2021-2038 Preferred Options Draft Consultation Response Report

Copeland Borough Council

January 2022

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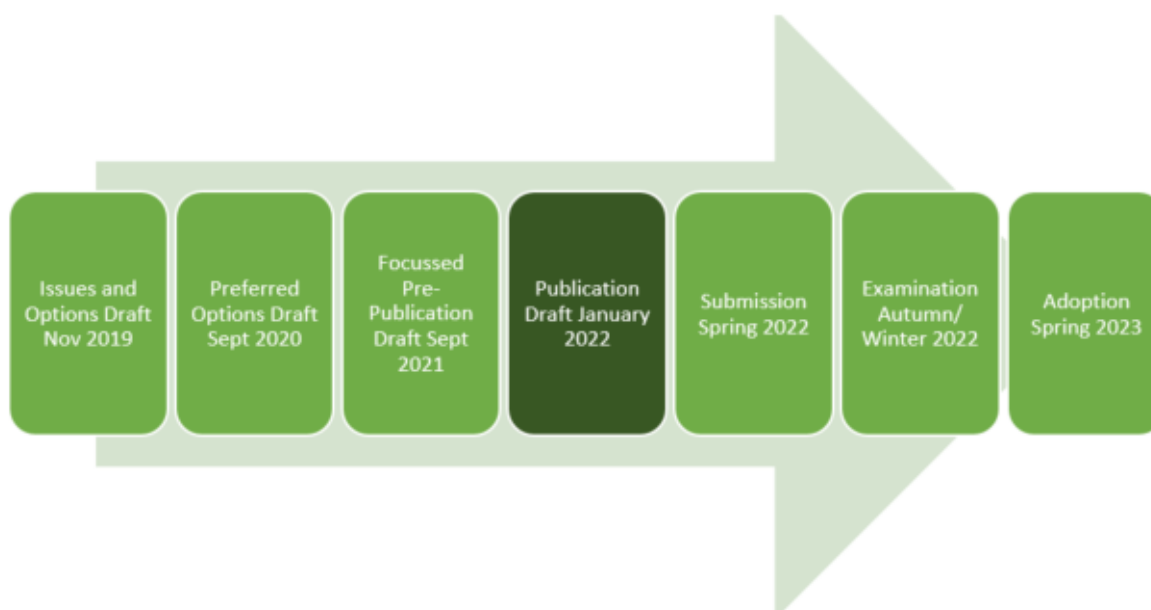
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1.0 Introduction

- 1.1 This report details the representations received on the Copeland Borough Council Preferred Options Draft Consultation, which took place between 20th September 2020 and 30th November 2020.
- 1.2 The consultation was designed to gain views and opinions on our draft policies and allocations, from key stakeholders and members of the public.
- 1.3 Responses received, along with additional evidence base documents and key corporate documents will contribute to the final draft of the Local Plan, the Publication Draft.
- 1.4 The purpose of this document is to outline the key responses received through the consultation and how they will be addressed through the Publication draft to ensure that the plan is as robust and well informed as possible.

Copeland Local Plan

- 1.5 Copeland Borough Council are currently in the process of developing a new Local Plan for the Borough. This will cover the period between 2021 and 2038 and will replace the existing Copeland Core Strategy 2013-2028 Core Strategy and Development Management Policies DPD.
- 1.6 Approximately two thirds of Copeland is located within the Lake District National Park. The emerging Local Plan covers the area of the borough outside of the park, with the remaining part being under the planning jurisdiction of the Lake District National Park Authority.
- 1.7 The Local Plan is currently still in draft form, with several stages contributing to the overall production. The timetable for this can be seen below:



Preferred Options Consultation

- 1.8 In November 2019, Copeland undertook a consultation into the first draft of the Local Plan, the Issues and Options Draft. This set out the key issues currently facing the borough, and potential options for solving these and contributing towards future development in Copeland. A report containing all the responses to this consultation can be seen on the Copeland website¹.
- 1.9 The responses received through this consultation, combined with a number of evidence base documents and other key corporate documents, contributed to the development of the Preferred Options Draft of the Local Plan. This draft sets out the Preferred Options for development in the Borough.
- 1.10 The Preferred Options Draft was subject to a 10 week consultation between September and November 2020, which asked for the views and opinions of key stakeholders, employers and members of the public on the draft.
- 1.11 The purpose of this report is to outline the responses received through the Preferred Options Consultation, and how these will contribute towards the development of the next draft of the Local Plan, the Publication Draft. This report is designed to be read in conjunction with the Preferred Options draft to provide a full understanding of the responses received.

2.0 Structure of the document

- 2.1 This report is designed to be an in-depth description of the consultation process, the responses received and the changes that will be made going forward. It is therefore very lengthy and has been split into sections for ease of understanding.
- 2.2 **Section 3** sets out the methodology used to consult on the Preferred Options draft of the Local Plan. This provides an overview of every consultation method used to ensure that the widest possible group of people have been reached.
- 2.3 **Section 4** summarises the results of the consultation. This includes a breakdown of respondent type and response methods, followed by a summary of how many comments each policy, allocation or site generated and an overview of the general points made.
- 2.4 **Section 5** Provides an in depth analysis of all representations received. This includes every policy and site allocation comment made, alongside the approach that the Council will be taking to address these comments as they prepare the next draft of the Local Plan. This is designed to provide clarity that every comment has been considered and acted upon accordingly. A separate table has been provided for policy comments and site allocation comments. This approach has been taken to try

¹

https://www.copeland.gov.uk/sites/default/files/attachments/consultation_response_report.pdf

and make it easier for respondents to understand, for example, if they responded in relation to all proposals in a particular settlement.

3.0 Consultation methodology

- 3.1 The Preferred Options consultation was designed to allow for a broad audience to engage in the process, particularly where it encouraged participation of under-represented groups. This required the utilisation of a number of different consultation methods
- 3.2 There is a requirement under the Planning and Compulsory Purchase Act (2004) for Local Authorities to prepare a statement of community involvement (SCI). This sets out the standards and processes the Council will use to achieve meaningful consultation through engaging, informing and involving the community, consultees, stakeholders and other interested parties. The SCI was updated in August 2020 to reflect changes to consultation methods as a result of legislation changes and the impact of the Covid-19 pandemic. The SCI can be viewed online at https://www.copeland.gov.uk/sites/default/files/attachments/sci_august_2020.pdf
- 3.3 As a result of the Covid-19 pandemic, several traditional consultation methods were not suitable or safe to use for the purpose of the preferred options consultation, including face to face meetings and exhibitions. The Council was also unable to deposit the document at public locations such as libraries and council offices. This resulted in a need to develop more varied and innovative methods to engage the population. These have been outlined briefly below:

Website

- 3.4 The Preferred Options draft and supporting documents were available to view on the Council's website during the consultation period. This included the response questionnaire, evidence base documents and advertising materials such as posters and leaflets. These can be viewed in the appendices.

Hard Copy and CD's

- 3.5 Usually we do not offer hard copies of consultation documents as they are made available in public places. However, due to the uncertainty surrounding opening hours and hygiene procedures during the pandemic, and in the interest of public safety, we made hard copies available by request, to be posted to people's homes. There was also a hard copy available to view by appointment only in both the Whitehaven Market Hall Office and the Beacon Museum, until November when these both closed. In addition to this there was also an option to have the draft document and any relevant evidence base documents burnt on to a CD.

Social media

- 3.6 A weekly post was made throughout the consultation on Twitter, Facebook and LinkedIn. Each week covered a different chapter of the Preferred Options Draft. In total, there were 12 Facebook post, 12 Twitter posts and 2 Linked in posts. In total,

the Facebook posts reached 22,212 people and generated a number of informal comments.

- 3.7 A video was also produced to explain the Local Plan process, the key topics covered and how to get involved. This was posted on YouTube and shared on Facebook and Twitter throughout the consultation. In total, this generated 558 views.

Press Releases

- 3.8 Two press releases were issued during the consultation process, one on September 21st and another on November 23rd 2020.

News articles

- 3.9 In total, the consultation featured in local newspapers 5 times. These were as follows and can be viewed in the appendices:

- News & Star, September 22 – Residents encouraged to share views
- Whitehaven News, October 7 – Have your say on borough's future
- Whitehaven News, October 21 – Views sought on future plans
- News & Star, October 26 – Comment on Local Plan
- Whitehaven News, November 25 – Speak your mind about future plans

Newsletters

- 3.10 The consultation featured in the Council's Residents Newsletter, Copeland Matters, in October and November issues, and in the Council's members update every week.

Posters and Leaflets

- 3.11 A poster and leaflet were developed to advertise the consultation and provide a brief overview about its context. These were sent to every parish Council to display in notice boards. For several weeks of the consultation, the Whitehaven Market Hall Council Office was open, meaning that posters and leaflets could also be displayed there.

Informative Meetings

- 3.12 Usually meetings and workshops would be held with wider communities to inform people of Local Plan processes. Due to restrictions on public gatherings, all meetings had to be held virtually, via Teams. During the consultation, we held a total of 12 virtual meetings with Parish and Town Councils and key stakeholders. Each of these groups received their own bespoke presentation explaining the key topics relevant to their area, and gave them the opportunity to ask questions. Following the event, we gave attendees a copy of the presentations to share with colleagues and other interested parties.

4.0 Summarised results of the consultation

Respondent Breakdown

- 4.1 During the 10 week consultation, 256 people responded to the Preferred Options consultation, which resulted in approximately 1,400 individual comments. By far the largest proportion of respondents to the consultation were members of the public, who would have primarily found out about the consultation through social media posts and newspaper articles. There was also a relatively strong response rate from statutory consultees, and the majority of Parish and Town Councils also provided a response. The following table outlines the number of each type of respondent who got involved in the consultation.

Table 1: Respondent type

Respondent type	Number of respondents
Public	188
Developer	4
Landowner	5
Planning consultant/ agent	13
Statutory Consultee/ Government department	12
Local Authority	2
Housing Association	1
Parish/ Town Council	13
Business	4
Major employer	5
Community/ Residents group	5
Other	4

- 4.2 Responses were requested in a questionnaire format, either through Survey Monkey or as a hard copy. This was to ensure that it was clear as to which policy or allocation the response referred to. However, a significant number of respondents submitted comments as an email, which resulted in difficulties analysing the responses and ensuring that every point was thoroughly picked up. The breakdown of method of response is shown in the table below.

Table 2: Source of response

Source of response	Number of respondents
Response Form	68
Email	126
Survey Monkey Form	42
Letter	20

Summary of comments made in relation to each policy/ allocation

- 4.3 This table sets out a brief summary of the key points and comments made in regard each policy within the Preferred Options Draft of the Local Plan. The number of occurrences has also been included to indicate where a policy has generated a high response rate.
- 4.4 Key points have only been included where they would require consideration of amendment to the policy, i.e. no comment has been made where there has only been support for the policy. This will be identified in further depth later in the report.
- 4.5 The ‘number of occurrences’ has been highlighted to provide a visual aid surrounding the response rate of each policy/ allocation at a glance. This has been highlighted in the key below. Please note, this is purely indicative of responses, and does not necessarily guarantee a policy will be altered. It also does not take into consideration any other factors which may cause changes to policies in the future, such as emerging evidence base documents and National policy changes.

Key

	Policy/ allocation received a number of comments, which may require significant changes
	Policy/ allocation received a small number of comments, such as wording suggestions, which may require alterations
	Policy/ allocation received little to no comment and will require few changes

Draft Policies

Policy	Number of Occurrences	Key points from responses
Development Strategy		
DS1PO: Presumption in favour of sustainable development	3	<ul style="list-style-type: none"> Policy wording should be altered to reflect the model wording suggested by the Planning Inspectorate
DS2PO: Settlement Hierarchy	147	<ul style="list-style-type: none"> Large number of objections, particularly from members of the public, relating to the scoring based approach to the settlement hierarchy, the clustering approach used and the placement of settlements in tiers of the hierarchy.

Policy	Number of Occurrences	Key points from responses
		<ul style="list-style-type: none"> Additional evidence required here, including a revised assessment of settlement services Developer support for revised strategy, particularly the additional tiers
DS3PO: Settlement Boundaries	156	<ul style="list-style-type: none"> Large amount of comments, particularly from members of the public, objecting to settlement boundaries in specific settlements. Some of this will be reflected in the allocation table below Additional evidence required.
DS4PO: Strategic Development Priority Projects	13	<ul style="list-style-type: none"> Argument that this policy should be removed and included into supporting text as it does not provide guidance for decision makers Not enough focus on the south of the borough in priority projects
DS5PO: Development Principles	16	<ul style="list-style-type: none"> Suggested reference to active design, remediation of contaminated land and minimising development in flood risk areas as well as stronger reference to enhancing natural beauty. When directing development to brownfield land, biodiversity value should be assessed to prevent prioritisation of high value sites Several comments from members of the public that some draft allocations do not meet the criteria for this policy
DS6PO: Planning Obligations	12	<ul style="list-style-type: none"> Biodiversity net gain and green infrastructure should be added Argument that education requirement has not been adequately addressed Restrictive nature of allocations for small builders as a result of S106 expectations Decision on whether to progress CIL needs making prior to publication draft as this can affect delivery of other aspects of the plan
DS7PO: Design Standards	11	<ul style="list-style-type: none"> More clarity is required over expectations for developers Incorporate provision of links for cycling and walking
DS8PO: Reducing Flood Risk	5	<ul style="list-style-type: none"> Midgey Gill ought to be incorporated into this This should work with natural processes and be linked to green infrastructure policies and SUDs
DS9PO: Sustainable Drainage	4	<ul style="list-style-type: none"> There are some development sites where SUDs are not appropriate e.g. contaminated sites that incorporate soakaways

Policy	Number of Occurrences	Key points from responses
DS10PO: Landscaping	5	<ul style="list-style-type: none"> Policy should refer to both hard and soft landscaping to demonstrate the benefits of both
DS11PO: Soils and Contamination	4	<ul style="list-style-type: none"> Development sites likely to cause detriment to land quality need to be risk assessed- this is the developer's responsibility. Where damage is significant, appropriate remediation should be required All developments should seek to achieve pre development or better levels of surface water drainage and ensure pollution prevention measures are in place for surface water run off
Copeland's Economy		
E1PO: Economic Growth	6	<ul style="list-style-type: none"> Should include need to comply with N1PO to prevent harm to Natura 2000 sites Policy needs to be more flexible to meet changing economic opportunities
E2PO: Location of Employment	6	<ul style="list-style-type: none"> Biodiversity should be given additional weight within policy Should be accessible by modes other than car, particularly active travel. Would benefit from clustering alongside other uses
E3PO: Westlakes Science and Technology Park	9	<ul style="list-style-type: none"> Needs more clarification on the impact of new use class order Desire for policy to be more flexible- should not be restricted to technology and research Potential heritage impacts on Scalegill Hall
E4PO: Employment Sites and Allocations	9	<ul style="list-style-type: none"> Potentially significant Highways impacts on A595- individual site comments provided. Cumulative impact also needs assessing More evidence required Natural impacts need assessing- impacts of certain development near St Bees Heritage Coast and impact of Hensingham Common and Whitehaven Commercial park on Hen Harrier species. Sellafield and LLWR ought to be allocated to support growth More information required to give a full understanding of impact on water and wastewater infrastructure Proposed changes to boundary of Bridge End allocation Potential heritage constraints Disagreement with policy being screened out of HRA

Policy	Number of Occurrences	Key points from responses
		<ul style="list-style-type: none"> Smaller sites should also be included to allow for greater flexibility
E5PO: Opportunity Sites and Areas	3	<ul style="list-style-type: none"> Appropriate Assessment required at Cleator Mills Disagreement with policy being screened out of HRA Potential heritage constraints
E6PO: Safeguarding of Employment Sites	0	
E7PO: Home Working	0	
Climate change and clean energy		
CC1PO: Reducing the impacts of development on Climate Change	7	<ul style="list-style-type: none"> Brownfield sites should be assessed on biodiversity land so high value sites are not prioritised Additional integration of cycling and pedestrian opportunities required Criteria should also be included for development to avoid artificial light pollution Addition of minimising development in flood risk areas and securing nature based solutions to improve extent of tree cover
Policy CC2PO: Large Scale Renewable Energy Developments, Geothermal, Low-carbon and Decarbonisation, Hydrogen to Electricity Plants, and other Large Scale Technologies (excluding nuclear and wind energy developments)	2	<ul style="list-style-type: none"> Addition of consideration for natural environment
CC3PO: Wind Energy Developments	12	<ul style="list-style-type: none"> Large number of objections surrounding wind energy paper, particularly the preferred location for wind energy development - need reviewing prior to being given weight
CC4PO: Supporting development of the Nuclear Sector	3	<ul style="list-style-type: none"> Refer to Government Nuclear policy and NDA strategy specifically Suggested wording changes Remove link to Council Position Statements There is not sufficient reference to LLWR
CC5PO: Maximising opportunities from Nuclear Decommissioning and Transformation	3	<ul style="list-style-type: none"> Primarily wording changes

Policy	Number of Occurrences	Key points from responses
CC6PO: Supporting Nuclear Energy Sector Development and Infrastructure	2	<ul style="list-style-type: none"> Remove link to Council Position Statements Clarification that NSIPs would not be determined by CBC
CC7PO: Nuclear Sector Development at Sellafield	2	<ul style="list-style-type: none"> Primarily working/ structural changes. Remove link to Council Position Statements Reference that CC have responsibility for radioactive waste planning at Sellafield
CC8PO: Nuclear Demolition	2	<ul style="list-style-type: none"> Policy is unnecessary as it duplicates other planning requirements and legal frameworks incorporate the need to mitigate/ reduce impacts of demolition on other 'interests of acknowledged importance' e.g. contamination of groundwater
Retail and Leisure		
R1PO: Vitality and Viability of Town centres and other identified villages within the Hierarchy	0	
R2PO: Hierarchy of Town Centres	0	
R3PO: Sequential Test	1	<ul style="list-style-type: none"> Main town centre uses may be required on SL site
R4PO: Retail and leisure Impact Assessments	1	<ul style="list-style-type: none"> Policy has been written to allow greater flexibility for sites at Whitehaven but no other area has been offered this- detrimental to other towns. Also undermine opportunities to develop brownfield sites outside of town centres
R5PO: Whitehaven Town Centre	2	<ul style="list-style-type: none"> Suggested wording changes to ensure this reflects wording in NPPF
R6PO: Whitehaven Town Centre Primary Shopping Area	0	
R7PO: The Key Service Centres	1	<ul style="list-style-type: none"> Undermine opportunities to develop brownfield sites outside of town centres
R7aPO: Cleator Moor Town Centre	1	<ul style="list-style-type: none"> Suggested additional bullet point to read: "Conserves and enhances those elements which make a positive contribution to the historic environment of the town centre and accord with principles of the Conservation Area Appraisal and Conservation Area Management Plan."
R7bPO: Egremont Town Centre	0	
R7cPO: Millom Town Centre	0	
R8PO: Local Service Centres, Sustainable Villages and Other Rural Villages	3	<ul style="list-style-type: none"> Several responses supporting service and retail provision in lower tiers of hierarchy

Policy	Number of Occurrences	Key points from responses
R9PO: Open Countryside (Rest of the Borough)	1	
R10PO: Non-retail Development in Town Centres	0	
R11PO: Shopfronts	1	<ul style="list-style-type: none"> One comment, asking about the possibility of including the ability to enforce improvement action directed at owners of derelict or degraded shop fronts.
R12PO: Hot Food Takeaways	0	
R13PO: Loss of Village Shops, Post Offices and Public Houses	2	<ul style="list-style-type: none"> Several responses supporting policy
Tourism		
T1PO: Strengthening the Tourism Offer	2	<ul style="list-style-type: none"> Lack of recognition given to work in protecting and enhancing proposed St Bees Heritage Coast extension area. Also opposed to lack of reference to 'gateways' or 'hubs' as a means of promoting coastal tourism
T2PO: Tourism Development	3	<ul style="list-style-type: none"> Improvement of visual amenity along coastline to make it more attractive for visitors
T3PO: Coastal Development outside of the Undeveloped Coast	1	<ul style="list-style-type: none"> All development should ensure local landscape character is maintained and does not have detrimental impact on setting of heritage coast
T4PO: Caravans and Camping Sites for Short Term Letting	1	<ul style="list-style-type: none"> Any coastal caravan and camping sites will need to consider recreational disturbance impacts on SPA birds as a result of the increase in visitors.
Rural Economy		
RE1PO: Agricultural Building	2	<ul style="list-style-type: none"> Reference should be made to reducing ammonia emissions from agricultural developments and activities such as livestock housing, slurry stores and spreading of manures
RE2PO: Equestrian Related Development	0	
RE3PO: Conversion of Rural Buildings to commercial or community use	3	<ul style="list-style-type: none"> Include the need to consider bat surveys for rural buildings Proposed wording changes
Housing		
H1PO: Improving the Housing Offer	10	<ul style="list-style-type: none"> General support for this policy from developers and public

Policy	Number of Occurrences	Key points from responses
H2PO: Housing Requirement	12	<ul style="list-style-type: none"> House builder comments- policy does not reflect growth aspiration, believe that 300dpa is a more appropriate figure Requirement should be 200 due to SHMA conclusion for an economic based OAN of up to 198 dwellings per annum
H3PO: Housing Delivery	7	<ul style="list-style-type: none"> House builder comments: policy is not positively prepared or consistent with para 75 of the NPPF. Also, additional housing in lower tiers should be approved where they meet an identified need. Under delivery should be addressed sooner than 3 years. Reiterates lack of consistency with NPPF
H4PO: Distribution of Housing	10	<ul style="list-style-type: none"> Should remove reference to 'maximum' dwellings- is not in line with government aim to boost housing supply or the NPPF. Additional housing in lower tiers should be approved where they meet an identified need. Several concerns raised surrounding infrastructure provision and traffic Additional consideration should be given to locational advantages and the connections to larger, more sustainable settlements.
H5PO: Housing Allocations	21	<ul style="list-style-type: none"> See allocations table for breakdown of individual sites Additional evidence required before draft allocations hold any weight UU: more information required to give a full understanding of impact on water and wastewater infrastructure
H6PO: New Housing development	9	<ul style="list-style-type: none"> National Trust: criteria A should be expanded to make reference to local landscape character, natural and cultural heritage assets and the Whitehaven Heritage Coast Inclusion of Active Design into policy
H7PO: Housing Density and Mix	9	<ul style="list-style-type: none"> Important for policy to not be overly prescriptive and compromise housing delivery. Also, there is a need to create a housing market that will provide an element of aspiration to ensure working people and families can be retained House builder comments: a degree of flexibility is needed to allow alternative evidence to be provided by applicant e.g. up to date market evidence reports to ensure policy is not too restrictive and ensure that individual site circumstances are taken into account

Policy	Number of Occurrences	Key points from responses
		<ul style="list-style-type: none"> Responses relating to opposition of 'estate type developments' which change the rural and agricultural character of an area Specific reference should be given to local landscape character and natural and cultural heritage assets
H8PO: Affordable Housing	6	<ul style="list-style-type: none"> The tenure split set out in the policy does not meet the requirements of the NPPF and should be revised
H9PO: Gypsies, Travellers and Travelling Showpeople Windfall Sites	1	<ul style="list-style-type: none"> Proposed wording changes
H10PO: Community-led, Self-build and custom build housing	3	<ul style="list-style-type: none"> General support for policy and benefits of self- build
Policy H11PO: Residential Establishments, including Specialist, older persons housing and purpose built student and key-worker accommodation	1	<ul style="list-style-type: none"> One comment requesting for additional provision for the elderly in Millom
Policy H12PO: Conversion and sub-division of buildings to residential uses including large HMO's	0	
Policy H13PO: Domestic Extensions and Alterations	0	
Policy H14PO: Rural Exception Sites	4	<ul style="list-style-type: none"> Policy should be restricted to local occupancy to prevent dwellings becoming holiday lets or second homes Policy wording should include reference to preventing adverse impact on biodiversity
Policy H15PO: Essential Dwellings for Rural Workers	1	<ul style="list-style-type: none"> Policy should include reference to preventing adverse impacts on biodiversity
Policy H16PO: Conversion of Rural Buildings to Residential Use	5	<ul style="list-style-type: none"> Policy should include the need to consider Bat surveys and requirement for a European protected Species license if bats are present Important to work closely with CCC, especially where the conversion of a building could significantly sterilise areas of mineral resource, if the development is proposed in a mineral safeguarding area

Policy	Number of Occurrences	Key points from responses
		<ul style="list-style-type: none"> • Criterion d is overly onerous and does not comply with para 79 of the NPPF • Suggested rewording criterion a.
Policy H17PO: Replacement Dwellings outside Settlement Boundaries	1	<ul style="list-style-type: none"> • Addition of an additional criterion: “Replacement would not lead to the avoidable loss of a building that already contributes to architectural or historic interest”
Policy H18PO: Beach Bungalows	0	
Policy H19PO: Removal of occupancy conditions	1	
H20PO: Residential Caravans	1	<ul style="list-style-type: none"> • Any caravans being proposed around the coast where there are designated SPA will need to assess impacts from recreational disturbance.
Health, sport and community facilities		
Policy H21PO: Sporting, Leisure and cultural Facilities (excluding playing pitches)	3	<ul style="list-style-type: none"> • Developing brownfield sites should be informed by data on biodiversity value so sites of high value are not prioritised • Criterion D needs additional flexibility and should require replacement in a suitable location not the same locality.
Policy H22PO: Playing Fields and Pitches	1	<ul style="list-style-type: none"> • Suggested wording changes
Policy H23PO: Community Facilities	4	<ul style="list-style-type: none"> • Proposed wording changes to ensure flexibility
Policy H24PO: Advertisements	0	
Natural Environment		
Policy N1PO: Conserving and Enhancing Biodiversity and Geodiversity	4	<ul style="list-style-type: none"> • Identify sequential steps as ‘mitigation hierarchy’ as this is a recognised process in national planning policy. Also change wording in first paragraph from ‘should be’ to ‘must be’ • Policy should specifically mention “protected species and habitats”
Policy N2PO: Biodiversity Net Gain	7	<ul style="list-style-type: none"> • Comments on whether the policy is not required as it will be covered in national Policy • Suggested amendments to align with best practice and planning policy • Requirement to monitor for 30 years does not accord with national planning policy. Environment bill is still in draft form so Council should not rely on it for emerging policy • Sellafeld seeking exemption as a Nuclear Licensed site and request that exemptions to the rule are reflected in the policy

Policy	Number of Occurrences	Key points from responses
Policy N3PO: Local Nature Recovery Networks	2	<ul style="list-style-type: none"> Suggestions to produce supporting SPD
Policy N4PO: Marine Planning	3	<ul style="list-style-type: none"> Marine management Organisation: Makes a number of suggestions of policy areas that ought to be referred to, as well as the requirement for Duty to Cooperate Proposed structural/ wording changes
Policy N5PO: Landscape Protection	7	<ul style="list-style-type: none"> Developments likely to have an impact on landscape character, or a protected landscape, must be required to submit a Landscape and Visual Impact assessment and provide mitigation/ compensation measures Wording suggestions to make policy stronger. Policy should be strengthened through reference to SLCA and Cumbria Landscape Character Guidance and Toolkit.
Policy N6PO: The Undeveloped Coast	3	<ul style="list-style-type: none"> The Undeveloped coast is not defined anywhere in the plan. Support for a policy which only permits development required to provide safe access to and interpretation of the coast, subject to it meeting certain criteria
Policy N7PO: Green Wedges	3	
Policy N8PO: Protected Green Spaces	4	<ul style="list-style-type: none"> No objections to policy, but several suggestions on land which ought to be protected. Recognition that green infrastructure is wider than just green space- integrated approach
Policy N9PO: Local Green Spaces	3	<ul style="list-style-type: none"> Requested amendment to policy to separate 'playing fields' from the 'amenity greenspace' typology. Several other recommendations e.g. where potential sites had been missed
Policy N10PO: Woodlands and Trees	2	<ul style="list-style-type: none"> No objections to policy. Suggestions to provide examples of "wholly exceptional" reasons for loss and damage to ancient or veteran trees.
Built and Historic Environment		
Policy BE1PO: Heritage Assets	3	<ul style="list-style-type: none"> Policy wording suggestions
Policy BE2PO: Designated Heritage Assets	3	<ul style="list-style-type: none"> Policy wording suggestions
Policy BE3PO: Archaeology	3	<ul style="list-style-type: none"> Policy wording suggestions
Policy BE4PO: Non-Designated Heritage Assets	3	<ul style="list-style-type: none"> Policy wording suggestions

Policy	Number of Occurrences	Key points from responses
Connectivity		
Policy CO1PO: Telecommunications and Digital Connectivity	2	<ul style="list-style-type: none"> Only one objection: states that policy is weak but does not provide suggestions for improving this
Policy CO2PO: Priorities for improving connectivity within Copeland	11	<ul style="list-style-type: none"> Several objections from members of the public to the inclusion of Whitehaven relief Road as a priority project Request that policy is strengthened with regards to air quality impacts and an outline of the avoidance and mitigation measures that will be required within project HRAs Not enough provision for the south of borough- potential for improvements on road between Millom and Barrow and additional investment into cycle networks
Policy CO3PO: Priorities for improving transport links to and from the Borough	2	<ul style="list-style-type: none"> Highways England recognition for intention to support improvements to strategic road network- these will be identified through transport evidence base work
Policy CO4PO: Sustainable Travel	8	<ul style="list-style-type: none"> Highways England to be consulted on proposals likely to impact the safety or operation of the A595, where possible through pre- application scoping discussions. House builders: expectations surrounding the standards for provision for electric vehicles need to be clear.
Policy CO5PO: Transport Hierarchy	4	
Policy CO6PO: Countryside Access	2	<ul style="list-style-type: none"> Suggestions to enhance signage, particularly on the Coast to Coast route.
Policy CO7PO: Parking Standards	2	

Draft Allocations

4.6 The following table is similar to the previous one, but it relates to any comments made in relation to the draft residential allocations. Where sites have been promoted by the Landowner/ Agent/ Developer, this has been highlighted. Comments made in relation to the employment allocations have been shown under the relevant policy later in the report.

Settlement	Allocation ref/ name	Number of Occurrences	Key points from responses
Whitehaven	HWH1 Land at West Cumberland Hospital and Sneckyeat Road	2	<ul style="list-style-type: none"> Objections from local residents on parking grounds and loss of open space

Settlement	Allocation ref/ name	Number of Occurrences	Key points from responses
	HWH2 Red Lonning and Harras Moor	2	<ul style="list-style-type: none"> Loss of playing field Promoted
	HWH3 Land at Edgehill Park (former Marchon car park)	3	<ul style="list-style-type: none"> Environmental issues- within 200m composting facility Potential impacts on adjacent playing field Promoted by Story Homes (PP and under construction)
	HWH4 Land south and west of St Marys School	2	<ul style="list-style-type: none"> Consider proximity to Heritage coast Potential impacts on adjacent playing field
	HWH5 Former Marchon Site north	1	<ul style="list-style-type: none"> Consider proximity to Heritage coast
	HWH6 Land south of Waters Edge Close	2	<ul style="list-style-type: none"> Promoted
Cleator Moor	HCM1 Land at Jacktrees Road	2	<ul style="list-style-type: none"> Promoted by developer and landowner
	HCM2 Land North of Dent Road	0	
	HCM3 Former Ehenside School	1	<ul style="list-style-type: none"> Potential impacts on adjacent playing field
	HCM4 Land at Mill Hill	0	
Egremont	HEG1 Land North of Ashlea Road	3	<ul style="list-style-type: none"> Mitigation required for lost playing field Promoted by landowner
	HEG2 Land at Gulley Flatts	3	<ul style="list-style-type: none"> Potential impacts on Groundwater Source protection Zone Promoted by landowner
	HEG3 Land to south of Daleview Gardens	3	<ul style="list-style-type: none"> Potential damage to setting of Egremont Castle Promoted by landowner
Millom	HMI1 Land west of Gammerscroft	0	
	HMI2 Moor Farm	2	<ul style="list-style-type: none"> Flood risk- requires early pre-app discussions Promoted by developer
Arlecdon and Rowrah	HAR1 Land east of Arlecdon Road	0	
	HAR2 Park Road	1	<ul style="list-style-type: none"> Objection due to drainage and flooding issues, highways safety and landscape character.
Bigrigg	HBI1 Land north of Springfield Gardens	4	<ul style="list-style-type: none"> Potential harm to setting of St Johns Church Objection from local resident- no local need for new homes
	HBI2 Land west of Jubilee Gardens	3	<ul style="list-style-type: none"> Promoted by landowner Objection from local resident- no local need for new homes

Settlement	Allocation ref/ name	Number of Occurrences	Key points from responses
	HB13 Springfield Farm	4	<ul style="list-style-type: none"> Potential harm to setting of St Johns Church Objection from local resident- no local need for new homes
Distington	HDI1 Land south of Prospect Works	1	<ul style="list-style-type: none"> Promoted by landowner
	HDI2 Land south west of Rectory Place	0	
Drigg/ Holmrook	HDH1 Land north of Meadowbrook	22	<ul style="list-style-type: none"> Promoted by landowner Potential impacts on setting of Drigg Hall Public objections for several reasons- character, services, infrastructure, flooding, traffic etc. Objections were also made to the clustering of Drigg and Holmrook- belief that they should be kept separate and that the scale of development would be inappropriate for the two settlements
	HDH2 Wray Head, Station Road	16	<ul style="list-style-type: none"> Objections for several reasons- character, services, infrastructure, flooding, traffic etc Objections were also made to the clustering of Drigg and Holmrook- belief that they should be kept separate and that the scale of development would be inappropriate for the two settlements
Frizington	HFR1 Land at Griffin Close	0	
St Bees	HSB1 Land adjacent Abbots Court	106	<ul style="list-style-type: none"> Promoted by landowner Potential legal issue- covenant Potential impact on setting of listed buildings CCC objection- highways Many objections to development in general from local residents for reasons including access/ highway countryside/ amenity issues, lack of services etc.
	HSB2 Land north east Abbey Road	105	<ul style="list-style-type: none"> Promoted by landowner Potential legal issue- covenant Potential impact on setting of listed buildings Many objections to development in general from local residents for many reasons including access/ highway countryside/ amenity issues, lack of services etc.
Seascale	HSE1 Land north east Santon Way	4	<ul style="list-style-type: none"> Adjacent wastewater treatment works

Settlement	Allocation ref/ name	Number of Occurrences	Key points from responses
			<ul style="list-style-type: none"> Proximity to cricket pitch could require mitigation Potential impact on setting of the Church of St Cuthbert CCC objection-flooding Parish council supports partial allocation
	HSE2 Fairways Extension	2	<ul style="list-style-type: none"> Sport England comment Parish council objection on flooding and access grounds Proximity to cricket pitch could require mitigation
Thornhill	HTH1 Land to south of Thornhill	1	<ul style="list-style-type: none"> Potential impacts on existing playing field
Beckermest	HBE1 Land north of Crofthouse Farm	2	<ul style="list-style-type: none"> Within Beckermest conservation area Objection to site on access/ highways grounds
	HBE2 Land adjacent to Mill Fields	1	
Moor Row	HMR1 Land to north of social club	3	<ul style="list-style-type: none"> Promoted by landowner Potential impacts on adjacent playing field
	HMR2 Land to south of Scalegill Road	2	<ul style="list-style-type: none"> Promoted by landowner
Lowca	HLO1 Solway Road	0	
Summergrove	HSU1 Land to south west of Summergrove	14	<ul style="list-style-type: none"> Promoted by landowner for residential use Historic England comment- setting of Netherend Farmhouse Several objections to site being allocated for residential rather than employment

Additional sites mentioned or promoted through the PO responses

- 4.7 This table outlines where there have been comments in relation to sites not included as a draft allocation. This can include where an additional site has been promoted, or where objections have been made to a sites inclusion within the settlement boundary. It is important to note these as they can become 'debated sites' and contribute towards the next draft of the Local Plan.
- 4.8 Please use this table in conjunction with the Copeland Borough Council Strategic Housing Land Availability Assessment (SHLAA) for an understanding of the location of sites.

Settlement	SHLAA reference	Number of Occurrences	Key points from responses
Whitehaven	Wh001	3	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh002	3	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh003	3	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh005	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh006	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh008	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh009	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh010	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh011	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh011/a	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh012	3	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh014	3	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh016	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wh022	4	<ul style="list-style-type: none"> • Promoted by agent • Objections on grounds of infrastructure, drainage, access
	Wh023	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn002	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn003	6	<ul style="list-style-type: none"> • Promoted by agent • Objections on grounds of infrastructure, drainage, access
	Wn004	4	<ul style="list-style-type: none"> • Promoted by agent • Objections on grounds of infrastructure, drainage, access
	Wn006	5	<ul style="list-style-type: none"> • Promoted by agent • Objections on grounds of infrastructure, drainage, access
	Wn008	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn009	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn010	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn012	4	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	Wn013	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	We007	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access

Settlement	SHLAA reference	Number of Occurrences	Key points from responses
	We010	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	We010/a	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure, drainage, access
	We022	1	<ul style="list-style-type: none"> • Promoted by developer
	We036	2	<ul style="list-style-type: none"> • Poor infrastructure
	Ws008	1	<ul style="list-style-type: none"> • Potential impacts on adjacent playing field
	Ww018	1	<ul style="list-style-type: none"> • Objections on grounds of infrastructure/ drainage
	Wt012	1	<ul style="list-style-type: none"> • Potential impacts on Whitehaven Conservation Area
	Wt030	1	<ul style="list-style-type: none"> • Potential impacts on Whitehaven Conservation Area
	Wt013	1	<ul style="list-style-type: none"> • Potential impacts on Whitehaven Conservation Area
	Wt028	1	<ul style="list-style-type: none"> • Potential impacts on Whitehaven Conservation Area
	Wt019	1	<ul style="list-style-type: none"> • Potential impacts on Whitehaven Conservation Area
Egremont	Eg003	1	<ul style="list-style-type: none"> • Promoted by agent
	Eg054	1	<ul style="list-style-type: none"> • Potential impacts on Egremont Conservation Area
	Eg064	1	<ul style="list-style-type: none"> • Potential impacts on Egremont Conservation Area
	Eg067	1	<ul style="list-style-type: none"> • Potential impacts on Egremont Conservation Area
Millom	Mi041	1	<ul style="list-style-type: none"> • Potential impacts on adjoining playing field
Arlecdon and Rowrah	Ar029	1	<ul style="list-style-type: none"> • Promoted by agent
	Ar008	1	<ul style="list-style-type: none"> • Promoted by agent
Cleator	Cl003	1	<ul style="list-style-type: none"> • Promoted by agent
	Cl004	1	<ul style="list-style-type: none"> • Promoted by agent
	Cl005	1	<ul style="list-style-type: none"> • Promoted by developer
Distington	Di013	1	<ul style="list-style-type: none"> • Promoted by agent
Frizington	Fr047	1	<ul style="list-style-type: none"> • Promoted by agent
Haverigg	Ha017	1	<ul style="list-style-type: none"> • Potential impact on existing cricket pitch
Seascale	Se017	1	<ul style="list-style-type: none"> • Request to not allow site to be considered further due to access and intensification issues
	Se018	1	<ul style="list-style-type: none"> • Request to not allow site to be considered further due to access and intensification issues
St Bees	Sb018	1	<ul style="list-style-type: none"> • Promoted by agent

Settlement	SHLAA reference	Number of Occurrences	Key points from responses
	Sb023	1	<ul style="list-style-type: none"> Request for withdrawal from availability by agent
	Sb028	1	<ul style="list-style-type: none"> Promoted by agent
	Sb016	1	<ul style="list-style-type: none"> Promoted by agent
Beckermert	Be009	1	<ul style="list-style-type: none"> Promoted by agent
	Be010	1	<ul style="list-style-type: none"> Promoted by agent
	Be020	1	<ul style="list-style-type: none"> Promoted by agent
	Be020/a	1	<ul style="list-style-type: none"> Promoted by agent
	Be028	1	<ul style="list-style-type: none"> Promoted by agent
Ennerdale Bridge	En001	9	<ul style="list-style-type: none"> Requests to remove site from settlement boundary
Moor Row	Mo026	1	<ul style="list-style-type: none"> Requests to remove from settlement boundary on grounds of landscape character issues and traffic/ access issues
Moresby Parks	Mp010	1	<ul style="list-style-type: none"> Site promoted by landowner/ agent
The Hill	Th001	1	<ul style="list-style-type: none"> Promoted by landowner

4.9 A total of 6 new sites were also brought forward through the Preferred Options consultation process. These have all subsequently been considered through the SHLAA process but none have been deemed as suitable for allocation. These can be viewed in the site specific tables and the revised SHLAA document at publication draft stage.

5.0 In depth analysis of representations received and Copeland's response

- 5.1 This table goes into more detail than the previous ones. It includes every comment received through the Preferred Options consultation, and how we will be addressing those through the next draft of the Local Plan, the Publication Draft. This is designed to provide clarity that every comment has been considered and acted upon accordingly.
- 5.2 It needs to be noted that not every comment will result in a change within the Local Plan. For example, where there are conflicting opinions, where comments are contrary to professional advice or evidence base data, or where proposed changes are outside of Copeland's planning remit. In these cases, an explanation will be provided.

- 5.3 Responses that explicitly support policies, and therefore no action is required, have not been included in this report to make the report more concise.
- 5.4 A numerical respondent reference number has been provided to protect the anonymity of the respondent.
- 5.5 An overview of the relevant policy or allocation references has also been included to show where potential changes may be required. This includes any evidence base or supporting documentation that may need alterations, such as the development Strategy and Hierarchy paper. Please read in conjunction with the Preferred Options draft for the full names of each policy or allocation. Where respondents have responded by email and failed to clarify the relevant policy or allocation they refer to, a judgement has been made by the Strategic Planning Team.
- 5.6 Please note that the number of comments included in this table may not reflect the number in the overview table. This is because in some instances the comment has been provided elsewhere. For example, if a respondent has commented on the boundary of a settlement, that comment will be included below in the settlement specific table rather than under DS3PO in this table. This is to try and distinguish between settlement specific comments and generalised points surrounding a policy.

Policy Specific Comments

Introduction, Vision and Objectives and Spatial Portrait

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
162	The challenge for Copeland in ensuring economic diversification to reduce the reliance upon Sellafield is noted. The NDA would take the opportunity to highlight that allocation of the site for B1, B2 and B8 uses1 will assist in meeting this challenge as decommissioning progresses	<ul style="list-style-type: none"> Comments noted. It is not considered necessary to allocate the Sellafield site for employment uses given that it is recognised as a nuclear site in Government policy, the Local Plan contains a Sellafield-specific policy and the site is not available for general, non-Sellafield related B1, B2 and B8 uses.
74	Figure 9 The St.Bees Heritage Coast possible extension area, Solway Firth pSPA, and the Cumbria Coast MCZ should also be indicated on this map.	<ul style="list-style-type: none"> A number of new maps have been added to the Local Plan. The St Bees Heritage coast and extension are now shown on the Key Diagram (Figure 2), Proposals Map and Whitehaven and St Bees maps. The Solway Firth SPA and the Cumbria Coast MCZ are now shown on the Proposals Map and Key Diagram (Figure 2) and the MCZ is also shown in Figure 10.
74	Figure 10 The Cumbria Coast MCZ should be indicated on the map.	<ul style="list-style-type: none"> See comment above
155	<p>Section 2.2 We are disappointed to note that no reference is made to the inscription of the Lake District as a World Heritage Site (2017) and the commitment made by Copeland Council to extend the St Bees Heritage Coast (2019).</p> <p>The Trust highlighted a number of concerns in response to the Issues & Options consultation, regarding the lack of reference to the extension of Heritage Coast. We are disappointed to see that this issue has not been addressed in the draft Plan. References are made to ‘potential’ extension. This does not reflect the above noted commitment.</p> <p>The Trust has undertaken a significant amount of work over many years, in partnership with Copeland Borough Council and Natural England, in the promotion, management and extension of the Heritage Coast. The extension area (including gateway areas) was agreed following widespread stakeholder engagement and a detailed landscape character assessment which clearly demonstrated the area formed a key element of the character of the Heritage Coast.</p>	<ul style="list-style-type: none"> Additional bullet points added to section 2.2 relating to the LDNP World Heritage Site The Council is keen to work with the relevant statutory bodies to progress the extension of the Heritage Coast. Additional/amended wording re. the St Bees Heritage Coast extension has been added to the following paragraphs: 2.2.4, footnote 9, 12.2.6, 12.2.7 and section 15.13.9. There are also a number of references to the

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
	<p>The Trust therefore welcomed the Council's decision on 9th April 2019, taken at a meeting of its full Council, to approve the extension of the Heritage Coast further north towards Whitehaven. This decision followed a 6 week period of public consultation in which over 50 responses were received and was announced in the press. At the same meeting, the Council also agreed the new name of 'St Bees and Whitehaven Heritage Coast' referring to both the existing and approved defined extension area.</p> <p>We note the development of the 'Lake District Coast' brand, alluded to in paragraph 2.2, and throughout the Plan. Whilst the Trust is generally supportive of this approach, in our view, the extended St Bees Heritage Coast should form the key element of the 'Lake District Coast' brand. The Heritage Coast is the only nationally designated landscape to fall within the jurisdiction of Copeland Council as a planning authority. It is a unique asset; the only area of high coastal cliff on the western coast between Wales and Scotland. In the Trust's view, the Council is selling this area short, by emphasising the 'Lake District', and by downplaying the Heritage Coast.</p> <p>We strongly advocate the inclusion of the approved defined extension area in the emerging Local Plan through reference throughout to the extended "St Bees and Whitehaven Heritage Coast", in the interests of protecting the undeveloped character and special character of this important asset.</p> <p>The agreed extension area does not appear to be currently given any specific protection by any policy in the draft Plan. Given the policy presumptions of the draft Plan, we are concerned that this area is under threat of inappropriate development. The 'St Bees and Whitehaven Heritage Coast' should therefore be clearly defined and protected.</p>	<p>importance of the heritage coast within the headline pages of the Plan and the extension area is shown on the Proposals Map, Key Diagram and Whitehaven and St Bees settlement maps.</p>
155	<p>We broadly support the wording of the Vision, and in particular the importance attached to the borough's landscapes, cultural heritage and biodiversity. We suggest this sentence is expanded to include reference the coastline which is a defining local natural asset and a key consideration in planning decisions:</p> <p>"We will make the most of our natural and built environment, protecting, enhancing and promoting our magnificent landscapes and coastlines, cultural heritage and biodiversity"</p>	<ul style="list-style-type: none"> • Wording change made as suggested
155	<p>We support the Strategic Objectives, and in particular welcomes those which relate to 'Copeland's Places'.</p>	<ul style="list-style-type: none"> • Support welcomed
155	<p>The table in paragraph. 10.3.6 refers to the 'potential extension of the St Bees Heritage Coast to enhance our visitor offer' under 'opportunities'. Whilst we support the intention of the statement, the use of the word 'potential' is misleading and inaccurate, since the extension area was agreed by full Council on 9th April 2019. Figure 9 should be amended to reflect this, and show the approved extension area.</p>	<ul style="list-style-type: none"> • The tables within this section have been removed and replaced with "Strength, Challenges and Opportunities" tables at the start of each chapter. Reference to "potential" extension has been removed.
170	<p>Section 2.2 Significant changes identified should include WHS designation of LDNP and the formal commitment made by Copeland Council to extend and rename St Bees Heritage Coast – these are not recognised and subsequently, not given appropriate recognition and treatment elsewhere in the plan. We</p>	<ul style="list-style-type: none"> • See comments above re. LDNP WHS and the Heritage Coast extension.

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
	<p>made a number of comments in relation to the extension and renaming of the Heritage Coast in our response to the Issues and Options consultation. We are disappointed to see that this issue has not been addressed in the draft Plan. References are made to ‘potential’ extension. This does not reflect the above noted commitment.</p> <p>Parties including the National Trust, Copeland Borough Council and Natural England have undertaken a significant amount of work over many years, in the promotion, management and extension of the Heritage Coast. The extension area (including gateway areas) was agreed following widespread stakeholder engagement and a detailed landscape character assessment which clearly supported the extension. We therefore welcomed the Council’s decision on 9th April 2019, taken at a meeting of its full Council, to approve the extension of the Heritage Coast further north towards Whitehaven and to rename it ‘St Bees and Whitehaven Heritage Coast’. This decision followed a 6 week period of public consultation in which over 50 responses were received, and was announced in the press.</p> <p>We strongly advocate the inclusion of the approved defined extension area in the emerging Local Plan. Reference throughout should be to the extended “St Bees and Whitehaven Heritage Coast”, in the interests of protecting the undeveloped and special character of this important asset and its setting. The agreed extension area does not appear to be given any specific protection by any policy in the draft Plan. Given the policy presumptions of the draft Plan, we are concerned that this area and its setting are under threat of inappropriate development. The ‘St Bees and Whitehaven Heritage Coast’ should therefore be clearly defined and protected.</p> <p>The plan makes repeated references to a new ‘Lake District Coast brand’, including at para. 2.2. This approach appears to be competing with the existing and extended Heritage Coast – our view is that the Heritage Coast is a unique and important asset in its own right as the only area of high coastal cliff on the western coast between Wales and Scotland and that this should form a central and integral part of the wider approach rather than be downplayed in favour of the new ‘brand’. The Lake District Coast brand also appears to be something that Copeland are promoting in isolation whereas the Cumbrian coast stretches across several authorities and much of it has close connections/proximity to the LDNP (indeed, a stretch of coast lies within the LDNP), this does not reflect the spirit of the duty to cooperate on cross boundary matters.</p>	<ul style="list-style-type: none"> The Lake District coast branding is not at odds with the Heritage Coast and the council do not feel that they compete with one another. The Lake District Coast brand is a strapline used to promote tourism in the area. It recognises the fact that the area offers something different to the national park and the Heritage Coast is one of the assets that makes it unique. Additional paragraphs have been added to the plan (12.2.6 and 12.2.7) to highlight the importance of the Heritage Coast to tourism in Copeland.
179	<p>We support the Council’s acknowledgement in paragraph 1.1.7 of the importance of public open spaces to people’s health and wellbeing and the contribution they can make to creating and sustaining vibrant communities.</p>	<ul style="list-style-type: none"> Comment noted. Ongoing engagement will be continued as the Local Plan and Playing Pitch Strategy progresses.

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
	<p>The reference to the Spatial Portrait section appears to be out of order with the contents list.</p> <p>Local Plan Evidence Base Sport England acknowledges that the Council is working on its sport and leisure evidence base including Sports and Physical Activity Strategy including Playing Pitch Strategy, Indoor Facilities Study and Play Strategy and that these will be up to date by the time the Local Plan is submitted for examination. We welcome ongoing engagement with the Council on these elements of the Council's evidence base.</p>	
	<p>Vision for Copeland</p> <p>Sport England welcomes the revisions made to the vision to include references to enhancing community facilities and providing opportunities for leisure; along with access to high quality education opportunities and improving the health and quality of life of Copeland's residents.</p>	<ul style="list-style-type: none"> • Support welcomed.
	<p>Sport England welcomes the following objectives:</p> <p>Economic prosperity – Sport England supports an objective to achieve economic prosperity. In 2010, sport and sport-related activity contributed £20.3 billion to the English economy¹ placing sport in the top 15 industry sectors in England. Sport and sport related activity is estimated to support more than 400,000 full-time equivalent jobs, 2.3% of all jobs in England</p> <p>Town Centre Improvements – including references to improving the leisure offer. Town Centres also enable people to lead active lifestyles and their layout should contain appropriate infrastructure and well-designed streets and spaces. They should contribute to walkable communities, provide co-location of community facilities, connected walking and cycling routes, and links to a network of multi-functional open space. All are key components of sustainable communities.</p> <p>Educational Attainment – Sport England supports securing new facilities that meet the needs of the current and future population of all ages; and would want to see sport and leisure facilities at schools and education establishments opened up to the community with secure access agreed in a community use agreement.</p> <p>Strategic development – focussing major development in Whitehaven and additional development in Cleator Moor, Millom and Egremont in line with strategic infrastructure provision.</p> <p>Sustainable Communities – protecting existing community facilities (including green infrastructure) and supporting new, although this should also be influenced by where new or enhanced community facilities or infrastructure is needed. Open space and other community infrastructure (including wider green and blue infrastructure) are important settings for sport and physical activity.</p> <p>Sport England advocates the need for a strategic and proactive approach to the protection, enhancement and provision of open space and other community infrastructure. Sport England believes that the ten principles of active design should inspire and inform the layout of towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. We also consider that walkable communities, co-location</p>	<ul style="list-style-type: none"> • Support welcomed and comments noted. Additional text regarding Active Design has been added throughout the Local Plan.

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
	<p>of community facilities, connected walking and cycling routes, a network of multi-functional open space, appropriate infrastructure and well-designed streets and spaces are key components of sustainable communities.</p> <p>Physical and Mental Health – ensuring development contributes to improving physical and mental health, reducing inequalities. Sport England acknowledges the value of access to high quality sport, recreation and leisure facilities in fostering good physical and mental health. Regular participation in sport and physical activity can reduce the risk of many chronic health conditions including coronary heart disease, stroke, type 2 diabetes, cancer and obesity. The impact of physical inactivity is estimated to cost the UK £7.4 billion per year. Taking part in any sport and physical activity can boost mental health and self-esteem. It has been shown to be effective for reducing depression, anxiety, psychological distress and emotional disturbance.</p> <p>High Quality Design – support for achieving high standards of design; safe secure places; enhances the public realm and creates quality places. Sport England believes securing active design is an essential element of high-quality design. Modern-day life can make us inactive, and about a third of adults in England don't do the recommended amount of weekly exercise, but the design of where we live, and work can play a vital role in keeping us active. Sport England knows sport isn't for everyone but embracing a lifestyle change to be more active can have real benefits including improving physical health, increasing mental wellbeing and building stronger communities.</p> <p>High Quality Design – As part of our drive to create an active environment, Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Active Design is a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities.</p> <p>High Quality Design – That's why Sport England, in partnership with Public Health England, have produced the Active Design Guidance which works as a step-by-step guide to implementing an active environment. This guidance builds on the original objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the 10 principles of Active Design. To bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching Active Design Principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL.</p> <p>Climate Change Mitigation – Sport England welcomes this objective but it's a cross-cutting objective, and also about transport choices, a broader picture of sustainable design and sustainable communities with blue and green infrastructure at their heart.</p> <p>Protecting and Enhancing Biodiversity and Landscapes and Built Heritage, Sport England broadly support these objectives and acknowledge that they can deliver places and spaces for people to be active and lead healthy</p>	

Ref	Comment/ Point Made	Notes/ any changes made in Publication Draft
	<p>lifestyles.</p> <p>Transport Improvements - Sport England supports encouraging 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. Applying the active design principles to transport is important when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active travel the easy choice.</p>	
	<p>Sport England would welcome the Borough's sporting heritage (referenced in the Sports and leisure section) along with sports and leisure facilities and opportunities featuring in the Spatial Portrait.</p>	<ul style="list-style-type: none"> • Sporting heritage was listed as a strength in the spatial portrait. The table within the portrait has been deleted and replaced with "Strengths, challenges and opportunities" tables within each chapter. • Copeland's sporting heritage is referred to in the table at the start of the Health, Sports and Culture chapter (14.1) and also in paragraph 14.3.1.
	<p>10.1.5 Sport England would welcome references to Copeland's Sport and leisure facilities and playing fields in this section, along with their locations being marked on the map on Figures 3, 4 and 5.</p> <p>10.2.5 Sport England acknowledge that there is an uneven distribution of sport and leisure facilities in the Borough with the majority or larger facilities in the north. We welcome the references to sport and leisure infrastructure in the strengths, challenges and opportunities this section. Figure 6, 7 and 8 don't appear to contain all the sports and leisure facilities and an obvious omission is the Copeland Bowls and Sports Centre at Cleator Moor from Figure 6</p> <p>10.3 Copeland's Places, Sport England would welcome all the playing fields, sports and leisure facilities being referenced in this section and being marked on Figures 9, 10 and 11. Figures 12, 13 and 14 have an item on the key for secondary education but the point only features in Figure 14 for Millom</p>	<ul style="list-style-type: none"> • Given the large number of facilities it would be difficult to show all on a map within the Local Plan. In light of the comments, we have however shown playing pitches and courts on the settlement maps that form an appendix to the Local Plan. Indoor facilities are listed in the Built Facilities Study document.

Development Strategy

Ref	Comments	CBC Response
DS1PO (Publication Draft Policy DS1PU)		
178	Presumption in Favour of Sustainable Development. It is vital that the emerging Local Plan is prepared positively and that development needs are met during the plan period. The NPPF seeks that development proposals which accord with the development plan should be approved without delay, unless material considerations indicate otherwise and we note that as part of the draft policy, the supporting text confirms that it should be read alongside Paragraph 11 of the NPPF, which is a material consideration when making planning decisions. Based upon a 'Plan Positively' agenda, policies must not contain too many restrictive and unduly onerous conditions which may result in unviable and, ultimately, undeliverable development sites. At the core of the Local Plan is a presumption in favour of sustainable development. This means that planning applications will be approved where they accord with the Development Plan unless material considerations indicate otherwise. We support Policy DS1PO in principle, as it is considered to be in line with the overarching aim to contribute to the achievement of sustainable development as set out within the 2019 National Planning Policy Framework (NPPF). However, to make the Policy more consistent with national policy and guidance, we suggest that the policy wording should reflect the model wording as proposed by the Planning Inspectorate.	<ul style="list-style-type: none"> • Wording changes have been made to reflect Planning Inspectorate wording. • Additional text added to the policy regarding the use of conditions.
DS2PO (Publication Draft Policy DS3PU)		
1	Why haven't the hill/the green/Hallthwaites been clustered together	<ul style="list-style-type: none"> • This is because there are no safe, accessible pedestrian link between the three settlements so they do not meet the requirements of a cluster as set out in the Settlement Hierarchy and Development Strategy Paper and Updates.
3	Lamplugh is still not identified as a settlement regardless of its recent expansion I would like this explained if Copeland council are going to support the growth of the area the least it should acknowledge it - It sets out in the criteria of D2SPO that development would be permitted to support some of the local services, I feel that by including Lamplugh under the sustainable or rural villages you could help better support the school and village hall as these are key local services. Currently due to the high house prices in the area Lamplugh is becoming an increasingly aging population along with a lot of other rural settlements there is a real need for an injection of youth to support and sustain the communities.-Ennerdale Bridge has been identified as a sustainable village, what is it that makes this a more sustainable development. Looking at the special constraints of the of the topography of the area Why has summer grove been identified as a rural settlement it has no key services there at all (is this directly linked to the planning of a new high grange development)	<ul style="list-style-type: none"> • Lamplugh has been excluded from the settlement hierarchy due to its dispersed nature. It is therefore classed as being an open countryside location. This is explained in full in the Settlement Hierarchy and Development Strategy Paper and Updates.

Ref	Comments	CBC Response
9	<p>I have been through the draft and the appendices and I wish to raise a concern in the respect of the policy and whole concept of “sustainable villages”. In our view the concept is outdated and needs a major rethink. In particular both the internet and covid-19 have vastly increased the amount of home working (something I am doing right now from a remote farm house in Upper Swaledale) so to designate a village as unsustainable by outdated criteria has a number of potentially damaging effects. The first is the risk that it becomes a self-fulfilling prophecy and accelerates a decline in the village with an aging demographic. This in turn leads to fewer children of school age putting local primary schools at risk as well as other local services, shops and pubs. Another issue is that because these villages are effectively considered to be open country there are plenty of infill sites that would accommodate small scale development of a few housing units that are unable to be bought forward as they are contrary to policy. The loss of economic activity by not developing these sites is damaging to Copeland and the local economy.</p>	<ul style="list-style-type: none"> • The criteria used for scoring the sustainability of a settlement based on its services is common and standard practice. Whilst the availability of the internet has made it possible for more people to work and shop from home, the Local Plan is unable to control the availability of internet services. It can, and does, however include policies to protect physical services such as shops and community facilities etc. These facilities are also of value as they encourage social interaction and engagement. • The settlement hierarchy allows for an appropriate scale of development in more rural villages than at present and the council feels this strikes a balance between supporting rural services and communities and preventing the urbanisation and sprawl into the countryside.
	<p>It is noted that Gilgarran is not included within the settlement hierarchy of the above policy. It is of similar type and size of settlement within Copeland as The Hill, Nethertown and Kirkland, which are residential villages that are linked to, and in close proximity, to larger sustainable settlements (Millom, Egremont and Ennerdale Bridge respectively). On this basis, it should also similarly be included in the Other Rural Villages tier.</p>	<ul style="list-style-type: none"> • Gilgarran has been assessed using the same scoring based criteria as all other settlements. No services have been identified there and there are no safe pedestrian routes between the village and larger settlements, therefore it is classed as open countryside location. • Nethertown and The Hill have been moved into the open countryside category following the village services survey review.

Ref	Comments	CBC Response
		<ul style="list-style-type: none"> Further information regarding the above can be found in the Settlement Hierarchy and Development Strategy Paper and Updates.
73	<p>Settlement Hierarchy. There is a presumption that the majority of persons will travel by public transport. The south of the Borough is poorly served by public transport with residents employed in a variety of businesses with no viable public transport links and hence to seek to restrict development to settlements with rail access seems unreasonable. The thinking seems to be around the reduction in CO2 emissions from vehicles. Within the time lines of the plan it is likely that electric vehicles will become widely available.</p>	<ul style="list-style-type: none"> The NPPF states that significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, protecting air quality and public health. It is acknowledged that the south of the borough is poorly served by public transport; this is why the majority of development in that area has been directed to the larger settlements that have their own services.
80	<p>We are pleased to note that, on page 47, Calderbridge has been classified as a sustainable rural community where limited development would be supportable in order to sustain that community. The Parish Council are very supportive of this, our village needs to grow if we are to thrive and survive. We are concerned that Calderbridge does not figure in the appendix of maps for preferred developments. It is not clear to us what needs to happen to create a preferred development status for Calderbridge and we would like to work with you to achieve this status as soon as possible and well before production of the next plan.</p>	<ul style="list-style-type: none"> An addendum to the Local Plan Appendices document was produced during the Preferred Options consultation which shows the settlement boundaries of smaller settlements, including Calderbridge Calderbridge was defined in the Preferred Options Draft as a 'sustainable rural village' in the settlement hierarchy. However the Village Services Survey review has indicated that there are less services than when previously assessed. The village has therefore been moved into the Rural Villages category. Further information regarding this can be found in the Settlement Hierarchy

Ref	Comments	CBC Response
		and Development Strategy Paper and Updates.
13	I broadly support the approach taken in this paper it seems to follow NPPF guidance and in the case of Lamplugh strongly follows the logic applied by planning inspectors in a number of appeals. However, there does appear to be an error in the scoring for Lamplugh as set out in Appendix A page 11. The village scores 5 points overall but these points include 1 point for a convenience store. There is no provision of this kind in Lamplugh, the nearest provision is the Gather in Ennerdale Bridge. This has been pointed out several times during responses. It is true that in some years there is a small shop operating at the Inglenook Caravan Park, but this service is focussed on the park residents and is not marketed to the general public. The latest details for the Dockray Nook Caravan Park does not include any form of shop, and it should be noted that this site does not operate in the winter months. The Village Survey of 2019 is therefore not correct.	<ul style="list-style-type: none"> Settlement services were reviewed in June 2021 and the latest scores given to Lamplugh and other settlements is set out in the Settlement Hierarchy and Development Strategy Paper January 22. The document does not assign points for a convenience store but does award one point for an “other store” reflecting the fact that the service offered by the shop at the caravan park is limited.
144	<p>Alternate Proposal</p> <p>I would recommend all proposed housing developments are located near more than one public transport link. Whitehaven has 2 rail stations, there are multiple bus routes that go north, south or east. There are numerous supermarkets and having families in easy walking distance of shops could help regenerate the shopping centre. Also an amendment to your development incorporates the equivalent infrastructure to support this. There are brown field sites in Whitehaven, particularly near the harbour, however I note these are not being considered. These sites could be used for housing developments, or are these brown field sites being held in obedience for when the UK takes back control of its fishing industry and larger facilities are required? This would be sustainable job creation and commendable. And if this is being considered, why is it not in your local plan? If it is not being considered, why is it not being considered?</p>	<ul style="list-style-type: none"> There are a number of brownfield sites allocated for housing and employment within Whitehaven. There are also a number of brownfield Opportunity Areas which would be suitable for a variety of different uses. Housing allocations are listed in Policy H5PU, employment allocations in Policy E5PU and Opportunity Sites are shown in appendix C.
155	The settlement hierarchy approach set out in DS2PO is broadly supported and provides a robust basis for ensuring that new development is directed to sustainable locations in terms of services and facilities. It also ensures that the countryside is protected from inappropriate development which could adversely affect the setting of the Lake District WHS and St Bees and Whitehaven Heritage Coast.	<ul style="list-style-type: none"> Support welcomed.
168	Many of the rural areas within Copeland Borough will be supported by infrastructure which is proportionate to its rural location. Therefore, United Utilities wishes to highlight that disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. From our review of the proposed housing allocations, the two proposed development sites within Drigg for example, would add a significant number of additional dwellings in comparison to the settlement size. In considering potential additional locations for development as part of the Local Plan process, our preference is that it is more appropriate to distribute additional growth to settlements within the authority area where the growth would be more proportional to settlement size.	<ul style="list-style-type: none"> The number of allocations in Drigg has been reduced from two to one. CBC will continue to engage with UU on future development proposals.

Ref	Comments	CBC Response
174	<p>Settlement Tiers – We welcome the extra tier of settlements, our smaller areas need investment and their sustainability can only be a benefit to the larger areas.</p> <p>Thornhill & Cleator – Although we know these areas are outside of the Egremont Parish boundary they are closely connected to Egremont. People are often seen walking from Cleator and Thornhill into Egremont using the cycle ways and this linkage we feel needs to be better recognised within the plan.</p>	<ul style="list-style-type: none"> Comments noted.
178	<p>Policy DS2PO: Settlement Hierarchy The Borough contains four towns; Cleator Moor, Egremont, Millom (all Key Service Centres) and Whitehaven (the Principal Town) and a number of rural villages. We agree with the proposed tiers set out in the proposed Settlement Hierarchy and that decisions on the location and scale of development should be informed by Copeland's Settlement Hierarchy. We fully support the inclusion of a Settlement Hierarchy within the Local Plan, as this is a great way of indicating the best locations for future development (both for local residents, landowners and developers). The Settlement Hierarchy shows what types and levels of development are appropriate for settlements in each of the six 'tiers' set out in the hierarchy (Principal Town, Key Service Centres, Local Service Centres, Sustainable Rural Villages, Other Rural Villages and Open Countryside). The draft policy wording states that the amount of development (housing, retail and leisure, employment) apportioned to each tier of the hierarchy is identified within the relevant chapter within the plan and that delivery will be closely monitored against these figures. Whilst we agree with this proposal, it is vital that some flexibility is sought within the plan to ensure needs and demands are met across the Borough and that flexibility is sought with regard to the figures set out in the Plan.</p> <p>In terms of specific interest, our client is a major landowner in Egremont which is identified as a Key Service Centre located on a Primary A Road connecting it to Whitehaven; the Principal Town in the Borough. The Borough's towns are self-sufficient providing a wide range of services, including convenience and comparison stores, employment opportunities, schools and healthcare. They also act as service hubs for nearby villages. We therefore fully support future growth in Egremont and other Key Service Centres and support the inclusion of the Settlement Hierarchy as proposed in Draft Policy DS2PO.</p>	<ul style="list-style-type: none"> Support welcomed and comments noted.
110	<p>The proposed settlement hierarchy continues to focus the majority of new development during the plan period (2017 – 2035) to the four largest towns of the Borough – Whitehaven, Egremont, Cleator Moor and Millom. This reflects the scale of these existing settlements and the range of existing services and infrastructure that they provide.</p> <p>These elements of the hierarchy are established within the extant Core Strategy where it was found sound by the examination Inspector⁸ in September 2013 with the Inspector, in relation to the Spatial Strategy, concluding that the "principles of sustainable development are fully covered" (paragraph 22). It is highly unlikely that since that time there has been a significant change in circumstances which would materially alter the role or function of any specific settlement. Indeed the current evidence base⁹ continues to endorse this approach in focussing the majority of development to the four main towns within the Borough due to the enhanced sustainability of</p>	<ul style="list-style-type: none"> Comments noted.

Ref	Comments	CBC Response
	<p>these settlements, relating to their accessibility via a range of sustainable modes of transport and the level of services they offer.</p> <p>Story supports the continued identification of Whitehaven as the 'Principal Town', which reflects that it provides the greatest range of services and facilities, including employment and transport infrastructure. As such, Story agrees that Whitehaven should remain as the primary focus for new development in the Borough over the plan period.</p> <p>Similarly, continuing to identify 'Key Service Centres', particularly Cleator Moor, and 'Local Service Centres', such as Cleator, within the Settlement Hierarchy is supported by Story due to the key role these settlements have in providing the wide range of services and facilities for existing and future residents. Settlements such as these are very well-connected to Whitehaven, including in terms accessibility via sustainable modes of transport, and thus support its role as the Principal Town in the Borough. These settlements have an important role to play in the delivery of sustainable growth across the Borough.</p> <p>Story welcomes the introduction of the 'Sustainable Rural Village' tier to the settlement hierarchy. The NPPF is clear at paragraph 78 in its support of sustainable development in rural areas, where development will enhance or maintain the vitality of rural communities. The provision of the 'Sustainable Rural Village' tier recognises the opportunity for smaller rural settlements to accommodate modest levels of development proportionate to the services and facilities these provide.</p> <p>This tier supports development in smaller settlements with easy, safe access to main towns and / or connecting villages. Settlements like these provide locations for people working within key employment locations, such as Westlakes Science and Technology Park, with places to live, close to existing services and facilities and employment opportunities. Areas of development within rural areas also provide the opportunity to also support services in other nearby villages.</p> <p>As such, the inclusion of 'Sustainable Rural Villages' within the settlement hierarchy accords with the NPPF, as discussed above, and guidance in the National Planning Practice Guidance (PPG). These acknowledge that people living in rural areas can face particular challenges in terms of housing supply and affordability, and therefore the location of new housing in rural areas can be important for the broader sustainability of rural communities.</p>	
111, 112	<p>These elements of the hierarchy are established within the extant Core Strategy which was found sound by the examination Inspector in September 2013. In relation to the Spatial Strategy, the Inspector concluded that the "principles of sustainable development are fully covered" (paragraph 22). It is highly unlikely that since that time there has been a significant change in circumstances which would materially alter the role or function of any specific settlement. Indeed the current evidence base continues to support the approach of focussing the majority of development within the four main towns within the Borough due to the sustainability of these settlements, relating to accessibility via a range of sustainable modes of transport, and level of services they</p>	<ul style="list-style-type: none"> • The Council believes, as set out in the Settlement Hierarchy and Development Strategy Paper, that there is justification for a new approach to that set out in the Core Strategy. As a result of this a number of additional villages are

Ref	Comments	CBC Response
	<p>offer.</p> <p>We support the continued identification of Whitehaven as the ‘Principal Town’, which reflects that it provides the greatest range of services and facilities, including employment and transport infrastructure. As such, we agree that Whitehaven should remain as the primary focus for new development in the Borough over the plan period. Similarly, continuing to identify ‘Key Service Centres’ (KSC), particularly Egremont, and ‘Local Service Centres’ (LSC), such as Bigrigg, is supported by us due to the key role these settlements have in providing a wide range of services and facilities for existing and future residents and their sustainable locations. Settlements such as these are very well-connected to Whitehaven, including in terms of accessibility via sustainable modes of transport, and thus support its role as the Principal Town in the Borough. These settlements have an important role to play in the delivery of sustainable growth across the Borough.</p> <p>It is noted that Ennerdale Bridge is no longer identified as an LSC. The adopted Core Strategy currently identifies Ennerdale Bridge and Kirkland as a ‘cluster’ comprising a Local Centre (Policy ST2). However, footnote 16 within the Preferred Options Draft Local Plan relating to the proposed settlement hierarchy notes that Ennerdale Bridge and Kirkland are no longer identified as a ‘cluster’ due to poor pedestrian links between the two settlements. As such, they are now identified separately and as per the current evidence base⁸, which CBC explains is a key reason why Ennerdale Bridge is now considered as a Sustainable Rural Village.</p> <p>We question the justification for the change in approach when it is unclear how the situation with regards to pedestrian links between Ennerdale Bridge and Kirkland has changed since the examination and adoption of the Core Strategy, such that the two settlements are no longer considered as a ‘cluster’. In this regard, this part of the Settlement Hierarchy does not meet the test of soundness as there is insufficient evidence to justify why these two settlement are no longer identified as a ‘cluster’ and thus an LSC. We are of the view, based on the evidence provided, that the situation between the connectivity of Ennerdale Bridge and Kirkland remains unchanged since the adoption of the Core Strategy. Therefore, the two settlements should continue to be identified as a ‘cluster’ to which the level of services they provide and their connectivity to other settlements and employment locations means that they can accommodate the proportionate level of growth expected of an LSC.</p> <p>Notwithstanding the above comments, we support the introduction of the ‘Sustainable Rural Village’ tier to the settlement hierarchy. The NPPF is clear at paragraph 78 in its support of sustainable development in rural areas, where development will enhance or maintain the vitality of rural communities. The provision of the ‘Sustainable Rural Village’ tier recognises the opportunity for smaller rural settlement to accommodate modest levels of development proportionate to the services and facilities these provide. This tier supports development in smaller settlements with easy, safe access to main towns and / or connecting villages. Settlements like these provide locations for people working within key employment locations, such as Westlakes Science and Technology Park, with places to live, close to existing services and facilities and employment opportunities. Areas of development within rural areas also provides the opportunity to also support services in other nearby</p>	<p>included within the hierarchy than are included within the Core Strategy.</p> <ul style="list-style-type: none"> • Support for the settlement hierarchy tiers is welcomed. • Bigrigg is no longer being taken forward as a Local Service Centre – please see the Settlement Hierarchy and Development Strategy Paper 22 for more information. • In terms of Ennerdale Bridge and Kirkland, in order to be classed as a cluster settlements need to be connected by a safe pedestrian link less than a mile long. Given that the distance between the villages (at their closest parts) is over a mile long with no continuous pavement they do not meet this definition. Travel between the two is therefore likely to be reliant upon private vehicle.

Ref	Comments	CBC Response
	<p>villages.</p> <p>As such, the inclusion of ‘Sustainable Rural Villages’ and ‘Other Rural Villages’ within the settlement hierarchy, and recognition that these settlements could support a limited amount of new development to meet housing needs and maintain communities, accords with the NPPF, as discussed above, and guidance in the National Planning Practice Guidance (PPG) which acknowledges that people living in rural areas can face particular challenges in terms of housing supply and affordability and therefore the delivery of new housing in rural areas can be important for the broader sustainability of rural communities</p>	
122	<p>Gosforth Parish Councillors would like to express their disappointment that Gosforth does not appear to be included in any of the documents for the Copeland Local Plan Consultation. Whilst the majority of the parish of Gosforth is within the Lake District National Park, a significant amount is within the boundary of Copeland Borough Council which seems to have been overlooked. Councillors discussed the Copeland Local Plan at their October meeting and feel that there should be some reference to the LDNPA Plan, especially as Copeland Borough Council is the housing authority for the area. Gosforth Parish Council is broadly in agreement with many of the policies included in the preferred options but cannot comment on any of the boundary or settlement areas as none are suggested for Gosforth.</p>	<ul style="list-style-type: none"> Comments noted. Gosforth falls outside the Copeland Local Plan Area and is under the planning jurisdiction of the LDNPA. An additional paragraph has been added to the Local Plan (para 5.4.15) to highlight the importance of services within the National Park area that serve residents in the Copeland Local Plan area.
DS3PO (Publication Draft Policy DS4PU)		
1	<p>What about all the outlying houses in between those settlements?</p> <p>Will they be classed as being in the open countryside</p>	<ul style="list-style-type: none"> Additional text has been added to the policy table to clarify that remaining parts of the Copeland Local Plan Area, including smaller settlements or areas of development not specifically listed, are classed as open countryside for planning purposes.
74	<p>In our previous response to the Issues& Options consultation we advised: Any extensions to settlement boundaries should not result in additional adverse impacts upon designated nature conservation sites or undermine the landscape character, landscape designations and definitions (including Heritage Coast). This also applies to the possible St. Bees Heritage Coast extension area. We reiterate these comments here in this consultation.</p>	<ul style="list-style-type: none"> An amendment to this policy is not considered necessary as these issues are covered elsewhere in the Local Plan under other specific policies e.g.

Ref	Comments	CBC Response
		landscape protection policy, St Bees to Whitehaven Heritage Coast policy etc.
103	Regarding the settlement boundaries, it may be most appropriate to consider Ennerdale Bridge's settlement boundary as a strategic cross boundary issue through our Duty to Cooperate discussions. The area of Ennerdale Bridge in the Park does not have a settlement boundary so discussions regarding the most appropriate solution would be helpful in order to protect the setting of the National Park and also for community understanding of the planning framework.	<ul style="list-style-type: none"> Comments noted, the issue was discussed in a following Duty to Cooperate meeting.
155	<p>It is noted that the settlement boundary for Whitehaven includes the former Marchon site, which lies directly adjacent to the defined and approved St Bees and Whitehaven Heritage Coast extension area, and is clearly extremely sensitive in terms of its landscape setting.</p> <p>Given the recent developer interest shown in the fields adjacent to the Marchon site, and the lack of clarity in regard to the Council's five year housing supply, we are concerned that the policy wording, as drafted in the consultation document, would enable inappropriate housing development in this location. The National Trust is strongly opposed to any new development outside the boundaries of the former works.</p> <p>NPPF Policy is clear that within areas defined as Heritage Coast, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character (paragraph 173).</p> <p>Accordingly, new development within the setting of a defined Heritage Coast should be subject to a robust set of criteria to ensure that full consideration is given to the landscape and visual impacts of development. Consideration should also be given to maintaining and promoting access, recreation and tourism opportunities, in line with the Strategic Objectives and Development Principles set out in the consultation document.</p> <p>We recommend that Policy DS3PO is redrafted, to clarify that it is not applicable to the Marchon site.</p>	<ul style="list-style-type: none"> The Marchon site that is allocated for housing development under Policy H5PU excludes any part of the Heritage Coast. The Council can demonstrate a 5 year + supply of deliverable housing sites. Please see the Five-year Housing Land Supply document for further information. In light of comments received, the Council has identified the Heritage Coast extension within the Local Plan, including on the Key Diagram and Proposals Map. Additional/amended wording re. the St Bees Heritage Coast extension has also been added to the following paragraphs: 2.2.4, footnote 9, 12.2.6, 12.2.7 and section 15.13.9. There are also a number of new references to the importance of the heritage coast within the headline pages of the Plan. A new Heritage Coast policy has also been added. Any development on the Marchon site would have to accord with this policy and any other relevant policies such as the landscape policy. As such it is not necessary to amend this policy as suggested.

Ref	Comments	CBC Response
178	<p>Settlement Boundaries In addition to supporting the use of a Settlement Hierarchy, we also support the use of Settlement Boundaries to be drawn around settlements, but only if these limits are not onerously tight. We note that the preferred Settlement Boundaries are identified in Appendix A and on the Proposals Map. Our client owns land in and around Egremont and we fully support the settlement boundaries proposed for this Key Service Centre; including the settlement boundary changes proposed south of Grove Road, Egremont. We fully agree with the assertion that Settlement Boundaries are a well utilised planning tool for guiding and identifying limits to development for an individual settlements. Identifying settlement boundaries provides an element of certainty for developers and residents and ensures that development is plan-led in accordance with paragraph 15 of the NPPF. Boundaries are to be based on clearly delineated curtilage edges or landscape features (both natural and unnatural) such as hedgerows or roads. Such boundaries allows for appropriate development to take place on sites directly adjoining and well-connected to towns and Local Service Centres, where it accords with the Development Plan. Additionally, we also support the Council in identifying that there may be circumstances in which it is acceptable to build homes outside of the settlement boundaries, subject to certain criteria. This provides flexibility, as sites within the settlement boundaries may not always come forward as anticipated, whilst ensuring that isolated homes are avoided, in line with national planning policy and important landscapes and the character of settlements are protected. However, the current criteria set out in the draft policy regarding development outside the settlement boundaries could be construed as not being flexible enough to ensure that the Council's housing needs are met and to ensure that sustainable developments come forward. We therefore suggest that the policy wording is slightly amended to state: 'Where the proposal is for housing and;</p> <p>a) the site is well related to a settlement identified in the settlement hierarchy directly adjoins the settlement boundary of a town or local service centre; and...</p> <p>In conclusion, subject to the above amendment, it is considered that the draft policy is positively prepared and in line with national planning policy and guidance.</p>	<ul style="list-style-type: none"> Comments noted. Additional text has been added to criterion a to ensure the site is well related to the settlement as suggested.
192	<p>I fully support this policy, especially that development outside of agreed settlement boundaries will only be accepted where the proposal is for housing and the site directly adjoins the settlement boundary of a Town or Local Service Centre. I would not support any form of housing development outside the proposed Settlement Boundaries of Sustainable Rural Village locations or Other Rural Village locations. This is to avoid unacceptable intrusion into the open countryside and so that local residents and developers have clarity on potential future areas within the village envelope where changes may occur. This also ensures that the character of settlements can be protected.</p>	<ul style="list-style-type: none"> Support welcomed and comments noted. New housing development outside the settlement boundaries would only be acceptable in a limited number of cases. These are set out in Policy DS4PU.

Ref	Comments	CBC Response
254	Development beyond the settlement boundaries has the potential to have significant adverse impacts on landscape and settlement character potential to have significant adverse impact. Add additional bullet point to the policy: There are no adverse impacts on landscape or settlement character	<ul style="list-style-type: none"> Landscape and settlement character are dealt with under separate Local Plan policies including DS6PU (Design and Standards), DS7PU (landscaping) and N6PU (Landscape Protection) which apply to all developments. Amending the policy as suggested would lead to repetition.
32	<p>This policy generally supports development within the settlement boundaries, whilst generally looking to restrict development outside of settlement boundaries except in certain circumstances. For housing development to be accepted it has to directly adjoin the settlement boundary for a town or local service centre; and have safe pedestrian links to the settlement; and the Council need to be unable to demonstrate a five year supply or to have had 3 years of under-delivery of housing or be for a specific type of housing supported by Policies H14,15 or 17 (Rural Exceptions, Dwellings for Rural Workers and Replacement Dwellings).</p> <p>The HBF supports the Council in supporting development within settlement boundaries. The HBF also supports the Council in identifying that there may be circumstances in which it is acceptable to build homes outside of the settlement boundaries. However, the HBF is concerned that the current criteria provided are too limited and may not provide the flexibility the Council require to ensure that their housing needs are met and to ensure that sustainable developments come forward.</p> <p>The HBF would recommend that the policy is amended to state: ‘Where the proposal is for housing and; a) the site is well related to a settlement directly adjoins the settlement boundary of a town or local service centre; and b) the site is or can be physically connected to the existing settlement by safe pedestrian links; and c) the Council is unable to demonstrate a 5 year supply of deliverable housing sites; or There has been previous under-delivery of housing against the requirement for 3 years or more The proposal is for a specific type of housing supported by Policies H14, H15 or H17.’</p>	<ul style="list-style-type: none"> The phrase “well related to” has been added to criteria 1 as suggested.
DS4PO (Policy not taken forward into Publication Draft)		
74	With regards to the Former Marchon site Strategic Development Priority Project in Whitehaven we previously provided advice to Copeland on potential issues related to landscape impacts of development at this site. This advice should be taken into account in any Local Plan policy/allocation for this site. Natural England would also welcome clarification on how the Council wish to progress with the proposed Heritage Coast extension adjacent to this site.	<ul style="list-style-type: none"> The Policy has been deleted to avoid repetition. The Council is keen to work with statutory bodies to extend the Heritage Coast and further discussions with Natural England have taken place since the PO Draft was produced.

Ref	Comments	CBC Response
		<ul style="list-style-type: none"> • The Council has now identified the area for extension within the Local Plan (as shown on the Key Diagram, Proposals Map and Settlement Maps for Whitehaven and St Bees), has added a policy that relates specifically to the extended area and has included additional text relating to the Heritage Coast and proposed extension throughout the Plan. • The Marchon site that is allocated for housing does not stray into the proposed extension area and the Housing Allocations Profiles document (as well as relevant Local Plan policies) alert developers to the sensitive landscape surrounding the site. Developers would have to demonstrate accordance with the relevant policies as part of any future application.
82	<p>We understand the need to focus on Whitehaven and its environs as the administrative and main population centre of Copeland, but we believe that the part of the Borough south of Ravenglass merits more attention than it has so far received in the Plan. We would strongly argue that some ‘evening-up’ is urgently required. While full of optimistic and positive ideas, there is some concern that plans for implementation remains rather vague.</p>	<ul style="list-style-type: none"> • The Policy has now been deleted to avoid repetition. We have added a number of additional references to settlements within the south of the borough throughout the plan, including reference to Town Deal projects in Millom.
123	<p>As for the plan, I feel that it very northern area centralised, and can see how secondary towns such as Cleator and Egremont may see some benefits. As for Millom, I cant see how we will benefit at all. There seems to be no mention of improvements to roads, transport or communication links in our area. The housing strategy seems only to relate to the need for new homes and does not take into consideration the situation in Millom, where we have plenty of accomodation but much of it is sub standard. I would of liked to see in the plan more direct investment into the south of the brough, such as improvements to transport links through road improvements or even a bus service connecting Millom To the north and south, ie whitehaven and Barrow. Also some</p>	<ul style="list-style-type: none"> • The Policy has been deleted to avoid repetition. • We have added a number of additional references to settlements within the south of the borough throughout the plan, including reference to Town Deal projects in Millom.

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	investment into the refurbishment of substandard homes to upgrade them to be more energy efficient and so more affordable. I would hope you would take my comments on board and alter your plan as needed.	<ul style="list-style-type: none"> Additional wording relating to roads in the south of the borough has been included within connectivity chapter, including in Policy CO2PU. The affordable housing policy relates to all areas of the borough and includes mechanisms to bring empty homes back into use as affordable housing.
178	Strategic Development Priority Projects Whilst we support the strategic development priority projects listed in draft Policy DS4PO, in principle, such as “Development that improves the Borough’s residential offer in order to meet needs and aspirations, in particular, the development of large, key regeneration sites and Town Centre renewal schemes in Cleator Moor, Egremont, Millom and Whitehaven...” we are unsure as to what the policy text actually aims to achieve. Would this be better off as being an objective set out at the beginning of the Local Plan? Whilst aspirations for such development is considered positive, and shows positive strategic planning, it is important for the Local Plan to contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, in accordance with paragraph 16 of the 2019 NPPF. This policy appears to contain a brief overview of each priority projects and whilst the supporting text states that further information can be found in the relevant chapter, perhaps draft Policy DS4PO should refer to these chapters / policies in its text to avoid unambiguity or that such text would be better off as Local Plan objectives and only the relevant chapters refer to the specific development proposals?	<ul style="list-style-type: none"> Comments noted – The policy has been deleted and the projects that it referred to are now included in the Spatial Portrait section and throughout the Local Plan document where they remain relevant.
192	A new pool is considered a very good idea but to encourage more use and make this available to local Schools and swimming clubs this should be a 25m x6 lane pool as anything smaller does not enable swimmers to develop a range of good swimming strokes or style.	<ul style="list-style-type: none"> The Policy has now been deleted to avoid repetition. Comments noted however current evidence does not support a larger pool which is likely to be unviable.
212	Coastal Cycle Route. This must follow the coast and be a viable and superior alternative for cyclists to the A595. Building this and still having cyclists on the A595 from the North to Sellafield would be a monumental failure. Support. Whitehaven Eastern Relief Road. Not before time. Support. Rail line improvements. Any are welcomed but serious consideration needs given to double-tracking the remaining section between Whitehaven and Sellafield. This was unacceptable in the 20th Century, let alone the 3rd decade of the 21st.	<ul style="list-style-type: none"> The Policy has now been deleted to avoid repetition. The Council are developing proposals to improve cycle links through projects such as the Town Deal bids. A number of these are referred to within the Connectivity chapter. The provision of new dual carriageways between Whitehaven and Sellafield falls outside

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		the Council's remit and would be a decision for Highways England.
225	<p>Reference 13 - Strategic Development Priorities - The need for a relief road is unproven and should be suspended from the Local Plan, pending reevaluation of traffic volumes. It is understood that Copeland Borough Council (CBC) is seeking to increase development within the new growth corridor. Such efforts need to be demonstrably succeeding before infrastructure is expanded. Although the following comments only address the relief road, they are also applicable to housing developments. "Our population has been falling and aging with the percentage of over 65s increasing by 24% between 2006 and 2016." Reference 39, Housing Key Facts. Whilst CBC may wish to reverse this trend, the current need is to cater for the population as it is. With the covid pandemic, there is increased homeworking, which the Local Plan recognises as likely continue. Reference 21.8 Homeworking. CBC is supporting and even encouraging homeworking viz encouraging "touchdown points" (40.7.10), promoting an excellent work life balance (21.2.7) and recognising the need for new provisions for flexible homeworking (21.3.1).</p> <p>In summary, there is a declining working population, an increasing non-working population and reduced demand for commuting. The Local Plan should reassess the traffic volumes on the A595 through Whitehaven, once the covid crisis has subsided. CBC can then reconsider whether there is an immediate need for a relief road. Highways England has not included this relief road in the Road Investment Strategy 2 (2020-2025), suggesting that there is no immediate need for such a road. (13.1.15).</p>	<ul style="list-style-type: none"> • The Policy has now been deleted to avoid repetition. • The relief road continues to be an aspiration for the Council and it is hoped that it will be included in a future RIS document. • In order to support the economic developments proposed in the Borough the trend of population decline needs to be reversed. • The Council is required to carry out a review of the Local Plan no later than 5 years from its adoption. At this point the full impacts of the Covid 19 pandemic can be considered, alongside consideration of whether the Local Plan Strategy has been successful. As the pandemic is still ongoing, waiting to assess the impacts on highways post-Covid would lead to unnecessary delays to the Local Plan.
DS5PO (Policy not taken forward into Publication Draft)		
51	<p>As you will be aware the Copeland area been subject to past coal mining activity with has left a legacy including; 627 mine entries, recorded and unrecorded coal mine workings at shallow depth and extraction of coal by surface mining methods.</p> <p>It is noted that Policy DS5PO: Development Principles refers to addressing land contamination issues under the 'Creation and retention of quality places', in light of the coal mining legacy present it is considered that this point should be amended as follows: Address land contamination and land stability issues with appropriate remediation measures.</p>	<ul style="list-style-type: none"> • This Policy has now been deleted to avoid repetition. • Additional criteria re land contamination and stability has been added to design and development standards policy DS6PU.
	Mitigation of and adaption to climate change we welcome the inclusion of green infrastructure within this policy, recognising the importance of healthy ecosystems in social, economic and environmental sustainability. In addition, we recommend additional wording should recognise the need to minimise development in flood risk	<ul style="list-style-type: none"> • The policy has been deleted to avoid repetition – climate change and green

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	<p>areas. This should also be referred to in Policy CC1PO Reusing previously developed land - You should ensure that the promotion of developing brownfield sites is informed by data on their biodiversity value, so that sites of high value aren't prioritised for development. Biodiversity-rich brownfield sites should be recognised for their potential to deliver high quality Green Infrastructure, for people and wildlife. Information on the amenity and biodiversity value of brownfield sites should also be taken into account within the Green Infrastructure Policy. Protection, enhancement and restoration of the Borough's valued natural and cultural assets we welcome the ambition of the Local Plan to protect, enhance and restore natural and cultural assets. We consider this policy could be strengthened by identifying the need to secure a measurable biodiversity net gain as a development principle. Additionally, the Local Plan should recognise opportunities to deliver multifunctional green infrastructure, minimise air pollution on sensitive habitats, and support the development of a nature recovery network. Healthy Communities This should include the benefits of multi-functional Green Infrastructure.</p>	<p>infrastructure are dealt with specifically under policies DS2PU and N9PU.</p> <ul style="list-style-type: none"> • The re-use of previously developed land is now set out in policy DS2PU. Any biodiversity value on brownfield sites is protected under Policy N1PU (Conserving and Enhancing Biodiversity). • The requirement for biodiversity net gain is included within Policy N2PU. • New Policy N9PU (Green Infrastructure) encourages the creation of multi-functional green infrastructure. • Policy N2PU supports the development of a Local Nature Recovery Network.
103	<p>We would recommend that you strengthen reference to conserving and enhancing the natural beauty, and wildlife of the Borough including setting of the Lake District National Park by including words to this effect in the bullet points. This will help to support Government's ambitions for nature recovery. We consider that cultural and heritage assets are adequately covered by the bullet points.</p> <p>Protection, enhancement and restoration of the Borough's valued natural and cultural assets.</p> <p>Protect and enhance areas, sites, species and features of biodiversity or geodiversity value, important landscapes and the undeveloped coast including valued landscapes which form a setting to the Lake District National Park and areas of Heritage Coast.</p> <ul style="list-style-type: none"> • Conserve and enhance the Borough's cultural and heritage assets and their settings • Conserve and enhance the natural beauty and wildlife of the Borough, and setting of the National Park • Provide and enhance recreational opportunities for the Borough's residents and its visitors, protecting existing provision where possible and ensuring that future development meets appropriate standards in terms of quantity and quality • Protect the Borough's best and most versatile agricultural land from development • Support the reclamation and redevelopment or restoration of the Borough's vacant or derelict sites, whilst taking account of landscape, biodiversity and historic environment objectives • Minimise air, ground and water pollution, ensuring that development does not have a negative impact upon water quality (including waterbodies and bathing waters)" 	<ul style="list-style-type: none"> • This Policy has been deleted to avoid repetition. The issues that were raised within the suggested bullet points are dealt with under other specific policies within the Local Plan.
110	<p>We are supportive of draft Policy DS5PO and the aims to achieve sustainable development in the Borough. In order to achieve sustainable development, the NPPF outlines the requirement for strategic policies to set out an</p>	<ul style="list-style-type: none"> • This Policy has now been deleted to avoid repetition.

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	<p>overall strategy for the pattern, scale and quality of development. Importantly this includes making sufficient provision for development (including housing and commercial development), associated infrastructure (e.g. transport, telecommunications), community facilities and enhancing the built and natural environment (paragraph 20).</p> <p>Draft Policy DS5PO outlines four principles that all development should aspire to achieve, these are:</p> <ul style="list-style-type: none"> • Mitigation and adaption to Climate Change – including through making the most efficient use of land and locating development on sites which minimise the need to travel. • Protection, enhancement and restoration of the Borough’s valued natural and cultural assets – including through the provision and enhancement of recreational opportunities. • Creation of and retention of quality places – including through ensuring high quality of design and providing good levels of residential amenity and security. • Healthy Communities – such as through contributing to the creation of mixed communities and enhancing local pedestrian links. <p>The above principles are guidelines, rather than requirements, thereby providing greater flexibility for new development should such principles negatively impact on a scheme, including its viability.</p> <p>Story welcomes this flexibility and agree that where a scheme may be unable to meet any of the principles, the justification for this will be set out within associated application documents.</p>	
111,1 12	<p>We are supportive of draft Policy DS5PO and the aims to achieve sustainable development in the Borough. In order to achieve sustainable development, the NPPF outlines the requirement for strategic policies to set out an overall strategy for the pattern, scale and quality of development. Importantly this includes making sufficient provision for development (including housing and commercial development), associated infrastructure (e.g. transport, telecommunications), community facilities and enhancing the built and natural environment (paragraph 20). Draft Policy DS5PO outlines four principles that all development should aspire to achieve, these are:</p> <ul style="list-style-type: none"> • Mitigation and adaption to Climate Change – including through making the most efficient use of land and locating development on sites which minimise the need to travel. • Protection, enhancement and restoration of the Borough’s valued natural and cultural assets – including through the provision and enhancement of recreational opportunities. • Creation of and retention of quality places – including through ensuring high quality of design and providing good levels of residential amenity and security. • Healthy Communities – such as through contributing to the creation of mixed communities and enhancing local pedestrian links. <p>The above principles are guidelines, rather than requirements, thereby providing greater flexibility for new</p>	<ul style="list-style-type: none"> • This policy has now been deleted to avoid repetition.

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	<p>development should such principles negatively impact on a scheme, including its viability.</p> <p>We welcome this flexibility and agree that where a scheme may be unable to meet any of the principles, the justification for this will be set out within associated application documents.</p> <p>Furthermore, this flexible approach to Policy DS5PO aligns with the Government’s streamlined technical housing standards²⁴ following the Written Ministerial Statement in March 2015 which outlined a new approach for the setting of technical standards for new housing. This rationalised the previous differing standards into a simpler, streamlined system which aimed to reduce burdens and help bring forward much needed new homes. Thereby meaning that local policy is no longer able to require any additional local technical standards relating to the construction or performance of new dwellings.</p> <p>The NPPF (paragraph 150(b)) states explicitly that “any local requirements for the sustainability of its building should reflect the Government’s policy for national technical standards.” Therefore, Persimmon and Gleeson would advise caution in any proposed requirements in this respect to ensure the Local Plan remains compliant with the NPPF.</p>	
155	<p>The development principles set out in Policy DS5PO are supported.</p> <p>We particularly welcome reference to important landscapes and the undeveloped coast including valued landscapes which form a setting to the Lake District National Park and areas of Heritage Coast, and the need to protect and enhance them.</p> <p>These principles should be consistently applied throughout the consultation document, by giving full consideration to the landscape and visual impacts of new development.</p>	<ul style="list-style-type: none"> • This policy has now been deleted to avoid repetition. The Local Plan contains policies specific to landscape (N6PU), the undeveloped coast (N8PU and the Heritage Coast (N7PU).
178	<p>Development Principles Draft Policy DS5PO identifies a number of principles that all development should aspire to achieve. We support such principles especially as it is confirmed that the principles are guidelines rather than requirements, acknowledging that there may be impacts upon viability, however consideration will be given to relevant principles when determining the sustainability of a proposal. As long as planning applications will be assessed on their individual merits, taking into account viability, we support the inclusion of these development principle aspirations to aim to deliver sustainable development in the Borough and meet Local Plan objectives. It is also welcomed that the Council will produce a Supplementary Planning Document relating to design which to support this Policy to provide greater clarity on this matter.</p>	<ul style="list-style-type: none"> • This policy has been deleted to avoid repetition. Support for the production of an SPD is welcomed.
179	<p>We broadly supports achieving sustainable development where it meets Local Plan objectives. Comments on each section of the policy as follows:</p> <p>Mitigation of and adaption to climate change 3rd bullet protect, after protect and enhance it should add “existing”. To make it clear that the policy applies to both existing and new green infrastructure.</p>	<ul style="list-style-type: none"> • This policy has now been deleted to avoid repetition. • Reference added to active design is included in the overarching design policy

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	<p>Mitigation of and adaption to climate change 6th bullet, located on sites, should include references to all forms of active travel including on cycles.</p> <p>Protection, enhancement and restoration of the Borough's valued natural and cultural assets 2nd bullet point should include mitigation for loss of facilities in accordance with paragraph 97 of the NPPF. Sport England advises rewording the sentence in this policy to comply with National Policy and Sport England's Playing Fields Policy The Government is clear that existing sport and recreational provision should be protected unless one of three specific circumstances are met. This protection is afforded to all provision irrespective of whether it is in public, private or educational ownership and regardless of the nature and level of use. It also relates to ancillary facilities including clubhouses, changing rooms and parking facilities. In relation to the first circumstance set out in paragraph 97 of the NPPF, it should be noted that a lack of use of sport and recreational provision should not be taken as necessarily indicating an absence of need in an area.</p> <p>The policy should also ensure it is proactive in ensuring that new development will not prejudice the use or place unreasonable restrictions on the use of existing sport and physical activity provision; it should also be clear that where existing sport and physical activity provision may give rise to a statutory nuisance in light of new development it is for the applicant of the new development to secure appropriate, deliverable and enforceable mitigation in accordance with paragraph 182 of the NPPF. It also needs to consider the need to protect existing sport and physical activity provision, and maintain adequate safety margins, when assessing the suitability of new land allocations.</p> <p>The creation and retention of quality places should also be healthy places. Again, we advocate bringing the principles of Active Design into the Local Plan.</p> <p>Active Design, provides a set of principles for creating the right conditions within existing and proposed development for individuals to be able to lead active and healthy lifestyles. It focuses on those ingredients of cities, towns and villages that offer individuals the opportunity to be active. The planning system as a whole, including individual development proposals, has a key role to play in creating such opportunities. Planning applications will therefore be assessed against how they embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. The Local Planning Authority will use the Active Design Principles to aid this assessment.</p> <p>Where Design and Access Statements are required to support an application, they should explain how the design of the proposal embraces this role and reflects the Active Design Principles. Public Health leads for the local area should be encouraged to work with the planning department to engage at pre-application stage with applicants as they will be consulted on all relevant applications. The Local Planning Authority may use planning conditions and/or planning obligations where necessary to address issues where developments could, but do not, embrace this role and do not adhere to the Active Design Principles.</p> <p>Healthy Communities</p>	<p>(DS6PU) along with additional supporting text in paragraphs 6.4.3 and 6.4.4.</p> <ul style="list-style-type: none"> • A new planning policy has been included along with supporting text that relates to prejudicial uses (SC4PU). • A new planning policy and supporting text has been added relating to health and well-being (SC1PU)

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	<p>4th bullet point, retain and enhance valuable community facilities should also support opening up educational facilities for community use and the securing of such use through Community Use Agreements.</p> <p>6th bullet point enhancing local pedestrian links should also include other active travel modes including cycling.</p> <p>15.1.10 (Ten Year Sports and Physical Activity Strategy 2020) and 15.2 (Developer Contributions)</p> <p>Developer contributions towards new and improved indoor sports and recreation facilities can be informed through use of the Sport England planning tools. Sport England advocate use of its Sports Facility Calculator (SFC) that can estimate help to estimate the amount of demand for key community sports facilities that is created by a given population. The SFC covers Swimming pools, Sports halls, Artificial Grass Pitches (AGPs) and Indoor bowls centres. The SFC helps with quantifying the demand side of the facility provision equation. It helps to answer questions such as, "How much additional demand for swimming will the population of a new development area generate, and what would the cost be to meet this new demand at today's values?". Sport England's Playing Pitch Calculator can also be used to estimate demand that may be generated for the use of playing pitches by a new population. Sport England also produces a suite of guidance documents on the design and cost of sports facilities that may be helpful to you. The cost guidance is updated quarterly. Sport England would be happy to help Council Officers by talking through or demonstrating the guidance that is available.</p>	
256	<p>We would prefer the Policy sub title concerning natural and cultural assets to be retitled as per our comments at 14.1.5. Suggest deletion of restoration as not always an appropriate solution to managing our historic environment. Amend sub title concerning natural and cultural assets to be read Protection, and enhancement and restoration of the Borough's valued natural, built and historic and cultural assets environment</p>	<ul style="list-style-type: none"> This Policy has now been deleted to avoid repetition.
DS6PO (Publication Draft Policy DS5PU)		
74	<p>We recommend an additional point in this policy to identify that Planning Obligations may be required to secure biodiversity net gain, compensatory habitats and green infrastructure.</p>	<ul style="list-style-type: none"> Additional text added to policy as suggested
110,1 11,11 2	<p>Draft Policy DS6PO outlines the planning obligations that CBC may request of new development where it is reasonable, necessary and directly related to the development. It is noted that the list is not exhaustive and is categorised relating to physical infrastructure (including digital connectivity, cycle parking), social infrastructure (including affordable housing, education facilities) and green infrastructure (including public open space and tree planting). This also includes the future management and maintenance of particular facilities and the future management and monitoring of biodiversity net gain for a period of 30 years²⁶. However, the priority for infrastructure will be dependent on the location of development. One type of infrastructure should not be prioritised until an assessment has been undertaken to identify the infrastructure for which there is the most pressing need in a certain location, and the most appropriate location for such infrastructure. Such need should be assessed by the relevant delivery partners, and may include the developer, CBC and the County Council, and the advice of a specialist should be obtained where appropriate.</p>	<ul style="list-style-type: none"> The policy lists infrastructure which may be required, this is not set out in any order of priority as this will depend upon the exact development proposal. The evidence documents relating to infrastructure are listed in the Publication Draft (see Table 3 and section 6.2). Site specific constraints on housing allocations, that may need to be addressed through infrastructure improvements, are also listed in the Housing Allocations Profiles document.

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	<p>It is considered that plan-making process provides the most appropriate mechanism for such an assessment. The Local Plan's supporting evidence base should assess the need for differing types of infrastructure, the preferred location within the Borough and the most appropriate method of delivery.</p> <p>Therefore, rather than listing types of infrastructure for which there is a priority, the Local Plan should identify specific infrastructure projects for which there is need and identify specific requirements, in terms of location and method of delivery, for such infrastructure. The draft policy confirms that where the provision of such planning obligations would impact the viability of a scheme, a site specific viability assessment must be submitted to and agreed by the Council. This is in line with paragraph 57 of the NPPF and the PPG27 and provides an opportunity to reconsider viability on a site-by-site basis where particular circumstances may merit a review of policy expectations.</p> <p>We are generally supportive of the categories outlined in the draft policy and welcome the opportunity to provide a site specific viability assessment, where necessary. However, in relation to the requirement to manage and monitor biodiversity net gain for 30 years, and the associated draft policy N2PO (Biodiversity Net Gain), We consider that this does not accord with national planning policy. The Environment Bill is still in draft form and therefore CBC cannot rely upon its content in formulating draft policy. In this regard, it is advised that this part of draft policy DS6PO and draft policy N2PO are revised to reflect the provisions of the NPPF, rather than the emerging Environment Bill. The NPPF confirms at paragraph 170(d) that planning policies should minimise impacts on and provide net gains for biodiversity; however, does not include requirements at this stage in terms of monitoring as outlined in the draft policies. In their current form, these policies will not meet the test of soundness as they are not consistent with national policy.</p>	<ul style="list-style-type: none"> The requirement for monitoring and management of areas of biodiversity net gain is set out in the Environment Act.
152	<p>Comments relate to education provision: access to, priority of allocations and evidence supporting acceptable secondary education provision across the 15 year plan period.</p> <p>The Copeland Local Plan 2017-2035 Preferred Options Consultation offers no confidence regarding fair access to secondary education for rural communities. We consider that the current process of allocating rural children with school places does not adequately take into account the needs of Copeland's rural communities, including Eskdale, leaving our children being socially excluded due to their geography in the Borough. Rejections for recent applications submitted for places at West Lakes Academy for pupils living in the Eskdale, Gosforth and Seascale area are due to secondary school capacity issues. The recent figures for Eskdale, Gosforth and Seascale are below:</p> <ul style="list-style-type: none"> Eskdale 5 pupils applied; 2 accepted; 3 rejected (60%) Gosforth 12 pupils applied; 5 accepted. 7 rejected (58.3%) Seascale 21 pupils applied; 5 accepted; 16 rejected (76.2%) <p>While we recognise that Cumbria County Council are the leading education authority, we also recognise that Local Plan growth will generate a need for the provision of additional school places. We are therefore using the Copeland Local Plan 2017-2035 Preferred Options consultation as an opportunity to formally register our</p>	<ul style="list-style-type: none"> The provision and need for new or extended education facilities has been reviewed through discussion with the County Council and the findings will be included in the Infrastructure Delivery Plan which supports the Publication Draft. The IDP will also identify how any gaps in provision could be filled.

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	<p>concerns. Given the nature of the housing target across the 15 year plan period (between 140 and 200 dwellings a year / 2520 – 3600 dwellings across the 15 year plan period), the Preferred Options consultation document offers no confidence around a) if or how the provision of additional school spaces will be secured and b) assurance that children in rural areas will no longer be marginalised because of their geographical location in the Borough.</p> <p>The only light touch reference to securing education provision across the plan period is made under Chapter 15 Development Standards and proposed policy DS6PO: Planning Obligations which, we consider is open to interpretation and only strengthens our concerns for the wellbeing of children in Copeland’s rural communities in terms of access to the nearest local secondary school. Chapter 15 on Development Standards states that an Infrastructure Delivery Plan will identify the current level of infrastructure provision across Copeland and the level of infrastructure required to support Copeland’s growth. It states that where growth exceeds capacity the additional infrastructure required will be identified, with a broad estimated cost, funding sources and details of who is responsible for delivery.</p> <p>Proposed policy DS6PO Planning Obligations states that planning obligations will secure the enhancement of existing or provision of new infrastructure (including education facilities) and that the Infrastructure Delivery Plan will be used to support these discussions. We are aware that Copeland Borough Council is in the process of writing an Infrastructure Delivery Plan which is being approached in two stages rather than the usual approach of publishing a single document. This Plan intends to provide detail of the infrastructure that is necessary to enable growth to occur. We consider that the Plan in its entirety should be used to support this Preferred Options consultation. Instead, the Infrastructure Delivery Plan is at Stage 1 (Evidence and Capacity) of its development and does not offer detail of those specific infrastructure requirements which will be necessary to support Local Plan growth. What is concerning is that Stage 1 ((Executive Summary) identifies areas of infrastructure that are already at capacity or are likely to be at capacity over the next 15 years. Education provision does not appear on that list: “This Stage 1 report identifies areas of infrastructure which is currently at capacity, or is expected to be at capacity over the next 15 years, even without any Local Plan growth.</p> <p>Key considerations for infrastructure provision include:</p> <ul style="list-style-type: none"> a. a potential new relief road around Whitehaven; b. increased demand on the electricity network due to increased demand for low carbon technology; c. an increased demand for the number of electric vehicle charging points; d. improvements to the drainage system in Millom; e. an ageing population increasing the demand for GP surgery services and Extra Care Housing; f. need for investment in the current indoor sports facilities due to the age of current facilities and an increased demand for gymnastics facilities, swimming pools and indoor bowls.” Yet, the data available within the Stage 1 plan states that West Lakes Academy in Egremont was oversubscribed in January 2020 (1029 pupils against a PAN capacity of 900) and that development in this area is likely to result in the increase of secondary school 	

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	<p>aged children living within the catchment of the school and may need to address the provision of secondary school education.</p> <p>We therefore would like to register the following Parish Council concerns:</p> <ul style="list-style-type: none"> • Education provision (specifically secondary) has not been recognised under the Infrastructure Delivery Plan's 'key considerations for infrastructure provision' for Copeland. As a result, this evidence is not adequately addressed within the Local Plan Preferred Options consultation document; • The consultation document offers no confidence around if or how the provision of additional school spaces will be secured; • The consultation document offers no assurance that children in rural areas will no longer be marginalised because of their geographical location in the Borough. This is also likely to prevent people choosing to invest in rural communities where access to schools is challenging; • Once Duty to Cooperate evidence becomes available, we would be interested to view the detail of how the District and County council are working with one another to discuss and agree education infrastructure over the 15 year plan period, particularly as Copeland is already experiencing capacity issues. 	
173	<p>Sellafield Ltd wishes to note that some of the requirements set out in this policy may not be possible nor appropriate for developments on the Sellafield site and we request that this is acknowledged within the Local Plan. "Address land contamination with appropriate remediation measures" – With respect to contaminated land, there may be a need to develop areas of the site more than once in order to deliver our mission and before the end state is reached. Therefore, we would like to request that this is appropriately reflected in the 'Supporting the Sellafield Mission' development policy (CC7PO) in the Nuclear Energy chapter and elsewhere in the Plan if appropriate (Policy DS5PO). With regards to flooding, the Sellafield site poses no increase to the risk of flooding elsewhere. Also, the use of SUDS or ponds on the Sellafield site is not appropriate as this could attract wildlife onto the nuclear site and in the case of SUDS, increase the risk of mobilising contamination.</p>	<ul style="list-style-type: none"> • Comments noted
174	<p>The Council has no control over the process so should not be reliant on something that it can't control. The fact that Egremont was not submitted towards the High Street fund alongside Cleator Moor and Millom is a disgrace and one that we can't understand, even though numerous Councillors have requested an explanation. In light of this we would expect Egremont to be given support by Copeland Borough Council in its want to improve and become a sustainable vibrant town. There is more need for children and young people spaces, Egremont suffers from having very few but the Council needs to clearly identify sites where these spaces can be created and use Section 106 agreements to aid their delivery. Housing allocations are extremely important to the sustainability of Egremont and we believe those proposed for Egremont are neither ambitious nor varied enough. The three sites are all above 100 houses. This is positive as it should ensure that infrastructure contributions through an s106 can be achieved. Has an assessment been made of the viability of these sites? Very little section 106 contributions have been secured by Copeland in recent history there needs to be an understanding what money can be secured from these site to improve Egremont's infrastructure.</p>	<ul style="list-style-type: none"> • Comments noted. The Local Plan identifies a number of allocations in Egremont from which s106 monies may be sought.

Ref	Comments	CBC Response
178	<p>Planning Obligations Draft Policy DS6PO sets out contributions for the enhancement of existing or provision of new physical, green or social infrastructure, facilities and services, which will be in addition to any infrastructure requirements set out within the individual site allocation policies.</p> <p>A requirement of the NPPF is for Local Plans to set out the contributions expected from development, as this will give developers some certainty on infrastructure requirements and the viability of a site at the earliest stage. Paragraph 34 of the NPPF establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. We fully support the inclusion of text which states that planning obligations will only be sought where it is reasonable, necessary and directly related to the development (until such time an alternative method is introduced). This is in line with paragraph 56 of the NPPF. Where new public green space is required it is expected that land management solutions will be arranged by the developer and third party and agreed through a Section 106 legal agreement. Whilst this is supported in principle, we do have some concerns regarding the draft policy as it currently stands. In terms of criteria 1c) "Future maintenance and/or monitoring of other facilities delivered as a result of development for a period of 15 years or as agreed/identified in a specific Development Plan policy" and criteria 1d) "Future management and monitoring of biodiversity net gain will be required for a period of 30 years", it will be vital that such timescales are backed up by evidence and do not lead to viability concerns regarding the overall development proposal at the time of granting consent. We also note that the Council intends to produce a separate Developer Contributions and Planning Obligations Supplementary Planning Document (SPD) and the date of publication is yet to be confirmed. The SPD will set out the Council's approach to planning obligations and the types of contribution that the Council may seek to secure, from new development. This document should lead to clear guidance for all stakeholders and we welcome the opportunity to comment on this matter once more information is available. Additionally, we note that the decision on whether to progress a Community Infrastructure Levy (CIL) will be published prior to the publication stage of the Local Plan. It is important that this decision is made prior to the publication draft as this could have impact on other aspects or policies of the local plan in terms of viability associated with the proposed strategy and proposed development allocations etc. We therefore would like to reserve the right to comment on this matter further once more information is available.</p>	<ul style="list-style-type: none"> • The Policies within the Local Plan have been subject to viability assessment. The Stage 2 Viability Assessment will be published alongside the Publication Draft of the Local Plan. • The requirement for 30 years of monitoring/management of biodiversity net gain sites has been taken from the Environment Act. • The Council has no current intentions to introduce CIL and will engage with the development industry on the production of an Obligations SPD in due course.
DS7PO (Publication Draft Policy DS6PU)		
74	Local Landscape Character should be included with reference to Copeland Settlement Landscape Character Assessment and Policy DS10PO.	<ul style="list-style-type: none"> • Additional wording added to policy criterion b (previously criterion a). The Settlement Landscape Character Assessment is discussed elsewhere within the Plan (particularly Section 6.5)

Ref	Comments	CBC Response
110,1 11,11 2	<p>We are supportive of Policy DS7PO which outlines the design standards expected of new developments, including:</p> <ul style="list-style-type: none"> • Creating and enhancing local distinctive places through taking account of local context; • Contributing towards good health and well-being by incorporating open spaces and layouts that encourage walking and cycling; and • Ensuring an effective use of land through building at an appropriate density. <p>Paragraph 124 of the NPPF outlines that “good design is a key aspect of sustainable development” and that “being clear about design expectations, and how these will be tested, is essential for achieving this”. It is noted that CBC intend to produce a Design Standards SPD that will expand upon policies within the local plan and provide more detailed guidance.</p> <p>We welcome the production of the SPD which will ensure compliance with paragraph 124 and 125 of the NPPF; however, evidence should be made available that informs or supports local plan policies prior to the publication of the local plan to ensure that the expectations of CBC are clear and that the local plan policy is sufficiently supported, as per paragraph 31 of the NPPF.</p> <p>Paragraph 16(d) of the NPPF states that plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to the development proposals”. Therefore, in order to ensure that policy DS7PO is compliant with the provisions of the NPPF and that interested parties can be clear on the expectations of CBC, further clarity / evidence on the SPD to support this policy should be provided at the earliest opportunity ahead of the publication of the new local plan.</p>	<ul style="list-style-type: none"> • The criteria within the policy are not considered to be onerous or ambiguous and are based on standard practice. Evidence would be required if the Council were introducing factors such as specific space standards but as this is not the case, the fact that the Council does not have a specific Design SPD at this stage should not prevent the Plan from being taken forward. • There will be an element of public consultation as the SPD is being produced therefore the development industry will be able to give their views on specific requirements at that stage.
173	Design is led by compliance with ONR and EA standards and there are likely to be occasions when Sellafield Ltd proposals do not meet everything on the list in Policy DS7PO. Therefore, we would suggest that this should be reflected in the revised Sellafield policy CC7PO to enable mission delivery.	<ul style="list-style-type: none"> • Comments noted.
179	c) and d) also need to include the provision of links to existing walking and cycling routes.	<ul style="list-style-type: none"> • Criteria amended and numbering altered. Additional wording added to criterion e.
192	Fully support these proposed policies. It needs to be made clear to all developers that Planning Application submissions that fail to demonstrate that these policies have been met will be rejected, especially where consultations with planners, local bodies or residents have not been held ahead of the formal submission of an application. This will then ensure that planners, local bodies and residents will have been consulted in order to assist with the proposed Design Standards.	<ul style="list-style-type: none"> • Support welcomed. Whilst the Council can encourage pre-application discussions, refusing applications where this had not taken place would be contrary to the NPPF. The importance of pre-application advice is referred to in paragraphs 5.2.4 and 13.9.5.
254	To provide wording which is consistent with the NPPF, paragraph 127 states at criteria c that planning policies and decisions should ensure that developments “are sympathetic to local character and history, including the	<ul style="list-style-type: none"> • Wording amended as suggested.

Ref	Comments	CBC Response
	surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);” A slight amendment to this policy at criteria a) is therefore suggested. Amend bullet point c, to read “Create and enhance locally distinctive places, taking account of the local context in terms of which are sympathetic to the surrounding context of the built, historic and natural environment”	
DS8PO (Publication Draft Policy DS8PU)		
45	Para b) should be revised slightly to include mention of Midgey Gill as follows: “Ensuring that developments on important regeneration sites in Whitehaven Town Centre, Harbourside and the Midgey Gill and Pow Beck Valleys are designed to address the existing levels of flood risk without increasing flood risk elsewhere.” Suggested new para: g) Taking into account the predictions of anticipated climate change impacts on peak river flow, peak rainfall sea level rise and offshore wind speed and extreme wave height, over the lifetime of the development	<ul style="list-style-type: none"> • Policy amended to relate to all opportunity sites, specific mention to town centre, harbour side, Midgey Gill and Pow Beck valleys added to the supporting text. • No change made re suggested additional criteria -such things are considered through the SFRA.
74	Plans should positively contribute to reducing flood risk by working with natural processes and link with Green Infrastructure policies, and SUDs provision below. For more information, see PPG on Flood Risk and Water Supply, Waste Water and Water Quality.	<ul style="list-style-type: none"> • Section on nature-based solutions added (6.6.8)
173	In relation to flooding, the Sellafield site poses no increase to the risk of flooding elsewhere. Also, the use of SUDs or ponds on the Sellafield site is not appropriate as this could attract wildlife onto the nuclear site and also increase the risk of mobilising contamination [DS8PO(e) and DS9PO]. Therefore, we would propose that this should be reflected in the revised Sellafield policy CC7PO.	<ul style="list-style-type: none"> • Comments noted.
178	Reducing Flood Risk As set out at paragraph 156 of the NPPF, “Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.”. Furthermore, at paragraph 157 “All plans should apply a sequential, risk-based approach to the location of Development...”. We note that the Council’s Draft Strategic Flood Risk Assessment, produced in May 2018, identifies localised flooding issues in the South of Copeland, North Whitehaven and Cleator Moor. These areas are particularly susceptible to flash flood events. As such, it is considered that the allocations comply with the requirements of the NPPF as when identifying sites for allocation, consideration was apparently given to flood risk at the earliest stage and sites were excluded where more than 50% of the site was in Flood Risk Zone 2 or 3. We therefore support draft Policy DS8PO which seeks to allocate new build development on sites located outside areas at risk of flooding where possible and only permits development in areas at risk of flooding where applicants have carried out the flood risk sequential and exception test to the satisfaction of the	<ul style="list-style-type: none"> • Comments noted.

Ref	Comments	CBC Response
	Council and appropriate mitigation is provided. The aims of this policy also ties in with draft Policy CC1PO: Reducing the impacts of development on climate change where developers are encouraged to steer new development away from areas at highest risk of flooding to reduce the impact of development on climate change. This again ties in with the policies and guidance set out in the NPPF.	
DS9PO (Publication Draft Policy DS9PU)		
45	Para. 16.3.1 should be revised slightly to include mention that there are some development sites where SUDS schemes are not appropriate. SUDs on contaminated Brownfield sites that incorporate any form of soakaway may pose a risk to land and groundwater quality through the movement of soluble contamination. Development may be opposed if there is a likelihood of causing or exacerbating pollution or derogation of water quality.	<ul style="list-style-type: none"> Additional paragraph added to supporting text (6.6.10)
173	In relation to flooding, the Sellafield site poses no increase to the risk of flooding elsewhere. Also, the use of SUDS or ponds on the Sellafield site is not appropriate as this could attract wildlife onto the nuclear site and also increase the risk of mobilising contamination [DS8PO(e) and DS9PO]. Therefore, we would propose that this should be reflected in the revised Sellafield policy CC7PO.	<ul style="list-style-type: none"> Comments noted.
192	Fully support policy. Developers need to put Sustainable Drainage at the forefront of any development proposal and not design a layout to maximise the size and scale of a development and then try to make a Sustainable Drainage system work around this. Drainage systems should be well designed and include detailed explanations and calculations including details of the responsibilities for the ongoing maintenance provision of the Sustainable Drainage system.	<ul style="list-style-type: none"> Support welcomed.
168	<p>Large Sites and Sites in Multiple Ownership</p> <p>United Utilities wishes to highlight that it has concerns regarding any large allocations that are in multiple ownership. The experience of United Utilities is that where allocations are large and in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. This can lead to issues between interconnecting infrastructure between phases of development. We would urge the Council to use their position to influence a strategy which seeks to secure a coordinated approach to infrastructure alongside the delivery of development for future Local Plan allocations. We would encourage a pro-active approach to sustainable drainage to try and ensure communication between phases so there is sufficient capacity to serve the entire allocation area and not just one phase. Any drainage in early phases of the development should have regard to future interconnecting development phases. Planning applications for developments on allocated sites within the Local Plan will then be expected to demonstrate how the drainage proposal for that particular development site relates to the holistic drainage strategy as part of the wider development.</p>	<ul style="list-style-type: none"> Comments noted. The majority of allocated sites are within single ownership. Owners were contacted in 2021 to confirm site availability.
DS10PO (Publication Draft Policy DS7PU)		

Ref	Comments	CBC Response
111,1 12	We consider that this policy as currently drafted is unclear. Whilst it is a general 'landscaping' policy, the wording relates almost wholly to 'soft landscaping' with the last sentence referring to surfacing for driveways without having previously acknowledged the use of 'hard landscaping' within developments. It is suggested that the policy is revised to refer to both hard and soft landscaping in a more balanced way to reflect the value both types of landscaping can bring to developments.	<ul style="list-style-type: none"> Policy title amended and additional wording added to policy and supporting text.
168	We are pleased to see that Policy DS10PO: 'Landscaping' requires that consideration is given to the role landscaping can play in reducing surface water discharge, for example through the planting of trees and the use of permeable surfacing for driveways.	<ul style="list-style-type: none"> Comments noted.
173	The Sellafield site is a heavy industrial site with limited amenity space and we do not wish to encourage wildlife or planting on the site. Also, given the constraints with respect to spare land on the site which we need for future developments, it would not be appropriate for high-quality landscape schemes to be required for our major planning applications. Therefore, we would like to propose that this is reflected in the revised Sellafield policy CC7PO so that the clean-up mission can be delivered.	<ul style="list-style-type: none"> Comments noted.
192	In addition to what is proposed developments need to be sensible when considering landscaping in conjunction with a Sustainable Drainage System, where roots, leaves and maintenance all need to be given full consideration as to how these could impact adversely on the SUDS over time. Landscaping should not be used as a mitigant to hide a poor quality development that is not in keeping with the local character of an area. The removal of any ancient hedgerows or woodlands should be avoided.	<ul style="list-style-type: none"> Additional text added (6.5.5). Link made to the policies within the natural environment chapter within supporting text (6.5.6).
DS11PO (Publication Draft Policy DS10PU)		
45	Para 16.5.2 Include in the final sentence: "The use of brownfield sites for development present a positive opportunity for remediation of despoiled, degraded, derelict, contaminated or unstable land." Include in Policy DS11 the following as additional new bullet points: In accordance with the NPPF, 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. It is the developer's responsibility to secure safe development and provide the necessary information. 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). The findings of this will determine if further investigation is needed. Where contamination issues are identified, development proposals should incorporate appropriate remediation	<ul style="list-style-type: none"> Additional text added as suggested.

Ref	Comments	CBC Response
	and subsequent management measures to remove unacceptable risks. The full implementation of approved remediation measures will normally be required prior to the occupation of the proposed development	
74	As stated in our previous response to the Issues & Options consultation: Where undeveloped/greenfield land is put forward for development we would support soil management measures which avoid, mitigate and compensate, including a soil resource plan and adherence to the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. All developments should seek to achieve pre-development or better levels of surface water drainage and ensure pollution prevention measures are in place for any surface water run-off into watercourses.	<ul style="list-style-type: none"> • Surface water is dealt with elsewhere in the Local Plan (Policies DS8PU and DS9PU). Additional text added to the policy relating to Soil Resource Plan on major developments.
111,1 12	Draft policy DS11PO states that development should not result in the loss of best and most versatile agricultural land. Persimmon and Gleeson outline that where development is proposed on such land, consideration of the acceptability of this is part of the overall planning balance. Therefore, we consider that draft policy DS11PO is amended to reflect this.	<ul style="list-style-type: none"> • Policy reworded and “Where possible” added to end.

Copeland’s Economy

Ref	Comments	CBC response
Supporting Text		
173	Please consider amending the text within this chapter to recognise that Sellafield Ltd is the largest employer and employment site in the Borough of Copeland and that this is positive for the local area. We also suggest that the opportunities associated with supply chain development in the local area and our Programme and Project Partners (PPP) should be appropriately presented.	<ul style="list-style-type: none"> • Additional wording added to introduction for the chapter
E1PO (Publication Draft Policy E1PU)		
74	In order to ensure that economic policy does not lead to LSE on Natura 2000 sites, policy E1PO (Economic Growth) could explicitly state conditions for such growth include compliance with Policy N1PO.	<ul style="list-style-type: none"> • Comments noted, but this policy outlines the broad aims for economic growth, and the considerations that will need to be considered for particular proposals are outlined in other policies in the Plan.
192	Support broad policy initiatives. These need to be flexible to meet changing employment and economic opportunities.	<ul style="list-style-type: none"> • Comments noted.

Ref	Comments	CBC response
E2PO (Publication Draft Policy E2PU)		
74	Biodiversity impacts should be given more weight and a separate bullet from landscape and settlement character.	<ul style="list-style-type: none"> Comments noted, and new bullet created.
178	Location of Employment We agree with the assertion at paragraph 21.3.1 of the preferred options consultation that, to supporting the Council's growth ambitions, it is vital to ensure there is enough suitable and flexible employment land for business development including manufacturing, warehousing, new initiatives, start-ups and the availability of flexible business space town centre offices and other sustainable locations for the life time of the Local Plan. For Key Service Centres we support the expansion of existing businesses and therefore support Policy E2PO in principle.	<ul style="list-style-type: none"> Comments noted.
179	We consider that the location of employment should be accessible to other modes of transport other than the car, and where possible accessible to modes of active travel. New provision would benefit from clustering and co-location alongside other uses	<ul style="list-style-type: none"> The strategy, with a settlement focussed approach tries to ensure this as far as possible.
E3PO (Publication Draft Policy E3PU)		
36	The Westlakes site should not be restricted to technology & research. Given its prime location on the A595 other opportunities should be explored.	<ul style="list-style-type: none"> The focus is to maintain its status as a regionally significant science park, and allowing a wider range of uses could dilute this focus. That said, ancillary uses for the occupants on the science park will be supported. The Cleator Moor Innovation Quarter, centred around the Leconfield employment site (new Policy E4PU) will play a complementary role by providing the spaces for manufacturing which can take forward ideas conceived at Westlakes.
57	Policy E3PO relates to Westlakes Science and Technology Park, highlighting the Park's location adjacent to the A595 stating that the Council will work with the site's owners to produce a Masterplan for Westlakes to inform its future development. It would be beneficial for Highways England to be involved in the masterplan process, to ensure that potential impacts on the A595 are fully considered and understood.	<ul style="list-style-type: none"> Comments noted.

Ref	Comments	CBC response
75	<p>The representations are submitted on the landowner of Scalegill Hall Farm and the adjacent agricultural land to the north. The agricultural land has previously been under option to Britain's Energy Coast (BEC), and discussion are currently ongoing to renew the option. BEC however have no interest in the existing range of modern and traditional farm buildings at Scalegill Hall Farm, and that area of land has previously not been under option, nor will it form part of the new agreement.</p> <p>Recent enquiries with Highways England about developing the greenfield land for a separate employment site unattached to Westlakes with an access from Scalegill Road received negative comments, and therefore the greenfield land needs to be accessed through Westlakes.</p> <p>Pre-application discussions have recently taken place with the Planning Manager regarding the submission of an application for residential development on the farm site on the basis of enabling development, to renovate the Listed Building on site. This application is being prepared and will be submitted in the near future. Therefore the applicant suggests that the Scalegill Hall developed area should not be included within the proposed allocation.</p>	<ul style="list-style-type: none"> Comments noted. This area has been removed from the expansion are within the allocation.
136	<p>We have perused the Plan with great interest and positivity and credit to the sheer scale and ambition it looks to deliver for both business and the overall community of Copeland and beyond. It is recognised that Westlake's Science Park is a regionally significant Science Park as well a prestigious employment zone as highlighted by its inclusion as a Strategic Development priority. It is genuinely welcomed that as a key employment site in the Borough that there is a desire by Copeland Borough Council to work with BEC to produce a Masterplan for Westlake's Science Park to shape its future development. At present the Park appears to have a restricted Use Class stated as being B1 and D1 but can you clarify that is indeed the case and also what impact with the introduction of new Use Classes from 1 September 2020 which put these into potentially wider classes in F1 and E in particular. Post Covid 19, we will require to diversify from predominantly office uses at Westlake's and have aspirations to try and develop some alternative uses that would complement the existing while servicing Park occupiers and without being detrimental to the wider town centre business community. Brief details of these are outlined below and while these are not exhaustive, we would welcome the opportunity to engage with you on various options and explore matters in line with the Council's desire to work with BEC and develop a meaningful Masterplan for Westlake's Science Park in the near future</p> <p>Policy E3PO – WLSP (P 88) – Comments · 15 acres of serviced development land set over 9 plateaus + 4.5 acres of Option land at Scalegill Hall Farm · Explore additional uses such as Gym, Creche-Nursery, café, beauty salon + potential food- growing land to operate a community food growing project run by social enterprise for the community. · Small, light industrial incubation units/modern Warehouse & storage/fabrication space; modern R&D space · Potential worker accommodation/hotel</p>	<ul style="list-style-type: none"> The focus is to maintain its status as a regionally significant science park, and allowing a wider range of uses could dilute this focus. That said, ancillary uses for the occupants on the science park will be supported. Some of this has been incorporated into the Supporting Text

Ref	Comments	CBC response
	<p>SDG-7 (24.1.2) P 95 – (Comments) · Westlake’s Micro-Grid aspirations ongoing. · EV charger initiatives progressing well. · Potential for Solar Farm & Wind power on vacant plateaus on the Science Park & alternative solar options for car ports, the Park has over 1400 car park bays.</p> <p>Also attached to this submission were documents – Guide to changes to the Use Classes Order in England & Guide to the Use Classes Order in England (from 1 September 2020)</p>	<ul style="list-style-type: none"> These proposals could be considered within the Masterplan and would also be informed by other policies in the Plan, such as CC1PU/CC2PU.
E4PO (Publication Draft Policy E5PU)		
74	Disagree with these Policies being screened out (of HRA). With respect to project stage mitigation the site policies concerned should include reference to what measures are required at application stage and should also reference the need for an Appropriate Assessment to include the details of the scheme that are (potentially) not yet known at the plan-level stage.	<ul style="list-style-type: none"> Text added at paragraph 7.8.5 stating that project level HRA may be required for employment allocations (now Policy E5PU) following information from HRA.
168	New development should be focused in sustainable locations which are accessible to local services and infrastructure. A fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. We would welcome continued dialogue to enable us to coordinate the delivery of development with the timing for delivery of infrastructure improvements.	<ul style="list-style-type: none"> Agreed, and the Council has been having ongoing discussions with infrastructure providers to help ensure this.
178	<p>We note that several employment allocations have been identified in draft Policy E4PO and development within the boundaries of the following employment sites and allocations will be supported where criteria set out in policies E1PO and E2PO is met. Development is restricted to B1, B2 and B8 Use Classes.</p> <p>One Major Employment Site is identified at Bridge End, Egremont which is an extension to the existing industrial estate. Whilst we support this in principle, it is suggested that amendments are made to the allocation boundary. The current proposed allocation is an elongated site running north-south along the A595 and is one field disconnected from the industrial estate to the west. Our client owns land immediately adjacent to the existing built up area of the industrial estate and it is therefore considered that some of our clients land is included as part of the allocation based on a logical extension to the existing site. As you can see from the image below, the land in our clients ownership is generally flat in topography and bounds the existing industrial estate immediately to the south. It creates a sensible extension to the already existing industrial estate.</p> <p>Please see our proposed amendments to the site boundary below. Our clients land we are proposing for inclusion in the allocation is identified by the blue hatching.</p>	<ul style="list-style-type: none"> The Council is not proposing to include the submitted land at this time. This is because approximately one third of the site is in Flood Zone 3, and based on the EDNA and ELAS the remaining allocated sites (which are not in the flood zone) should provide sufficient land for the Plan period. If however there are difficulties in terms of delivering the aspirations of the Plan and more land is required this site can be considered again in the 5 year review.

Ref	Comments	CBC response
	<p>We acknowledge that, following completion of the EDNA and ELAS, existing sites, proposed allocations and new sites submitted through the previous Call for Sites will be reviewed to reflect the latest evidence in terms of need and suitability. It is anticipated that a consultation of sites for economic/employment use will take place prior to consultation of the Publication Stage of the Local Plan and the table set out in draft Policy E4PO will be reviewed and amended to reflect the latest position. We therefore welcome this opportunity to submit further detail on our clients land at the appropriate time. In the meantime, however, we can confirm that our clients land immediately south of the Bridge End Industrial Estate (as identified by the blue hatching above) is available, suitable and deliverable for future employment development and we would welcome its inclusion as a future allocation as part of the Major Employment Site at Bridge End, Egremont.</p>	
57	<p><u>Policy E4PO</u> sets out the proposed employment sites and allocations and we have provided comments on each: Hensingham Common, Whitehaven: potentially significant impact on the A595 due to the scale of the site area, its proximity to A595, and likely increase in traffic using existing A595 junctions in Whitehaven, some of which are already under strain;</p> <p>Leconfield Industrial Estate: relatively large site area, however much of the site is already developed and therefore already generating vehicle trips. Potential impacts on the A595 on existing A595 junctions in Whitehaven, some of which are already under strain, and potentially on A595/A5086 roundabout for trips to/from the south; Whitehaven Commercial Park: relatively large site area, with potential impacts on existing A595 junctions in Whitehaven, some of which are already under strain;</p> <p>Bridge End, Egremont: relatively large site area, located adjacent to the A595/Vale View/Little Mill roundabout which would be used by the majority of traffic using the site and therefore a potentially significant impact on this junction and potential delays to mainline A595 traffic; Sneckyeat Road, Whitehaven: smaller site area than those listed above, however potential for impact on the A595/B5295/Homewood Road roundabout due to the proximity to this junction, which is known to have potential existing operational issues; Haig Business Park, Whitehaven: relatively small site in West Whitehaven – potential to add traffic to existing A595 junctions in Whitehaven, some of which are already under strain; Furnace Row, Distington: relatively small site, however is located directly adjacent to A595/A597/B5306 roundabout which would be used by the majority of traffic using the site and therefore a potentially significant impact on this junction and potential delays to mainline A595 traffic; Frizington Road, Frizington: relatively small site located some distance from the A595, which will result in dispersal of vehicle trips and reduced impact;</p> <p>Seascale Rural Workshops: relatively small site with traffic impact likely to be on non-SRN section of A595, part of the local highway network; Devonshire Road, Millom: site is located some distance from SRN, which will reduce the traffic impact. Mainsgate Road, Millom: site is located some distance from SRN, which will reduce the traffic impact.</p>	<ul style="list-style-type: none"> • Noted, and much of this has now been picked up in the Transport Improvement Study (TIS) that has been produced since the Preferred Options consultation. • An extra paragraph explaining the work of the TIS has been added to the supporting text for policy E2PU (para 7.5.8).

Ref	Comments	CBC response
	<p>In addition to the comments above on individual impacts, there is also a need to consider the potential cumulative impact of all employment sites. The transport evidence work which is required in order to underpin the Local Plan should account for this by assessing the cumulative impact of the full set of site allocations, in order to identify any required mitigation on the A595.</p> <p>The Plan also sets out a number of Additional Sites under consideration, which include further sites in Whitehaven, two large sites in Egremont (Begargill Quarry North, Egremont: 11.93ha and Begargill Quarry South, Egremont: 12.44ha) and other sites located in close proximity to the A595. Highways England will provide further comments on the updated set of site allocations which the Plan states will be provided as part of a future consultation.</p> <p>The Plan also sets out a number of Opportunity Sites and Areas, which will require a Masterplan to ensure the site is developed holistically. As with the Westlakes Science and Technology Park, it may be beneficial for Highways England to be involved in the masterplan process for any sites which may have an impact on the A595, to ensure that potential impacts are fully considered and understood.</p> <p>Policy H2PO sets out the housing requirement for the borough: “a minimum of 2520 net additional dwellings (an average of 140 dwellings per annum) to be provided between 2017 and 2035.” It goes on to state that, when combined with future windfall development, previous completions and extant permissions, a minimum of 3600 dwellings (an average of 200 dwellings per annum) will be provided over the Plan period.</p>	<ul style="list-style-type: none"> • All of the sites were considered through the Employment Land Availability Study (ELAS), which together with further evidence base work ruled some sites out, including most of the additional alternative sites.
74	<p>In reference to Local Employment Site - Haigh Business park, Whitehaven - Natural England notes this is an already established Business Park but due to it's location adjacent to St.Bees Heritage Coast proposed extension area (and within the proposed Heritage Gateway Site) Natural England advise that certain types of employment would be incompatible for this area. The policy should provide greater clarification on what appropriate employment types would be, and the environmental constraints on this site. Hensington Common Whitehaven and Whitehaven Commercial Park site are in a historically mapped area for Hen Harrier which is a Special Protection Area notified feature which should be assessed in the plan level HRA and these developments will need to be submitted with a project level HRA to assess any potential impacts. Any future developments at Cleator Mills will require an Appropriate Assessment under the Habitats Regulations 2017 as this site is adjacent to River Ehen.</p>	<ul style="list-style-type: none"> • Comments noted. Haig is an existing employment site that has existing small scale business use and this is expected to continue as no additional land has been allocated in the Local Plan. • Text added at paragraph 7.9.5 stating that project level HRA may be required for Opportunity Sites (now Policy E6PU) following information from HRA. • In addition to this text has been added to the Cleator Mills site description in Appendix D highlighting its sensitive location and likely need for an Appropriate Assessment.

Ref	Comments	CBC response
	For specific employment allocations (Hensington Common Whitehaven and Whitehaven Commercial Park) and the wind energy suitable areas (as above) the loss of supporting habitat for Hen Harrier needs to be assessed. There is evidence that some of the Hen Harriers which winter in Copeland area breed on SPAs in the North of England and the Isle of Man. West Cumbria Hen Harriers are therefore functionally linked to these SPAs. The employment allocations and wind farm proposals in this area should also be accompanied by a project HRA to address potential impacts. As above this section should outline an overview of the mitigation measures that would ensure no adverse effect on site integrity. St.Bees housing should assess impacts on the SSSI bird notified features, and although not an SPA it could be included within the HRA.	<ul style="list-style-type: none"> Text added at paragraph 7.8.5 stating that project level HRA may be required for employment allocations (now Policy E5PU) following information from HRA.
75	These representations are submitted on behalf of a local business who are looking for a new site for the business. They have considered many sites in the Borough, including those already allocated and proposed in the Local Plan, and consider this to be the most appropriate site for a new timber yard. Road connections, and in particular, access to the A595 is the most important issue in their new location. They have previously been located at Moresby, however the road connections caused issues with large wagons entering and existing the site on a regular basis. Without the proposed by-pass in place, the sites on this side of Whitehaven are still not appropriate. They also have a site size requirement of 5 acres+. In addition, the already have branches of the business at Barrow, Calderbridge and Lillyhall so the location needs to be between the latter two, and on the A595. The site at St Thomas' Cross in Egremont was considered, but this a further away from Whitehaven than desired, and it is also not a flat site, which the yard operations require. Their current site in Whitehaven is under option to a national property developer, along with adjacent land, who intends to pursue a planning application for a new office development in the Town Centre to provide further space for Sellafeld related office workers. With regards to this site, it is close to Whitehaven, attached to a settlement in the Local Plan, is flat and adjoins other commercial and industrial development on the west side of the A595 in Bigrigg. In addition, the landowner is a willing seller, and they are in the process of agreeing the heads of terms on an option agreement over the land.	<ul style="list-style-type: none"> Comments noted, however we are not proposing to allocate a new employment because: <ul style="list-style-type: none"> Bigrigg is identified as a Sustainable Rural Village which is not proposed for large new employment sites The representation is for a single business which the Council would not normally allocate for, and the type of which may well be of a scale that is too large for this tier of settlement. Also, the current interested party might not end up developing the site which would result in a large new employment allocation in a Sustainable Rural Village that would otherwise be an unacceptable location for such development (relating to the points above) Developing this parcel of land would result in Bigrigg encroaching on the farmstead at Springfield, which is contrary to the Settlement

Ref	Comments	CBC response
		Landscape Assessment desire to 'Conserve and maintain traditional farm buildings within their own setting'
162	<p>It is noted that neither Sellafield nor the LLWR site are included in the Appendices as Proposed Employment Allocations or Opportunity Areas within the Appendices provided, despite previous representations submitted by the NDA seeking allocation of both sites within the emerging Local Plan. It is reiterated that the Sellafield site should subject to an allocation within the new Copeland Local Plan to support Class E, B2 and B8 employment uses - together with works and uses associated with nuclear decommissioning and site remediation. Ideally this allocation should reflect the amended site boundary requested in previous NDA letters of representation. The LLWR Site should also be subject to such an allocation, reflecting its long-term strategic role for the UK nuclear industry in terms of waste management.</p>	<ul style="list-style-type: none"> • The purpose of the Employment Allocations is to identify land for general employment uses to give companies clarity about appropriate locations. • The Council recognises the importance of Sellafield and LLWR to the economy and the scale of jobs they support, but they are not an employment site in those terms. • The developments and operations to clean up the site are covered in the Sellafield Policy and its identification as a nuclear licensed site. • We can also recognise the importance of LLWR, but most planning matters that relate to LLWR are dealt with in the Cumbria Minerals and Waste Local Plan.
178	<p>We have been instructed by our client, the Leconfield Estate, to prepare and submit comments in respect of the draft plan. Our comments mainly relate to policies within the Development Strategy, Economic Context and Employment, and Housing Chapters.</p> <p>However, these representations also support the future allocation of the following residential allocations which are solely within our clients ownership, along with the expansion of the Bridge End Industrial Estate, in Egremont:</p> <ol style="list-style-type: none"> 1. HEG2 2. HEG3 	<ul style="list-style-type: none"> • The Council is not proposing to include the submitted land at this time. This is because approximately one third of the site is in Flood Zone 3, and based on the EDNA and ELAS the remaining allocated sites (which are not in the flood zone) should provide sufficient land for the Plan period.

Ref	Comments	CBC response
	<p>Based on the above, our comments also relate to Appendix A of the Local Plan 2017-2035 which contains maps showing the preferred settlement boundaries for each settlement within the proposed hierarchy along with the proposed housing allocations and sites which have planning permission for 5 units or more at 31st March 2020 within each of these settlements.</p> <p>We would also like to take this opportunity to confirm that we also support the proposed settlement boundary at Egremont.</p> <p>Our client would like to work closely with the Council to support and help deliver sustainable development in the Key Service Centre of Egremont. We should be pleased if the comments below would be taken into account during the preparation of the Local Plan and would ask that we are kept informed of all future consultations during the Local Plan process.</p>	<ul style="list-style-type: none"> • If however there are difficulties in terms of delivering the aspirations of the Plan and more land is required this site can be considered again in the 5 year review.
E5PO (Publication Draft Policy E6PU)		
74	Disagree with these Policies being screened out (of HRA). With respect to project stage mitigation the site policies concerned should include reference to what measures are required at application stage and should also reference the need for an Appropriate Assessment to include the details of the scheme that are (potentially) not yet known at the plan-level stage.	<ul style="list-style-type: none"> • Text added at paragraph 7.9.5 stating that project level HRA may be required for Opportunity Sites (now Policy E6PU) following information from HRA.
174	We recognise the want to protect Egremont Town Centre but there are smaller area which could offer semi retail just outside of the centre. East Road garage site and land at the Former Chocolate Factory for e.g. If managed correctly these could offer retail that does not compete with Town Centre trade and in fact could help attract people to Egremont that otherwise would not stop here at all. We believe these sites should be included within the rest of the sites listed in Policy E5PO.	<ul style="list-style-type: none"> • The former Chocolate factory has residential planning permission and so has not been identified as an Opportunity Site • The former East Road Garage has now been added as an Opportunity Site in Appendix D as a focus for investment and redevelopment.

Climate Change and Clean Energy

ref	Comments	CBC response
Supporting Text		
173	Sellafield Ltd would like to note that this is not always relevant to plant/process buildings and that there are other determining factors such as containment and shielding which must prevail in order to maintain safety. Sustainability opportunities should be considered in the context of the purpose of the facility and so we propose that this should be reflected in the revised Sellafield policy CC7PO to enable high hazard reduction.	<ul style="list-style-type: none"> Comments noted. Supporting text around Sellafield and its mission has been updated.
CC1PO (Publication Draft Policy DS2PU)		
74	In addition, we recommend additional wording should recognise the need to minimise development in flood risk areas. This should also be referred to in Policy CC1PO	<ul style="list-style-type: none"> Wording added as suggested
74	As stated in our response to the Issues & Options consultation development should seek to mitigate and adapt to the impacts of climate change by • minimising development in flood risk areas and • securing nature-based solutions which improve the extent of tree cover and green infrastructure This will help create connected and resilient wildlife corridors, sequester carbon, and help people adapt to climate change.	<ul style="list-style-type: none"> Added to strategic objectives
173	Please note that in order to meet nuclear safety requirements it is often not possible to use recycled or locally sourced materials and so we would like this to be acknowledged in the Local Plan. Also, incorporating energy production equipment is something that needs to be considered from an overall site perspective rather than for each individual building. Please consider addressing these points in the revised Sellafield policy CC7PO in order to enable mission delivery.	<ul style="list-style-type: none"> This has been noted. The policy states that developers will be encouraged to carry out the measures listed. Exceptions to this will be dealt with at planning application stage.
192	Developments should also look to avoid artificial light pollution, especially in rural dark sky areas.	<ul style="list-style-type: none"> Reference to light pollution added to policy DS7PO: Design Standards.
254	The historic environment has an important part to play in addressing climate change. Our Heritage Counts research reports demonstrate the importance of this. Heritage and the Environment 2020 found here https://historicengland.org.uk/content/heritagecounts/pub/2020/heritage-environment-2020/ Our research outcomes have identified that that the refurbishment and reuse of existing buildings reduces the amount of embodied carbon and waste produced when compared to demolishing them and building anew. It is also important that the policy recognises that in some locations the incorporation of renewable energy production equipment, such as photovoltaics, hydrogen energy may not be appropriate in the context of the surrounding historic environment or on heritage assets themselves. We therefore suggest providing a caveat within the policy. Amend the opening sentence of the paragraph to read “To reduce the impact of development on climate change developers are encouraged where appropriate to: Add bullet point to policy “ Encourage the sympathetic reuse and refurbishment of the existing building stock. ” Add sentence to reasoned justification. “ The historic environment can have an important role in contributing towards a reduction in carbon emissions. However, when considering proposals it will be important that great care and attention is taken to ensure heritage assets	<ul style="list-style-type: none"> Point added to policy

ref	Comments	CBC response
	are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;”	
CC2PO (Publication Draft Policy CC1PU)		
178	We support the proposals for large scale renewable and carbon neutral energy schemes where they do not adversely impact on the other development requirements for the Borough. Large scale renewable and carbon neutral energy schemes need to be located in appropriate locations where they do not hinder other development opportunities such as housing, employment etc. but more importantly that they do not individually or cumulatively have a significant adverse effect as a result of their scale, siting or design on surrounding landscapes, heritage assets and other material considerations, with planning application needing to include details of mitigation measures associated with any potential harm. As a major landowner, our client would be happy to discuss potential future opportunities with the Council on this matter, if deemed appropriate.	<ul style="list-style-type: none"> • Comment noted.
254	<p>In order to provide a suitable level of protection for the historic environment we suggest amendments to the policy which consider the different aspects of the historic environment. When considering applications for renewable energy the setting of heritage assets is particularly important and there should be direct reference within the policy to this. It is important as per paragraphs 195 and 196 of the NPPF that in the case of where a proposal would harm the significance of a designated heritage asset that development Paragraph 194 of the NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” Paragraphs 195 and 196 of the NPPF concern harm and public benefit, in the case of substantial harm to (or total loss of significance of) a designated heritage asset there is a requirement for substantial public benefits to outweigh the harm, whilst in the case of less than substantial harm of a designated heritage asset it will be important that this harm is weighed against public benefit. The order of the policy, currently puts mitigation prior to this consideration, we therefore advise amendments to the following paragraph “Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm” in order to align with the NPPF and the need to balance public benefits before reducing and mitigating harm. Amend first bullet point to read Landscape character including historic landscape character; Amend bullet point 8 to read Heritage assets and their setting; Add additional bullet point: 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. Amend paragraph “Where proposals would result in significant adverse effects, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits and in the case of the historic environment balanced against public benefit as per national policy. Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm. Where significant adverse effects remain, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits</p>	<ul style="list-style-type: none"> • Wording changes made as suggested.

ref	Comments	CBC response
CC3PO (Publication Draft Policy CC2PU)		
	<p>We are writing to object to the local plan consultation with the following points:</p> <p>Wind energy developments being marked in the green (favourable area) on the land between Drigg Holmrook Seascale and Gosforth</p> <p>This area is the setting of the national park now a world heritage site. This area should be in the national park. It has wide ranging views into the national park of 180degrees taking in all of western lake District fells and from within the park gives expansive views out to the coast and the sea. Blighted by one ugly horrendous wind turbine which should never have been allowed and to which the council made the entirely wrong decision. To the detriment of residents who see the thing from Holmrook Drigg and Seascale as well as looking into it out of the national park. The current local plan says tall structures should NOT be looked upon favourably in this area so I don't see why that should change as it is now a buffer zone for a word heritage site.</p> <p>The Drigg village plan which stands shows around 74% of residents do NOT support wind turbines in the area. Our Drigg parish newsletter a few years ago stated we were to have a consultation to be included in the expansion of the national park. This did not happen. An utter disgrace that that consultation was not carried out and a missed opportunity to protect one of the most beautiful areas in the western Lake District. This should now be taken forward and put to a public consultation. Questions should be asked as to why it wasn't and who benefits from that not happening.</p> <p>Councillors in this area should represent the community opinion. There was a very clear opinion of objection for all three wind turbine applications from local residents who live in and around the area of land between Drigg Holmrook Seascale and Gosforth.</p> <p>Landowners or councillors who support wind turbines should be looking directly at them from their own home. This land should be removed from any tall infrastructure development.</p>	<ul style="list-style-type: none"> • The Council is required by Government to identify a Suitable Area for Wind Energy. Such developments can help mitigate climate change. • The Wind Energy Technical document has been updated and has been informed by the final Settlement Landscape Character Assessment 2021 and Landscape Character Assessment (areas outside settlements) 2021. These documents (as well as others listed within the Technical document) identify the most sensitive areas to development and have informed the boundaries of the Suitable Area for Wind. • All wind energy developments would require a planning application regardless of whether they were located in the Suitable Area. The impacts of the specific development upon the landscape will be assessed at the time of the application and the community is able to make representations at this stage. • The decision regarding whether to extend the National Park is made at a national level and not by the Borough Council.
15	<p>I am writing to express my concern that the local plan does not protect out visual amenity enough.</p> <p>The area between Drigg Holmrook Seascale and Gosforth should be protected from any tall infrastructure such as wind turbines and huge pylons. This area should be in the national park really due to the open panoramic vista of the western lake District fells, it isn't but it is the setting for the national park and also provides fantastic views from inside the national park looking out to sea as much as it does looking into the national park.</p> <p>It is now a buffer zone to a world heritage site.</p> <p>It should be included in the undeveloped coast.</p> <p>The existing wind turbine is a total blight on the landscape. Should never have been granted permission, the</p>	<ul style="list-style-type: none"> • Please see comment above.

ref	Comments	CBC response
	<p>planning application visual impact pictures were completely wrong and did not represent where it would be seen from at all. You got it so wrong.</p> <p>There is no need in our area for any onshore wind turbines. There is more than enough out at sea. And we have Sellafeld, so I think Copeland has done its bit for eyesores on the beautiful countryside. Any national grid upgrade associated with moorside should be out at subsea cable or underground. With regards to the national grid upgrade in the Drigg area. It is not acceptable to underground half the village then put huge great pylons in front of the other half of the village (stubble green).</p>	
74	<p>The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew. This needs to be assessed in the accompanying Plan level HRA. At the project level suitable bird surveys would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins.</p>	<ul style="list-style-type: none"> • The impact upon SPA/Ramsar birds has been taken into account in the Local Plan HRA with the consultant concluding that there is no likely significant effect. • The Wind Energy Technical document, which the Local Plan draws developer's attention to, highlights that surveys may be required at planning application stage.
74	<p>Disagree that this Policy should be screened out (of HRA). The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew which are SPA species. Therefore this needs assessing the Plan HRA and reference to a requirement for project HRA's that would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins</p>	<ul style="list-style-type: none"> • See comment above.
85	<p>The Wind Energy Technical Document should be updated to take into account the current character and capacity of the landscape and consider a wider range of factors including residential amenity and existing and consented wind farm developments. The Representation Site (Haverigg III Wind Farm) should be identified as an area suitable for wind energy development within the Wind Energy Technical Document. (Please refer to Representation Statement and supporting documents for further information)</p>	<ul style="list-style-type: none"> • An additional point has been added to the policy to allow for the potential repowering of turbines in unsuitable areas providing the impacts are considered acceptable on a case by case basis
144	<p>May I recommend further research is carried out to establish the true costs of your initial preferred option. I also ask you to consider the impact on wild-life and also how many sustainable jobs will be created from this, when the turbines will be manufactured abroad and likely installed by the same supplier, with minimal local short-term jobs during the installation process. In contrast greater support for the Whitehaven coal mine would create up to 500 sustainable jobs, with minimal impact on wildlife.</p>	<ul style="list-style-type: none"> • The Government requires local authorities to identify suitable areas for wind energy in their Local Plans regardless of how many jobs such developments may create. The Suitable Area has been informed by a Wind Energy Technical

ref	Comments	CBC response
		Document which has been updated in 2021 to ensure that the least sensitive areas of the Borough are included.
150	Object to proposed location South Copeland Laca/ Kirksanton/Haverigg. Laca designated Landscape of County Importance. Laca forms one side of Whicham valley which is split by LDNP boundary. It is currently proposed for inclusion in the Southern Boundary LDNP Extension review. Laca contains high concentration of Ancient Scheduled Monuments in a small area which relate historically with Standing Stones at Kirksanton, Swinside Stone Circle and Black Combe. Previous small scale wind energy applications in this location have been refused because of the high visual and cultural heritage impact they would have for the local communities, LDNP, and from across the Duddon Estuary. The triangular area nearer to the coast highlighted in the vicinity is located on a natural flood plain for Kirksanton Pool/River Lazy which acts a sponge during heavy rain. There already exists a small co-operatively owned wind farm nearer to Haverigg which has been granted an extension to it's 25 year lease. There may be Grid issues regarding capacity for larger scale wind energy developments. The proposed location is on a narrow coastal plain where any such scheme will have major impact on the community. The landscape character assessment has not taken into account the heritage of Kirksanton [pre Doomsday Book] its relationship with Laca, and it's view point from the coast inland.	<ul style="list-style-type: none"> The Wind Energy Technical Document Update takes into consideration the findings of the Landscape Character Assessment 2021 and Settlement Landscape Character Assessment. This considers the impacts of any development on the setting of the National Park and the Landscape Character Assessment produced by Alison Farmer Associates to support the Lake District boundary extension.
155	We are disappointed to note that the Council's Wind Energy Technical Document has not considered the extension area to the Heritage Coast in establishing Areas Suitable for Wind Energy Development (paragraph 6.13). The extension area was established following extensive landscape assessment work, which was undertaken in consultation with Natural England. As noted elsewhere in our response, the Council has already committed to this extension. We therefore consider that sign off by Natural England is a formality, and that significant material weight should be given to the extension area. The extension area also acts as a buffer to the existing defined Heritage Coast. Notwithstanding the extension, we do not consider that an area in such close proximity to the existing defined Heritage Coast should be identified as an Area Suitable for Wind Energy.	<ul style="list-style-type: none"> The Suitable Area for Wind Energy has now been updated to exclude the Heritage Coast extension area. Please see the updated Wind Energy Technical document for more information. Wind energy developments would require a planning application regardless of whether they were in the Suitable Area or not and as stated in the Technical Document, a sites inclusion within the Suitable Area doesn't automatically mean the application would be approved. The application would be judged on its own merits taking into account the relevant policies and evidence at the time.
182	I am writing to OBJECT to the area roughly between Gosforth, Seascale, Drigg and Holmrook (ringed in red on the figure overleaf) being designated as potentially suitable for wind turbine development for the following material	<ul style="list-style-type: none"> Comments noted.

ref	Comments	CBC response
	<p>reasons:</p> <p>Connection to adjacent landscapes – adjacent to Lake District National Park and Drigg dunes SSSI and Halsenna Moor national nature reserve - HIGHLY SENSITIVE Ecology – adjacent to Drigg dunes SSSI and Halsenna Moor national nature reserve and Wild Bird General License Zone - HIGHLY SENSITIVE Remoteness and tranquillity – tranquil area close to coast use by people for recreation and tourism. Numerous businesses in area rely on tourism. – HIGHLY SENSITIVE Skyline and visual amenity Stretch of B5433 between Seascale and Drigg and numerous public rights of way – panoramic view of Lake District fells – HIGHLY SENSITIVE Historic environment / Frontiers of Roman Empire – close to / visible from Gosforth (Viking settlement) and Ravenglass (Roman settlement / Roman bathhouses) MODERATELY SENSITIVE Please see Figure below showing map with ringed area in red and points A, B and C. Following figures show panoramic views of landscape taken from points A, B and C illustrating the remoteness, tranquillity and connection to local landscapes .</p>	<ul style="list-style-type: none"> • Highly sensitive landscapes identified within the Cumbria Landscape Character Assessment. Copeland Settlement Landscape Character Assessment and Copeland Landscape Character Assessment have not been included within the Suitable Area for Wind Energy. • Wind energy developments would require a planning application regardless of whether they were in the Suitable Area or not and as stated in the Technical Document, a sites inclusion within the Suitable Area doesn't automatically mean the application would be approved. The application would be judged on its own merits taking into account the relevant policies and evidence at the time.
254	<p>We consider amendments are needed within this policy to take ensure the Outstanding Universal Value of the two World Heritage Sites within the borough is adequately protected. Whilst the plan area lies beyond the boundary of the English Lake District World Heritage Site, structures such as wind turbines are capable of substantial harm to its setting, particularly from cumulative impacts. To protect other elements which contribute to the historic environment within the Borough we also consider that mention should be given to historic landscape character and the setting of heritage assets. Paragraph 194 of the NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” Paragraphs 195 and 196 of the NPPF concern harm and public benefit, in the case of substantial harm to (or total loss of significance of) a designated heritage asset there is a requirement for substantial public benefits to outweigh the harm, whilst in the case of less than substantial harm of a designated heritage asset it will be important that this harm is weighed against public benefit. The order of the policy, currently puts mitigation prior to this consideration, we therefore advise amendments to the following paragraph “Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm” in order to align with the NPPF and the need to balance public benefits before reducing and mitigating harm. Evidence Base We have concerns over the proposed methodology for a buffer zone of 250m around the World Heritage Sites of the English Lake District and Frontiers of the Roman Empire. We would therefore request that a more detailed assessment is undertaken to determine areas of suitability in the context of the setting of these two World</p>	<ul style="list-style-type: none"> • Wording changes made as suggested.

ref	Comments	CBC response
	<p>Heritage Sites to prevent adverse effects to their Outstanding Universal Value. Historic England recognises the value of wind energy in addressing climate change and providing clean energy. However, we advise against the use of a standard distance to create a buffer zone around identified heritage assets, as impacts on setting vary according to topography and the characteristics of the asset and its surroundings. Wind energy development can also have an impact on sites of archaeological interest which is not currently assessed as part of the policy. We would welcome the opportunity to work with the Council in provision of a more developed evidence base concerning the suitability of areas for wind energy that incorporates a more detailed understanding of impact on heritage assets including the Outstanding Universal Value of the two World Heritage Sites. Amend first bullet point to read Landscape character including historic landscape character; Amend bullet point 8 to read Heritage assets and their setting; Add additional bullet point: 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. Amend paragraph "Where proposals would result in significant adverse effects, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits and in the case of the historic environment balanced against public benefit as per national policy. Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm. Where significant adverse effects remain, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits</p>	
108	<p>The Wind Energy Technical Document should be updated to take into account the current character and capacity of the landscape and consider a wider range of factors including residential amenity and existing and consented wind farm developments. The Representation Site (Haverigg II Wind Farm) should be identified as an area suitable for wind energy development within the Wind Energy Technical Document.</p> <p>Please refer to Representation Statement and supporting documents for further information.</p>	<ul style="list-style-type: none"> • Wording changes have been made in the policy which allows for the potential repowering of turbines outside the suitable area. This will be assessed on a case by case basis

Nuclear Energy

ref	Comments	CBC response
Supporting Text/ other		
162	The NDA would recommend reference to the Sellafield Core Mission is incorporated within this section of the Local plan, for example reference to operations at Sellafield which are focused on processing and storing nuclear materials and waste. It would also be beneficial to reference the importance of applying planning policies which enable both the Sellafield and LLWR sites to deliver the nationally significant nuclear mission, in accordance with Government policy and NDA Strategy. Section 9.2 notes a shift in Sellafield Ltd's mission towards decommissioning and environmental remediation following reprocessing operations, in addition to the opportunities this provides for the Council. This text is welcomed.	<ul style="list-style-type: none"> The introduction and supporting text has been updated
173	Page 102, first fact: "The transforming and decommissioning of Sellafield has approximately 100 years to go but did not commence in 2020." Please could this be reworded as some decommissioning activities began in the late 1980's. Please find below some suggested wording for your consideration. "The mission at Sellafield has changed throughout each decade of its existence and it will continue to evolve over many decades to come. Some decommissioning work began in the late 1980's and it will continue for about another 100 years. As reprocessing finishes, greater focus will be placed on waste retrievals, the secure storage of various nuclear materials and waste products, decommissioning and site remediation."	<ul style="list-style-type: none"> The introduction and supporting text has been updated, with the Key Facts removed
173	We welcome the inclusion of our core mission in the introductory text; noting that there still appears to be a focus on the delivery of future new missions within this Chapter. Therefore, we would like to suggest including a bullet point in this section which states "operations at the Sellafield site focused on processing and storage of nuclear materials and waste" as these will continue to grow over the period of this Plan. Please note that the Sellafield Ltd narrative is not about decline as there will be a significant amount of work to carry out over the coming decades. Therefore, we would like to propose that the Local Plan should reflect our mission and the Government's capital investment in nuclear waste processing and storage and continued operations over future decades, and hence should recognise the capital investment and the benefits to the Copeland economy and the local community of continuing employment opportunities. Sellafield Ltd would also like to request that the Local Plan should acknowledge the challenges faced on the Sellafield site in relation to safety, security, value for money and delivery of our mission and therefore provide planning policies which enable Sellafield Ltd to deliver the nationally significant nuclear mission in line with Government policy and NDA strategy	<ul style="list-style-type: none"> The introduction and supporting text has been updated
173	Page 106: Please could you remove the wording 'smaller Sellafield' from the text within the Local Plan? We suggest that the focus should be on collaborations with others, technological and digital innovation and investment in future capabilities. As noted above, the Sellafield Ltd narrative is not about decline – it is about a continuing significant mission	<ul style="list-style-type: none"> This reference has been removed

ref	Comments	CBC response
173	Page 106: We have recently launched our new Manifesto and Enterprise Strategy. Therefore, please could you replace the "Vision for Sellafield" with our purpose : "creating a clean and safe environment for future generations"?	<ul style="list-style-type: none"> Reference has been added into paragraph 10.12.1
173	In addition to the proposed policy wording, we also request that the Sellafield development boundary should be reviewed to reflect the area that is currently operated and controlled by Sellafield Ltd. The current boundary seems to follow the Nuclear Site Licence (NSL) boundary which is only part of the Sellafield site, there are areas outside of the NSL boundary which have been developed and it would therefore seem logical to include these, for example the former Visitors Centre site. We have drafted a proposed Sellafield development boundary which we would be keen to discuss with you further and refine as necessary	<ul style="list-style-type: none"> It is important to keep the site boundary focussed towards the existing buildings and areas that need to be cleaned up as part of Sellafield's mission rather than adding non-nuclear areas into the site
173	16.1.4 Sellafield Ltd would like to gain further understanding of the Council's proposed Design Standards Supplementary Planning Document (SPD) and its potential applicability to Sellafield Ltd proposals, particularly given our regulatory requirements relating to safety, security, mission delivery, and value for money for the taxpayer etc	<ul style="list-style-type: none"> The Design SPD will be a good practice guide to ensure that development in Copeland is of the highest standard. It is designed for the whole borough and so its application will vary depending on location and other requirements that may be material considerations.
CC4PO (Publication Draft Policy NU1PU)		
80	We are pleased with the way in which the plan deals with the need to diversify Copeland's economic base and embrace the "evening up" agenda set by the Government. It is vital that Copeland's planning framework is congruent with the direction our economy needs to follow. This is clearly an area where you will need to engage with our Parish on a regular basis. Half of the Sellafield site, part of the Moorside site (and the associated area where grid improvements will be required) and areas where there are likely to be headworks associated with GDF lie within our Parish Boundaries. We are very supportive of the need use opportunities in the Nuclear Industry to help Copeland's economy both sustain and diversify (Policies CC4PO/CC5PO/CC6PO) but note that as they are enacted they are likely to have a significant impact on our Parish and we need to be engaged on an ongoing basis to ensure impacts remain acceptable and manageable.	<ul style="list-style-type: none"> Comments noted.
162	Criteria C notes that proposals that deliver the Sellafield mission will be supported where they meet the criteria in Policy CC7PO, whilst detailed comment is provided in relation to this policy further in this table, the NDA would highlight the need for this policy refer to Government nuclear policy and NDA strategy specifically. Criteria D is welcomed, in that Copeland Borough Council will work proactively with Cumbria County Council and site operators of the Low-Level Waste Repository and Sellafield sites in the development and the management of materials and associated facilities and infrastructure	<ul style="list-style-type: none"> Reflected in the introduction and supporting text for the chapter
173	A1) We would like to request the inclusion of Government nuclear policy and NDA strategy.	<ul style="list-style-type: none"> Reflected in the introduction and supporting text for the chapter

ref	Comments	CBC response
	<p>A2) Please could you consider removing Criterion A2? Sellafield Ltd is concerned that the Local Plan proposes that the Council's internal Nuclear Position Statements are to be used as a material consideration in the planning process. Sellafield Ltd questions their status and the appropriateness of this given that they have not been the subject of any public consultation as part of the Local Plan.</p> <p>A3) With regards to low carbon technologies, there may be occasions when Sellafield Ltd is unable to meet the criteria set out in the Local Plan. For example, for nuclear safety reasons and therefore we would like to request that this is acknowledged within the Plan so as not to unnecessarily constrain delivery of the Sellafield mission to clean-up the site. We would also like to propose that this should be recognised in a revised CC7PO policy for Sellafield developments in order to enable mission delivery.</p> <p>E) Sellafield Ltd provides and demonstrates economic and environmental benefits in the delivery of its mission with capital investments to make the Sellafield site safer, sooner for future generations. With regards to social impact, we deliver our Social Impact Programme in line with the NDA's Strategy and the Energy Act 2004. We have developed our Social Impact Programme in collaboration with other stakeholders, including Copeland Borough Council and we are determined to continue to deliver the maximum social impact that can be derived from the £2bn of taxpayers' money that we spend at Sellafield every year. Therefore, we believe that this is the appropriate way to contribute what is a significant sum to the social and economic priorities of the Borough and so we do not feel it is necessary to include a requirement within the Local Plan for Sellafield Ltd to contribute funds through our planning applications, which may inadvertently restrict delivery of the social agenda. Linking the social impact agenda to planning applications is likely to lead to a fragmented approach and therefore missed opportunities</p>	<ul style="list-style-type: none"> Reference to the Council's Nuclear Position Statements has been removed from the policy (Policy NU1PU) The policy is designed to cover all potential nuclear proposals, which can vary significantly, and so this requirement would be considered on a case by case basis Comments noted, but as with the above this requirement applies to all nuclear development, and each proposal/developer will need to demonstrate how they meet this requirement.
183	<p>Policies CC4PO, CC6PO and CC7PO make reference to development being supported if it aligns with the Council's approved Nuclear Position Statements or that those statements will be a material consideration when assessing proposals. It is not considered appropriate to link Local Plan policy to Council position statements unless those statements are to be included as appendices to the plan and subject to examination. We suggest that criteria within the policies are developed so that the basis for supporting nuclear development is clear without reference to the position statements. The statements could be referenced in the supporting text as background information.</p> <p>Policy CC4PO states that the Borough Council will work proactively with the County Council and the site operators of the Low-Level Waste Repository at Drigg and the Sellafield site in the development and management of materials and associated facilities and infrastructure. In applying Policy CC4PO, the Borough Council expects that all nuclear sector development in the Borough to make a proportionate and meaningful contribution to local economic, social and environmental strategies / priorities. LLWR is a waste site, with all planning applications being determined by the County Council in accordance with the Cumbria Minerals and Waste Local Plan. It is not</p>	<ul style="list-style-type: none"> Reference to the Council's Nuclear Position Statements has been removed from the policies (now Policy NU1PU, NU3PU and NU4PU) Specific reference to LLWR has been removed from the policy (Policy NU1PU)

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	clear how the Local Plan has relevance to that site. Reference could be made to LLWR in the supporting text to provide context.	
CC5PO (Publication Draft Policy NU2PU)		
162	This draft policy states that Copeland will maximise opportunities resulting from nuclear decommissioning and transformation to grow and diversify their economy. It is again reiterated that formal allocation of both the Sellafield and LLWR sites to include B1, B2 and B8 uses ¹ will enable the completion of the NDA mission in as timely a manner as possible – with the overall aim of the mission to see successfully decommissioned sites repurposed for alternative uses, maximising the economic benefits generated for Copeland Borough.	<ul style="list-style-type: none"> The purpose of the Employment Allocations is to identify land for general employment uses to give companies clarity about appropriate locations. The Council recognises the importance of Sellafield and LLWR to the economy and the scale of jobs they support, but they are not an employment site in those terms.
173	2nd point - “and off-set the forecast decrease in workforce there” – Please could you delete this because our current projections for the next 10 years or so are not predicting a significant decrease in the workforce (assuming that we continue to secure Government funding at the current levels)?	<ul style="list-style-type: none"> Text has been removed and bullet reworded (now 3rd bullet of Policy NU2PU)
CC6PO (Publication Draft Policy NU3PU)		
183	Policy CC6PO expresses the Borough Council’s support for nuclear energy sector development and associated major infrastructure projects. Major infrastructure development that constitutes Nationally Significant Infrastructure Projects are determined under the Planning Act in accordance with National Policy Statements. It is suggested that clarity is provided in the plan to explain that the Borough Council is not the determining authority for such development.	<ul style="list-style-type: none"> The Council recognises there will be some types of development proposals that it will not be the determining authority. To help give that clarity Table 1 on page 3 of the Publication Draft outlines the different types of development and the respective determining authorities at the front of the Plan. In such cases the policy will be useful to support the Council’s position in working with the developer and producing a Local Impact Report. It should also be recognised that, even with NSIPs, there may be enabling and associated development that will need to be approved through Town and Country planning applications, and this policy will

ref	Comments	CBC response
		help to provide a framework for determining such applications.
CC7PO (Publication Draft Policy NU4PU)		
162	<p>It is imperative the emerging Local Plan provides the enabling land-use framework for both Sellafield and LLWR to deliver both the NDA and the Government's nationally significant nuclear mission. The NDA would reiterate their request for an extension to the Sellafield development boundary within the adopted Local Plan accordingly, in addition to a specific allocation for the LLWR site. To enable fulfilment of the NDA mission, it is requested that the following points are taken into consideration in reviewing proposed Policy CC7PO:</p> <ul style="list-style-type: none"> • it should be emphasised that use of the Sellafield and LLWR sites for delivery of the core nuclear mission should be supported in line with NDA requirements, with any remaining planning issues to be explored with the applicant(s) on a case-by-case basis; • Emphasis upon the need for supporting development near Sellafield is required to achieve site-clearance and, ultimately, the NDA mission. The NDA would welcome providing input into a framework offering certainty as to how such proposals could and should be enabled going forwards; • Reference to the broad range of activities carried out on the Sellafield site should be incorporated, with it being important to note that not all will be direct "nuclear development" (e.g. supporting activities, construction sites and temporary site cabins) - with the Local Plan seeking to enable all appropriate types of development; • Reference to the Council's internal Nuclear Position Statement should be reviewed. The NDA do not believe it is appropriate to reference an internal document of this type which has not been reviewed by either the NDA or Sellafield Ltd from a planning perspective. Key provisions should be included in a public policy statement which is transparent and subject to predictable change controls; • Acknowledgement of the requirement for all Sellafield-related planning applications to explain and demonstrate appropriate mitigation or off-setting of harmful effects on the physical environmental impacts should be included; • It should be noted with regard to Criteria F that the adopted NDA Strategy has already been subjected to extensive public consultation, therefore further rounds of public consultation are not considered to be absolutely necessary nor a policy requirement; • The Council should consider that the NDA already demonstrates social, economic and environmental benefits in the delivery of its mission in seeking to make all asset sites safer, sooner for future generations with operations delivered in accordance with NDA strategy and the Energy Act 2004; and • Use of both sites for in delivering the core nuclear mission should be supported as part of this policy, with any remaining planning issues resolved through discussions with the NDA and site operators – seeking to explain and demonstrate appropriate mitigation or off-setting of any harmful effects on the physical environmental impacts, whilst taking constraints into consideration on a case-by-case basis 	<ul style="list-style-type: none"> • Supporting text (paras 10.12.1 & 10.12.2) has been updated to highlight Government and NDA policy and strategy. • Reference to the Council's Nuclear Position Statements has been removed from the policy (now Policy NU4PU) • Requirement for local community and stakeholder support has been removed. • Noted.

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173	<p>We suggest that it would be beneficial to both the Borough and the nuclear industry if the Copeland Local Plan could provide the enabling land use framework for Sellafield Ltd to deliver the Government's nationally significant nuclear mission. Therefore, we would like to propose that the following is reflected in a policy alongside a review of the Sellafield site development boundary:</p> <ol style="list-style-type: none"> 1. On-site nuclear development – Use of the site for delivery of the core nuclear mission, in line with the Office for Nuclear Regulation (ONR), Environment Agency (EA) and NDA requirements should be supported, and for any remaining planning issues Sellafield Ltd should explain and demonstrate appropriate mitigation or off-setting of any harmful effects on the physical environmental impacts. 2. Off-site development appropriate for town centres or employment sites – Sellafield Ltd should engage with the planning system in line with the Local Plan, noting we would encourage a Local Plan which enables economic growth. 3. Off-site development required close to site – As in our previous response, there is likely to be a need for supporting development in close proximity to the Sellafield site so that we can enable our on-site developments because the available land on site is very limited and so its use needs to be prioritised for nuclear activities. Sellafield Ltd would like to engage with Copeland Borough Council on how we can establish a framework which would offer certainty as to how any such proposal could be enabled. Proposals are likely to come forward with lead times, so it would be helpful if a clear framework could be developed in anticipation of publication of the Copeland Local Development Plan. <p>We note that parts of Policy CC7PO have been used in previous Local Plans and therefore we suggest that the policy needs to be reviewed as some criteria may no longer be valid, should not be considered by the planning system, and/or are out of date or are covered by other regulatory regimes. We would like to propose that the points above should be reflected in a revised policy to be used for all development proposals which support the Sellafield mission. We would be keen to discuss this further and refine as necessary.</p> <p>We have noted in our previous correspondence, and in our recent meeting, that the generic policies within the Local Plan are often inconsistent or in conflict with our other regulatory commitments/requirements and are sometimes inappropriate for development on the Nuclear Licenced Site. This, in turn, leads to uncertainty for Sellafield Ltd and for the Local Planning Authority and therefore it will not provide the enabling framework which the Local Plan intends to provide for developers.</p>	<ul style="list-style-type: none"> • Supporting text provides positive framework outlining Sellafield's mission and its importance and the policy explains how the Council will consider planning applications. • The Council identifies employment allocations and Opportunity Sites, and encourages pre-applications discussions with developers • These can be considered on a case by case basis, and pre-application discussions should take place as early as possible. • Discussion took place and policy revised • The Local Plan is designed to enable effective planning decisions for all types of development. Once again this issue should be overcome through early and effective pre-application discussions as proposals and requirements for Sellafield emerge.

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	<p>We wish to make the following points on the proposed Preferred Options policy CC7PO in support of the need for a revised policy: “Nuclear Development” – There are a broad range of activities carried out on the Sellafield site, not all of which are directly “nuclear development”. For example, there are a broad range of support activities (such as canteen and welfare facilities) and construction sites. The Local Plan should seek to enable all appropriate types of development on the Sellafield site that are required to deliver the work that needs to be carried out on the site.</p> <p>A) Please consider removing Criterion A. Sellafield Ltd is concerned that the Council’s internal Nuclear Position Statements are proposed in this policy to be used as a material consideration in the planning process. Sellafield Ltd questions their status and the appropriateness of this given that they have not been the subject of any public consultation as part of the Local Plan.</p> <p>B) Definition of Nuclear development (please see above).</p> <p>C) Off-site development required close to site – As in our previous response, there is likely to be a need for supporting development in close proximity to the Sellafield site so that we can enable our on-site developments because the available land on site is very limited and so its use needs to be prioritised for nuclear activities. Sellafield Ltd would like to engage with Copeland Borough Council on how we can establish a framework which would offer certainty as to how any such proposal could be enabled. Proposals are likely to come forward with lead times, so it would be helpful if a clear framework could be developed in anticipation of publication of the Copeland Local Development Plan.</p> <p>D) Please consider removing Criterion D as it should not be a matter for inclusion within the Copeland Local Plan nor should it be debated through the planning process. The NDA publishes its Strategy after public consultation, and it is then the responsibility of Sellafield Ltd as the Nuclear Site Licence Holder for the Sellafield site to respond and deliver its mission in line with the NDA’s Strategy. The Local Plan should seek to enable this delivery as the NDA Strategy has already been subject to public consultation. With regards to “best practical environmental option”, Sellafield Ltd is regulated by the EA under environmental permits, with a requirement to demonstrate Best Available Techniques (BAT). Hence, it does not seem appropriate to include this requirement within the Local Plan as it duplicates another regulatory regime. Therefore, please consider removing this requirement.</p> <p>E) Please retain in the revised Policy CC7PO with a slight suggested amendment. As noted above Sellafield Ltd should in its applications explain and demonstrate appropriate mitigation or off-setting of any harmful effects on the physical environmental impacts.</p>	<ul style="list-style-type: none"> Reference to the Council’s Nuclear Position Statements has been removed from the policy (now Policy NU4PU) These can be considered on a case by case basis, and pre-application discussions should take place as early as possible. Retained in Policy NU4PU

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	<p>F) Retain in revised Policy CC7PO.</p> <p>G) Please consider removing Criterion G because the NDA's Strategy is subject to public consultation and therefore Sellafield Ltd does not believe it is appropriate for this to be further considered or debated in the planning process.</p> <p>H) Please consider rewording Criterion H because Sellafield Ltd provides and demonstrates economic and environmental benefits in the delivery of its mission to make the Sellafield site safer, sooner for future generations. With regards to social impact, we deliver our Social Impact Programme in line with the NDA's Strategy and the Energy Act 2004. We have developed our Social Impact Programme in collaboration with other stakeholders, including Copeland Borough Council and are determined to deliver the maximum social impact from the £2bn of taxpayer money that we spend at Sellafield every year. We believe this is the appropriate way to contribute a significant sum to the social priorities of the Borough and do not feel it is necessary to include a requirement within the Local Plan for Sellafield Ltd to contribute funds through our planning applications, which may inadvertently restrict delivery of the social agenda. Linking the social impact agenda to planning applications is likely to lead to a fragmented approach, missed opportunities and it has the potential to inappropriately raise local community expectations for 'community benefit funding' arising from Sellafield Ltd's planning applications. Therefore, we suggest that this should be removed or rewritten as community benefit funding cannot be a material consideration in planning applications.</p> <p>Other considerations for the Sellafield policy CC7PO: Please consider the following when reviewing the Sellafield CC7PO policy:</p> <ul style="list-style-type: none"> • With respect to contaminated land, there may be a need to develop areas of the site more than once before the end state is reached and so we would like to request that this is appropriately reflected in the Sellafield policy and elsewhere in the Plan if appropriate e.g. Policy DS5PO. • We would also request that within the Sellafield policy (CC7PO) it is recognised that it may not be possible nor appropriate for Sellafield Ltd to comply with other policies within the Local Plan: for example, biodiversity net gain, landscaping, flooding, SUDS and design etc owing to the existing constraints on the Sellafield site, safety and security requirements, the imperative to reduce hazards and risks, and the obligation to deliver value for money to the UK taxpayer. Therefore, as noted above, we propose that the use of the site for delivery of the core nuclear mission, in line with ONR, EA and NDA requirements, should be supported, and for any remaining planning issues the Local Plan should require Sellafield Ltd to explain and demonstrate appropriate mitigation or offsetting of any harmful effects on the physical environmental impacts whilst taking constraints into consideration 	<ul style="list-style-type: none"> • Retained in Policy NU4PU • Requirement for local community and stakeholder support has been removed. • Criterion reworded (now criterion G in Policy NU4PU.) • Noted.
183	Policy CC7PO, which sets out the approach for dealing with proposals for nuclear sector development at Sellafield, refers to working with Cumbria County Council. It would be helpful for the reader to understand this aspect if the	<ul style="list-style-type: none"> • This has been reflected in Table 1 on page 3 of the Publication Draft

ref	Comments	CBC response
	supporting text made reference to the County Council's responsibility for radioactive waste planning matters at Sellafield.	
CC8PO (Publication Draft Policy NU5PU)		
173	Sellafield Ltd would like to understand the rationale for including a Nuclear Demolition policy in the Local Plan. The principle of demolition is permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 which sets out the requirements of a Prior Notice of Demolition to be submitted to the Local Planning Authority. The additional requirement set out in the Local Plan in Policy CC8PO relating to ecological assets is at odds with the requirements set out in the GPDO 2015 and also covers other legal frameworks. Sellafield Ltd therefore believes that this policy is unnecessary as it duplicates other planning requirements and legal frameworks; for example, The Wildlife and Countryside Act 1981 and thus proposes that it should be removed	<ul style="list-style-type: none"> Policy retained (now Policy NU5PU)
183	Policy CC8PO sets out principles for the demolition of buildings and structures on the Sellafield site and a programme of restoration and/or redevelopment of the site. The policy includes a third principle, that demolition should not adversely affect any ecological assets unless it is demonstrated that appropriate mitigation or compensation can be provided. The policy is silent on the impacts of demolition on other interests of acknowledged importance, for example, contamination of groundwater. It is suggested that the text is amended to include these.	<ul style="list-style-type: none"> New criterion added to consider other impacts in Policy NU5PU

Retail and Leisure

ref	Comments	CBC response
R3PO (Publication Draft Policy R7PU)		
173	Sellafeld Ltd would like to comment on the application of the Sequential Test for town centres. To demonstrate value for money in accordance with our Energy Act 2004 obligations there may be a need for proposals for developments on site that may be classed as “Main Town Centre Uses”. Hence, Sellafeld Ltd would wish to see this acknowledged and accounted for in the Local Plan. For example, we may require office space close to the workforce in order to safely manage nuclear operations and deliver significant efficiencies to the taxpayer, thus allowing the mission to be delivered quicker, and ultimately leading to greater environmental gain. Please consider acknowledging this in the revised Sellafeld policy CC7PO so that we can safely and efficiently deliver the mission.	<ul style="list-style-type: none"> Comment noted and the need for main town centre uses on site has been acknowledged. We do not consider that this needs explicitly adding to the policy or supporting text, but will be dealt with through relevant planning applications.
R4PO (Publication Draft Policy R8PU)		
174	Policy R7PO and Policy R4PO undermine the opportunities to develop brownfield sites located outside of the Egremont Town Centre. The policy is presently written in a way that only allows development outside the town centre to support the role of Egremont town centre. As said this then stops development which could benefit Egremont town centre by allowing developments that would attract people to the area.	<ul style="list-style-type: none"> Comment noted- Policy R4PO is not designed to prevent out of town centre development, but to ensure that any retail/leisure development out of town is of an appropriate scale so as to not harm the vitality and viability of the town centre
R5PO (Publication Draft Policy R3PU)		
254	Whilst we welcome the intention that design should be of a good quality that is consistent with the setting of a Conservation area we consider that an amendment to wording may help which provides greater clarity that reflects wording within the NPPF as these are recognised terms. Amend bullet point 13 to read Maintains high standards of design consistent with the setting of a Conservation area of national significance that conserves and where possible enhances those elements which contribute to the significance of Whitehaven Town Centre and High Street Conservation Area including principles set out within the Conservation Area Appraisal and Conservation Area Management Plan.”	<ul style="list-style-type: none"> Comment noted- wording change made in text
R7PO (Publication Draft Policy R4PU)		
174	Policy R7PO and Policy R4PO undermine the opportunities to develop brownfield sites located outside of the Egremont Town Centre. The policy is presently written in a way that only allows development outside the town centre to support the role of Egremont town centre. As said this then stops development which could benefit Egremont town centre by allowing developments that would attract people to the area. Using the Premier Inn example under the draft plan it would be contrary to Policy R7PO because it is not located in the town centre but this ignores the patrons of the hotel who would visit and spend money in Egremont and would actually encourage businesses to cater for visitors, furthermore it would change the perception of the town by bringing back into use	<ul style="list-style-type: none"> R4PO is designed to prevent development outside of the defined centres from having an impact on the town centre. This is not to say that retail and leisure used would not be approved outside of the defined centres, but it ensures that appropriate steps have been taken to ensure that such

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	a vacant site and would create much needed construction jobs. These policies must be redrafted to support the use of brownfield sites on the edge of town locations.	development would not result in reduced footfall in the centres.
R7aPO (Policy not taken forward into Publication Draft)		
254	Cleator Moor like Whitehaven has a conservation which includes the town centre. It is therefore important that development proposals which come forward conserve and enhance those elements which make a positive contribution to the historic environment of the town centre. We would therefore suggest an additional bullet point is added to this policy which provides a positive strategy for its conservation. Add additional bullet point to read “Conserves and enhances those elements which make a positive contribution to the historic environment of the town centre and accord with principles of the Conservation Area Appraisal and Conservation Area Management Plan.”	<ul style="list-style-type: none"> Policy R7aPO has been removed and the three KSC’s have been incorporated into one policy to avoid duplication. The supporting text talks about Cleator Moors conservation area
R11PO (Publication Draft Policy BE5PU)		
36	Support the proposals for well-designed shop fronts. However should also include the ability to enforce improvement action directed towards owners of derelict or degraded facades/shop fronts. They are a significant detractor to the towns’ property stock.	<ul style="list-style-type: none"> Whilst the Council agrees that this is a problem, the ability to enforce against derelict shops comes under other legislation.
R13PO (Policy not taken forward into Publication Draft)		
209	It is too easy to close these down and the council appears little interested in why and how to prevent it.	<ul style="list-style-type: none"> Comment noted Policy requirements now included within Policy R5PU

Tourism

ref	Comments	CBC response
Supporting Text		
155	<p>We welcome the reference to the St Bees Heritage Coast under ‘Tourism: Assets and Aspirations’ (33). However, the potential of the Heritage Coast as a driver for tourism is not fully acknowledged in the Tourism chapter of the Plan. The ‘initiatives’ listed in paragraph 35.1.6 make no reference to the Heritage Coast, or its proposed extension. The report taken to full Council in April 2019 (Agenda Item 11, paragraph 1.3) highlighted the range of benefits that Heritage Coast definition can bring, which are not limited to landscape conservation:</p> <p>A defined Heritage Coast area provides a number of benefits including: • Wider recognition of the quality of the area • Increased tourism opportunities • Opportunities for attracting grant funding, which can help with enhancements to the Heritage Coast as well as ongoing maintenance • Production of a management plan for the defined area • Protection from inappropriate and unsympathetic development through the planning system, and ensuring that development is of a higher quality where it does take place.</p> <p>In our view, these wider benefits should be recognised in the Tourism chapter of the Plan.</p> <p>Para. 36.1.9 refers to the new ‘Lake District Coast’ brand, (which) will provide opportunities for new and improved leisure and tourism provision and entice visitors to the National Park to also visit Copeland thus improving the local economy.’ As noted elsewhere in our response, we are supportive of this approach in principle, but consider that the key role to be played by Heritage Coast should be highlighted.</p> <p>36.2 Tourism Opportunity Sites: The National Trust had previously supported the identification of Tourism Opportunity Sites with specific reference to the Whitehaven Coastal Fringe in the Issues and Options consultation. We note that consultants have been appointed to identify sites. We are disappointed that no opportunity has been presented to formally feed into this process.</p>	<ul style="list-style-type: none"> • Additional wording has been added to emphasise the role of the Heritage Coast. • Tourism opportunity sites are no longer being identified through the plan
T1PO (Policy not taken forward into Publication Draft)		
8	<p>I’ve just received your preferred options consultation letter, we as a long term owners of the quay and surrounding areas at Borwick rails Millom would like to keep all options open for our site including construction O+M base, local infrastructure developments, storage and maybe tourism, I am currently looking at these different options for the site as I feel the land has massive potential but unfortunately laid dormant for many years now and with the current climate could in fact be positive for our site if we went down the tourist route, any information you would like please get in touch and I’ll be only too happy to discuss this with you.</p>	<ul style="list-style-type: none"> • Comment noted, Millom Pier has now been included within the Local Plan as an Opportunity Area. Policy deleted as it was a statement rather than a policy.

ref	Comments	CBC response
155	The policy states the Council will work 'positively and proactively' with partners including National Trust in the marketing, coordinating and managing the development of the Borough's tourism offer and to maximise the 'Lake District Coast' brand. Whilst we always welcome the opportunity to work in partnership, we would note that we have already invested a significant amount of resource in the management of the area around the Heritage Coast, and in seeking to secure further enhancement and protection through the proposed extension area. The lack of recognition given to this in the draft plan is therefore very disappointing. Unless the Council are prepared to acknowledge and act on the work of partners, the offer to work 'proactively and positively' is empty rhetoric. We previously supported the identification of 'gateways' or 'hubs' as a means of promoting coastal tourism. The St Bees Head Gateway Site was defined following engagement with stakeholders as part of work relating to the approved extension to the Heritage Coast (refer to comments above). The Plan contains no reference to this.	<ul style="list-style-type: none"> Gateways and Hubs have now been identified through the Local Plan, including the Heritage Coast. Policy deleted.
T2PO (Publication Draft Policy T1PU)		
74	We support the general intent of the policy, to locate the majority of development in Principal Town and Key Service Areas. This approach affords a level protection to valued landscapes and coastline, whilst not being unduly restrictive.	<ul style="list-style-type: none"> Comment noted
T3PO (Publication Draft Policy T2PU)		
104	Copeland's beautiful coastline and the Coastal Path are without doubt important magnets to tourists, and, while I commend the initiatives to develop the coastal trail, I would like to make a plea for the Copeland Plan to include a programme of maintenance to keep our coastline free from plastic waste. I think this is vital in order to promote the safety of wildlife and enhance the visual impact of our beautiful coastline. Unfortunately, there are long stretches of coastline that are polluted with plastic waste. It is distressing to see this, and I feel it is a priority to address this blot on our landscape if we are to promote the coastal path as a tourist attraction. Local ad hoc attempts and community beach cleans are not sufficient to keep our coastline free of this unwanted waste. I would like to see the council take the initiative in developing a programme to keep our coastline clean. Maybe there is scope for partnership working with the parishes and local communities?	<ul style="list-style-type: none"> Unfortunately this does not come under the Local Plan remit. However it is recognised that it is an important issue and comments will be passed on to relevant teams within the Council
74	Any development should ensure the local landscape character is maintained and does not have a detrimental impact within the St Bees Heritage Coast or its surrounding setting, as well as the biodiversity features along the undeveloped coast.	<ul style="list-style-type: none"> This is dealt with through the Settlement Landscape Character Assessment
T4PO (Publication Draft Policy T3PU)		
74	This Policy should include ensuring no unacceptable impacts on biodiversity. Specifically, any coastal caravan and camping sites will need to consider recreational disturbance impacts on SPA birds as a result of the increase in visitors.	<ul style="list-style-type: none"> Biodiversity criteria added to policy

Rural Economy

ref	Comments	CBC Response
RE1PO (Publication Draft Policy RE1PU)		
74	Linked to the Air Quality comments for Policy N10PO below, reference should be made to ammonia emissions from agricultural developments and activities such as livestock housing, slurry stores and spreading of manures. Ammonia impacts upon sensitive habitats and several SSSI's within the Borough are currently over their critical threshold levels for ammonia (see Table 1 under Policy N10PO). Potential objectives and actions for the Local Plan could be seeking to support and assist landowners/farmers to implement ammonia reduction measures, improved infrastructure and exploring opportunities for ammonia reduction mitigation measures such as tree screening and green infrastructure. As nitrogen from ammonia settles (nitrogen deposition) it can impact upon the local natural environment and human health resulting in the general loss of plant diversity and health impacts. In combination with other impacts such as acidification of land and water, ammonia can lead to changes in ecosystem structure and function. To address this the Government's Clean Air Strategy (2019) aims to reduce ammonia by 16% by 2030. In Copeland several designated sites (SSSI's and SAC's) are at risk of ammonia pollution, listed below under the Air Quality comments (for further information on critical loads, please see APIS.). Natural England therefore recommend a separate policy to address Air Quality that would further strengthen this policy.	<ul style="list-style-type: none"> New policy added
RE3PO (Publication Draft Policy RE3PU)		
74	We advise including the need to consider bat surveys for conversions of rural buildings.	<ul style="list-style-type: none"> Incorporated into the supporting text and requirement for appropriate surveys added to the policy, with the view that it may not just be bats that are affected by development.
	We welcome a policy on the reuse of buildings. However, the wording at present is somewhat unclear at criteria a. The conversion of traditional buildings for new uses will most likely have a permanent effect on its character and appearance. In architectural, historical and landscape terms, this change will almost always result in some degree of harm to character and appearance. The degree of harm will vary according to the building's significance, its location, and the intensity of the new use. However, this harm needs to be weighed against the public benefits offered by the new use. Proposals need to be fully informed and this begins with an assessment of the building's significance before it can be determined whether it is suitable for conversion. Amend criteria a to read: The building is redundant or disused, is of a traditional design and construction and contributes to the landscape character and/or historic environment the proposal would not have an adverse effect on the historic environment, the character of the local landscape or its setting;	<ul style="list-style-type: none"> Wording change made

Copeland's Communities: Housing

ref	Comments	CBC Response
H1PO (Publication Draft Policy H1PU)		
32	The HBF generally supports this policy which sets out how the Council will make Copeland a more attractive place to live, including allocation a range of housing sites to meet local needs and aspirations and approving housing development on appropriate windfall sites.	<ul style="list-style-type: none"> Comments noted.
110, 111, 112	<p>The draft Local Plan acknowledges that ensuring the provision of a range of attractive, high-quality housing to suit a variety of changing needs is essential to provide choice, attract new residents to the Borough and ensure vulnerable residents have access to the specialist housing they need¹¹. It also notes that the growing interest from developers presents a real opportunity to improve the housing offer within the Borough.</p> <p>Draft policy H1PO relates to CBC working with key stakeholders, partners and communities to ensure that the Borough has a range of attractive, high quality housing to attract new residents. We are supportive of this policy, particularly the requirement to allocate a range of deliverable and attractive housing sites which meet the needs and aspirations of local people.</p> <p>Furthermore, we support the inclusion of supporting proposals which contribute to the regeneration of the wider residential environment and approving housing developments which accord with the Development Plan on appropriate windfall sites. This is in accordance with paragraph 68 of the NPPF which outlines that “local planning authorities should... support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”; and supports the Council’s vision and objectives in ensuring there is a ‘balanced housing market’ through improving existing stock whilst also providing for new, high quality housing to be provided on appropriate sites.</p> <p>This approach is also in accordance with paragraph 59 of the NPPF which confirms that a “...sufficient amount and variety of land where it is needed....” is made available to boost the supply of homes.</p>	<ul style="list-style-type: none"> Comments noted.
123	The housing strategy seems only to relate to the need for new homes and does not take into consideration the situation in Millom, where we have plenty of accommodation but much of it is sub standard.	<ul style="list-style-type: none"> Criterion b relates to existing homes. The affordable housing policy (H8PU) also includes measures to bring back into use empty homes as we recognise that this can help meet housing needs as well as building new homes.
134	This policy states that the Council will work with stakeholders, partners and communities to make Copeland a more attractive place to build homes and live. To achieve this Copeland atate that they will allocate a range of deliverable and attractive sites to meet local housing needs and aspirations ensuring	<ul style="list-style-type: none"> Comments noted.

ref	Comments	CBC Response
	they are built to a high standard and whilst protecting the amenity of existing residents. We are supportive of this aim by allocating deliverable sites in attractive Local Service Centre, such as Bigrigg, Copeland is better places to provide an improved housing mix, offering a wider range of types, tenures and choice of locations, with excellent access to services.	
H2PO (Publication Draft Policy H2PU)		
32	<p>This policy sets out that the housing requirement is for a minimum of 2,520 net additional dwellings (an average of 140 dwellings per annum (dpa)) to be provided between 2017 and 2035.</p> <p>The HBF is generally supportive of the Council utilising a figure over and above the local housing need (LHN) identified by the current standard method. The latest LHN calculated using the standard method is 11.3dpa, the full calculation can be found in Appendix 1. It should be noted that the local housing need figures calculated by the standard method are the minimum starting point in determining the number of homes needed in the area, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. Circumstances where housing need may be higher, include where there are growth strategies; strategic infrastructure improvements; meeting an unmet need; where previous levels of housing delivery are higher; or previous assessments of need, which may mean that housing requirement should be a higher figure than the LHN indicated by the standard method.</p> <p>It is noted that the 'Changes to the current planning system' (August 2020) document proposes changes to the standard method for assessing local housing need. These changes include consideration of the existing housing stock and an affordability adjustment that takes into account changes over time. This new method identifies an indicative housing figure of 154dpa for Copeland, again the consultation identifies that the standard method provides the starting point and not the final housing requirement. This suggests that the Council may need to consider a higher housing requirement than is currently proposed.</p> <p>The Strategic Housing Market Assessment (SHMA) 2019 states that it would be reasonable to conclude that an economic based Objectively Assessed Need (OAN) for Copeland would be for up to 198dpa. The HBF is generally supportive of a plan seeking to align job growth and housing needs and would suggest that the housing requirement for Copeland is higher than the figure currently proposed.</p> <p>The policy also suggests that in order to plan positively the plan will provide a supply of housing sites, which will provide a minimum of 3,600 dwellings over the plan period (average of 200dpa). The HBF would generally support a level of housing land supply which would identify a sufficient number of sites to meet the housing requirement plus an additional 20%, to create flexibility and choice within the range of sites, and would help to ensure that the housing requirement can be met. However, as the</p>	<ul style="list-style-type: none"> • The Council has published a SHMA which gives the most up to date picture of housing need in the Borough. This recommends that the housing requirement is set at 146 dwellings per annum over the plan period to meet housing need. The SHMA Update also recommends that the Council plans for 200dpa to support additional economic growth in the Borough. The Local Plan identifies sufficient deliverable housing sites to meet this higher figure. It is also expected that windfall development will contribute additional housing over and above this figure. • The Government's Standard Methodology has not changed in the way proposed in the Changes to the Current Planning System paper and the figure for Copeland produced under the current methodology is 8 dwellings per annum. • Given this, the Council feel the Local Plan is both ambitious whilst being realistic and deliverable.

ref	Comments	CBC Response
	HBF consider that the housing requirement is likely to be higher than the figure currently proposed, this may also mean that the level of supply also has to increase proportionately.	
36	The allocation of 140-200 housing provision appears a more realistic target given previous years shortfalls	<ul style="list-style-type: none"> Comments noted.
37	I see no reason for the vast amount of new dwellings stated to be built in areas where currently there is inadequate infrastructure for the present amount of dwellings/traffic. This will not bring new residents and investment to the area.	<ul style="list-style-type: none"> New housing development is required to meet the housing needs identified in the Strategic Housing Market Assessment. The Council has sought advise on traffic impacts and the ability for the road network to accommodate development from Cumbria County Council Highways department and Highways England. Where infrastructure is inadequate it will be improved through new development as identified in the Transport Improvements Plan and Infrastructure Delivery Plan.
110, 111, 112	<p>Draft Policy H2PO outlines the proposed housing requirement for the borough, this being a minimum of 2,520 net additional dwellings to be provided between 2017 and 2035, equating to an average of 140 dwellings per annum (dpa). The draft policy goes on to state that, in order to plan positively and support employment growth over the plan period, a range of attractive allocated housing sites, when combined with future windfall development, previous completions and extant permissions, will provide a minimum of 3,600 dwellings – an average of 200 dpa – over the plan period. It also confirms that housing delivery will be ‘monitored closely’ and, where development is not coming forward as anticipated, interventions will be sought as out at Policy H3PO.</p> <p>Story has prepared a technical critique of Copeland’s housing needs, undertaken jointly with Persimmon and Gleeson. This provides a comprehensive response in respect of draft policy H2PO and is submitted alongside these representations. The following paragraphs draw upon the findings of that technical critique to provide comments in respect of the housing requirement proposed by the draft Local Plan.</p> <p>The NPPF at paragraph 17 makes clear that the Local Plan must include strategic policies to address the identified priorities for the development and use of land across the Borough. These policies must</p>	<ul style="list-style-type: none"> The Council has published a SHMA Update which gives the most up to date picture of housing need in the Borough. This recommends that the housing requirement is set at 146 dwellings per annum over the plan period to meet housing need. The SHMA Update also recommends that the Council plans for 200dpa to support additional economic growth in the Borough. The Local Plan identifies sufficient deliverable housing sites to meet this higher figure. It is also expected that windfall development will contribute additional housing over and above this figure. The Government’s Standard Methodology has not changed in the way proposed in the Changes to the

ref	Comments	CBC Response
	<p>address the social, economic and environmental objectives in “...mutually supportive ways...”¹⁴ mindful that they are interdependent components of achieving sustainable development.</p> <p>In respect of social objectives, as per paragraph 20 of the NPPF, the strategic policies of the Local Plan must make sufficient provision for housing, including affordable housing. This should be achieved by ensuring that a “...sufficient amount and variety of land...”¹⁵ is made available.</p> <p>In accordance, with paragraph 60 of the NPPF, the minimum amount of new homes needed across Copeland should be calculated using the Governments ‘standard method’. The Planning Practice Guidance (PPG) makes clear that the housing need figure calculated by the standard method is a minimum “starting point”; it therefore makes clear that there will be circumstances where “... the actual housing need is higher than the standard method indicates...”¹⁶.</p> <p>As outlined in the accompanying Housing Needs Report, the standard method calculation for Copeland currently implies a need for only 11 dpa, which evidently is not credible where it is recognised that the borough has consistently delivered at least 110 dpa over the past decade and as many as 158 dpa in 2011/12¹⁷. This is clear evidence that the scale of the need and demand for new homes in the Borough is significantly higher than the standard method indicates.</p> <p>This is primarily due to the reliance of the standard method upon trend-based demographic projections which assume a sustained decline in the borough’s population due to the impact of a continued ageing population. However, this does not align with CBC aspiration to depart from past trends to boost economic growth and ensure a sustainable future for the Borough.</p> <p>Therefore, within the context of the PPG, “previous levels of housing delivery” undoubtedly signal a “significantly greater” need for housing in Copeland than implied by the standard method, and as such it is clearly “appropriate to plan for a higher level of need”¹⁸.</p> <p>Furthermore, the Council’s aspiration to depart from past trends is built on a consideration of investment potential in the borough with specific reference to its major employers and sectorial specialisms. The realism of achieving employment growth must be considered in the context of the success the borough has had over recent years in creating new employment opportunities. It is critical that this growth is sustained and its full benefits realised within the borough. The supply of an adequate quantity and range of housing is critical to achieving this objective.</p> <p>Story supports the Council’s positive approach in identifying that the full need for housing exceeds that set through the standard method. However, it is considered that the minimum housing requirement of 140 dpa outlined in draft policy H2PO does not reflect the Council’s aspirations for economic growth; rather it is ‘demographic-led’. Indeed, this figure does not include consideration of supporting future employment growth.</p> <p>Furthermore, the Government recently consulted¹⁹ on its initial proposals for a revised approach, acknowledging that it can no longer use the increasingly dated 2014-based household projections that</p>	<p>Current Planning System paper and the figure for Copeland produced under the current methodology is 8 dwellings per annum.</p> <ul style="list-style-type: none"> • Given this, the Council feel the Local Plan is both ambitious whilst being realistic and deliverable. • The Local Plan period has been amended so that it now covers the period 2021-2038.

ref	Comments	CBC Response
	<p>currently form the baseline. The Government therefore proposed to introduce a new element into the standard method, linked to existing housing stock, to take account of the number of homes that are already in an area.</p> <p>In the case of Copeland, the approach described above would substantially raise the minimum need currently implied by the standard method, from 11 to 154 dwellings per annum. This is entirely caused by the proposed introduction of the existing stock into the method, which takes precedence over a 2018-based projection that unhelpfully envisages zero additional households in Copeland. It is important to recognise, however, that this approach was a proposal subject to consultation and therefore it is currently unclear precisely how the formula will be altered.</p> <p>While the Council's proposed approach to housing provision cannot help but appear positive in the context of a standard method that currently implies a scarcely credible need for only 11 dwellings per annum, it is markedly less so where the method is revised in the manner that now appears likely. The proposed housing requirement of 140 dwellings per annum would fail to meet housing needs where the latter are calculated using the method that was subject to consultation this summer, and the same could conceivably be true even of the 'aspirational' supply if – as appears a possibility – this is reweighted in favour of the existing housing stock.</p> <p>Therefore, Story encourage CBC to review the housing requirement to ensure that it is positively prepared and justified, including making sure that it is fully aligned with the economic growth aspirations and in the context of boosting the supply of housing outlined in the NPPF. This will ensure that social and economic growth is pursued in mutually supportive ways (paragraph 8 of the NPPF).</p> <p>As such, Story consider that the minimum housing requirement for the borough should be 300 dpa which reflects the 'employment-led growth' which will ensure the delivery and be "mutually supportive..."²⁰ of economic growth in the Borough and assist CBC in meeting its stated aims and objectives.</p> <p>Furthermore, it is noted that the plan period is currently 2017 – 2035. The NPPF at paragraph 22 states that "Strategic policies should look ahead over a minimum 15 year period from adoption". Therefore, the current proposed expiry date of the Local Plan is 2035 (expiring on 31 March 2035), meaning that the Local Plan should have been adopted before 1 April 2020 to cover 15 years, as required in the NPPF. As such, the current plan period is inconsistent with the NPPF in this regard.</p> <p>Taking into account the future consultation on the Local Plan and submission to the Planning Inspectorate for examination, the plan period should be extended at least up to 2037, or beyond, in order to be in accordance with paragraph 22 of the NPPF.</p>	
134	The Draft Copeland Local Plan, sets out a minimum requirement for the delivery of 2520 net additional dwellings between 2017 and 2035. This equates to an average annual requirement of 140 dwellings per	<ul style="list-style-type: none"> The Council produced a Five Year Housing Land Supply Position Paper in 2020. This document is available

ref	Comments	CBC Response
	<p>annum. Within the Settlement Hierarchy, Bigrigg is identified as a Local Service Centre (LSC), The LSC's are expected to contribute at least 20% of the overall housing requirement equating to 28 dwellings per annum.</p> <p>The policy also outlines an aspirational additional requirement for the delivery of new homes, which increases the annual target to 200 new homes per annum. This target will not be used to assess Housing Land Supply, instead the lower figure will be used. It is unclear why this specific approach is being taken; however, it does indicate that CBC are seeking to support housing growth beyond their minimum demographic requirement, which we support. The figure of 140 new homes per annum, broadly accords with past delivery rates; however, it is noted that the delivery of the housing requirement will be heavily reliant upon large strategic sites, particularly in Whitehaven which are unlikely to deliver in the first five years. The Council has not yet published its updated Housing Land Supply figure, as such it is not possible to comment in more details as to whether the Council has a five year supply of housing sites currently available.</p> <p>My client's land is currently available and could easily be developed within the first five years of the plan period. The delivery of the additional land not currently proposed for allocation, but also with my client's ownership, would make a more significant contribution to the overall housing requirement.</p>	<p>here: https://www.copeland.gov.uk/attachments/five-year-housing-land-supply-statement-202021</p> <ul style="list-style-type: none"> • This identifies a 6.35 year supply of deliverable housing sites against the draft housing requirement in the SHMA and a 55 year supply against the figure produced using the Government's standard methodology. • A 2021 update the paper will be produced to support the Local Plan Publication Draft. • The Council has identified a sufficient number of deliverable sites to deliver in excess of 200dpa over the plan period when combined with a likely windfall allowance. This includes a site in Bigrigg. A number of other sites were put forward for consideration within the village and were either ruled out through the Strategic Housing Land Availability Assessment (SHLAA) process or ruled out through the Local Plan process as the sites taken forward were considered to be less constrained and more suitable.
141	<p>Policy H2PO (Housing Requirement). The preferred option analysis in paras 40.2.9 & following identifies the most optimistic growth-led scenario as preferred, on the apparent grounds that it is the only one likely to meet the profitability model of developers. However the 'Employment Led Growth' scenario of 200 homes per annum (para 40.2.9 – 40.2.19) does not take account of the likely impact of EU Exit or of Covid-19 in its projections. It also assumes that a large-scale Moorside development will go ahead, an outcome on the margins of probability given the government's recent statements and the continuing lack of a sound financial model for generation at scale. While the Scenario is informed by the government-imposed duty of aspiration, there is no quantification of the reasonable bounds of that aspiration, its driving assumptions or of the associated risk margin. It is also noted that the requirement projection seems not to take into account the number of vacant properties in the borough (1,000 – Key</p>	<ul style="list-style-type: none"> • An Updated Employment Development Needs Assessment (EDNA) has been produced that identifies the potential number of jobs that could be created if a number of strategic projects are delivered. The EDNA can be found at the following link: https://www.copeland.gov.uk/attachments/copeland-edna-2021. The EDNA takes into consideration the impacts of Covid and Brexit.

ref	Comments	CBC Response
	<p>Housing Facts, p 159). It's therefore reasonable that strategic planners should revise this policy by refining and improving the assumptions behind it and requesting developers to amend their business models in a way that will allow an improved re-quantification of requirement that closes the gap between rational need and desired profit.</p>	<ul style="list-style-type: none"> • The EDNA, and not the profitability mode of developers, has informed the Strategic Housing Market Assessment (SHMA) Update 2021, which identifies the number of homes that would be required to meet such a need. If all identified projects came forward at once this would require a figure closer to 300 dwellings per annum. As this is unlikely to happen a more realistic figure of 200 dwellings has been recommended by the consultants producing the SHMA.
178	<p>Housing Requirement The housing requirement is for a minimum of 2,520 net additional dwellings (an average of 140 dwellings per annum (dpa)) to be provided between 2017 and 2035. This is based on a 'Demographic-led Scenario' as set out in table 11 of the consultation document.</p> <p>However, the policy also suggests that in order to plan positively the plan will provide a supply of housing sites, which will provide a minimum of 3,600 dwellings over the plan period (average of 200dpa). This figure is based on an 'Employment-led Growth Scenario'. It includes an uplift based on the most optimistic employment forecasts. Both these figures are higher than the standard methodology which currently identifies a housing need for only 11 dwellings per year in Copeland. As per paragraph 60 of the NPPF 2019, "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.". It is considered that it is appropriate to plan for a higher figure than the standard method indicates as exceptional circumstances have been demonstrated in that the figure identified within the Standard Methodology does not take into account projected economic growth. As required by the NPPF, the emerging Local Plan must define the overall level of growth over the Plan period (up to 2035), based on the requirement to meet the Borough's Objectively assessed needs (OAN). We fully support the approach proposed by the Council to increase its housing need. As previously highlighted by the Home Builders Federation (HBF), the standard method could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the current standard methodology (which is 11 dwellings per annum for the Borough) it would most certainly lead to the Borough not planning enough homes to support the current need, let alone any economic growth. However, it is considered that the housing requirement needs further thought. The current proposal is to meet at least 140 dwellings per annum,</p>	<ul style="list-style-type: none"> • The Council has published a SHMA Update which gives the most up to date picture of housing need in the Borough. This recommends that the housing requirement is set at 146 dwellings per annum over the plan period to meet housing need. The SHMA Update also recommends that the Council plans for 200dpa to support additional economic growth in the Borough. The Local Plan identifies sufficient deliverable housing sites to meet this higher figure. It is also expected that windfall development will contribute additional housing over and above this figure. • The Government's Standard Methodology has not changed in the way proposed in the Changes to the Current Planning System paper and the figure for Copeland produced under the current methodology is 8 dwellings per annum. • Given this, the Council feel the Local Plan is both ambitious whilst being realistic and deliverable. • A housing requirement of 300dpa is unrealistic and is likely to be undeliverable based on previous delivery rates. This level of housing would only be required, as

ref	Comments	CBC Response
	<p>however, as already set out in policy, this does not ‘plan positively’. The Council has even acknowledged this in the consultation document as policy text for Draft Policy H2PO: Housing Requirement states “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 3600 dwellings (an average of 200 dwellings per annum) over the Plan period.”. The current proposed housing requirement of 140dpa is based on a Demographic-led Scenario’ and not an Employment-led Growth Scenario. We consider the housing requirement should be higher than 140dpa (closer to 200dpa, if not 200dpa itself) due to the fact that The Strategic Housing Market Assessment and Objectively Assessed Housing Need Report (October 2019) states on page 7 that it would be reasonable to conclude that an economic based OAN for Copeland would be for up to 198 dwellings per annum. Additionally, based on an average delivery rate of housing development over the last three years this has been in excess of 130 dwelling and this is based on the development strategy set out in the Core Strategy and Development Management Policies DPD (Adopted in December 2013) and a number of policies “saved” from the Copeland Local Plan 2001-2016 where new housing allocations have not been adopted since the Copeland Local Plan 2001-2016 was adopted in 2006.</p> <p>It is therefore considered that the average delivery rate of housing development over the last three years could have been higher if recent up to date housing allocations were in place giving landowners, developers and stakeholders certainty in respect of pursuing planning applications. Furthermore, the current adopted Local Plan housing requirement is up to 300 dwellings per annum as set out in the Copeland Local Plan 2013-2028. As part of the adopted Local Plan, the Council confirmed that it was sensible to start from what the market has proved itself capable of producing as well as including an aspirational figure equating up to 300 dwellings per year, to cater for the ‘nuclear investment’ scenario. We therefore question whether the most positively prepared plan in respect of its housing requirements has been put forward? Whilst the policy seeks to be positive with the range of housing sites provided it is considered that to ensure that the policy is in line with the NPPF the base target of a minimum 200 dwelling per annum should be the housing requirement; not 140dpa. If the Council does not seek to meet the most appropriate level of development needed it is considered that the Borough would suffer significantly from out-migration, reduced / limited employment opportunities and have a detrimental impact on the existing supply of local services and facilities. This goes against the strategic Vision, Strategy and Objectives of the Plan and would therefore be unsound as the plan would not have been planned positively. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. At the time of writing, the MHCLG consultation paper ‘Changes to the current planning system’ recognises that the current standard method could have implications for housing targets in some areas of the country and</p>	<p>demonstrated through the SHMA Update 2021, if all large scale, strategic employment projects identified in the Employment Development Needs Assessment came forward at once. This is unlikely and there are a number of uncertainties around several of them which are reliant upon government funding. The Council believes the best way to deal with this issue is to plan for 200dpa and review the situation again in 5 years time where delivery against the figure can be assessed.</p> <ul style="list-style-type: none"> • It should be noted that the housing requirement set out in the Plan is not a ceiling and additional housing development will be supported where it accords with the Development Plan.

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	<p>proposes a revised Standard Method for calculating Local Housing Need (LHN) which will deliver at least 300,000 homes a year across the country. For Copeland, it suggests a revised figure of 154 dpa as the minimum LHN need. We appreciate the planning reforms are yet to take full effect but this again helps illustrate the need for a higher figure to be adopted to meet need and demand across the Borough. Whilst it is considered that a higher figure is proposed within the policy text, we also consider that the use of a single figure in the policy is more appropriate. This rules out any potential ambiguity with regard to future development over the plan period. It is also important that the proposed housing figure set out in the policy is a minimum figure, rather than viewed as a cap and a restriction to new development. It is not considered consistent with National Policy to place a restrictive cap on the housing requirement. In the interest of effective, positive and justified plan making, where there is a need for new homes, there should be no cap on sustainable development. In conclusion, we support a housing requirement which would identify a higher figure than 140dpa along with a sufficient number of sites to meet the housing requirement (plus an additional 20% subject to the deliver test set out in the NPPF), to create flexibility and choice within the market and help ensure that the housing requirement can be met.</p>	
192	<p>Very sensible policy, 140 dwellings per annum is in line with what has been historically delivered, which along with the aspirational increase to 200 appears a sensible proposal to support economic growth in the Borough.</p>	<ul style="list-style-type: none"> Comments noted.
H3PO (Publication Draft Policy H3PU)		
32	<p>This policy sets out what the Council will do if housing development is not being delivered as anticipated. The HBF is not convinced that most of the content of this policy, is necessary to be policy, it reads much more as a statement of intent than a policy.</p> <p>The HBF is also concerned that some of the language used is not appropriate and not in line with the NPPF. For example, criteria 1 refers to 'significant persistent under-delivery', in terms of the NPPF this is defined as where the Housing Delivery Test (HDT) figure was below 85%. However, the NPPF states that an Action Plan should be prepared where the HDT is below 95%, therefore, the HBF considers that the reference to significant persistent under-delivery is not appropriate. The HBF is also not clear why the need to wait for 3 years after the adoption of the plan, if homes are not being delivered the Council should be preparing an Action Plan in line with the requirements of the NPPF. It is also likely that any Action Plan prepared will look for the Council to engage with the development industry at the earliest opportunity, so again it is not clear why the Council would wait three years from adoption for this to start to happen.</p> <p>The policy also states that where housing delivery has exceeded expectations within a particular tier of</p>	<ul style="list-style-type: none"> Policy amended.

ref	Comments	CBC Response
	<p>the settlement hierarchy the Council will consider carrying a review of the Plan. The HBF does not consider that this is appropriate and considers that additional housing development should continue to be supported once the housing requirement figures have been met for the lower tiers of the settlement hierarchy, this would be in line with the NPPF which seeks to boost housing supply.</p>	
110, 111, 112	<p>Draft Policy H3PO sets out the measures by which housing delivery within the borough will be monitored and the interventions that will be sought where development is not coming forward as anticipated.</p> <p>Whilst the principle of Policy H3PO in seeking to maintain housing delivery over the plan period is supported, Story have a number of concerns with the content of the draft policy.</p> <p>Firstly, Point 1 of the draft policy states that, where there is “significant persistent under-delivery” against the housing requirement in any single monitoring year, CBC will engage with the development industry to understand the reasons for under-delivery and produce an action plan which identifies methods to address such issues.</p> <p>The NPPF refers to “significant under-delivery” as where the Housing Delivery Test indicates that the delivery of housing over the previous three years was below 85% of the housing requirement²¹. Paragraph 75 of the NPPF requires that, where the Housing Delivery Test indicates that delivery has fallen below 95% of the housing requirement over the previous three years, an action plan should be prepared by the authority in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.</p> <p>Therefore, the policy would benefit from the definition of “significant persistent under-delivery” to aid clarity and ensure consistency with the NPPF, as outlined above.</p> <p>Secondly, Point 1 and 2 of the draft policy refer to a 3 year monitoring period of housing delivery after the plan’s adoption. Paragraph 75 of the NPPF states that where “delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan...”.</p> <p>The NPPF does not refer to three years following a plans adoption. Rather, it relates to the previous three years of housing delivery in general terms and across a plan period. Therefore, it is recommended that this text should be revised to ensure that it is clear and consistent with paragraph 75 of the NPPF.</p> <p>Thirdly, Point 2 suggests that where housing delivery has exceeded expectations within a particular tier of the settlement hierarchy set out in Policy H4PO, CBC will consider carrying out a full / partial Local Plan Review.</p> <p>The overall housing requirement figures set out at draft policy H1PO and the distribution set out at draft policy H4PO comprise a minimum number of homes needed within the Local Authority area, as identified within Paragraph 60 of the NPPF, and accordingly should be considered as such.</p>	<ul style="list-style-type: none"> • Policy amended.

ref	Comments	CBC Response
	<p>Each settlement will have different needs which development above and beyond the housing requirement may be able to meet. Furthermore, higher delivery in one settlement might be needed to offset a shortfall in another settlement to ensure that sufficient development is provided across the Borough as a whole. In order to boost significantly the supply of housing and accord with the presumption in favour of sustainable development identified within Paragraph 11 of the NPPF, additional housing within the lower tiers of the settlement hierarchy should be approved where they meet an identified market, affordable or elderly needs of the Borough.</p> <p>Therefore, in this context, this point of the draft policy is not supported by Story. It does not meet the tests of soundness as it is not 'positively prepared' relating to housing delivery, appropriately 'justified' within the Council's evidence base or 'consistent with national policy' as discussed above.</p> <p>For the reasons outlined above, Story is not supportive of draft Policy H3PO in its current form and suggest that this is redrafted to ensure that it is positively prepared, justified and compliant with the NPPF. The revised policy should refer to "significant under delivery" and monitoring across the plan period, and remove reference to capping the supply of housing in particular settlements.</p>	
134	<p>This policy sets out the action which will be taken by CBC in the event that delivery of new housing does not come forward at the anticipated rate. We consider this Policy to be particularly important as delivery of new homes across Copeland has consistently fallen below their housing target which has resulted in a significant undersupply of homes.</p> <p>We broadly support the mechanism proposed; however consideration could be given to look more positively/proactively at sites which lie adjacent to settlement boundaries (similar to the approach taken by Allerdale) As these locations, are likely to be the most sustainable locations outside of the allocations.</p>	<ul style="list-style-type: none"> • A change not considered necessary in this regard. The settlement boundaries will be extended in a number of cases to allow for draft allocations (and in some cases suitable windfall sites) to come forward over the plan period. The Local Plan identifies sufficient deliverable sites to support economic growth over the plan period and policy DS4PU (settlement boundaries) does allow for development outside the settlement boundaries in a number of cases.
178	<p>Housing Delivery Draft Policy H3PO aims to identify measures that will be put in place if monitoring shows that housing is not being delivered as expected, to ensure that any delays do not hinder the delivery of the Local Plan as a whole. This is fully supported by our client and we look forward to seeing a housing trajectory being included in the Publication draft in due course to help understand how much housing is anticipated to come forward on allocated and windfall sites and at what stage of the plan period. We also support partial Local Plan Review. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary in accordance with paragraph 33 of the NPPF. Furthermore, Local Plan Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). However, we question the need to wait for 3 years after the adoption of the plan to prepare an Action Plan. Whilst we</p>	<ul style="list-style-type: none"> • Policy amended.

ref	Comments	CBC Response
	acknowledge that paragraph 75 of the NPPF states that “To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years”, surely, if the council is under delivering this should be addressed immediately to ensure that a backlog of under delivery does not occur.	
H4PO (Publication Draft Policy H4PU)		
32	This policy along with the accompanying table provides the distribution of housing, it sets out the maximum amounts that will be supported in the Sustainable Villages and Other Rural Villages. The HBF does not consider that this form of moratoria is in line with the NPPF and the Government’s aim to boost the supply of housing. The HBF considers that the Council should remove reference to development being ‘limited’ within the policy and to ‘maximum’ within the table.	<ul style="list-style-type: none"> The cap on development within the lower tiers has been removed. Upon reflection it was not considered to accord with the NPPF and other plan policies will prevent sprawl and village cramming therefore the cap is not required.
57	<u>Policy H4PO</u> sets out a settlement hierarchy for the proposed distribution of housing. The proposed proportion of 40% of housing being located in Whitehaven and 30% of housing in the key service centres is a higher proportion than previously indicated in the Interim SHLAA, published as part of the Local Plan Issues & Options consultation. Whilst locating residential development where there are existing sustainable travel options has the potential to reduce the number of vehicular trips, the scale of residential development proposed for Whitehaven and to a lesser extent, Egremont, highlights the need for a clear understanding of the associated traffic impact on the A595 in these locations, in order for appropriate mitigation measures to be identified which support the level of growth proposed.	<ul style="list-style-type: none"> The Council has engaged with Highways England and Cumbria County Council Highways Authority throughout the production of the Local Plan. Where improvements to the road network are required these are highlighted in the Transport Improvement Study 2021.
74	Policy E2PO (Location of Employment) effectively mitigates policy E4PO (Employment Sites and Allocations) through stating that “Where the following impacts occur, and have been deemed to be acceptable by the Council, mitigation measures must be sought....biodiversity” and this protection could usefully be added into policy to mitigate policies H4PO and H5PO in terms of housing delivery.	<ul style="list-style-type: none"> A note has been added to the start of the plan (section 2.10) to remind the reader that it must be read as a whole. The suggested change is therefore not considered necessary.
86	There appears to be something in the region of 2000 new home builds planned for the Whitehaven area alone... and given current road difficulties we endure in a Georgian designed town - built in a valley with very limited space and heritage restrictions I foresee some additional problems arising. I would urge that roads be improved across West Cumbria prior any new builds to avoid any greater difficulties for 'getting around'	<ul style="list-style-type: none"> The Council has engaged with Highways England and Cumbria County Council Highways Authority throughout the production of the Local Plan. Where improvements to the road network are required these are highlighted in the Transport Improvement Study 2021.

ref	Comments	CBC Response
110	<p>Story is supportive of the proposed settlement hierarchy which focusses the distribution of new development to the four largest settlements in the Borough, comprising the ‘Principal Town’ and ‘Key Service Centres’. These settlements are those which have the greatest range of services and facilities, including employment centres and transport infrastructure; as such, they should continue to be the primary focus for new development in the Borough.</p> <p>Draft Policy H4PO supports this through identifying that 40% of new residential development will be directed to Whitehaven and 30% to be distributed between Egremont, Cleator Moor and Millom. The remaining distribution of new residential development will be split between the Local Service Centres (20%), Sustainable Rural Villages (7%) and the Other Rural Villages (3%).</p> <p>Story is generally supportive of this percentage split. However, the figures set out in the table at Policy H4PO will need to be updated to reflect comments on the overall housing requirement outlined in this document and the accompanying technical critique²². Similarly, the figures are a minimum and should not be treated as a barrier to further delivery in particular settlements.</p> <p>Principal Town</p> <p>It is noted that the overall distribution of new housing to Whitehaven (40%) has decreased by 5% when compared with the adopted Core Strategy (45%). The accompanying evidence base²³ acknowledges this and states that “this is a minimum requirement and additional development will be supported in the town where it accords with the development plan”. Whilst the justification for the reduction in the proposed distribution of new housing to Whitehaven is unclear, it is presumably due to the inclusion of Sustainable Rural Villages and Other Rural Villages within the hierarchy and thus the expectation for them to take on a combined 10% of new residential development, as noted above. However, there is no clear justification outlined in the evidence base.</p> <p>Whitehaven is the largest and most sustainable location in Copeland. It has the greatest range of services and facilities, accommodating the Borough’s key employment centre, as well as being well-connected by roads and public transport links. Story is therefore supportive that the focus on the delivery of new homes in Whitehaven has been retained, but suggests that further clarification as to why the proportion of distribution to the Borough’s Principal Town has decreased would be helpful.</p> <p>As discussed further below and in Chapters 3 and 4 of this document, the draft proposed housing allocations include HWH3 (land at Edgehill Park and High House) and HWH6 (Land south of Waters Edge Close) located to the south west of Whitehaven and on land owned by Story which is clearly suitable, available and achievable.</p> <p>Key Service Centres and Local Service Centres</p> <p>Story emphasises that the geography of Copeland needs to be taken into account when directing</p>	<ul style="list-style-type: none"> • Comments regarding specific sites noted. • The reasoning behind the reduction in the amount directed to Whitehaven is set out in the Settlement Hierarchy and Development Strategy Document 2021. Additional text has been added (13.6.6) to support the policy to explain the reduction.

ref	Comments	CBC Response
	<p>growth to the identified KSC's and LSC's to ensure growth is as sustainable as possible. Importantly, locational advantages of some KSC's and LSC's, such as Cleator Moor, should be recognised through the proportion of growth directed to these areas. As defined within Paragraph 8 of the NPPF sustainable development has three strands, therefore the sustainability of settlements isn't solely dependent on the size of the settlement or which services it contains, but also its proximity to other settlements, employment opportunities and or services.</p> <p>Settlements such as Cleator Moor are well-connected to Whitehaven and the existing employment areas, making them key sustainable locations for growth.</p> <p>As discussed below and in Chapter 5 of this document, Story is supportive of the growth of Cleator Moor to the east of Jackstrees Road. Development in this location would relate well to the existing settlement, be located adjacent to existing housing and would be contained between the existing built up area of Cleator Moor and the existing road network to round off the settlement.</p> <p>This area is close to main arterial routes ensuring the delivery of sustainable development which will subsequently enable residents to access employment services and facilities in accordance with the provisions of Paragraph 8 of the NPPF. Furthermore, the southern areas of Cleator Moor suffer the highest levels of deprivation in comparison to the northern part of the settlement. As such, development to the south would assist in the regeneration of this area of the settlement.</p> <p>As identified below and in Chapter 5 of this document, Story control land to the east of Jackstree Road which is identified as a proposed housing allocation (ref. HCM1). This land is suitable, available and achievable and would therefore assist in meeting identified needs within the Borough.</p>	
111, 112	<p>Persimmon and Gleeson are supportive of the proposed distribution of housing proposed within Policy H4PO, which focusses the majority of new development to the four largest settlements in the Borough, comprising the 'Principal Town' and 'Key Service Centres'. Draft Policy H4PO supports this through identifying that 40% of new residential development will be directed to Whitehaven and 30% to be distributed between Egremont, Cleator Moor and Millom. The remaining distribution of new residential development will be split between the Local Service Centres (20%), Sustainable Rural Villages (7%) and the Other Rural Villages (3%).</p> <p>Whilst Persimmon and Gleeson are generally supportive of this percentage split, the figures set out in the table at Policy H4PO will need to be updated to reflect comments on the overall housing requirement outlined in this document and the accompanying technical critique</p> <p>Principal Town</p> <p>It is noted that the overall distribution of new housing to Whitehaven has decreased by 5% when</p>	<ul style="list-style-type: none"> Whilst it is noted that Millom and Haverigg are poorly connected to Whitehaven, they are approximately half an hour from Barrow (which also offers significant employment opportunities). Millom, being the only town in the South of the Borough, also contains a large number and variety of services and is well connected to Barrow, Whitehaven and Sellafield, all of which provide employment opportunities, by train. Haverigg justifies its position in the hierarchy by the number and type of services it contains. Rural, coastal villages such as this are also becoming increasingly more attractive, with the Town Council noting that the number of second and holiday homes in the

ref	Comments	CBC Response
	<p>compared with the adopted Core Strategy (noted as 45% in the adopted Core Strategy). The accompanying evidence base²¹ acknowledges this; however, states that “this is a minimum requirement and additional development will be supported in the town where it accords with the development plan”. Persimmon and Gleeson welcome this recognition within the evidence base and also within the policy itself. Whitehaven is the largest and most sustainable settlement in Copeland. It has the greatest range of services and facilities, accommodating the Borough’s key employment centre, as well as being well-connected by roads and public transport links. Persimmon and Gleeson are therefore supportive that the focus on the delivery of new homes in Whitehaven has been retained.</p> <p>Key Service Centres and Local Service Centres</p> <p>Persimmon and Gleeson emphasise that the geography of Copeland needs to be taken into account when directing growth to the identified KSCs and LSCs to ensure growth is as sustainable as possible. Importantly, locational advantages of some KSCs and LSCs such as Egremont and Bigrigg, should be recognised through the proportion of growth directed to these areas. As defined within Paragraph 8 of the NPPF, sustainable development has four strands, therefore the sustainability of settlements isn’t solely dependent on the size of the existing settlement or which services it contains, but also its proximity to other settlements, employment opportunities and or services.</p> <p>As discussed at paragraph 2.7, settlements such as Egremont, Cleator Moor and Bigrigg are all well-connected to Whitehaven, including in relation to accessibility via sustainable modes of transport, and the existing employment areas, making them key sustainable locations for growth perhaps considered excessive for the services they provide. However, the more isolated settlements, such as Millom and Haverigg, also need to be seen in this locational context and their capability of delivering large scale growth. These areas are isolated from Whitehaven as the Principal Town (c. 1 hour drive) and also key employment areas, such as Westlakes Science and Technology Park (c. 50 minute drive) and the Sellafield Campus (c. 40 minute drive). Furthermore, as per Chapter 10 of the Preferred Options Draft, the opportunities for economic growth in Copeland are focussed in and around Whitehaven and the existing key employment areas already mentioned. These locational constraints make these areas less appealing to national house builders and local developers due to the relative lack of demand in these locations and increased difficulties of building at scale in locations which are less accessible, and therefore less sustainable. As such, Persimmon and Gleeson request that further consideration is taken to understand the geography of Copeland and that the distribution of sustainable growth across KSCs and LSCs is not solely reliant upon the existing services and facilities settlements they provide; but their connections to and ability to sustainably support the Borough’s Principal Town and key employment areas.</p>	<p>village has increased since the start of the Covid pandemic. This may make the area more attractive to developers.</p> <ul style="list-style-type: none"> • There is developer interest in at least one of the two Millom allocations. • Additional recognition of the isolated nature of the South of the Borough, and potential opportunities to improve this, has been added to the connectivity chapter.

ref	Comments	CBC Response
178	<p>Distribution of Housing We support the assertion that the distribution of housing in the Borough will be broadly in line with the settlement hierarchy set out in Policy DS2PO. We also support that additional housing will be supported within the towns and Local Service Centres where it accords with the Development Plan. However, for clarity, we trust that ‘towns and Local Service Centres’ also include Key Service Centres? Clarification on this matter would be welcomed. Draft Policy H4PO sets out how many dwellings will be sought within each tier of the hierarchy in order to meet the baseline housing requirement of 2520 dwellings across the Borough over the Plan period. We agree that the proportion of development for the Key Service Centres should be at least 30% of the overall housing requirement, however, in line with our comments to draft Policy H2PO it is considered that the housing requirement should be higher than the figure currently proposed (at least 200dpa not 140dpa). Based on this, we consider that the housing target for the three Key Service Centres should be should be at a minimum 756 dwellings in order to meet the 3,600 dwellings over the plan period in alignment with the Employment-led Growth Scenario. We appreciate that as part of this change there may be a need increase housing allocations to ensure that the minimum and possibly more is met over the full plan period. As mentioned above, our clients interest is in respect of the Key Service Centre of Egremont. We support Egremont being identified as a Key Service Centre and that at least 30% of all new development will take place within the three identified Key Service Centres of Cleator Moor, Egremont, Millom (which we believe should be a minimum of 756 dwellings). As it stands, the policy currently sets out a ‘maximum’ target for some settlements and we do not consider that this restriction is in line with the NPPF and the Government’s aim to boost the supply of housing. The Council should remove reference to development being ‘limited’ within the policy and to remove the ‘maximum’ figures within the table.</p>	<ul style="list-style-type: none"> • Key Service Centres added to the policy for clarity. • The Council has published a SHMA Update produced by JBA consultants which gives the most up to date picture of housing need in the Borough. This recommends that the housing requirement is set at 146 dwellings per annum over the plan period to meet housing need. The SHMA Update also recommends that the Council plans for 200dpa to support additional economic growth in the Borough. The Local Plan identifies sufficient deliverable housing sites to meet this higher figure. It is also expected that windfall development will contribute additional housing over and above this figure. • The Council feel the Local Plan is both ambitious whilst being realistic and deliverable. However delivery against both figures will be monitored and housing need will be reviewed as part of the Local Plan Review 5 years from the Plan’s adoption. • The cap on development within the lower tiers has been removed. Upon reflection it was not considered to accord with the NPPF and other plan policies will prevent sprawl and village cramming therefore the cap is not required.

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H5PO² (Publication Draft Policy H5PU)		
32	<p>The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. Under the NPPF, the Councils should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.</p> <p>The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.</p> <p>The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.</p>	<ul style="list-style-type: none"> The Council has identified more sites than required to meet the requirement to provide choice and flexibility. This can be seen in the housing trajectory accompanying the Publication Draft. This also shows that at least 10% of sites (allocations and sites with extant permission) are on sites of less than a hectare. The trajectory has been informed using evidence from the development industry where available. This includes emails from developers regarding delivery rates on sites where available and where this has not been possible assumptions have been based upon rates agreed with the industry through the SHLAA process.
57	<p><u>Policy H5PO</u> sets out the individual residential site allocations. The most significant locations for proposed residential development are in large-scale regeneration sites, in which the Plan states that new housing would be transformational and where we are working with developers and partners to seek external funding to unlock development (e.g. through funding necessary infrastructure). The regeneration sites relevant to the SRN are listed below:</p> <p>Former Marchon Site, Whitehaven: 52ha, Approx. 500 homes; Harras Moor, Whitehaven: 23.05ha, Approx. 370 homes; Mirehouse South Well-Being Village, Whitehaven: 73.19ha, Approx. 700 homes;</p>	<ul style="list-style-type: none"> Comments noted. A Transport Improvement Study has been produced which looks at the impacts of new development upon the road network and has identified required improvements to mitigate any negative effects.

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	<p>Land at Edgehill Park (part former Marchon car park), Whitehaven: 20.39ha, Approx. 408 homes.</p> <p>We have provided consultation responses to planning applications on or adjacent to several of these sites previously, and through this, have had discussions with Copeland Borough Council regarding the combined scale of proposed residential development in Whitehaven and associated potential impact on the A595 junctions, some of which are already known to be under strain. The designation of the above regeneration sites in Whitehaven further reinforces the need for this cumulative impact to be assessed as part of a robust transport evidence base to underpin the Local Plan.</p> <p>It is noted that the Mirehouse South Well-Being Village is not included as an allocated site, however if there is an aspiration to develop this site then it should be included as part of the transport assessment work undertaken to assess the individual and cumulative impacts of all sites, and identify appropriate mitigation measures. In the case of this site, there would likely be a significant impact on the A595 / Mirehouse Road junction, which would also likely to be impacted by development of the proposed regeneration sites at Land at Edgehill Park and the Former Marchon Site, suggesting the need for detailed consideration of the potential impacts and mitigation requirements at this junction (but not limited to this junction only).</p>	
74	<p>Policy E2PO (Location of Employment) effectively mitigates policy E4PO (Employment Sites and Allocations) through stating that “Where the following impacts occur, and have been deemed to be acceptable by the Council, mitigation measures must be sought....biodiversity” and this protection could usefully be added into policy to mitigate policies H4PO and H5PO in terms of housing delivery.</p>	<ul style="list-style-type: none"> • A note has been added to the start of the plan (section 2.10) to remind the reader that it must be read as a whole. The suggested change is therefore not considered necessary.
134	<p>The draft policy recognises the importance of making provision for a variety of attractive housing sites, to encourage developers and new residents to the Borough, to meet existing residents housing needs and aspirations and reverse the trend of population decline.</p> <p>The number of new homes delivered in the Borough has consistently fallen below the housing requirement in the Core Strategy and the new proposed housing requirement will significantly lower than the previous requirement</p> <p>Policy H5PO identifies all the sites which are to be allocated and that will contribute to the delivery of the overall housing requirement. The site (ref: HB12 or BI002a) which is proposed for allocation measures approximately 0.74 hectares and has an indicative yield of 19 units, using a standard density of 25 dwellings per hectare.</p> <p>This site is available for delivery immediately and more importantly is in a location that is commercially viable and will provide a strong build out rate to support the Borough's five year supply. Furthermore, the site will make an important contribution to the strategic growth aspirations of Copeland BC.</p>	<ul style="list-style-type: none"> • Comments noted.

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	<p>Para 67 of the NPPF states that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period; and identify specific, developablesites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.</p> <p>The NPPF states that " to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the sitewithin five years.</p> <p>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for thtype of units or sites have long term phasing plans)</p> <p>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"</p> <p>We consider there to be pent up demand for housing development in Bigrigg, as no sites have been allocated since 2001-2016 Plan, and the settlement boundary was drawn tightly around existing development.</p> <p>Other proposed allocations in Bigrigg, HBI1 & HBI3 have non-known developer interest and access constraints, yet have been deemed to be developable within the 0-5 year period. We are in discussion witha national housebuilder who have expressed an interest in bringing the site forward for development. As such, we would ask that consideration is given to the allocation of additional land, comprising site B1002 to help meet housing requiremnt and demand.</p> <p>Paragraph 68 recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and can often be built out more quickly.</p>	
155	<p>Sites HWH4, HWH5, HSB1 and HSB2 are all located in very close proximity to the St Bees Heritage Coast. High priority should be given to protecting the setting of the Heritage Coast when considering proposals in these locations, including through suitable layout, design and landscaping.</p>	<ul style="list-style-type: none"> • Comments noted. The Council has included a new policy relating to the Heritage Coast (N7PU) and any development on these sites would have to comply with this. • Site HSB2 has not been taken forward into the Publication Draft.
168	<p>Future Site Allocations</p> <p>New development should be focused in sustainable locations which are accessible to local services and</p>	<ul style="list-style-type: none"> • Comments noted.

ref	Comments	CBC Response
	infrastructure. A fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. We would welcome continued dialogue to enable us to coordinate the delivery of development with the timing for delivery of infrastructure improvements.	
169	<p>We are generally supportive of the approach and aspirations within the plan, however, we do feel it is important that the Council work closely with Cumbria County Council on the site allocations considerations and also on specific policy considerations such as Policy H16PO: Conversion of Rural Buildings to Residential Use, where the conversion of a rural building could significant sterilise areas of mineral resource, if such development is proposed within a mineral safeguarding area.</p> <p>The plan includes a number of Site Allocations which do not appear to have considered the issue of mineral safeguarding as required by the NPPF and the PPG. You will be aware that Cumbria County Council has identified mineral safeguarding areas (MSA). It has not been possible for me to assess specific site allocations in any detail, largely due to the scaling issues associated with the Copeland Plan and the adopted Cumbria Minerals Plan. It is not clear if the site allocations are within MSAs, or whether or not any consideration to the prior extraction of minerals. As indicated in the PPG, district councils should show MSAs on policy maps.</p>	<ul style="list-style-type: none"> • Comments noted. The Council has produced a Housing Allocations Profile Document as an appendix to the Local Plan Publication Draft. This identifies whether the site is within a Mineral Safeguarding Zone or Mineral Consultation Zone. The text supporting Policy H16PO (Conversion of Rural Buildings) has been updated to include reference to mineral safeguarding areas. • The Mineral Safeguarding Areas are shown on the Council's webmapping. Given that they cover a large portion of the borough it was not considered possible to show them on the Proposals Map given the level of information the map already contains.
179	<p>It's not clear from the information on housing allocations if any of the sites affect playing field sites. Any allocation/development of sports facilities or playing field land (including school playing fields) would need to comply with paragraph 97 of the NPPF. If any allocations are likely to prejudice the use of playing field sites, then their development would need to comply with paragraph 182 of the NPPF.</p> <p>Should any allocated site contain a sport facility, then in accordance with paragraph 97 of the NPPF it should be replaced, unless it can be evidenced in a robust and up to date Playing Pitch Strategy and up to date built sports facilities strategy that the sport facility is surplus.</p> <p>There is no distinction between privately and publicly available sports provision in the National Planning Policy Framework. In paragraph 74, it is specified that existing open space, sports and recreational buildings and land, including playing fields should not be built upon unless various criteria are complied with. This is sufficiently broad to cover the last use of the relevant part of the application site."</p> <p>"There is no definition of the word 'existing' in the glossary. Although the site is not currently in active use, it is capable of being used for that purpose for the reasons given earlier in my decision. There has been no argument that the land has any other lawful use."</p>	<ul style="list-style-type: none"> • The Council has produced a Housing Allocations Profile Document as an appendix to the Local Plan Publication Draft. This highlights whether the allocation contains playing fields or if any neighbouring sites contain playing fields. • If the site contain a playing field, the development must comply with the relevant policies within the Health, Sport and Culture chapter. • An additional policy (Policy SC4PU) has been included in the Local Plan Publication Draft to ensure that new development does not prejudice the use of existing playing fields. Development on allocated sites would need to comply with this policy.

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	<p>On that basis of the above, the Planning Inspectorate held that, in accordance with Local Plan Policy and National Planning Policy Framework, compensatory replacement provision is necessary and should be provided as part of the scheme. Sport England is a statutory consultee on planning applications affecting playing field land.</p> <p>The requirement to consult Sport England covers all playing field land regardless of ownership and all playing pitches regardless of their surface (i.e. natural and artificial grass pitches). We assess planning consultations against the five exceptions in our Playing Fields Policy.</p> <p>Sport England exceptions above, reflect paragraph 97 of the NPPF. Sport England suggests that any planning policy is consistent with the NPPF and our playing fields policy exceptions. Where a robust evidence base shows that a site is genuinely surplus to sporting requirements, then it can be redeveloped. However, without such an assessment, there is no way of demonstrating that a site is surplus. Sport England would wish to avoid a situation where an allocation document proposes a sport facility for redevelopment which we then must object to under our statutory role. We acknowledge that the Council are progressing with a new Playing Pitch Strategy which should be complete on 2021.</p>	
H6PO (Publication Draft Policy H6PU)		
110, 111, 112	<p>Draft Policy H6PO aims to minimise any adverse impacts of new housing development on existing communities and ensure that schemes are of a high design standard. The draft policy outlines a number of criteria that all housing developments on allocated and windfall sites must meet.</p> <p>It is considered that the criteria outlined relates well to the draft design standards policy DS7PO. We are therefore broadly supportive of this policy; however, it emphasises the comments made in relation to draft policy DS7PO below are also relevant here (please refer to paragraphs 2.90 – 2.93).</p>	<ul style="list-style-type: none"> Comments noted.
155	<p>In our view, the criteria of this policy are insufficiently robust. In particular, criteria 'a' should be expanded to make specific reference to local landscape character, natural and cultural heritage assets, and - given the scale of development proposed to the west of Whitehaven - the St Bees and Whitehaven Heritage Coast.</p>	<ul style="list-style-type: none"> Criterion A expanded as requested
179	<p>Sport England would welcome the policy including delivering healthy communities, good design needs to achieve this. Sport England advocate including the Active Design principles into this policy or the inclusion of a separate Active Design policy in its own right as set out earlier in this response.</p>	<ul style="list-style-type: none"> The overarching design policy (policy H6PU) and supporting text in the Design Standards Chapter has been expanded to include reference to active design. Housing development must comply with this policy and therefore no change is required to Policy H6PO (New Housing Development) in that respect. Active design will also be an important feature in the proposed Design Guide SPD which the Council intends to produce.

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192	Proposal detailing all of the criteria that housing developments need to demonstrate ahead of being granted is supported. Planners need to ensure that developers are fully aware of these requirements and are given advice on how to submit applications to demonstrate this. Policy should also clearly state that applications that have not been subject to any form of planning, local body and / or local resident consultation will not be looked at favourably.	<ul style="list-style-type: none"> Unfortunately, requiring additional consultation over and above what is carried out at the planning application stage would not be in keeping with the NPPF and would place additional constraints upon developers. It is likely that the Inspector at the Public Examination into the Local Plan would not be able to find the Plan sound if it contained such a requirement. The council can however encourage early and meaningful pre-application engagement with relevant groups and residents even it cannot require this and the Local Plan contains text at paragraphs 5.2.4 and 13.9.5 that does this.
217	In an attempt to improve newly build housing greater emphasis on efficiency should be included. New housing should be of the highest efficiency and housing that exceeds the current minimum standards should have a higher likelihood of approval. This will impact throughout the housing plan as by improving the efficiency of the housing stock people's costs are reduced and those in fuel poverty will benefit the most in any decrease in running costs. So by enforcing higher standards we will all benefit through reduced bills and reduced CO2 emissions. Any development that exceeds the standards by a significant amount should be looked at favourably.	<ul style="list-style-type: none"> Whilst we support the intentions of this comment, the Council is restricted in terms of what measures it can require through planning policies. The Government has stated its intentions to include energy efficiency standards through new Future Homes Standard through amendments to the Building Regulations. Planning Policy is unable to replicate the provisions in the building regulations and therefore no changes are proposed to the policy in this regard.
H7PO (Publication Draft Policy H7PU)		
32	<p>This policy states that when determining appropriate densities consideration should be given to the shape and size of the site, the appropriate housing mix and the character of the area, amongst other elements. The HBF generally supports this element of the policy, which is considered to provide suitable guidance in considering the density of development.</p> <p>The policy also states that applicants must demonstrate to the satisfaction of the Council how proposals meet local housing needs and aspirations identified in the latest Strategic Housing Market Assessment (SHMA) and Housing Needs Assessment in terms of house type, size and tenure.</p> <p>The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, it should be noted that the SHMA or Housing Needs Assessment documents will only ever form a snapshot in time and may not be up to date or appropriate for the site proposed for development. Therefore, the HBF considers that alternate evidence should also be considered, this could include information provided by the developer or by others for example the housing waiting list. The HBF also considers it is important</p>	<ul style="list-style-type: none"> Additional text added to the policy regarding other forms of evidence that will be accepted. The supporting text above the policy notes that there is a case for more aspirational housing therefore the Council does not feel any additional changes are necessary.

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	<p>that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. The HBF would also highlight the need for creating a housing market that will provide an element of aspiration to ensure working people and families are retained within the area.</p>	
110, 111, 112	<p>Draft Policy H7PO outlines that development should make the most effective use of land and that the density of new development should reflect the shape and size of the site and the requirement for public open space and landscaping; this approach is in accordance with paragraph 117 of the NPPF. The draft policy requires applicants to demonstrate how their proposals meet local housing needs and aspirations identified in the latest Strategic Housing Market Assessment (SHMA) and Housing Needs Assessment in terms of house types, sizes and tenures.</p> <p>Whilst Story is generally supportive of this policy and the ambition of providing a range and choice of homes, it should be emphasised that the SHMA reflects conditions of the Borough at that time of production and therefore may not reflect up-to-date conditions at the time of an application. It also does not consider any site specific requirements or constraints.</p> <p>As such, Story consider that CBC and the draft policy should incorporate a degree of flexibility such that it is supportive of alternative evidence being provided by the applicant such as their own up-to-date market evidence reports. This will ensure that the draft policy is not overly onerous and allows developers to work collaboratively with CBC to ensure that individual site circumstances are taken into account.</p> <p>Furthermore, the draft policy does not include minimum density standards as required by paragraph 123 of the NPPF, rather the supporting text of the draft policy states that CBC feel the most appropriate approach is for applicants to determine the most appropriate density for their developments²⁴. The NPPF makes clear that “this will be tested robustly at examination...”²⁵, therefore, the policy should be amended to include minimum density standards to ensure the plan meets the test of soundness relating to consistency with national policy.</p>	<ul style="list-style-type: none"> • Additional text added to the policy regarding other forms of evidence that will be accepted. • The minimum density standards identified in the NPPF (now para 125) are only required “<i>Where there is an existing or anticipated shortage of land for meeting identified housing needs...</i>” Therefore no change is required to the policy on this basis.
	<p>This Plan was last published from community questionnaire feedback in 2016, and since then has been regularly reviewed and updated.</p> <p>The feedback from the community was that they are opposed to the building of estate type developments which could change the rural and agricultural character of the Parish. Any development needs to be of an appropriate size and scale, such that the sustainability of the community is enhanced by providing access to sheltered accommodation and affordable homes, either for starter homes or to provide an opportunity for downsizing to create a ‘release’ of family sized accommodation in the community.</p>	<ul style="list-style-type: none"> • Any new housing development will need to comply with the overarching design policy which requires developers to take into account local context etc. The Council intends to produce a Design Guide SPD that will provide developers with further advice on what and what isn’t considered acceptable in design terms. • Development must also accord with the NPPF, particularly Chapter 12. It should be noted however that paragraph 30 of the NPPF suggests that change

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		<p>should not always be viewed in a negative light stating “planning policies and decisions should ensure that developments...are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”</p> <ul style="list-style-type: none"> The draft Local Plan includes a policy (policy H8PU) that requires 10% of all developments over 10 units to be affordable dwellings. 25% of these must meet the definition of First Homes.
155	<p>Whilst we welcome reference to character and setting, in our view, this policy is not sufficiently robust. Specific reference should be made to local landscape character and natural and cultural heritage assets. The phrase ‘consideration should be given’ should be more positively worded, for example as: ‘development proposals should clearly demonstrate that consideration has been be given’.</p>	<ul style="list-style-type: none"> Policy amended as suggested.
178	<p>Housing Density and Mix Whilst we support, in general, the aim for draft Policy H7PO to meet local housing needs and aspirations identified in the latest Strategic Housing Market Assessment (SHMA) and Housing Needs Assessment in terms of house type, size and tenure, it is important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. The housing mix for each site should be considered on a site by site basis and is something that will be duly considered by future housing developers. A house builder will not build a product mix that is not required by the local housing market.</p>	<ul style="list-style-type: none"> Comments noted. The Council feel that this policy is not too onerous as developers can demonstrate they have duly considered the issues listed within the policy quite easily through a Design and Access Statement.
H8PO (Publication Draft Policy H8PU)		
32	<p>This policy looks for sites of 10 or more houses (or 0.5ha or more in size), or of 5 or more in the Whitehaven Rural sub-area, to provide at least 10% of the homes as affordable. It sets a tenure split of 40% affordable home ownership and 60% as affordable or social rent.</p> <p>The SHMA 2019 sets out an affordable housing need of 23dpa, or 49dpa if the need were to be addressed over the first five years. However, it does also highlight that if the level of housing delivery were to be increased to 198dpa rather than using the CLG baseline projections of 10dpa that the affordable housing need would increase, it suggests to a figure of 83dpa. It suggests that affordable</p>	<ul style="list-style-type: none"> The SHMA 2021 identifies a need for 99 affordable homes per annum. It also notes the following: <p><i>When looking at the need for AHO products, the analysis also suggests a need across the Borough, albeit (at 33 dwellings per annum) the need is lower than for rented housing. In interpreting this figure, it should however be noted that there could be</i></p>

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	<p>housing need increases by about 32% for every additional dwelling (on top of the 10dpa). Therefore, a housing requirement of 140dpa would give an affordable housing requirement of 65dpa¹. However, it is noted that this affordable housing need also includes the Lake District National Park, and that of the 83dpa only 76dpa are within the Plan area, this would suggest that based on the 140dpa housing requirement and the affordable housing need of 65dpa that 59dpa of this need is within the Plan area. The NPPF2 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. This suggests that if 100 homes were to be built, based on this policy 10 of those homes should be available for affordable home ownership. Based on Policy H8PO: 10% of homes should be affordable, of which 60% should be for affordable or social rent and 40% should be for affordable home ownership and other affordable products, therefore if 100 homes were to be built 10 of them would be affordable and 4 of those would be for other affordable products including affordable home ownership. Therefore, the HBF does not consider that the policy is consistent with national policy. The tenure split set out in the policy should be amended and should ensure that the requirements of the NPPF are met, unless the Council can demonstrate that this would significantly prejudice the ability to meet the identified affordable housing need of specific groups. NPPF3 is clear that 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'. There does not appear to be a viability report available with this document and therefore at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.</p>	<p><i>additional supply from resales of market homes (below a lower quartile price) which arguably would mean there is a more limited need for AHO.</i></p> <p><i>Analysis does suggest that there are many households in Copeland who are being excluded from the owner-occupied sector (as evidenced by reductions in owners with a mortgage and increases in the size of the private rented sector). This suggests that a key issue in the Borough is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy.</i></p> <p><i>The study also considers different types of AHO (notably First Homes and shared ownership) as each could have a role to play. In Copeland, where house values are low and newbuild prices look to be substantially higher it may be difficult to make forms of AHO genuinely affordable and therefore AHO products might be viewed as helping to diversify the market rather than directly meeting an affordable need.</i></p> <ul style="list-style-type: none"> • Given this, the Council feels the proposed tenure split is justified as there is a greater need for affordable (or social) rented homes than affordable home ownership products. • Paragraph 65 of the NPPF requires 10% of the affordable homes provision to be affordable owned (as set out by footnote 31). The SHMA justifies a departure from this based upon local evidence which demonstrates that there is a need for affordable rental products as well as home ownership options.

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		<ul style="list-style-type: none"> The Local Plan Publication Draft has been informed by a Stage 1 and 2 Viability Study.
110, 111, 112	<p>We are supportive of draft policy H8PO. This outlines that on sites of 10 units or more (or of 0.5ha or more in size), or on sites of 5 units or more within the Whitehaven Rural sub-area, at least 10% of the homes provided should be affordable. This is in accordance with paragraph 63 and 64 of the NPPF. Similarly, we also welcome the support of this policy in allowing a reduction in the level of affordable housing required where a proposal involves the re-use or redevelopment of vacant buildings. This is in accordance with paragraph 63 of the NPPF.</p> <p>However, it should be noted that there is reduced demand for housing within some of the smaller settlements in the Borough. It is therefore likely that scales of development in such locations, particularly on a site by site basis, may be below the threshold in the NPPF for the provision of affordable housing. Focusing development on the principal towns and key service centres, where demand is higher, will assist in delivering a higher number of affordable dwellings.</p> <p>We also welcome the recognition in the draft policy that a financial contribution in lieu of on-site affordable housing provision may be more appropriate in certain situations. Similarly, the flexibility to provide a viability assessment where affordable housing may impact the viability of a development is also welcomed by Story. This approach is in accordance with paragraph 57 of the NPPF.</p>	<ul style="list-style-type: none"> Comments noted – no changes considered necessary.
178	<p>Affordable housing Draft Policy H8PO looks for sites of 10 or more houses (or 0.5ha or more in size), or of 5 or more in the Whitehaven Rural sub-area, to provide at least 10% of the homes as affordable. It is considered that this is in line with national policy and guidance as paragraph 64 of the NPPF states “Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups”. Notwithstanding this, it is vital that any policy ensures that the development site remains viable and viability needs to be taken into account as this policy evolves during the preparation of the Local Plan.</p>	<ul style="list-style-type: none"> Comments noted.
H9PO (Publication Draft Policy H10PU)		
254	<p>We recognise the intention of the Council to ensure that proposals do not have an impact on the historic environment. However, the term important is not one that is recognised in national policy in relation to heritage assets which are either designated or non-designated. We would therefore recommend that the policy is amended to align with national policy.</p>	<ul style="list-style-type: none"> Policy amended.

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H10PO (Publication Draft Policy H11PU)		
3	I did read the 1 paragraph on self-build, do Copland council feel that they give adequate support to promote self-build. There seems a lot of work in identifying major development for development companies but nothing for the self-builder. There are many advantages to prompting self-building and the Government has also identified this as an area where as a nation we need to grow. The advantages are but not limited to - Self-builders utilise a lot of local SMEs keeping local people employed helping building business and creating opportunities for business to grow - The quality of a self-build tends to be better - The architecture tends to be better and will help with the forthcoming build beautiful legislation - They tend to be greener as they are being built by the owners and as they are the end customer this is important - As they tend to be designed with involvement for the end user they can be built to meet the needs and future needs of a family meaning they will retain the property for longer.	<ul style="list-style-type: none"> • Comments noted. • The Local Plan identifies a range of sites in a variety of size, including sites with planning permission, draft allocations and possible windfall sites. Many of these sites would be suitable as self-build sites, providing they accord with the Development Plan.
217	Community led, self build and custom built housing. High quality sustainable housing is a desired outcome and it is recognised that self build achieves this but little is made of its potential. Most of the attention has been given to large scale developer led building. If we are to achieve the desired outcomes or reducing the environmental impact of housing a greater emphasis on self build would be beneficial. They are often of a higher standard, with greater energy efficiency than developer housing. Increased small scale self developments being identified and encouraged would improve the overall built environment. So a move away from large scale developer led to small scale self build led would benefit the area and attract more people to it.	<ul style="list-style-type: none"> • The Local Plan identifies a range of sites in a variety of size, including sites with planning permission, draft allocations and possible windfall sites. Many of these sites would be suitable as self-build sites, providing they accord with the Development Plan.
H11PO (Publication Draft Policy H12PU)		
139	<p>It is felt that one of the Council's focus should be more proactive in the delivery of the care for elderly especially where medical issues prevent them from staying in their own home!</p> <p>This certainly applies to small settlements areas such as Millom and Haverigg. Where the infrastructure of transport is extremely limited. In both sections Copeland Council acknowledges that Cumbria has an ageing population and that fact is not going to change any time soon.</p> <p>There is no 24 hour nursing care in Millom and Haverigg. All residents/patients that require this service are forced to take up beds in Barrow/Kendal and in some cases further afield. This means that the cost of visiting a loved one each week becomes expensive!</p> <p>Reading through your proposed plans there is no obvious focus to address the issue of meeting the need of our ageing population. In the future this will become a major problem.</p> <p>In the Millom and Haverigg area population electoral Division 5,980 there are only 64 beds available for residential care not nursing care! As a Council we are awaiting the result of a community survey which will inform us of the issues facing the community.</p>	<ul style="list-style-type: none"> • Comments noted. The Local Plan identifies a need for a greater number of extra care homes and specialist housing. Cumbria County Council is the lead authority for health and social care and the Council is currently in the process of updating its evidence on extra care housing. • The Local Plan encourages the provision of extra care and specialist housing in the Borough.

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	Travelling to Barrow is only possible via train or taxi. Fare Train: £5.60 return. Taxi: £70.00 return. This amount for an old age pensioner leaves a very big hole in their weekly pension! If a loved one is in Kendal then the cost increases dramatically. Visits go down to once a month. In 2020 even with Covid this is wholly unacceptable for couples/single people who worked all their adult life in the County.	
H14PO (Publication Draft Policy H15PU)		
36	Development of isolated homes in the countryside should be avoided is supported. The protection of rural areas is fundamental to rural villages to maintain their natural attraction for future generations.	<ul style="list-style-type: none"> Comments noted.
74	This Policy wording should include no adverse impact on biodiversity, in addition to the character of the area or the surrounding landscape.	<ul style="list-style-type: none"> Additional text added to policy.
192	Policy supported as regards affordable criteria in rural locations, However I would also like any open market units agreed under this policy to have a local occupancy clause in perpetuity to prevent these becoming holiday lets or second homes and that the dwellings should be of a style that meets the needs of the local Parish Council plans.	<ul style="list-style-type: none"> The policy states that the local, affordable use should be retained in perpetuity.
195	Housing development within the open countryside will be permitted on rural exception sites, these are small sites where it is demonstrated that affordable housing is required to meet local needs. Applicants must demonstrate that the development is viable and housing will be retained in local, affordable use in perpetuity. An element of market housing will be accepted to support the development of local, affordable housing where: a) There are excessive development costs due to site constraints; and b) It is demonstrated that the additional revenue created by the development of open market housing is essential to enable the delivery of affordable housing on the site; and c) The majority of the homes are affordable and the amount of open market housing is the minimum required to achieve site viability. The development must meet an identified need to the satisfaction of the Council, must be well designed and appropriate in terms of size and scale for its location. The development must not result in a significant adverse impact on the character of the area or the surrounding landscape. This would seem acceptable and we would support it	<ul style="list-style-type: none"> Comments noted.
H15PO (Publication Draft Policy H16PU)		
74	This Policy wording should include no adverse impact on biodiversity, in addition to the character of the area or the surrounding landscape.	<ul style="list-style-type: none"> Additional text added to policy.
H16PO (Publication Draft Policy H17PU)		
74	As for Policy RE3PO Natural England advise including the need to consider bat surveys for conversions of rural buildings. If occupied by bats or other European Protected Species, mitigation/compensation is	<ul style="list-style-type: none"> Additional wording added to policy and supporting text.

ref	Comments	CBC Response
	secured and opportunities are taken to support those specific species in the conversion. The need for a European Protected Species Licence should be flagged if bats are present.	
169	We are generally supportive of the approach and aspirations within the plan, however, we do feel it is important that the Council work closely with Cumbria County Council on the site allocations considerations and also on specific policy considerations such as Policy H16PO: Conversion of Rural Buildings to Residential Use, where the conversion of a rural building could significant sterilise areas of mineral resource, if such development is proposed within a mineral safeguarding area.	<ul style="list-style-type: none"> • Additional wording added to the policy's supporting text. • Where a proposed housing allocation falls within a mineral safeguarding area or consultation zone this has been identified in the Housing Allocations Profiles document which forms an appendix to the Plan.
178	Conversion of Rural Buildings to Residential Use Whilst we support the inclusion of this policy, as it is important to give clarification for the future conversion of rural buildings that do not comply with (or where the applicant does not wish to utilise) the GPDO, we do have concerns over some of the criteria set out in draft Policy H16PO. As many rural buildings are located in open countryside, it is considered that criterion D, which requires that "The building is located adjacent to or in close proximity to an existing habitable group of buildings, and the number of dwellings proposed is appropriate to the surroundings;" is overly onerous and does not comply with the policies set out in the NPPF. The NPPF states at paragraph 79 that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply...the development would re-use redundant or disused buildings and enhance its immediate setting...". There is no restriction set out in national policy which states that such development should be located adjacent to or in close proximity to an existing habitable group of buildings. As such, we propose that criterion d) is deleted from the policy.	<ul style="list-style-type: none"> • Criterion d deleted.
254	We welcome a policy on the reuse of buildings. However, the wording at present is somewhat unclear at criteria a. The conversion of traditional buildings for new uses will most likely have a permanent effect on its character and appearance. In architectural, historical and landscape terms, this change will almost always result in some degree of harm to character and appearance. The degree of harm will vary according to the building's significance, its location, and the intensity of the new use. However, this harm needs to be weighed against the public benefits offered by the new use. Proposals need to be fully informed and this begins with an assessment of the building's significance before it can be determined whether it is suitable for conversion. Amend criteria a to read: a) The building is redundant or disused, is of a traditional design and construction and contributes to the landscape character and/or historic environment; the proposal would not have an adverse effect on the historic environment, the character of the local landscape or its setting;	<ul style="list-style-type: none"> • Policy amended as recommended.
H17PO (Publication Draft Policy H18PU)		

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254	At present the policy does not provide adequate protection for the historic environment in the consideration of replacement dwellings. Such a provision should be incorporated within the policy to protect heritage assets and their setting. Add additional criteria point to the policy to read: "Replacement would not lead to the avoidable loss of a building that already contributes to architectural or historic interest."	<ul style="list-style-type: none"> Change not considered necessary. The suggested sentence would conflict with Designated Heritage Assets (BE2) and Non-Designated Heritage Assets (BE4) Policies that do allow the loss of a building in certain circumstances, subject to certain criteria. The Local Plan should be viewed as a whole, therefore any demolition involved would need to be subject to those policies.
H20PO (Publication Draft Policy H21PU)		
74	Any caravans being proposed around the coast where there are designated SPA will need to assess impacts from recreational disturbance.	<ul style="list-style-type: none"> The policy requires that the caravan is located within a settlement identified within the settlement hierarchy. Additional wording added to the supporting text.
H21PO (Publication Draft Policy SC2PU)		
179	<p>44.2 Health Sport England broadly supports the desire to improve the health of the borough's residents. The ten Active Design Principles are relevant across many sections of the Local Plan. Sport England believes that neighbourhoods, facilities and open spaces should be accessible to all users and should support sport and physical activity across all ages. Supporting infrastructure to enable sport and physical activity to take place should be provided across all contexts including workplaces, sports facilities and public space, to facilitate all forms of activity.</p> <p>The Council's Indoor Facilities Study, Playing Pitch Strategy, and the Play Strategy will inform policies and decisions for sport and recreation. Sport England welcomes specific policies for sport and recreation facilities.</p> <p>44.1.1 Sport England supports the Council's wish to continue to support and develop recognising the socio-economic benefits sport and leisure can bring to our communities.</p> <p>44.3.2 Paragraph 96 of the NPPF is relevant here. "Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." The Council is undertaking an Indoor Sports Strategy and a Playing Pitch Strategy therefore the Council's planning policies will be based on robust and up-to-date assessments of need for sport and recreation facilities.</p> <p>44.3.5 The statement in this section is inaccurate. School playing fields are treated no different in</p>	<ul style="list-style-type: none"> Reference added to relevant paragraphs of the NPPF. The Development Standards chapter now includes a section on active design and additional text has been added above this policy relating to active travel. Additional text added relating to the evidence base documents.

ref	Comments	CBC Response
	<p>planning terms than council or private playing fields. Any policy should apply to them equally as it does within the NPPF. The Town and Country Planning (Development Management Procedure) (England) Order 2015 (“the 2015 Order”) defines a playing field as ‘the whole of a site which encompasses at least one playing pitch’. This definition is also provided within the glossary to the Government’s National Planning Policy Framework. The definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. It also does not differentiate between different types of ownership e.g. public, private or educational ownership. The 2015 Order defines a playing pitch as ‘a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.’ Even where wider sports facilities fall outside the definition of a playing field, they are afforded protection through the planning system under the provisions of paragraph 97 of the Government’s National Planning Policy Framework. Paragraphs a) to d) need to be tighter and reflect national policy as set out in paragraph 97 of the NPPF.</p>	
74	<p>As for Policy DS5PO When developing previously developed land - Natural England recommend the Local Plan should ensure that the promotion of developing brownfield sites is informed by data on their biodiversity value, so that sites of high value are not prioritised for development.</p>	<ul style="list-style-type: none"> • Last bullet first section applies therefore no need to change the policy.
179	<p>Policy H21PO Sporting, Leisure and Cultural Facilities (excluding playing pitches) Paragraph d) needs flexibility and should require replacement in a suitable location not the same locality. Suggested wording: The Council will seek to protect and enhance existing sport and leisure facilities. Proposals resulting in the loss of a sports or leisure facility will only be permitted where this is fully justified to the satisfaction of the Local Planning Authority and demonstrated in the most up to date evidence base. Applicants must demonstrate that:</p> <p>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; or</p> <p>b) An assessment has been undertaken which has clearly shown the facility to be surplus to requirements;</p> <p>c) The land in question only forms an ancillary use and its loss would not affect overall public usage of the facility; or</p> <p>d) The facility would be replaced by equivalent or better provision, with equivalent or better access and management arrangements within a suitable location.</p>	<ul style="list-style-type: none"> • Wording amended.
H22PO (Publication Draft Policy SC3PU)		

ref	Comments	CBC Response
179	<p>The first paragraph needs to be expanded to reflect Exception E2 in Sport England's Playing Fields Policy. Sport England welcomes the policy wording that reflects Sport England's Playing Fields Policy Exception E3. The policy needs to refer to the Playing Pitch Strategy as the policy relates to playing fields. Sub paragraph g) should be removed and included as part of a separate biodiversity/ natural environment policy elsewhere in the Local Plan.</p> <p>The following points need revision to comply with the NPPF and Sport England's Playing Fields Policy:</p> <p>i) Revision needed, the policy needs to refer to playing field and not pitches. Policy H22PO Playing Fields and Pitches</p> <p>ii) Revision needed, the policy needs to refer to playing field and not pitches. Policy H22PO Playing Fields and Pitches</p> <p>iii) Revision needed, the policy needs to refer to playing field and not pitches. Revision needed to comply with Exception E4 of Sport England's Playing Fields Policy: The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of the development, by a new area of playing field:</p> <ul style="list-style-type: none"> • of equivalent or better quality, and • of equivalent or greater quantity, and • in a suitable location, and • subject to equivalent or better accessibility and management arrangements. <p>There is no necessity to restrict the location to the 'same locality', flexibility is required. Policy H22PO Playing Fields and Pitches</p> <p>iv) Revision needed, "the development proposes an alternative sports facility to meet a strategic need as set out in the Council's Playing Pitch Strategy, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field."</p> <p>v) An additional point is needed to bring in Sport England's Playing Fields Policy Exception E2, i.e. "the proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use."</p>	<ul style="list-style-type: none"> • Wording amended.
H23PO (Publication Draft Policy SC5PU)		
68	<p>Draft Policy H23PO – Community Facilities Policy H23PO – Community Facilities of the Preferred Issues Local Plan manages the loss or change of use of existing 'community facilities'. At present the policy reads: The loss of existing community facilities through new development requiring planning</p>	<ul style="list-style-type: none"> • Wording amended.

ref	Comments	CBC Response
	<p>permission will only be permitted where it can be clearly demonstrated, to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> a) Its continued use as a community facility or service is no longer feasible, having had regard to appropriate marketing (over an appropriate period of time and at a price which reflects its use, condition and local market values), the demand for the use of the site or premises, its usability and the identification of a potential future occupier; or b) There is sufficient provision of such facilities in the area; or c) That sufficient alternative provision has been, or will be made elsewhere which is equally accessible and of the same quality or better than the facility being lost. The policy currently fails to take into account that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. <p>Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services where it can be demonstrated that community facilities would be lost or have their use changed as part of a wider NHS estate reorganisation programme. To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on “e-PIMS”, the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their potential use for it. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that NHS sites are not strategically constrained by restrictive local planning policies. Where such restrictive policies are in place, the reorganisation of underutilised facilities can be delayed. In turn, there are direct implications for the provision of quality healthcare facilities and services, as the reinvestment of capital in modern and fit-for-purpose facilities is prevented or delayed, with ongoing revenue spent on maintaining inefficient parts of the estate. Where NHS commissioners can demonstrate that healthcare facilities are in need of reorganisation, which might include the disposal or development of a facility, there should be a presumption that such sites are suitable for other uses and should not be subject to restrictive policies</p> <p>Modifications To ensure Policy H23PO is sufficiently flexible and supports the ongoing needs of the NHS, we propose that following additional wording be inserted into Policy H23PO: The loss of existing community facilities through new development requiring planning permission will only be permitted where it can be clearly demonstrated, to the satisfaction of the Council that: a) Its continued use as a</p>	

ref	Comments	CBC Response
	<p>community facility or service is no longer feasible, having had regard to appropriate marketing (over an appropriate period of time and at a price which reflects its use, condition and local market values), the demand for the use of the site or premises, its usability and the identification of a potential future occupier; or b) There is sufficient provision of such facilities in the area; or That sufficient alternative provision has been, or will be made elsewhere which is equally accessible and of the same quality or better than the facility being lost; or d) The loss or change of use of existing facilities is part of a wider public service estate reorganisation. These changes would directly address the issues outline above; they would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p> <p>Summary: Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses. This should include a presumption in line with national policy that those sites are suitable for other uses and should not be subject to overly restrictive planning policies. NHSPS thanks Copeland Borough Council for the opportunity to comment on the Preferred Issues Plan and hopes the proposed amendments to Policy H23PO are considered constructive and helpful. We look forward to reviewing future iterations of the plan and receiving confirmation that these representations have been received.</p>	
209	<p>The Trust is supportive of this policy but urges that text is amended to ensure it applies to cultural facilities such as arts centres, cinemas and theatres of which there are a number in the district such as the Millom Palladium, Gaiety Cinema and Florence Arts Centre, along with others already referenced in the plan. These facilities contribute tremendously towards the social and cultural well-being of local people. Their inclusion would be consistent with how cultural facilities are contained within the NPPF. We would also suggest a minor amendment to criteria by which loss of facilities is managed to require applicants to provide evidence of marketing through recognised agents and online platforms appropriate to the nature of the facility. This would make the criteria and policy more robust.</p>	<ul style="list-style-type: none"> • Additional wording added to policy and supporting text.

Copeland's Places

Ref	Comments	CBC Response
N1PO (Publication Draft Policy N1PU)		
74	Change wording from 'should be' to 'must be' for the first paragraph. The wording 'Sustainable construction methods should be used where possible' needs strengthening also. Natural England recommend identifying the sequential steps as the 'mitigation hierarchy', as this is a recognised process in national planning policy.	<ul style="list-style-type: none"> Wording amended
74	49.2.2 Table 17 should also include: • Morecambe Bay Special Area of Conservation (SAC) and the • River Derwent & Bassenthwaite Lake SAC. There should be reference included to functionally linked land having the same status as international designations. Supporting habitats outside of the designated site boundary (and sometimes a considerable distance away) may be used by SPA populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in maintaining SPA bird populations, and proposals affecting them may therefore have the potential to affect the SPA which needs to be addressed in the Local Plan.	<ul style="list-style-type: none"> Additional SACs added to list (now forming an appendix). Additional text added to policy N1PO and supporting text.
74	49.2.5 Table 18 identifies SSSI's within Copeland, however this list appears to only include sites within the National Park boundary area of Copeland, rather than the area that falls within the Local Plan. As stated in Natural England's response to the Issues & Options consultation other SSSI sites to include are: • High Leys SSSI • Yeathouse Quarry SSSI • Black Moss SSSI • Silver Tarn, Hollas and Harnsey Mosses SSSI • Florence Mine SSSI • St Bees Head SSSI • Haile Great Wood SSSI • Hallsenna Moor SSSI • Low Church Moss SSSI And also, a small section of • River Derwent & Tributaries SSSI	<ul style="list-style-type: none"> Additional SSSIs added to list (now forming an appendix).
74	49.6.3 Natural England welcome the proposal to produce a Biodiversity and Development Supplementary Planning Document. We recommend your Authority strongly commit to this and prioritise this SPD. We advise this also covers Net Gain as per below comments on the Net Gain Policy.	<ul style="list-style-type: none"> Comments noted and support welcomed.
74	49.7.1 Natural England often advise at the development management stage the submission of a Construction Environmental Management Plan to outline the pollution prevention measures that will be implemented to prevent impacts on the environment and biodiversity. It would be beneficial for this to be a stronger requirement in the Policy wording, and also included in the subsequent Biodiversity and Development Supplementary Planning Document to provide clearer guidance on when a CEMP is required to protect water quality.	<ul style="list-style-type: none"> Additional wording added to supporting text and policy.
192	This policy should specifically mention "Protected Species and Habitats" and the direct impact developments can have on these, as this aspect is not clear. Copeland Borough Council has a large part to play in ensuring that Protected Species and Habitats are conserved and this should be specifically noted in this Policy.	<ul style="list-style-type: none"> Additional wording added to policy. Supporting text refers to protected species and habitats
N2PO (Publication Draft Policy N3PU)		
32	This policy states that all development must provide a minimum 10% biodiversity net gain. It is the HBF's opinion that the Councils should not deviate from the Government's proposals on biodiversity gain. In 2019 Spring Statement, the Government announced that it would mandate net gains for biodiversity in the	<ul style="list-style-type: none"> Comments noted. The policy is aspirational in that it seeks <i>at least</i> 10% net gain to be provided.

Ref	Comments	CBC Response
	<p>forthcoming Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is therefore likely that this policy will not be required</p> <p>It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further or do so in designing proposals to meet other local planning policies. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.</p> <p>The Government will introduce exemptions applicable to only the most constrained types of development. Exemptions will be set out in secondary legislation.</p> <p>The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRS will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. Each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State. This will achieve the best combination of local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.</p> <p>The Government will require net gain outcomes to be maintained for a minimum of 30 years and will encourage longer term protection, where this is acceptable to the landowner. The Government will legislate for Conservation Covenants in the Environment Bill.</p> <p>The Government will not introduce a new tariff on loss of biodiversity. The Environment Bill will make provision for local decision makers to agree biodiversity net gain plans with developers. Where offsite compensation is required, Councils will be able to review developers' plans to deliver compensation through local habitat creation projects. Where suitable local projects are not available, there will be the option for investment in nationally strategic habitats through a Government offering of biodiversity units set at a standard cost. The Government will make provision for these 'statutory biodiversity units' in the Environment Bill. By not instating a rigid tariff mechanism, the Government will make it easier for Councils, landowners and organisations to set up habitat compensation schemes locally, where they wish to do so, where this is not the case the Government will still provide a last-resort supply of biodiversity units. The Government's proposals for statutory biodiversity units will provide a recourse for developers and Councils, where local habitat compensation schemes are not available, therefore preventing delays to development.</p> <p>There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the</p>	<ul style="list-style-type: none"> Guidance from the Planning Advisory Service recommends Local Plans contain their own net gain policies as it will be some time before the Environment Act becomes law.

Ref	Comments	CBC Response
	<p>Councils viability assessment. The DEFRA Impact Assessment⁴ sets out regional costs (based on 2017 prices) in the North West of £18,952 per hectare of development based on a central estimate but there are significant increases in costs to £65,265 per hectare for off-site delivery under Scenario C. There may also be an impact on gross / net site acreage ratio. The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery. The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.</p>	
74	<p>Natural England strongly welcome and support the proposed Biodiversity Net Gain policy. For alignment with national planning policy and best practice, we recommend the following amendments: • 10% biodiversity net gain should be secured, following application of the mitigation hierarchy in the planning of the proposed development e.g. Avoid (then net gain), Mitigate (then net gain), Compensate (then net gain). • Details of the biodiversity baseline and proposed net gain should be submitted to, and agreed with the Council in the 'Biodiversity Gain Plan', including Biodiversity Metric calculations. NE support the wording on monitoring of the gain sites and wording to stop deliberate damage of habitats. Due to net gain being a new and evolving requirement for developers, land owners, and their consultants, we advise you commit to an SPD which outlines in further detail the requirements of the approach. It will be easier to update an SPD and keep it up to date once the evidence base grows. This would benefit from being included as part of the proposed Biodiversity SPD referred to in Para 49.6.3. Natural England advise referencing that biodiversity net gain approach does change any existing protections upon protected sites or irreplaceable habitats. This Policy should link to other strategies for example Green Infrastructure. Natural England advise it is made clearer how Net Gain can be achieved alongside Green Infrastructure opportunities.</p>	<ul style="list-style-type: none"> • Policy wording amended and support welcomed. • The Council has made its commitment to producing an SPD in the supporting text.
74	<p>49.8 Natural England welcome this detailed supporting text outlining the biodiversity net gain approach and Local Nature Recovery Strategy, and consider further information about how the Council expect applicants to follow the biodiversity net gain approach should be provided within a SPD. Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of Net Gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the Plan, for example the total number and type of biodiversity units created, the number of developments achieving Net Gain and a record of on-site and off-site contributions.</p>	<ul style="list-style-type: none"> • The Publication Draft of the Plan contains measures for monitoring all indicators, including biodiversity net gain. The Environment Act also contains a number of monitoring requirements with regards to biodiversity net gain. Further information will also be contained within a Biodiversity

Ref	Comments	CBC Response
		SPD which the Council makes a commitment to in the supporting text.
74	49.8.6 Whilst Natural England recognise that 10% is the minimum net gain that should be provided, we encourage the Council to support developers who wish to deliver net gain above 10%	<ul style="list-style-type: none"> Additional text added to encourage developers to go further than the 10% where possible (paragraph 15.10.12).
74	49.8.7 Natural England advise you outline how you intend to link development to the habitat networks referenced in the policy and work with neighbouring Authorities to develop a nature recovery network	<ul style="list-style-type: none"> Additional text added (paragraphs 15.10.6).
74	49.8.9 As above a separate SPD would be beneficial to outline this process in more detail once the Environment Bill is passed and more national guidance is available.	<ul style="list-style-type: none"> Comments noted.
74	49.8.11 Natural England recommend rewording 'Defra Metric 2.0' to just 'Government's Biodiversity Metric' to avoid wording going out of date. Biodiversity Metric 3.0 due to be released January 2021, improving upon Biodiversity Metric 2.0.	<ul style="list-style-type: none"> Text amended as suggested.
173	The NDA is currently seeking an exemption for Nuclear Licenced Sites and so we would suggest that this should be reflected in the Copeland Local Plan so that potential exemptions to the application of Biodiversity Net Gain may apply. As noted in our Issues and Options response, the National Planning Policy Framework (NPPF) does not place a hard requirement on developers to achieve biodiversity net gain. The thinking behind the 10% biodiversity net gain was a precursor to 10% environmental gain. Sellafield Ltd, in delivering its mission, contributes to environmental net gain. However, additional requirements to achieve 10% biodiversity net gain will divert funds from mission delivery and place constraints on the Sellafield site. Sellafield Ltd responded to the Government consultation on Biodiversity Net Gain and made strong representations that Nuclear Licenced Sites should be exempt from the requirement. It is expected that Nuclear Licenced Sites will be exempt on passing of the Environment Bill. The Local Plan should not place itself in conflict with that position nor restrict delivery of the mission which, in itself, delivers environmental net gain. Sellafield Ltd actively discourages wildlife on the site and therefore our developments generally do not require removal of habitats etc. In applying the hierarchical approach set out in 49.8.5, if required Sellafield Ltd would seek to start at point 2 – Off Site provision (in an area identified as a Local Nature Recovery Network). Should this be necessary, we would be willing to explore opportunities to work with other organisations to derive some 'added benefit' for the local area, such as supplying spoil to create wildlife corridors. If the Council opt to produce a Biodiversity and Development Supplementary Planning Document, Sellafield Ltd requests that as part of the process we are consulted on this.	<ul style="list-style-type: none"> Comments noted. The section relating to exceptions has been updated (15.10.9) to reflect the Environment Act. The policy does acknowledge that net gain cannot always be provided on site and allows for off-site contributions where this is the case. The council will carry out full consultation on its SPD at the relevant stages.
110, 111, 112	Draft Policy DS6PO outlines the planning obligations that CBC may request of new development where it is reasonable, necessary and directly related to the development. It is noted that the list is not exhaustive and is categorised relating to physical infrastructure (including digital connectivity, cycle parking), social infrastructure (including affordable housing, education facilities) and green infrastructure (including public open space and tree planting). This also includes the future management and maintenance of particular facilities and the future management and monitoring of biodiversity net gain for a period of 30 years ²⁶ . However, the priority for	<ul style="list-style-type: none"> Comments noted. The development industry will be fully engaged in the production of the Viability Assessment and this will inform the Local Plan with regards to contributions.

Ref	Comments	CBC Response
	<p>infrastructure will be dependent on the location of development. One type of infrastructure should not be prioritised until an assessment has been undertaken to identify the infrastructure for which there is the most pressing need in a certain location, and the most appropriate location for such infrastructure. Such need should be assessed by the relevant delivery partners, and may include the developer, CBC and the County Council, and the advice of a specialist should be obtained where appropriate.</p> <p>It is considered that plan-making process provides the most appropriate mechanism for such an assessment. The Local Plan's supporting evidence base should assess the need for differing types of infrastructure, the preferred location within the Borough and the most appropriate method of delivery.</p> <p>Therefore, rather than listing types of infrastructure for which there is a priority, the Local Plan should identify specific infrastructure projects for which there is need and identify specific requirements, in terms of location and method of delivery, for such infrastructure. The draft policy confirms that where the provision of such planning obligations would impact the viability of a scheme, a site specific viability assessment must be submitted to and agreed by the Council. This is in line with paragraph 57 of the NPPF and the PPG27 and provides an opportunity to reconsider viability on a site-by-site basis where particular circumstances may merit a review of policy expectations.</p> <p>Story is generally supportive of the categories outlined in the draft policy and welcome the opportunity to provide a site specific viability assessment, where necessary. However, in relation to the requirement to manage and monitor biodiversity net gain for 30 years, and the associated draft policy N2PO (Biodiversity Net Gain), Story consider that this does not accord with national planning policy. The Environment Bill is still in draft form and therefore CBC cannot rely upon its content in formulating draft policy. In this regard, it is advised that this part of draft policy DS6PO and draft policy N2PO are revised to reflect the provisions of the NPPF, rather than the emerging Environment Bill. The NPPF confirms at paragraph 170(d) that planning policies should minimise impacts on and provide net gains for biodiversity; however, does not include requirements at this stage in terms of monitoring as outlined in the draft policies. In their current form, these policies will not meet the test of soundness as they are not consistent with national policy.</p> <p>It is also noted that CBC has yet to prepare a site specific Stage Two Whole Plan and CIL Viability Assessment or the supporting Development Contributions and Planning Obligations Supplementary Planning Document (SPD). Story notes that the Stage Two Viability Study will need to take account of:</p> <ul style="list-style-type: none"> • Current Building Regulations, including the requirements for M4(2) homes and electric vehicle charging points; and • Other existing and emerging policy and statutory requirements, such as in respect of achieving a 10% biodiversity net gain²⁸. <p>Similarly, CBC intends to produce a separate Developer Contributions and Planning Obligations Supplementary Planning Document (SPD) to set out the approach to planning obligations within the Borough and the types of contribution that CBC may seek to secure from new development.</p>	<ul style="list-style-type: none"> • The Environment Act states that this will be required for most developments subject to a small number of exemptions.. The Council feel that providing net gain is an important way of reducing the decline in biodiversity across the country and feels it is important to seek <i>at least</i> 10% through new developments where possible.

Ref	Comments	CBC Response
	<p>Story agrees that the Stage Two review can help to ensure that the emerging local plan and SPD policies do not result in onerous requirements that would prohibit much needed sustainable development being brought forward in the Borough. Local planning policies should wholly support the growth aspirations and the evidenced demand for new sustainable development in the Borough and be “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” (paragraph 16(d), NPPF).</p> <p>However, Story emphasises that this evidence should be available now to inform the draft policies that are being proposed by CBC. Paragraph 31 of the NPPF states that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.</p> <p>Until such evidence is made available, Story is unable to comment on the overall viability of the policy and others within the Preferred Options draft of the Local Plan or be confident that the policies will not include onerous requirements such that sustainable development in the Borough will be hindered.</p>	
N3PO (Publication Draft Policy N2PU)		
74	We support this policy. Consider this should also be included in SPD to allow it to evolve as national legislation, policy and local situation changes.	<ul style="list-style-type: none"> Comments noted.
N4PO (Publication Draft Policy N4PU)		
5	<p>Please see below suggested policies from the draft North West Marine Plan that we feel are most relevant to your local plan. We recommend considering reference to these policy areas within the supporting policy text. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the draft North West Marine Plan is completed.</p> <p>Infrastructure, renewables, ports harbours and shipping, employment, climate change resilience and adaptation, landscape and seascape, marine protected areas (including geodiversity), biodiversity, heritage assets, tourism and recreation, and marine litter policies</p> <p>Further points to note - Within the document out for consultation Copeland Local Plan 2017-2035 Preferred Options Draft, we welcome inclusion of Policy N4PO: Marine Planning and reference to the draft North West Marine Plan. We welcome the advice that applicants may also require an appropriate license from the Marine Management Organisation. We recommend that the document contains a reference to the duty to co-operate with the Marine Management Organisation and that the draft North West Marine Plan is now a document for material consideration.</p> <p>As previously stated, these are recommendations and we suggest that your own interpretation of the draft North West Marine Plan is completed. We would also recommend you consult Explore Marine Plans, our marine planning portal, for further information.</p>	<ul style="list-style-type: none"> Comments noted.
74	Natural England support the inclusion of a section on Marine Conservation, however it is incomplete: • Missing the Drigg Coast SAC/SSSI, which is partly within Copeland • Missing the St Bees Head SSSI • The map of the	<ul style="list-style-type: none"> Map replaced and additional supporting text added re SSSIs and SAC. Additional

Ref	Comments	CBC Response
	Cumbria Coast MCZ is old and does not include the 2019 update. The up to date maps can viewed at https://magic.defra.gov.uk/magicmap.aspx We advise a separate Marine Planning section, rather than incorporating it in with Marine Conservation. This is because whilst the Marine Plans themselves are subject to assessments of their environmental impact, they include many other considerations other than conservation. This section should also briefly outline the purpose of Marine Plans. The wording of the policy implies that 'giving consideration' to the NW Marine Plan will sufficiently account for any impacts to the marine environment. Whilst the Marine Plan will be subject to a plan level HRA and Sustainability Assessment, this does not mean that all projects which may proceed under this plan are necessarily automatically compliant with relevant environmental legislation. Noting that the Marine Plans are relatively high level, there will always need to be some amount of tailoring of assessments for individual projects, rather than relying solely on the Marine Plan.	wording added to policy in relation to the MCZ.
155	<p>The National Trust is strongly supportive of the conservation of the borough's undeveloped coast. However, we are concerned in regard to the Council's approach in a number of respects:</p> <p>Paragraph 50.1.8 states 'Natural England, the Colourful Coast Partnership and Copeland Borough Council are currently considering a proposal to extend the Heritage Coast northwards towards Whitehaven'. This is not the case. The Colourful Coast Partnership has given its full support to the extension. The Council has also given explicit support to the extension; a decision taken at full Council in April 2019 following public consultation. It is only awaiting formal sign off by Natural England. It is unclear why this is taking such a long period of time, when the aforementioned organisations are fully supportive, and Natural England has been involved throughout the process.</p> <p>Paragraph 50.1.9 is attributed to the National Trust. This is not the case. The purpose of a Heritage Coast is defined by Natural England.</p> <p>Paragraph 50.1.10 states that 'a Management Plan protects and enhances the Heritage Coast'. This is not the case. St Bees has never had a Management Plan, since it was originally defined in the mid-1970s (it is one of the very few Heritage Coasts to not be covered by a Management Plan of any sort). The National Trust has previously expressed a willingness to help the Council to fulfil its obligations in this respect, by playing an active role in the preparation of a Management Plan for the area, in partnership with the Council and other key stakeholders. This is on the basis that the extension to the Heritage Coast is fully approved and recognised in planning policy.</p>	<ul style="list-style-type: none"> • Wording amended – the phrase “have made a commitment” has replaced “is currently considering a proposal” • Footnote amended as requested • Wording amended as requested.
N5PO (Publication Draft Policy N6PU)		
13	This section omits to specifically include an area of landscape importance identified in Lake District National Park Landscape Character Assessment and Guidelines document 2018 as High Fells Fringe. This area is identified in the Copeland B C Settlement Landscape Character Assessment (SLCA) but I feel should also specifically include this	<ul style="list-style-type: none"> • This landscape type is considered in the LCA 2021. Policy amended to include reference to the LCA.

Ref	Comments	CBC Response
	<p>area designated as High Fells Fringe as it is very important in ensuring the setting of the Western High Fells is protected.</p> <p>It is clear from the SLCA that development in the area that is also described as High Fells Fringe by the LDNPA Assessment should be avoided. It would seem a further bullet point should be added to Policy N5PO: Landscape Protection, stating development in open countryside in areas designated by either the SLCA or LDNPA Landscape Character Assessment and Guidelines document 2018</p>	
74	Natural England recommend that developments which have the potential to impact upon the landscape character, or a protected landscape, must be required to submit a Landscape and Visual Impact Assessment and provide mitigation and compensation measures.	<ul style="list-style-type: none"> • Wording amended as requested.
103	<p>Policy N5PO does not currently provide the necessary landscape protection as required by the 1949 Act, as amended by the 1995 Act, and we ask that the policy could be strengthened with inclusion of the following:</p> <p>“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 where proposals could impact on its setting and views into and from the National Park.”</p> <p>In the supporting text we would recommend reference to the Sandford Principle.</p> <p>Regarding the settlement boundaries, it may be most appropriate to consider Ennerdale Bridge’s settlement boundary as a strategic cross boundary issue through our Duty to Cooperate discussions. The area of Ennerdale Bridge in the Park does not have a settlement boundary so discussions regarding the most appropriate solution would be helpful in order to protect the setting of the National Park and also for community understanding of the planning framework.</p>	<ul style="list-style-type: none"> • Policy and supporting text wording added as requested.
155	The National Trust strongly supports this policy in principle. However, we consider that it should be strengthened, through specific reference to the Cumbria Landscape Character Guidance and Toolkit, the Copeland Settlement Landscape Character Assessment, and the protected landscapes of the St Bees and Whitehaven Heritage Coast, and the Lake District National Park/WHS (and their setting). This policy should require that proposals demonstrate that local landscape character and sensitivities, as defined by the above noted assessments, are conserved and enhanced. The phrase ‘does not detract from’ in criteria b should be more positively worded as ‘conserves and enhances’. The policy should contain a requirement for landscape and visual impact assessments to be submitted for all schemes which may affect sensitive landscapes and their settings.	<ul style="list-style-type: none"> • Wording added and amended as suggested.
N6PO (Publication Draft Policy N8PU)		

Ref	Comments	CBC Response
74	As stated in our previous response to the I&O consultation: Natural England would support a policy which only permits development required to provide safe access to and interpretation of the coast, subject to it meeting certain criteria. Any development should ensure the local landscape character is maintained and does not have a detrimental impact within the St Bees Heritage Coast or its surrounding setting, as well as the biodiversity features along the undeveloped coast.	<ul style="list-style-type: none"> Such a policy would be too restrictive and could potentially limit the Council's ability to mitigate climate change through new energy development where appropriate.
155	<p>Whilst the National Trust strongly supports the conservation of the undeveloped coast, we are concerned in regard to the current approach taken by Policy N6PO. The points noted below should be addressed and/or clarified:</p> <p>It is unclear to which area the 'Undeveloped Coast' refers. The 'Undeveloped Coast' is not defined anywhere in the draft Plan. There is a need therefore, for the Plan to clearly define both the 'Undeveloped Coast' and the 'St Bees and Whitehaven Heritage Coast' on a suitable map base.</p> <p>The policy as currently drafted is highly reactive. As noted elsewhere in our response, we consider the Heritage Coast to be a major socio-economic as well as environmental asset to Copeland. Policy should positively seek opportunities to conserve and enhance the Heritage Coast, and commit to the preparation of a Management Plan.</p> <p>We do not consider that the suggested approach to energy developments is consistent with the purposes of Heritage Coast definition. In our view this approach raises conflict with NPPF policy (paragraph 173), which states: '...planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.' We would note that the Heritage Coast has no defined seaward limit.</p>	<ul style="list-style-type: none"> New policy added relating to the heritage coast (N7PU).
N8PO (Publication Draft Policy N11PU)		
74	As stated in our previous response to the Issues and Options consultation Natural England welcome the designation of land as Protected Green Space. However, it should be recognised within the Local Plan that the Boroughs green infrastructure network is wider than just Local Green Space designation, also including local nature reserves, woodlands, allotments, verges, SuDS features, street trees and blue features such as rivers and coast. Together this network can provide a range of benefits for recreation and biodiversity. We recommend identifying all existing green infrastructure assets to establish a baseline, and using this to identify which areas to protect and where there are opportunities identified to enhance and connect this green infrastructure network.	<ul style="list-style-type: none"> New Green Infrastructure policy added to the Plan (Policy N9PU)
74	50.2.5: Natural England welcome the provision of a Green Infrastructure Strategy. As stated in our previous response to the Issues & Options consultation we advise the following to increase GI in the District: • Mapping exercise to identify location and quality of existing green infrastructure and what services it is currently providing. Having established this baseline, opportunities should be identified to enhance and connect this green	<ul style="list-style-type: none"> Comments noted. This will be covered in the GI Strategy. Elements of GI are currently mapped in the Open Space Assessment and Settlement Landscape Character

Ref	Comments	CBC Response
	infrastructure network. • Establishing principles or standards for high quality green infrastructure, providing clear expectations for development proposals. Existing standards include Accessible Natural Greenspace Standard. We note a new national green infrastructure standards project is currently in development.	Assessment Part 3 and are shown on the Proposals Map and on individual settlement maps accompanying the Local Plan.
149	Appendix D Supply of Open Spaces by Settlement and Typology. There is no mention of the protected village green in Kirksanton village which is an asset of Whicham Parish Council. The Green offers social, health and amenity value adjacent to the Care Home and recently refurbished, extended village hall. It provides varied social, health and educational activities for the village and wider rural area. There is a children's play area offering the only form of play provision in the settlement, adjacent to the village hall with runs a children's play group. The Green offers landscape benefits with stunning views to Black Combe and Lacra. It offers heritage value as the semi circular track around the Green is the ancient rope winding works which villagers were employed in making during the 18th Century for the tall sailing ships of the west coast.	<ul style="list-style-type: none"> Kirksanton was not assessed through OSA as at the time the village was not contained in the draft settlement hierarchy. The village green has now been assessed and is identified in the Local Plan as a Local Green Space and Protected Open Space. An addendum to the Open Space Assessment and Local Green Space document will be produced shortly.
N9PO (Publication Draft Policy N12PU)		
179	<p>Appendix C contains a list of open spaces in the Borough that the Council considers meets the NPPF definition of a Local Green Space according to the CBC Open Space Assessment (2020). The consultation documents advise that the Council will produce a Local Greenspace Evidence Document that will contain further information regarding each of the sites prior to the production of the Local Plan Publication Draft. Sport England would welcome consultation with the Council on that document. It is noted that some sites are playing fields, yet the typology used is 'amenity greenspace'. Sport England would welcome revisions to this typology to make it clear which sites are playing fields and would prefer the term 'playing field' to be used. Sport England also consider that this document should identify playing field sites which have been used as playing fields in the past and are not developed. This could also include playing field sites which are lapsed or disused e.g. former school playing fields or other open space on which a pitch has been marked out in the past. And the field to the south of Calderbridge and Ponsonby Village Hall, on the opposite side of the road junction with the A595, contained a cricket pitch in the past and still retains its playing field status, is this included in the LGS designation? Information on the use of playing field sites could also be fed in from the emerging Playing Pitch Strategy or Active places Power (activeplacespower.com) (where available) such as the type and number of pitches it contains. It would be helpful for each of these designations to contain a map with the site boundary marked. Does the site area include ancillary buildings and car parks, where provided, and would these features for part of the LGS designation?</p> <p>Policies for managing Local Green Spaces needs to be consistent with green belt policy.</p> <p>Sport England would like to understand how the Council intends to consider proposals for development on LGS where development is proposed to expand or enhance the sports use on site such as through car parking, fencing, ancillary buildings, or sports lighting?</p>	<ul style="list-style-type: none"> The LGS document was produced in September 2020 and was published alongside the Preferred Options Draft of the Local Plan. It contains a proforma for each LGS including a description that sets out if the site is currently used as a playing field. The typology "amenity greenspace" reflects that used in the Open Space Assessment, this reflects the fact that their benefits extend beyond the use of the pitch e.g. several are also used for dog walking etc. Sites are mapped within the Open Space Assessment. Local Green Spaces and protected open spaces are shown on the Settlement Maps accompanying the Local Plan. Playing fields including those that aren't currently used, will be identified in the Playing Pitch Strategy. Playing fields are shown on the settlement maps accompanying the Local Plan.

Ref	Comments	CBC Response
	Sport England generally supports Local Green Space designation it should not be at the cost of stifling the sports use now or in the future on the site.	<ul style="list-style-type: none"> • The PPS Update includes the pitch at Calderbridge referred to in the response. • Policy bulletpoint 2, along with the supporting text, has been expanded taking into account the comment re enhancing existing sports uses on the site.
N10PO (Publication Draft Policy N13PU)		
74	The wholly exceptional reasons for loss or damage to ancient woodland or veteran trees could include examples e.g: infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat.	<ul style="list-style-type: none"> • Additional wording added to the policy as suggested.
	50.6.1 We welcome the ambition for a Community Forest. In addition, existing tree cover should be assessed and opportunities to increase the tree cover identified. The policy should seek to enhance tree provision from developments, helping applicants to understand what and where tree planting would be most appropriate. This should be linked to Policy DS10PO.	<ul style="list-style-type: none"> • Additional text added to policy. The introduction of new trees is dealt with under the landscaping policy (DS7PU).

Built and Historic Environment

Ref	Comments	CBC Response
BE1PO (Publication Draft Policy BE1PU)		
254	<p>The opening paragraph of this policy provides protection for designated heritage assets only. Around 95% of our heritage assets across the country are non-designated and should also be afforded protection. We would therefore suggest amending this to the conservation and enhancement of the historic environment. A strategic policy on the historic environment should also set out a commitment towards the conservation and where possible enhancement the Outstanding Universal Value of the borough's two World Heritage Sites including their setting, which are assets of the highest significance. Whilst the English Lake District World Heritage Site lies beyond the boundary of the plan area, there is strong potential that development within its setting could impact on Outstanding Universal Value. Where such potential exists for development to have an impact on the two World Heritage Sites proposals should accord with the Management Plan. The NPPF at paragraph 193 requires great weight to be given to the conservation of all designated heritage assets, we would therefore suggest amendments to the third bullet point of the policy to reflect this.</p> <p>Amend first sentence of policy: Designated Heritage assets and their setting will be conserved and enhanced by: Requiring a heritage impact assessment or heritage statement where appropriate a proposal would affect a heritage asset. Maintaining up-to-date records of the character and significance of Conservation Areas through conservation area appraisals and management plans Ensuring the correct weight has been given to an asset's significance during decision making Giving great weight to the conservation of Copeland's designated heritage assets, Ensuring that new development is sympathetic to local character and history Promoting heritage-led regeneration initiatives in the Borough, particularly within the town centres Continuing to identify heritage assets that are "at risk" and work with partners to develop strategies for their protection Supporting proposals for the appropriate reuse of vacant historic buildings, recognising that putting buildings into viable uses consistent with their conservation can help sustain and enhance their significance Supporting proposals that increase the enhancement, promotion and interpretation of the Borough's architectural and archaeological resources • Conserving and enhancing the Outstanding the Universal Value of the Frontiers of the Roman Empire (Hadrian's Wall) and English Lake District World Heritage Site including their integrity and authenticity. Proposals that may have an impact on</p>	<ul style="list-style-type: none"> Text amended as requested.

Ref	Comments	CBC Response
	the World Heritage Sites or their setting should accord with the World Heritage Site \Management Plan.	
BE2PO (Publication Draft Policy BE2PU)		
254	<p>Para 54.3.1: The terminology for World Heritage Sites and their protection as Paragraph: 031 Reference ID: 18a-031-20190723 explains is different to that within the National Planning Policy Framework. Historic England considers that this terminology would be best used within the local plan: Development that conserves and where possible enhances the Outstanding Universal Value of the Borough's two World Heritage Sites (the English Lake District and the Frontiers of the Roman Empire Hadrian's Wall) will be supported in principle. Proposals which are likely to have an effect upon World Heritage Sites should be determined in accordance with draft Policy BE2PO (Designated Heritage Assets).</p> <p>We provide general support for the policy on designated heritage assets. However, to align with national policy we have suggested several changes: • A proportionate approach to the conservation of heritage assets depending on their level of importance. • The need for a clear and convincing justification for any harm. • The replacement of National Planning Policy Guidance with the national policy, as it is currently the National Planning Policy Framework that sets policy with regards harm to heritage assets, however this may change with emerging planning reform. • A positive approach to development within conservation areas. Development should preserve or enhance designated heritage assets (or an archaeological site of national importance) and their setting. The more important the asset, the greater the weight that will be given to its conservation. Proposals that better reveal the significance of heritage assets will be supported in principle. Any harm to, or loss of, the significance of a designated heritage asset will require clear and convincing justification.</p> <p>Wording change: Development should preserve or enhance designated heritage assets (or an archaeological site of national importance) and their setting. The more important the asset, the greater the weight that will be given to its conservation. Proposals that better reveal the significance of heritage assets will be supported in principle. Any harm to, or loss of, the significance of a designated heritage asset will require clear and convincing justification. Development that will lead to substantial harm to, or total loss of significance to of, a designated heritage asset, will only be accepted where there are substantial public benefits that outweigh the harm or in such cases listed within national policy the National Planning Policy Guidance68 Substantial harm to, or loss of: grade II</p>	<ul style="list-style-type: none"> Paragraph and policy amended as suggested

Ref	Comments	CBC Response
	<p>listed buildings, or grade II registered parks or gardens, should be exceptional; scheduled monuments (or non - designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments), protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal. Regardless of the level of harm, where proposals result in the loss of all or part of a heritage asset all reasonable steps must be taken by the developer to ensure that new development will proceed after the loss has occurred. Proposals that preserve or enhance the character or appearance of a Conservation Area, especially those elements which have been identified in a Conservation Area Appraisal as making a positive contribution to its significance will be supported. Demolition within a Conservation Area will only be permitted where the building does not make a positive contribution to the character and appearance of the Area</p>	
BE3PO (Publication Draft Policy BE3PU)		
254	<p>Para 54.4: We consider that the reasoned justification at present needs additional detail. Footnote 63 of the National Planning Policy Framework states that non-designated archaeological sites can be of equal significance to a Scheduled Monument and where this is the case such sites should be considered subject to the same Policies as for a designated heritage asset. However, not all sites of archaeological interest will be of national interest. However, this does not mean they are not valuable to our understanding of the past. The Planning Practice Guidance provides useful information on this at Paragraph: 041 Reference ID: 18a-041-20190723. Reference should be made to the Cumbria Historic Environment Record for the place for where copies of evidence should be deposited.</p> <p>Suggested change: Provide a fuller reasoned justification which provides a differentiation between archaeology of national interest archaeology and less than national interest. Provide a brief narrative on the Cumbria Historic Environment Record</p> <p>BE3PO: The policy should clearly distinguish between archaeology of national interest (which could be considered under the designated heritage assets policy) and archaeology of less than national interest. In line with the provisions of the NPPF, a rewording of the policy may be necessary which provides a proportionate approach to significance. We support the provision for remains to be kept</p>	<ul style="list-style-type: none"> • Additional supporting text added. • Policy amended as suggested.

Ref	Comments	CBC Response
	<p>on site (in situ). However, we consider that greater clarity could be provided within the policy, as to how a developer should manage remains where it has been justified not to be kept in situ.</p> <p>Amend policy as follows: “Proposals affecting archaeological sites of less than national importance (or local significance) should conserve those elements which contribute to their significance in line with the importance of the remains. Where there are potential archaeological interests on the site, a desk-based assessment must be submitted alongside the planning application and where this identifies that archaeological interests are likely, a field evaluation will be required. Development must protect, and should where possible appropriate, should reveal and allow public interpretation of, any archaeological remains in situ on site. Where remains cannot be preserved or managed in situ on site, provision must be made for their suitable archiving. the developer will be required to make suitable provision for excavation and recording before and during development. The findings should be submitted to the Local Plan Authority and deposited with the Historic Environment Record. “</p>	
BE4PO (Publication Draft Policy BE4PU)		
254	<p>We welcome the inclusion of a policy on non-designated heritage assets. We have provided some amendments which we consider would ensure better protection for non-designated heritage assets and where possible the reuse of special features.</p> <p>Amend the policy to read: Development should preserve or enhance heritage assets and their setting. Proposals that better reveal the significance of heritage assets will be supported in principle. Proposals affecting non designated heritage assets or their setting should demonstrate that consideration has been given to the significance of any heritage assets affected, including any contribution made by their setting. Where the scale of any harm or loss of and the significance of to the heritage asset outweighs the benefits of the proposal the development will be resisted. Where loss of the whole or part of a non -designated asset is accepted, the developer will be required to take all reasonable steps to ensure that the new development will proceed after the loss has occurred. The following In such cases, the developer will may also be required: make a public record and advance understanding of the significance of the asset lost⁶⁹. i. An appropriate level of survey is undertaken and public record made which may also include an archaeological excavation; ii. Provision or replacement of with buildings of comparable quality and design; iii. The salvage and reuse of special features within the replacement development</p>	<ul style="list-style-type: none"> • Policy amended as suggested.

Connectivity

Ref	Comments	CBC Response
Supporting text		
	Sport England advocates applying the ten principles of Active Design to connectivity where appropriate. Sport England considers that creating walkable communities, colocation of community facilities, creating a network of multi-functional open spaces, high quality streets and spaces and appropriate infrastructure and all-important components of connectivity that the policy can embrace.	<ul style="list-style-type: none"> Additional supportive text added relating to active design above general design policy (which would apply to all developments including sports facilities).
CO1PO (Publication Draft Policy CO1PU)		
174	The need to upgrade the Borough's digital connectivity is wholeheartedly supported but the solution to do this seems very weak "Exploring ways to improve connectivity" does not instil confidence that this much needed area of growth will actually be improved.	<ul style="list-style-type: none"> Comment noted.
CO2PO (Publication Draft Policy CO2PU)		
37	The plan identifies a Whitehaven bypass funded by contributing developers, I can't believe developers would be in agreement with this. The bypass shown in the plan would only cause a bottleneck on the A595 southbound between Westlakes Science Park and Blackbeck roundabout, not removing the traffic problem just moving it.	<ul style="list-style-type: none"> The Whitehaven relief road is an aspiration held by the Council, but no defined route has yet been identified. Work will continue to ensure the most sustainable location.
74	This Policy needs strengthening with regards to air quality impacts as detailed in the Plan HRA and the future modelling and monitoring from traffic impacts. There should also be an outline of the avoidance and mitigation measures that will be required within project HRA's.	<ul style="list-style-type: none"> Link added to policy relating to air quality policy.
82	<p>Public transport in the south of the Borough has been recognised as lacking but the Plan does not seem to address this. Bus connections with towns within the borough (Egremont and Cleator Moor) and neighbouring settlements (e.g. Broughton) are required to mitigate the need for car usage.</p> <p>We recognise that 2 out of 3 of the key Service Centre Towns, SCT (Egremont and Cleator Moor) are within a 5 mile travel distance to the Principle Town, PT (Whitehaven) and therefore directly benefit from the infrastructure and services/offer provided there. Furthermore these two SCT are linked by public bus services to the PT.</p> <p>The third SCT, Millom is 30 miles from the PT and not linked by any public bus service or any reliable transport to the PT. The CBC Plan does not make any account of this situation.</p>	<ul style="list-style-type: none"> There is a regular, direct train approximately every hour from Millom to Whitehaven The Copeland Transport Improvement Study seeks to address transport issues in the borough

Ref	Comments	CBC Response
104	I support this policy but it is evident that most of the existing cycling networks are to be found in North Copeland. There is a distinct lack of cycle ways in the south of the district , especially in the locality of Millom, where I believe there is an urgent need for investment. The roads connecting Millom to the surrounding villages are narrow and twisting, and with current levels of traffic, are not safe routes for walkers or cyclists. During the first COVID 19 lockdown when travel by car was restricted, there was a noticeable increase in the number of cyclists on the roads. But the numbers have reduced again as the traffic has returned. Many people do not feel safe venturing out on their bikes. As a resident of Kirksanton I believe there is a need to develop a network of safe cycling/walking ways(off-road and ideally accessible for pushchairs and wheelchairs) between the isolated villages of Silecroft and Kirksanton linking them to Haverigg and the supporting town of Millom. Such a network would promote active travel, benefitting the health and well-being of residents and visitors to the area. It would enable local people to visit each other without having to resort to the car (we have no bus service). Also a network of safe routes connecting the beaches and facilities in our area would be an additional tourist attraction and have a positive impact on our visitor economy.	<ul style="list-style-type: none"> Reference to specific cycle schemes the Council will support have been added to supporting text.
117	The document states ‘Opportunities have been identified as part of the Connecting Cumbria’s Hidden Coast programme to create a new recreational route from Whitehaven to Millom, which largely follows the English Coastal Path’ but does not reference the positive benefits to ensuring a cycle/pedestrian link from Millom through the South East edge of Copeland at Duddon Bridge. Similarly, the benefits of extending the National Cycle Network (most southerly point in Copeland is Ravenglass) through to Barrow (the next most southerly point on the NCN, for the start of the Walney to Weir route) are not referenced.	<ul style="list-style-type: none"> Reference to specific cycle schemes the Council will support have been added to supporting text, including reference to Millom to Duddon Bridge
117	<p>The Whitehaven relief road and growth corridor provides little benefit for connections into and beyond the South of Copeland. Further, the focus on providing road upgrades within Whitehaven is not consistent with sustainable transport and the acknowledged challenges of climate change.</p> <p>The document references improvements to the coastal route rail and connections to Whitehaven and connectivity between Whitehaven stations and the town centre but misses out improvements to public transport links between the stations and Whitehaven Hospital and West Lakes, for instance. Connectivity between transport hubs and key service and employment centres is essential if people are to easily make such journeys without a car or taxi. Also, lack of parking at the two Whitehaven stations limits the utility of these station for ‘park and ride’.</p>	<ul style="list-style-type: none"> Comment noted. The Council is committed to providing and encouraging a broad range of transport options, with the relief road being just one scheme we support. The Copeland Transport Improvement Study makes recommendations for improvements that could be made to active travel, public transport and highways, particularly where they link to Local plan sites. CBC will support proposals which seek to deliver these schemes

Ref	Comments	CBC Response
172	A Transport Interchange Hub for Whitehaven is vital to bring about a modal shift in transportation, with emphasis on the use of public transport for work, leisure and shopping in the town centre, reducing the number of vehicles in order to free up parking spaces available. Traffic management in Whitehaven has been a major issue for some years. The relief road project in my view is very uncertain. It is my understanding that Highways England have pushed the matter into RIS 3 with no immediate schemes in place to backstop if the project is abandoned.	<ul style="list-style-type: none"> • Comment noted. • The relief road remains a priority for the Council.
209	In particular section f, improvements to local cycle and walking network. A specific improvement would be St Bees to Whitehaven cycleway, which has been discussed for over 25 years. St Bees Parish Council has most recent proposals. This would link into the current cycleway network, and - provide alternative commuting to the main local service centres of Whitehaven, Egremont, Cleator Moor -enhance our Tourism offer	<ul style="list-style-type: none"> • Reference to specific cycle schemes the Council will support have been added to supporting text, including reference to the Whitehaven to St Bees cycleway
CO3PO (Publication Draft Policy CO3PU)		
57	Policy CO3PO relates to Priorities for Improving Transport Links to and from the Borough. The intention to support improvements to the SRN which would have a positive impact on safety and journey times is noted, and these should be identified through the transport evidence work.	<ul style="list-style-type: none"> • Comment noted
117	<p>There is reference to opportunities in tourism addressing some problems with deprivation. This needs to be linked to providing ready public transport from Copeland communities into the centre of Cumbria. Copeland very much needs transport to other areas of employment and recreation that is sustainable and affordable.</p> <p>The document states that 'The main town in south Copeland, Millom, is well connected to Barrow-in-Furness by bus'. That is not the case at present. Support+ comment: The document acknowledges that 'the rural location of Copeland means that services between Whitehaven and Millom are limited, with infrequent stops at the villages between the two settlements'. This is certainly true and there need to be more innovative transport opportunities for outlying communities to serve residents and visitors. Without such there is always going to be a heavy and unsustainable reliance on cars</p>	<ul style="list-style-type: none"> • Wording change to reflect lack of public transport provision between Millom and Barrow
117	There should be reference to the Cumbria coast railway as an important development opportunity both for allowing residents and workers to sustainably access Copeland but also for tourists	<ul style="list-style-type: none"> • Comment noted- reference to Cumbrian Coastal railway made in supporting text
CO4PO (Publication Draft Policy CO4PU)		
57	Policy CO4PO states that developments that are likely to generate a large amount of movement will be required to be supported by a Transport Assessment and Travel Plan. We should be consulted on any development proposals which have the potential to impact the safety or operation of the A595. Where possible, we would want be involved in pre-application scoping discussions for such proposals, to ensure that potential SRN impacts are considered from the start of the process.	<ul style="list-style-type: none"> • Comment noted

Ref	Comments	CBC Response
57	<p>Thresholds for assessment are provided in Appendix J of the Plan. Whilst the thresholds set out appear to be reasonable, it should be noted that Highways England does not prescribe the rigid application of trip generation thresholds when it comes to new development trips forecast to use the SRN, as an important consideration when considering potential development impact is the existing operation and sensitivity of the particular SRN links or junctions in that vicinity.</p> <p>In terms of the IDP, Copeland Borough Council is preparing this in two stages. The Stage 1 – Evidence and Capacity document identifies the known shortfalls and constraints regarding infrastructure across Copeland. Stage 2 of the IDP will be commissioned following the Regulation 18 Preferred Options public consultation and will include details of the infrastructure required to support delivery of the Local Plan and a delivery programme. This will be published by the Council as part of the Regulation 19 Pre-Submission consultation. The Stage 1 IDP provides a brief overview of the current transport provision in the Borough. It highlights the importance of the A595 as the primary highway route in the Borough and the detrimental economic impact that the current performance of the road network has on growth in the local economy. No further information or evidence is presented within the IDP regarding the existing performance of the A595. In the absence of this, we expect that the forthcoming transport evidence work will provide this, however there should be clear linkages between the transport evidence and IDP. The Stage 2 IDP will set out details of the infrastructure required to support delivery of the Local Plan and a delivery programme, which will be of key importance to Highways England and this document should be clearly linked to, and evidenced by, the forthcoming transport evidence work.</p>	<ul style="list-style-type: none"> Comments noted. The stage 2 IDP will be informed by the Transport Improvements Study and National Highways will be kept informed throughout.
110, 111, 112	<p>We are supportive of draft Policy CO4PO which confirms that the Council will support development which encourage the use of sustainable modes of transport; this approach is in accordance with paragraph 102 of the NPPF.</p> <p>It is noted that principles will be encouraged in new development, including:</p> <ul style="list-style-type: none"> Safe and direct connections to routes promoting active travel and public transport; and The integration of electric vehicle charging infrastructure into new developments. <p>Whilst Persimmon and Gleeson are generally supportive of this, it would be useful to understand whether any standards for the provision of electric vehicle charging infrastructure are being produced by CBC, so that expectations are clear in accordance with paragraph 16(d) of the NPPF as referenced above. Furthermore, as the Local Highway Authority in the area, the implications of this policy need to be considered fully by Cumbria County Council, and include the full design / development of a site from the obvious public transport links, through to the materials and hard / soft landscaping of a site that can act to significantly reinforce these principles</p>	<ul style="list-style-type: none"> Requirements relating to the provision of Electric Vehicle charging infrastructure have been added to policy CO7PU. Cumbria County Council are consulted throughout the Local Plan process for their input into policies.

Ref	Comments	CBC Response
179	We welcome a section on active travel, and supports the inclusion of a sustainable travel policy Copeland Local Plan Preferred Options Draft Appendices Document	<ul style="list-style-type: none"> Comment noted
251	<p>Firstly, I have personally been excited about the prospect of the Coastal Path and had hoped it would have been completed in part this year in the Millom area but no. And even worse I have learned that beyond Millom alongside the glorious route by the Duddon estuary, the path is to finish at Green Road station, because of insufficient funds to create a pedestrian bridge to enable walkers to proceed to the facilities of Broughton in Furness.</p> <p>However, it is heartening that there seems to be lots of plans for cycling and walking routes within this Community Plan. Our roads around here are twisty and very narrow in parts and cycling for leisure quite hazardous, so we would very much welcome this development.</p>	<ul style="list-style-type: none"> Comment noted. Reference to specific cycle schemes the Council will support have been added to supporting text
	<p>I'm delighted to read that opportunities for cycling and cycling routes are regularly mentioned within the strategy document. However, I ask that specific attention is drawn to the design of the entry/exit points of any new cycle development. I ride a wider than normal cargo bike with my children, and I simply cannot get onto the majority of our existing cycle ways as the gates/turns to get on are simply too narrow. In order to further increase the uptake of cycling within Copeland, my recommendation is to ensure that our cycling infrastructure is accessible to all kinds of cycles, including wider/longer cargo bikes, tandems, trailers and specifically made adapted cycles for inclusive cycling. And finally, please ensure that the cycling track project for St Bees is firmly included in the plan. This will help alleviate issues with transport and connectivity, and promote health, wellbeing and sustainability.</p>	<ul style="list-style-type: none"> Reference to specific cycle schemes the Council will support have been added to supporting text, including Mirehouse to St Bees Added to supporting text that we will support safe and accessible routes.
CO5PO (Publication Draft Policy CO5PU)		
110 111 112	Draft Policy CO5PO outlines a transport hierarchy for new development which should be promoted with the highest priority given to pedestrians, cyclists second, public and community transport users third, vehicles that facilitate car sharing fourth and all other vehicles fifth on the priority list. This approach is in line with paragraph 110a of the NPPF. We are supportive of this policy and the requirement to ensure that new development should be designed to follow this hierarchy, where possible, including the requirement to consider accessibility for all throughout the design of proposals.	<ul style="list-style-type: none"> Support for transport hierarchy noted
CO6PO (Publication Draft Policy CO6PU)		
192	Policy fully supported. Enhancements should be made to the signage, including distance markers along the Copeland Borough stretch of the Coast to Coast Footpath route. This is poorly marked at present and much	<ul style="list-style-type: none"> Criteria relating to enhanced signage added to policy

Ref	Comments	CBC Response
	could be done to enhance this including details of local places of interest that could be visited and places where food / other provisions can be found.	

Other comments

This table outlines other policy related comments received through the Preferred Options Draft Consultation. This relates to where a comment cannot be attributed to an existing policy, i.e. where they suggest additional policies to be added to the Local Plan, or make generalised comments about the plan in its entirety.

Ref	Comments	CBC Response
164	With regard to the bigger picture, I'm concerned that, with national planning policy going through a turbulent time and Copeland advocating a unitary council with Allerdale and Carlisle, the Local Plan is being developed in isolation and may well be obsolete before it is finally approved. I hope you will be addressing this as you produce the final draft of the 2017-2035 Local Plan for Copeland outside of the National Park.	<ul style="list-style-type: none"> It is currently unclear what planning process will look like under the new authority. However, it is a requirement for all Local Authorities to have an up to date Local Plan and therefore we will be progressing with it, with the ambition that the Plan will be complete prior to Local Government Review.
45	<p>We would like to see the inclusion of an additional policy, focused on the protection of water quality and quantity. Clean and plentiful water resources supports the Vision as it is essential for a healthy environment, and for quality of life, health and happiness</p> <p>Suggested new Policy: 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. The possibility of contamination from former uses on any proposal site and its effects on the water environment and human health needs to be considered and remediated where it is present. Proposals will be required to support the objectives of the Water Framework Directive, including the objectives</p>	<ul style="list-style-type: none"> A new policy has been added to the Local Plan covering water quality (N5PU). This takes into account the suggested text provided here.

Ref	Comments	CBC Response
	<p>for Protected Areas (such as Bathing Waters and Shellfish Waters) as set out in the North West River Basin Management Plan.</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. All new residential development must achieve the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.</p> <p>Supporting text:</p> <p>A high quality water environment supports wildlife, provides quality of life benefits, and can support local economies, boosting land and property values, agriculture, tourism and recreation. Where it is not properly planned for, new development can increase pressure on the water environment. Planned development can provide opportunities to protect and enhance the water quality. Pressures on the water environment arise from point sources such as discharges from wastewater treatment, and from diffuse sources such as urban and rural water run-off. Development should ensure there is adequate waste water treatment infrastructure to ensure no deterioration in water quality.</p> <p>The current River Basin Management Plan (the North West River Basin Management Plan) requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Any development should safeguard these important water resources and protect and improve water quality with an overall aim of getting water bodies to 'good' status as defined by the Water Framework Directive. Copeland has 4 designated Bathing Water beaches at Haverigg, Silecroft, Seascale and St Bees and all comply with the standards outlined in the Bathing Water Directive;</p> <p>Silecroft and St Bees are both classed as excellent water quality, Seascale is Good and Haverigg is Sufficient. Further investment to improve water quality in the Duddon catchment is required to protect Haverigg from the risk of failing future assessment.</p> <p>Copeland has 2 designated Shellfish Waters on the Duddon estuary and at Ravenglass, and microbial water quality has improved to enable them to achieve the Water Framework Directive requirement for Shellfish Water Protected Areas.</p> <p>There are 30 river waterbodies designated under the Water Framework Directive in the area covered by the Plan. The 2019 classification results showed that, of these 13 are currently achieving 'Good'; 13 are achieving 'Moderate' and 4 are classified as 'Poor' ecological status/potential.</p>	
103	<p>As Copeland Borough Council has recently formed a working group for a Geological Disposal Facility we wonder whether there is a policy omission in the draft Plan, though we do recognise waste is a County Council function. Should the Plan include a policy position regarding Geological Disposal Facilities or facilities associated with the investigation of facilities that would fall within the Borough's rather than the County Council's remit? If it is appropriate to have a policy we would expect reference that such a facility would not take place within or</p>	<ul style="list-style-type: none"> The GDF proposals are not under the remit of CBC, and they are currently still in an early stage. Local Authorities are required to undertake a plan review every 5 years, and

Ref	Comments	CBC Response
	<p>under the National Park and would not harm the setting of the National Park, in line with the Borough's recent statements, and that this would align with our draft Local Plan Policy 29 – Waste Management.</p> <p>Given the timescales of any Geological Disposal Facility, it may be appropriate to consider how those areas of the Borough which form part of the National Park boundary review form part of the Geological Disposal Facility consideration.</p> <p>Regarding the Duty to Cooperate we would expect to be involved in identifying cross boundary strategic issues, such as housing, flooding, water supply, transport infrastructure at an early stage so this can be adequately reflected in the Statements of Common Ground, which, in our recent experience, is an integral element of the examination process.</p>	<p>therefore there may be potential for the GDF to be included within the revised plan.</p> <ul style="list-style-type: none"> • We will continue to undertake our duty to cooperate at an early stage.
101	<p>Provision of Education/skills training does not feature directly in the report. However it is a key factor to regeneration throughout Copeland. See page 82 fourth bullet point about Campuses in Egremont and Whitehaven. These schools have been the subject of significant investment and support from the Nuclear industry in financial terms and Governance input.</p> <p>Contrast these schools with Millom school (see extract from OFSED report below) This school is underperforming and it requires some pro-active intervention with the support of CBC and possibly governance from proven industry managers and CCC. CBC have a role in facilitating this and raise the declining performance standards</p> <p>This is a school that requires improvement n the standard of education provided at the school is variable. Where leaders fail to review the impact of their actions effectively, the improvement is slower and inconsistent. n The implementation and impact of the key stage 3 curriculum is variable. As a result, pupils are not consistently provided with opportunities to learn with depth, detail and fluency. n Leaders have not ensured that teaching is consistently good, especially in key stage 3 and in mathematics. As a result, pupils' attainment and progress are not good in these areas. n Despite recent improvements, pupils who are disadvantaged and those who have special educational needs (SEN) and/or disabilities make variable progress. n Teachers do not consistently use assessment information, including from the tests that pupils take at the end of primary school, to plan work that stretches pupils' thinking n The attendance of disadvantaged pupils and that of pupils who have SEN and/or disabilities is lower than that of others nationally. n The standard of education provided by the sixth form is mixed. Sixth-form leaders are not consistently effective in providing a demonstrable impact for their actions. n The teaching of academic courses is variable. As a result, too many students who follow these</p>	<ul style="list-style-type: none"> • Whilst CBC supports the provision of educational opportunities and skills development to help meet the "educational attainment" objective identified at the start of the Local Plan, education does not come under the planning remit of CBC, and is dealt with through Cumbria County Council. It therefore does not feature as a specific education policy within this plan. • The Local Plan supports education provision through policies DS5PU, E1PU, NU2PU and SC1PU. If funding became available for education, such policies could be used to help support a case. • Education is also considered through the Infrastructure Delivery Plan which identifies if new or extended school provision is required to support new development.

Ref	Comments	CBC Response
	<p>courses do not attain the grades of which they are capable. n The curriculum that leaders provide for A-level students does not consistently provide opportunities to learn in depth and detail</p> <p>Below are 3 examples of significant funding given to North Copeland via CCF. Although not directly funded by CBC it has a very key role in ensuring its function. These types of project would significantly enhance the wellbeing in South Copeland. Yes. A nominal amount of funding does come to South Copeland but pro-rata. is vastly disproportionate to population balance and need. There is no mention of in the Copeland plan will target industry support to the South of Copeland in the future. Millom has multi deprivation issues !!!</p> <p>Whitehaven Campus</p> <p>In March 2017 the Copeland Community Fund Board formally approved an investment grant of £3m for the Whitehaven Campus Project for sport and leisure community facilities.</p> <p>The community facilities became available for public hire and use on 7 January 2019 with individual facilities including:</p> <ul style="list-style-type: none"> •Sports Facilities - 4G pitch, Sports Hall, Activity Studio, Tennis Courts, Low Impact Gym, Pool. •Arts Spaces -Theatre / Lecture space, Performing Arts space and Music/Drama space. •conference facilities. •soft play •sensory room. <p>A new Community Development Manager was appointed and in post from the beginning of January 2019. Keith Hitchen, Chair of Copeland Community Fund Board, said: "It is exciting to see the fund's investment of £3 million become a reality in terms of exceptional community sports and leisure facilities available for the whole of the Copeland area. We would encourage members of the local community and community sports organisations to take full advantage of what should be an amazing community asset."</p> <p>Investment in the Campus came from a range of partners including the Nuclear Decommissioning Authority, Sellafield Sites Ltd, Copeland Community Fund, and Cumbria County Council.</p> <p>Whitehaven Harbour Youth Project – Opportunity and Adventure on your Doorstep</p> <p>The Copeland Community Safety Hub (The Hub) was formed in 2016 and is based within the Whitehaven Police Station. The Hub brings together multiple partners from across the community to find innovative and proactive ways to tackle anti-social behaviour and to provide opportunities for people to develop transferable and positive life skills. As part of the objectives of the Hub a project known as Future Pathways was piloted. The pilot saw local employers, providers of activities and other youth focused organised coming together to deliver an 8-week program of activities to Key Stage 3/Key Stage 4 students in local secondary schools. The University of Central Lancashire supported the evaluation and monitoring of the project. Due to its resounding success the principles of the Future Pathways are being expanded to include primary schools and other organisations working with young people. The Hub overall has been such a successful initiative that it is now being regarded as a best practice and rolled out throughout Cumbria.</p> <p>Whitehaven Harbour Youth Project (WHYP) are responsible for the deliver the activity element of the project:</p>	

Ref	Comments	CBC Response
	<ul style="list-style-type: none"> • All outdoor activity delivery (including Future Pathways and Junior Award Scheme for Schools). Working closely with local primary and secondary schools to engage young people in their local environment in a positive and healthy way and to support them to develop transferable life skills for their future • Provision of long term exit routes for young people to remain engaged in sport/activity and general positive youth club activity. • Access to the Duke of Edinburgh Award scheme as part of their 'Open Award Centre' status for any interested young people following their participation in Future Pathways • For all technical expertise, equipment expenses, safety and management of outdoor activities (including outdoor abseiling) in line with their Adventurous Activities Licensing Authority commitment • For advertising and promotion of new outdoor activities (e.g. abseiling, climbing) to ensure their long term success so that the wider community can enjoy low cost accessible adventure. • For the delivery and management of the Sea Bins Project. • Joint coordination of evaluation and monitoring of JASS and Future Pathways in conjunction with University of Central Lancashire <p>Inspector Mark Wear, Cumbria Police said "The pilot project was so successful and the feedback from the schools and many parents was so positive we had to move this project forward.</p> <p>Working with Whitehaven Harbour Youth Project is not only positive for the programme participants, helping WHYP to increase its sustainability, but also will have a great impact on opportunities for the community in and around the marina area".</p> <p>Gina McCabe, WHYP Manager said "The funding from Copeland Community Fund will support the purchase of new canoes and paddles some outdoor climbing/abseiling area equipment and orienteering course mapping kit and a proportion of the salary cost. This will help to expand and develop the opportunities for WHYP to provide activities to local young people that will develop their potential, to understand themselves and others, to enjoy life and contribute positively to the world." Gina added "this 2-year project is very exciting not just for young people but the whole community as it will create much better opportunities in the marina than ever before".</p> <p>Additional funding was secured from: Morgan Sindall, Police & Crime Commissioner and Sellafield Sites</p> <p>Vulture Club – Creative Writing Project</p> <p>This project will be delivered to individuals in recovery from addiction and those with a history of mental ill health/psychological/trauma based issues.</p> <p>The project enables Whitehaven based Vulture Club to broaden their range of therapeutic activities and open their doors for two additional days, allowing the club to offer much needed additional support to their membership from Monday through to Friday.</p>	

Ref	Comments	CBC Response
	<p>The creation of two part-time coordinator roles will support Vulture Club's ongoing plans for future development. Vulture Club hope this project will enable them to welcome new people from the local community to join their confidential, safe and supportive club and benefit from taking part in opportunities for personal development and growth.</p> <p>The Creative Writing sessions will be led by a highly experienced tutor who will work with an individual or a group's needs using many methods, for example structured free writing, communication and presentation skills and open reading, to improve self-esteem and confidence in participants.</p> <p>David Rudd, Vulture Club Coordinator said, " We are thrilled to have received the support of Copeland Community Fund and are confident the project will enhance our unique menu of services by allowing us to open for our members five days per week instead of three."</p> <p>Other funding was provided by Unity and Hadfield Trust.</p>	
74	<p>Air Quality needs to be a separate Policy within the Local Plan. The Policy needs to strongly emphasise impacts from air quality on designated sites. We therefore suggest that policy criteria is included for developments to ensure reducing impacts on designated sites, particularly in relation to the following: industrial developments; roads; pig, poultry and cattle developments and slurry tanks; and combustion sources. As stated in our response to the Issues & Options consultation: Natural England note that the Air Quality section of this consultation document has no reference to increased ammonia emissions from new agricultural developments and activities such as livestock housing, slurry stores and spreading of manures. Ammonia impacts upon human health and damages sensitive habitats. Several SSSI's within the Borough are currently over their critical threshold levels for ammonia (see below): • Duddon Valley Woodlands SSSI • Greendale Mires SSSI • Silver Tarn, Hollas and Harnsey Mosses SSSI • Brantrake Moss and Devoke Water SSSI • Ennerdale SSSI • Haile Great Wood SSSI • Milkingstead Wood SSSI • Wasdale Screes SSSI • Hallsenna Moor SSSI • Duddon Estuary SSSI • Pillar and Ennerdale Fells SSSI • Duddon Mosses SSSI • Black Moss SSSI There are also impacts to sensitive habitats from air pollution within 200m of a transport corridor and therefore the need for avoidance and mitigation measures. These should be included in an Air Quality Policy as outlined in the HRA and referred to below.</p>	<ul style="list-style-type: none"> • A new air quality Policy has been added (DS11PU).
74	<p>Natural England welcome the thorough and detailed approach to the Habitats Regulations Assessment. We welcome the process of assessing impact pathways from allocations to designated sites which has been detailed within the HRA. However the conclusion of the HRA is slightly confusing for this. It states that the policies and sites there is no LSE via certain pathways of impact but that it is not possible to conclude the Local Plan can be delivered without further Appropriate Assessment. It would be clearer to state in bullets what these impact pathways that require further assessment are: Air Quality and Water Quality. Throughout the HRA there is reference to project specific HRA's being required for some sites but then no further level of detail provided. By allocating a site the Council needs to be certain that the site will pass the project level HRA and</p>	<ul style="list-style-type: none"> • An Updated HRA has been produced to support the Publication Draft of the Local Plan which takes these comments onboard. • A new air quality Policy added (DS11PU).

Ref	Comments	CBC Response
	<p>therefore should outline an overview of the mitigation measures that would ensure this. Example wording: The site adjoins a site designated as SSSI, SAC, SPA and under the Ramsar Convention. Mitigation measures will therefore be required, guided by existing evidence and an appropriate ecological survey, including; 1) Timings of construction works to avoid the wintering period (October – March inclusive), 2) The erection of acoustic & visual screening throughout the construction period, 3) Barriers to prevent debris entering the nearby watercourse/ designated site This should include an Appropriate Assessment taking into account the identified mitigation above and any other identified measures required as a result of project level ecological survey and assessment. Standard best practice approaches such as pollution prevention measures must be implemented. This will make it clear to developers what the minimum mitigation requirements that are known to be required at this stage. If conclusions for certain site allocations cannot be reasonably be reached by the Local Plan HRA, lower tier plans can be relied upon, subject to the Local Plan HRA being able to confirm that viable mitigation measures are available, despite not having full details at this stage. Throughout the HRA there are recommendations of how the Plan can be strengthened to ensure protection of designated sites from future development. However, some of these do not appear to have been incorporated into the Plan and therefore must be included in the next draft. The recommendations that need to be included are listed in the table below. Air quality impacts are detailed within the HRA but there is no specific policy within the Plan for air quality and, as in above comments on the Plan, this needs to be a separate Policy. It needs to incorporate the comments within the HRA regarding the Transport impacts from traffic flows, and reflected in Policy CO2PO.</p>	
109	<p>On behalf of our client, Tendley Quarries Ltd, Heatons have previously submitted comments to the Issues and Options stage of the Local Plan's development in January 2020. Tendley Quarries Ltd have land and mineral interests within Copeland District including at Eskett, Rowrah, and Peel Place Quarries. Sand and gravel resources at Peel Place Quarry are allocated within Policies SP9 and SAP4 of the Cumbria Minerals and Waste Local Plan 2015-2030 as an Area of Search for mineral extraction over the Plan period (Allocation reference M15). Planning policies should account for the safeguarding of mineral resources in accordance with NPPF paragraph 204. As detailed below, this responsibility is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, 'whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways: • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.' We submit that the emerging Copeland Local</p>	<ul style="list-style-type: none"> • Additional text relating to mineral safeguarding areas added to paragraph 13.18.3. • Mineral Safeguarding Zones and Mineral consultation areas that may affect any housing allocations have been highlighted within our Housing Allocation Profile document. • The relevant consultations will take place at planning application stage.

Ref	Comments	CBC Response
	<p>Plan should, when considering policies and potential allocations, ensure that operational and allocated/future mineral sites are safeguarded from inappropriate land uses and non-mineral allocations that would prejudice the ongoing / future operation of the mineral site. In accordance with NPPF guidance, mineral safeguarding should extend to both mineral extraction sites and minerals-associated infrastructure as stated within NPPF paragraph 204. In line with national guidance, we wish to reiterate the importance of the inclusion of policies in the emerging Local Plan that acknowledge the need for the Borough to co-operate with Cumbria County Council in the identification of known mineral reserves and other mineral sites to ensure their protection from incompatible land uses through the Copeland Local Plan. In accordance with national policy, the District-level Local Plan should include a policy or policies ensuring that due consideration in the case of determining non-minerals planning applications is given to the need to safeguard finite mineral resources or the possibility of enabling their prior extraction where feasible. In accordance with Minerals PPG paragraph 005, the Copeland Local Plan policies maps should show the Mineral Safeguarding Areas within the District as illustrated on the Cumbria Minerals and Waste Local Plan Policy Map – Part 2 – Minerals Safeguarding Areas map. The Local Plan Preferred Options version references mineral safeguarding within the Strategic Objectives Chapter at ‘Copeland’s Places’, but does not support the objective in draft Policy.</p>	
125	<p>I have seen the plan and I would like to know what is happening in the Millom area as we are part of Copeland and if it was not of the town deal we would be left in the dark yet again.</p> <p>We are fed up to the back teeth with false promises we have no bus service and parents that chose to send their children out of the catchment area are spending far too much to send their children to school.</p> <p>We are well aware that we are isolated from the rest of Copeland.</p> <p>When we get the police update they say Millom and Copeland that says it all to me.</p> <p>All we want is the same as other parts of Copeland and that everything is not Whitehaven centric.</p> <p>We don’t have a 24 hour care home the question is why do we have to travel miles to see our relatives I know of one lady that was placed in Keswick and her family did not see her for 7 Month as they could not drive sadly she has dies now.</p> <p>Our children have to travel for further education with many unable to peruse their dreams due to the cost of travel.</p> <p>Things are starting to change but far to slow we are an afterthought I have so many people come up to me with sad stories it breaks my heart.</p> <p>We are living in the most beautiful part of the borough and</p> <p>We need to get the infrastructure in place drainage system, roads and digital before we can put anything else right.</p> <p>The pavement are full of Moss it’s disgusting and then we are told tourism is the answer</p> <p>Don’t get me wrong this is not just a rant I am really worried that we are so far behind and it is going to cost a fortune to bring use up to speed.</p>	<ul style="list-style-type: none"> Comments have been noted. Whilst a number of these issues are outside of the Local Plan remit and therefore cannot be mitigated through the Local Plan, we recognise that there are geographical differences between Millom and the rest of Copeland. We have included more detail surrounding Millom and some of the opportunities that could be provided within the Publication draft, as well as promoting Millom through the use of supporting text and images

Ref	Comments	CBC Response
	<p>We are so lucky that Millom people know how to look after their own</p> <p>We are not O it's Just Millom we are proud to be part of Copeland.</p>	
174	<p>§ Smaller sites of between 10 and 30 units. This could be achieved by breaking up one of the existing sites and supporting the local builders who want to make the next step as a house builder by ensuring that infrastructure is less onerous on these sites than the ones that will be attractive to the bigger developers.</p> <p>In general, we were disappointed with the plans, or lack of, for Egremont which does not seem to have a defined role in the future delivery of the Councils overall vision for Copeland. The potential the Town has to offer is not recognised and yet it is home to one of the Country's highest performing Academies in West Lakes and we all know one of the top criteria for families considering moving into an area is the performance of the local schools. West Lakes Academy sitting alongside high performing primary schools in themselves offer families the educational excellence they require. Egremont's history needs to be exploited and developed into the tourism benefit it could be.</p> <p>Our access to the countryside is another potential overlooked in the plan, an asset that so many visitors and tourists to the area would see as a positive and lastly our proximity to Sellafield, the fact that Egremont is the nearest Town to the Sellafield site and with the Councils desire to hit national environmental targets, helped by cars travelling less miles, we would suggest is another evidence based reason to include this as a potential for Egremont.</p> <p>We feel the cultural excellence demonstrated throughout Copeland does not seem to have been considered in the plan. The arts and crafts skills shown by many could be expanded and with the link to Florence Mine Egremont could become the Copeland hub. If thought was given to the use of an empty property/unit turned into an incubator centre for arts and crafts, we are sure it could be start of creating a niche market in Egremont that benefits the whole of Copeland.</p> <p>It is right that we highlight those areas within the plan that we feel will not help Egremont Parish deliver its potential though this does not take away from the draft plan which does contain many positives that will help Copeland realise its vision Again thank you for the opportunity to comment and we look forward to reading the final plan in the hope our feedback has been taken into account.</p>	<ul style="list-style-type: none"> • Comments noted. We have included more detail surrounding Egremont and some of the opportunities that could be provided within the Publication draft, as well as promoting Egremont as best as possible through the use of supporting text and images. • In terms of the comments about the size of allocations, we would support a smaller developer coming forward on these sites. In addition to the Housing allocations, we have proposed boundary extensions for our settlements, which can provide flexibility by allowing for smaller levels of windfall development to come forward.
149	<p>In response to the Copeland Local Plan 2017-2035 Section 44.3.1 where it is suggested that "planning policies should; a) plan positively for the provision and use of community facilities". Overall, the plan demonstrates a Whitehaven-centred approach to regional development with centres currently enduring hardship destined, once again, to be excluded from major regeneration activities. Specifically, I would like to draw your attention to Youth services. The Whitehaven Youth Project is identified as an exemplar project but there is no suggestion that lessons learned from this initiative are to be rolled out in centres that currently have no provision for young people. The town of Millom and the surrounding area provide a notable example of urgent need. In the</p>	<ul style="list-style-type: none"> • Policies surrounding health and wellbeing have been developed further for the Publication draft of the Local Plan. An overarching health and wellbeing policy has been added (SC1PU) as well as a policy which supports the future provision of

Ref	Comments	CBC Response
	<p>absence of targeted (8-16 years) youth provision young people (not engaged in organised team sports for which Millom has an excellent reputation) typically congregate outside Tesco Supermarket using the Town Centre as a play area with bikes and scooters causing issues with both motorists and pedestrians. Furthermore, vandalism including graffiti, damage to Millom Park play areas and the burning of vehicles is becoming increasingly problematic for Millom residents. I would therefore request that the Local Plan is amended to incorporate a more inclusive, borough wide strategy in respect of future youth provision.</p>	<p>sport, leisure and cultural facilities, which would include provision for young people (SC5PU). The Local Plan also gives protection to existing open spaces and facilities used by younger people such as playing fields.</p> <ul style="list-style-type: none"> Projects funded by Town Deal monies within Millom will also help improve provision for younger people.
149	<p>I was both surprised and dismayed to read a document purporting to set out an optimistic plan for the people of Copeland that failed, so overtly, to recognise the value of culture. Culture in its myriad forms is both central to the Borough's unique 'offer' and will also be central to the future vitality of the area; especially following Covid. The word culture appears in the document once and then only as part of a generic list with no further incorporation in specific or detailed proposals. I therefore wish to bring to your attention the considerable contribution made to the Copeland area by the arts and in particular the visual arts. Typically, this contribution takes the form of artist-Initiated projects with the artist or artists drawing considerable funding into the region. Furthermore, the visual arts can claim to having made a significant contribution to Copeland's 'offer' in terms of coverage gained through local, national and international media. In recent years artist led initiatives have created opportunities for social participation and local engagement helping foster a greater sense of local pride in the immediate locality. Moreover, participation in the arts is increasingly recognised as making a positive contribution to health and wellbeing objectives. I am an independent arts practitioner based in Millom and passionately believe that the arts and creative industries should play a significant role in Copeland's future. Specifically, the provision of creative infrastructure in the form of an arts hub, facilitating both practice and acting as a showcase venue, has been identified as potentially making a significant contribution to Millom's regeneration.</p>	<ul style="list-style-type: none"> See comment above.
57	<p>Thresholds for assessment are provided in Appendix J of the Plan. Whilst the thresholds set out appear to be reasonable, it should be noted that Highways England does not prescribe the rigid application of trip generation thresholds when it comes to new development trips forecast to use the SRN, as an important consideration when considering potential development impact is the existing operation and sensitivity of the particular SRN links or junctions in that vicinity.</p> <p>In terms of the IDP, Copeland Borough Council is preparing this in two stages. The Stage 1 – Evidence and Capacity document identifies the known shortfalls and constraints regarding infrastructure across Copeland. Stage 2 of the IDP will be commissioned following the Regulation 18 Preferred Options public consultation and will include details of the infrastructure required to support delivery of the Local Plan and a delivery programme. This will be published by the Council as part of the Regulation 19 Pre-Submission consultation.</p>	<ul style="list-style-type: none"> Comments noted.

Ref	Comments	CBC Response
	<p>The Stage 1 IDP provides a brief overview of the current transport provision in the Borough. It highlights the importance of the A595 as the primary highway route in the Borough and the detrimental economic impact that the current performance of the road network has on growth in the local economy. No further information or evidence is presented within the IDP regarding the existing performance of the A595. In the absence of this, we expect that the forthcoming transport evidence work will provide this, however there should be clear linkages between the transport evidence and IDP. The Stage 2 IDP will set out details of the infrastructure required to support delivery of the Local Plan and a delivery programme, which will be of key importance to Highways England and this document should be clearly linked to, and evidenced by, the forthcoming transport evidence work.</p>	
<p>242, 243</p>	<ul style="list-style-type: none"> • The current CBC Preferred Options Local Plan shows no application of the National Levelling Up agenda but perpetuates the North Copeland v South Copeland divide. • Two out of 3 of the key Service Centre Towns, SCT (Egremont and Cleator Moor) are within a 5 mile travel distance to the Principle Town, PT (Whitehaven) and therefore directly benefit from the infrastructure and services/offer provided there. Furthermore these two SCT are linked by public bus services to the PT. • The third SCT, Millom is 30 miles from the PT and not linked by any public bus service or any reliable transport to the PT. The CBC Plan does not make any account of this situation. • The Report makes it clear about the imbalances caused by over-reliance on the nuclear sector but needs to be more explicit about how to rebalance the economy, particularly in the light of much reduced activity at Sellafield in future years. • Note Government policy to expand housing provision, but the problem facing towns such as Millom is the poor state and unsuitability of existing accommodation rather than a lack of housing. • A key feature of the borough is the profile of an ageing population but the Plan seems at present to lack realistic suggestions of how this can be addressed. <p>BELOW is a summary of an independent professional assessment of the key need to address in Millom. In general the current draft of the Copeland Plan does not address any of these (Weaknesses/Challenges/Opportunities) issues. (See attached Scanned Response for report)</p>	<ul style="list-style-type: none"> • Millom is connected to Whitehaven by train. The TIS suggests that it would not be viable to provide a bus service between the two settlements. • Plans for diversifying the economy have been included within our economy chapter. • Policy H1PU outlines CBCs support for the renewal and improvement of Copeland's existing housing stock. Developers are also required to take into account the Housing Needs Study when determining the most appropriate type of housing to develop within each sub area. • Addressing an aging population is a significant challenge that the Local Plan will help address through creating job opportunities, providing the right types of homes and protecting and encouraging new leisure facilities.
<p>248</p>	<p>Although a resident of Millom for over 5 years, I have approached my reading of this document as if through the eyes of someone looking to move into the Millom area to live or, perhaps, invest in some professional or business capacity. You will understand that therefore my focus is on what the document tells me about Millom. Having said that, I was extremely disappointed by what I found in that the information was almost non-existent,</p>	<ul style="list-style-type: none"> • We have included more detail surrounding Millom and detailed some of the challenges it faces and the opportunities that could be

Ref	Comments	CBC Response
	<p>told me nothing more about the town than I could pick up on in general terms on the internet and, overall, the document gave me the impression that Copeland Borough Council had little or no interest in, or plans for, Millom and its surrounding area. Many references were no more than corporate phrasing.</p> <p>Apart from the 'Cleator Moor, Egremont and Millom' reference groupings I managed to find Millom itself referenced on only about 16 pages out of something like 250 pages. I have learnt that there are 2 industrial sites; there is an area of land for housebuilding; that for Sports and Leisure 'it is recommended that a 15mx8m swimming pool be provided for the town'; and I also found a very important error in the statement that there are bus services between Millom and Barrow and northwards between Millom and the villages. There are NO bus services in or out of Millom apart from the Town Council limited, subsidised service between Millom and Haverigg.</p> <p>The references for Millom</p> <p>10.1.6 No mention of the south of the Borough in the Opportunities column</p> <p>10.2.5 The general comment 'improved sports and leisure facilities in Millom'</p> <p>10.44 'limited rural bus services particularly in the south of the Borough' (see 57.4.3 later)</p> <p>I 13.1.9 'recommendation of a 15mx8m pool for the town'</p> <p>I 13.1.10 'production of Spatial Frameworks for Millom '</p> <p>I 13.1.16 'Town centre renewal schemes in Millom '</p> <p>21.5.1 ' and Devonshire Road, Millom'</p> <p>21.5.4 'Devonshire Road, Millom and Mainsgate Road, Millom'</p> <p>30 'Town Bids Millom- Low carbon opportunities, changed economy and better connectivity'</p> <p>32.1.5 A short bland description of the town</p> <p>32.3.4 6 lines referencing the Experience Millom initiative</p> <p>32.3.5 Short reference to the Town Bid</p> <p>32.8 Short description of the town shops referencing high 19% vacancy rate</p> <p>33 9 pages about Tourism in which the area is referenced once '...accommodation and tourist provision which includes Haverigg ...'</p> <p>40.5.2 'The development of a new, leisure size pool in Millom'</p> <p>57.4.3 Totally erroneous information about bus services in and out of Millom: The main town in south Copeland, Millom, is well connected to Barrow-in-Furness by bus. However, the rural location of Copeland means that services between Whitehaven and Millom are limited, with infrequent stops at the villages between the two settlements.</p> <p>Why is there this huge discrepancy and emphasis in your document? Why is Millom often linked with Cleator Moor and Egremont, both towns whose residents can easily access all the facilities in Whitehaven whilst Millom residents can not?</p> <p>I feel that you need to look again at your document and try to view it through the perspective that I have</p>	<p>provided within the Publication draft.</p> <p>We have also promoted Millom through the use of supporting text and images.</p>

Ref	Comments	CBC Response
	suggested. It should mean that you make a number of changes which result in Millom being given a greater profile	
Suggestions relating to Evidence base		
	<p><u>Recommendations within the HRA to be incorporated into the Plan</u></p> <p>5.4.6 In order to further strengthen the protection of Natura 2000 sites, policies H4PO and H5PO could specifically cross-reference the need for delivery of housing numbers at specified locations and individual allocations to be compliant with other Plan policies, including N1PO, where development must result in no LSE on Natura 2000 sites, both alone and in combination with other plans and projects. Policy E2PO (Location of Employment) effectively mitigates policy E4PO (Employment Sites and Allocations) through stating that “Where the following impacts occur, and have been deemed to be acceptable by the Council, mitigation measures must be sought....biodiversity” and this protection could usefully be added into policy to mitigate policies H4PO and H5PO in terms of housing delivery.</p> <p>6.6.3 It is important that where, following the production of the transport assessment and/or air quality modelling, a LSE through reduced air quality cannot be screened out, there is also a mechanism established to monitor the effectiveness of the measures adopted within the Local Plan currently or in the future.....</p> <p>7.4.4 Policy DS5PO.....could be strengthened further by stating that development will only be supported where infrastructure capacity is in place or may be provided prior to operation of the development.</p> <p>7.4.8 With regards to reduced water quality, policy N6PO.....does not provide strong protection for Natura 2000 sites, and could be strengthened to state that such projects will only be supported where harm to Natura 2000 sites can be avoided, mitigated or as a last resort compensated for.</p> <p>9.4.8 In order to ensure that economic policy does not lead to LSE on Natura 2000 sites, policy E1PO (Economic Growth) could explicitly state conditions for such growth include compliance with Policy N1PO.</p>	<ul style="list-style-type: none"> • Cross references to other policies within the Plan are considered unnecessary and could lead to repetition. A note reminding the reader that the Plan must be read as a whole has been added to the start of the Plan. • The HRA has been updated in light of air quality modelling and a new policy relating to air quality has been added to the Local Plan (DS11PU) • In relation to DS5PO this is covered by other policies within the Plan, therefore the suggested change is not considered necessary. • Whilst Policy N6PO doesn't directly refer to Natura 2000 sites, they would be protected under Policy N1PU.
	<p>HRA Page 8 The HRA stages need further clarification: Stage 1 – Is the proposal directly connected with or necessary to the management of the site. Stage 2 – Screening Likely Significant Effects (LSE) – This stage identifies potential effects of a plan or project on the qualifying features of the Natura 2000 sites (without mitigation) and assess whether these effects will be significant alone or in-combination with other plans or projects. The precautionary principle should be used, so where there is any uncertainty, the potential effect is carried to next stage. Stage 3 – Appropriate Assessment Where LSE is found or uncertainty remains, more detailed assessment is carried out at this stage, considering adverse effects alone and in-combination with other plans and projects. This stage considers the avoidance and mitigation measures. Stage 4 – No alternatives and Imperative reasons of overriding public interest (IROPI). This stage is required if stage 3 concludes there is an impact on site integrity that cannot be mitigated (not if there is a Likely Significant Effect which has already been addressed at Stage 2) Stage 5 – Compensation This ensures compensation to maintain the European Site</p>	<ul style="list-style-type: none"> • The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.

Ref	Comments	CBC Response
	network if the project has no alternatives and IROPI. Plans and projects only need to go to in-combination assessment with other live plans or projects if they do not have a likely significant effect alone. This is in-combination rather than cumulative.	
	HRA Page 14 This should also identify any live specific projects/developments within Copeland that could have a Likely Significant Effect in-combination with this Local Plan. The HRA should consider individual projects as well as other strategic plans	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.
	HRA Policy H20PO Any caravans being proposed around the coast where there are designated SPA will need to assess impacts from recreational disturbance.	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.
	HRA E4PO and E5PO Disagree with these Policies being screened out. With respect to project stage mitigation the site policies concerned should include reference to what measures are required at application stage and should also reference the need for an Appropriate Assessment to include the details of the scheme that are (potentially) not yet known at the plan-level stage.	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.
	HRA CC3PO Disagree that this Policy should be screened out. The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew which are SPA species. Therefore this needs assessing the Plan HRA and reference to a requirement for project HRA's that would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.
	HRA section 5 As above any caravan site developments or extensions to existing sites being proposed around the coast where there are designated SPA's will need to assess impacts from recreational disturbance	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft.
	HRA Section 6 We welcome the thorough assessment of air quality impacts within the HRA and the need for further modelling. As well as traffic impacts from allocations and associated improved road links this section should also include air quality impacts from agriculture as stated above.	<ul style="list-style-type: none"> Support welcomed. The HRA has been updated to take into account air quality impacts. A specific Air Quality policy has also been added to the Local Plan and reference has been made within the plan to ammonia emissions etc.
	HRA Section 7 The HRA should also include potential water quality impacts from any proposed flood defences or bank reinforcements as a result of allocations.	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and

Ref	Comments	CBC Response
		will be available alongside the Local Plan Publication Draft.
	HRA Section 9 For specific employment allocations (Hensington Common Whitehaven and Whitehaven Commercial Park) and the wind energy suitable areas (as above) the loss of supporting habitat for Hen Harrier needs to be assessed. There is evidence that some of the Hen Harriers which winter in Copeland area breed on SPAs in the North of England and the Isle of Man. West Cumbria Hen Harriers are therefore functionally linked to these SPAs. The employment allocations and wind farm proposals in this area should also be accompanied by a project HRA to address potential impacts. As above this section should outline an overview of the mitigation measures that would ensure no adverse effect on site integrity. St.Bees housing should assess impacts on the SSSI bird notified features, and although not an SPA it could be included within the HRA.	<ul style="list-style-type: none"> The HRA has been updated to take into account comments received and will be available alongside the Local Plan Publication Draft. Comments noted re the requirement for project level HRAs.
155	We note the Local Plan Evidence Base, and in particular welcome the 'Settlement Landscape Character Assessment' (SLCA). The SLCA will form a key element in the assessment of policies and proposals. We support the findings of the SLCA in regard to the 'West of Whitehaven' (Part 3, p. 34-36).	<ul style="list-style-type: none"> Support welcomed
35, 118, 165	Sustainability appraisal Both HDH1 and HDH2 are not marked correctly: - Biodiversity -HDH1 is basically the same as DH013 which has been rejected. HDH2 has Natterjack toads, threatened by habitat loss and is strictly protected by British law. So, neither site is suitable for development. Flooding – needs to be negative as it already floods at HDH1 which is a well-known and documented issue. At HDH2 there are known and reported surface water and drainage issues, planning has previously been turned down in this site due to these problems. Climate Change – needs to be negative due to the increased carbon footprint as there is a lack of access to services and facilities within walking distance or via public transport, being over a mile away from the Holmrook services so car travel necessary. Accessibility – needs to be negative due to lack of pedestrian access and public transport Within the villages there is room for some sympathetic and small-scale development (affordable housing and sheltered housing for the elderly) as per community plan, the identity of Drigg village will be totally lost amongst these 2 planned housing estates at Meadowbrook (aka Southerly) and Wray Head. Please do not forget that these villages are agricultural in origin and this needs to be taken into account with any developments in the future. I do not support either of the villages becoming Local Service Centre's nor do I support the planned developments for Drigg village	<ul style="list-style-type: none"> Comments have been taken into consideration and the Sustainability Appraisal will be updated prior to the Publication Draft. For responses to other comments surrounding Drigg and Holmrook, please see the site specific comments section
Document format		
117	General comment: I found the document very cumbersome to read and review. Consequently, I have made comments on only a few of the topics that are of most interest to me as my time has been limited. I think that many who might have wanted to comment have been daunted by the scale of the document and therefore the number of comments and their depth and scope will not be representative of the Copeland population.	<ul style="list-style-type: none"> Comment noted. The Local Plan covers a broad range of topics and site allocations and therefore is a very large document. However,

Ref	Comments	CBC Response
		efforts will be made to streamline the local Plan further.
43	<p>As a long term resident of St Bees I would like to comment on the proposed changes to the local plan for St Bees by Copeland Borough Council (CBC).</p> <p>The first thing I must stress is that even though CBC have worked on this local plan for a number of years and its now nearing the final stages, a vast amount of villagers are deeply concerned as they are UNAWARE of the local plan proposal and potential for housing development. I know the C19 pandemic has not helped the situation but even so it does seem inconceivable that such a potential impact on our quaint village (and future generations) has not been communicated in a much simpler manner and to the masses. Only by the efforts of a small group of concerned villagers (within the village) who took it upon themselves to publicise this CBC proposal has it being put on the community 'radar'. I have also been amazed with all the comments on 'St Bees News and Views ' website concerning CBC decisions to move the boundaries, all negative!!! One of the main issues that has also been identified is how EXTREMELY DIFFICULT people find the CBC website, being totally user unfriendly, making it impossible/difficult to respond!!</p>	<ul style="list-style-type: none"> • A number of different consultation methods were made use of during this process, which have been outlined previously in this report. This is in line with the CBC Statement of Community Involvement. • Comments surrounding the website have been noted. The format of this will be revisited prior to the Publication Draft Consultation
167	I find the Local Plan consultation response format quite hard to respond to – it uses language like 'agent' & 'sites' and makes you feel like this is for developers, and businesses not aimed to be as accessible to interested residents	<ul style="list-style-type: none"> • The agent field is designed to let interested parties have an agent reply to the consultation on their behalf, with the site option helping CBC officers to determine exactly which piece of land respondents are referring to. However, this will be noted through future consultations

Site specific comments

This section of the response report considers all of the site or settlement specific comments made in response to the Preferred Options Draft Consultation. It has been broken down in order of the Preferred Options Settlement Hierarchy for ease of understanding. Please note, in some places where there are duplicate or similar comments, they have been grouped together. However, all comments have been considered thoroughly throughout this process.

Whitehaven

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
128, 255	HWH1	<p>The access to the playing field is via the garage site a route taken by many people walking dogs, jogging and running and a parking area used by those with cars pick up trucks and vans and hospital workers who sometimes park their cars and walk into hospital. Many of those park there because there is no room to park near their homes although many on the Avenue park on the footpath regardless of the new laws making it illegal to park on any footpath in the United Kingdom, these include the blocking of dropped kerb areas which are put there for emergency access delivery of goods as well as wheelchair access but are still blocked off by cars with total disregard to the residents of the Avenue this is due to there being no place to park, a problem that has existed for more than 30 years in this area, surely this would have been a good time for the council to promote the use of the garage site by residents because of the new parking laws which will result in fines for some residents. To the front of Rutland Avenue from house no. 23 to no. 30. A triangular piece of green area land which is cut by the council grass cutting team every season which we have tried for more than 30 years off and on to have this area turned into land for parking our vehicles but each time the council have never had the finances we have been told. It has been identified on the map of the area including land on the Homewood hill area there is room for 127 homes, although this figure has been quoted does this mean there will be room for car parking in this area as well. It would virtually double the homes of Rutland Avenue and Homewood which we hope would see a safer access and exiting from Rutland Avenue onto the busy A595 with either traffic lights or a roundabout in place, and hopefully a bus route throughout the area to help the elderly in particular and would shops be allowed on the area to serve the many residents.</p>	<ul style="list-style-type: none"> Any development on this site would be required to meet parking standards as set out in the Cumbria Design Guide. This will prevent the development from exacerbating existing parking constraints. The site access assessment outlines that the indicative level of development would need to be assessed in terms of the impact and safety surrounding additional traffic turning onto Rutland Avenue from the A595
128	HWH1	<p>There is an increase of new families moving onto Rutland and there will be nowhere for the children to go. If you take away the playing field the children could resort to playing football on the roads. Which is dangerous with all the cars going up and down and they could also damage people's property. At least if they have the field they can stay out of trouble. However my main concern is it is a playing field where the children on Rutland Avenue can go to have a game</p>	<ul style="list-style-type: none"> We001 is currently protected open space in Core Strategy. While the Open Space Assessment does not propose this protection is carried forward into the new Local Plan the Council would

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		of football. I would also like to point out there is a family whose daughters play for 3 different teams and use the field to practise on. I would also like to add that my grandson is autistic and he likes nothing better than to burn his energy off by playing football on the field.	expect a well-designed development scheme that incorporates high quality and useful open space
179	HWH2	The site includes a playing field. This site has been used as a playing field in the past and goal posts can be seen from satellite images. In order to bring the site forward for development there would need to be mitigation in place to replace the playing field and comply with paragraph 97 of the NPPF and Sport England's Playing Fields Policy.	<ul style="list-style-type: none"> This has been highlighted in the Housing Allocations Profile document and will be taken into consideration at planning application stage
197, 199, 213, 216	HWH2	My objection is regarding the following main areas. Excessive and unsafe road traffic due to increased residence down Harras Road. Lack of consideration regarding the gas and water service pipelines on Harras Moor. Combined sewer, increase in use due to increased residence at Harras Moor. The road infrastructure to St Benedicts school is incorrect, inadequate and badly planned.	<ul style="list-style-type: none"> CBC has engaged with infrastructure providers throughout the Local Plan process, which will highlight any significant issues with allocations and where mitigation is required. This will be highlighted in the Housing Allocation Profiles document. Site has not been assessed through the Transport Improvement Plan or Site Access Assessments as highways and access constraints will be considered through the determination of the current planning application (4/18/2287/001)
179	HWH3	The site lies adjacent to a playing field site. In this instance the resulting development, coupled with that already granted planning permission would	<ul style="list-style-type: none"> A policy has been added to the Publication Draft which outlines

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		surround the playing field on three sides by residential development. The issue of prejudicial impact on the playing field needs to be assessed and considered either as part of the allocation or planning application process. If mitigation is required, then it should be secured as part of the planning application and constructed and maintained in perpetuity at the developers' expense. The site appears to include the access and parking that services the playing field which is also a matter of concern. Paragraph 182 of the NPPF applies.	the need for development to prevent/ reduce prejudicial impacts on playing fields. This has been highlighted in the Housing Allocation Profiles document and will be dealt with at planning application stage.
45	HWH3	<p>Housing allocation HWH3 : Is within 200m of a pre-existing composting facility at NX9703915326. The site operates under an EA regulated permit for Household, Commercial and Industrial Waste Transfer station and Treatment, and undertakes biological treatment of waste (ie open windrow composting).</p> <p>The proposed housing allocation will bring more receptors within close proximity of any amenity impacts arising from this facility. However, we are unaware of any previous complaints to the EA regarding the operation of this site.</p>	<ul style="list-style-type: none"> This will be highlighted through the Housing Allocations Profiles document and will highlight where mitigation may be required at application stage
179	HWH4	In this instance the resulting development of this site would surround the playing field on three sides by residential development. The site lies adjacent to a playing field site and the issue of prejudicial impact on the playing field needs to be assessed and considered either as part of the allocation or planning application process. If mitigation is required, then it should be secured as part of the planning application and constructed and maintained in perpetuity at the developers' expense. Paragraph 182 of the NPPF applies.	<ul style="list-style-type: none"> A policy has been added to the Publication Draft of the Local Plan which outlines the need for development to prevent/ reduce prejudicial impacts on playing fields. The field has been highlighted in the Housing Allocations Profiles document and will be taken into consideration at planning application stage
74	HWH4/ HWH5	Sites HWH4, HWH5, HSB1 and HSB2 are all located in very close proximity to the St Bees Heritage Coast. High priority should be given to protecting the setting of	<ul style="list-style-type: none"> This has been highlighted through the Housing Allocations Profiles document and the setting of the

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		the Heritage Coast when considering proposals in these locations, including through suitable layout, design and landscaping.	Heritage Coast will need to be considered through the application process.
75	HWH6	Gleeson Homes have recently submitted a planning application on the land to the south of Waters Edge Close for residential development. This area is previously developed land within the primary settlement of the Borough and is within the existing and proposed settlement boundary for Whitehaven.	<ul style="list-style-type: none"> Promoted site- no action required.
110	HWH3, HWH6	<p>Draft Policy H5PO identifies the housing allocations proposed. As discussed earlier in this document, Story is supportive of the following sites identified for allocation in the Draft Plan:</p> <ul style="list-style-type: none"> Land at Edgehill Park, Whitehaven, including Land at High House, Whitehaven (ref. HWH3) – 510 units Land south of Water's Edge, Whitehaven (ref. HWH6) – 35 units 	<ul style="list-style-type: none"> Promoted sites- no action required.
74	HWH3, HWH4, HWH5, HWH6	Strategic regeneration sites - Former Marchon Site, Whitehaven. As above for Policy DS4PO Natural England previously provided advice to Copeland on potential issues related to landscape impacts of development at this site. This advice should be taken into account in any Local Plan policy/allocation for this site.	<ul style="list-style-type: none"> All landscape issues that require mitigation has been taken into consideration through the Housing Allocation Profiles document and must also be addressed at planning application.
197, 199, 213, 216	Harras Moor Broad location	My objection is regarding the following main areas. Excessive and unsafe road traffic due to increased residence down Harras Road. Lack of consideration regarding the gas and water service pipelines on Harras Moor. Combined sewer, increase in use due to increased residence at Harras Moor. The road infrastructure to St Benedicts school is incorrect, inadequate and badly planned.	<ul style="list-style-type: none"> CBC has engaged with infrastructure providers throughout the Local Plan process, which will highlight any significant issues with allocations and where mitigation is required. These will be highlighted through the IDP. The TIS outlines a need for development to contribute

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
			towards traffic calming measures along Harras Road.
172	Harras Moor Broad location	With regard to our recent conversation on the Zoom platform, I re affirm in writing my points raised. The land between Harras Moor Road and the Bay Vista Estate is primarily a green belt, drainage outfalls and road access are in this case problematic added to this any backland development on a large scale to this area would cause severe overcrowding and a major detriment to the town on its feeder roads. We should be maintaining some open spaces. In my view such large scale development would require a Section 106 agreement.	<ul style="list-style-type: none"> • The requirement for developer contributions has been set out in the development standards chapter of the plan. • In terms of open spaces, this area has not been identified through the Open Space Assessment, nor have any issues been raised through the SLCA. However, this will be considered further at application stage where necessary.
138,161	Harras Moor Broad location	<p>Representation to Copeland Local Plan 2017-2035: Preferred Options Draft - representation , relating to the Preferred Options Draft to the emerging Copeland Local Plan.</p> <p>Below is the Executive Summary of the (132 page) Report setting out the reasons to allocate the land at Harras Road</p> <p>The land north of Harras Road, Whitehaven represents a highly sustainable urban extension which could contribute to the delivery of an ambitious and forward-thinking Local Plan to deliver economic growth and prosperity in the Borough of Copeland.</p> <p>These representations are supported by an illustrative masterplan and technical work which confirms that:</p> <ul style="list-style-type: none"> • Approximately 300 dwellings can be accommodated on the site with the first phase of development coming forward in the short-term to meet an immediate housing shortfall; • There are no ecological concerns, and ecological enhancements can add biodiversity net gain; 	<ul style="list-style-type: none"> • Support for Broad location at Harras Moor has been noted • Housing need has been assessed as 146 per annum through the SHMA. A growth figure of 200 has been provided to allow for additional economic growth. The percentages provided in the table in H4PU are minimum figures, meaning that additional development will be permitted where it accords with the development plan. • Duty to cooperate meetings have been held with all neighbouring authorities.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> • Access can be suitably achieved and improvements to the local highways network can be made; and • Appropriate landscape mitigation will minimise any harm to landscape character. <p>Additional technical and surveys are also underway which will help support the evidence base in subsequent drafts of the plan.</p> <p>National Policy The National Planning Policy Framework requires the planning system to be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area. It supports the Government's objective of significantly boosting the supply of homes. Local Plans must pass four 'tests of soundness' in order to be found 'sound' and adopted:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred; and • Consistent with national policy – enabling the delivery of sustainable development. Planning Practice Guidance sets out a standard method for setting a minimum housing requirement figure. The Government has recently consulted on Changes to the current planning system, including changes to the standard method consistent with the aim of delivering 300,000 new homes each year across England. The Government has also consulted on its 'Planning for the Future' White Paper which sets out more significant changes to overhaul 	<ul style="list-style-type: none"> • If delivered, the allocations would meet the housing need in each tier of the settlement hierarchy, with the exception of Local Service Centres. Windfall sites enable greater flexibility in addition to the allocations. • The approach to allocating sites is based on deliverability of sites and where the constraints related with sites are reduced, and can be mitigated. Therefore the sites allocated in Whitehaven are the ones that have been deemed most suitable through assessment. • Policy H3PU sets out the Council's approach in an event where housing delivery is lower than expected.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>the planning system, but these are not expected to come into effect in the immediate short-term.</p> <p>Meeting Copeland's Future Housing Need We have identified several areas of the Local Plan Preferred Options Draft that require improvement before the plan can progress to the next stage:</p> <ol style="list-style-type: none"> 1. An inappropriate starting point has been taken for the minimum housing requirement. The Government's proposed changes to the standard method identify a 10% increase in Copeland's minimum housing requirement figure (above the proposed requirement), which should be addressed before submission; 2. There is a lack of clarity over whether Copeland has fulfilled its 'Duty to Cooperate' to ensure that any unmet needs from neighbouring authorities (such as the National Park Authority and Barrow and Allerdale Borough Councils) can be accommodated within Copeland's boundaries; 3. There is an over reliance on 'windfalls', instead of allocating more sites; 4. The approach to site allocations in Whitehaven is not justified and the proposed distribution focuses too many new homes on the southern edge of the town; and 5. There is a lack of a meaningful 'safety buffer' of additional sites to ensure a positively prepared plan. This places the plan at significant risk of failure. <p>To address these issues, we recommend that the Council makes the following changes to its plan:</p> <ul style="list-style-type: none"> • Revisit the strategic approach, specifically by increasing the overall housing requirement to 200 new homes per year, with the uplift to be delivered in Whitehaven; • Provide clarity on whether it has met its 'Duty to Cooperate', and if necessary, accommodate unmet needs from neighbouring authorities; • Place less reliance on windfalls by allocating a greater number of sites to ensure there is a truly plan-led approach to development in the Borough; 	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> • Revisit the underlying assumptions for proposed allocations and allocate additional sites in Whitehaven; • Identify an additional buffer of sites as “proposed additional growth” as has been proposed – but, importantly, this must be on top of an appropriate minimum housing requirement of 200 dpa, to ensure sufficient flexibility and to accommodate changes in the market; and • Land north of Harras Road is an available, suitable and deliverable site which should therefore be allocated for around 300 new homes. <p>We would request to discuss the content of these representations and the land north of Harras Road with the Council at the appropriate opportunity.</p>	
31, 188	Wn006	<p>I am writing on behalf of the landowners to make representation regarding the above site. I note the site has been excluded from the Preferred Options Draft September 2020 document issued for public consultation on 22/09/2020. As you are aware, the site in question was deemed to be a ‘possible housing allocation’ in the Site Allocations and Policies Plan Preferred Options (January 2015) document (site ref: WN1). It is the view of the landowner that the site should be reinstated in the Preferred options Draft September 2020 document on the following grounds.</p> <p>1) The site was the subject of an outline planning application under planning ref: 4/17/2296/001. Pre-application meetings took place with the LPA who, based on the lack of a 5-year housing land supply, invited the application to be submitted in advance of the Local Plan process being completed. Whilst the application was refused by Members, the LPA supported the application with a recommendation for approval and there were no objections from any statutory consultees.</p> <p>2) Following the refusal, the applicant submitted an appeal to the Secretary of State (APP/Z0923/W/18/3217111). During the appeal, the Highway Authority altered their stance and removed their support for the scheme which led to the appeal being dismissed. There was only one reason for refusal and that related to the junction of the Bay Vista estate with Victoria Road.</p>	<ul style="list-style-type: none"> • Planning permission has been refused on this site and dismissed at appeal (APP/Z0923/W/21/3277409). It has been included within the Harras Moor Broad location to enable suitable development to come forward in the future.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>3) Following the appeal dismissal, the applicant re-engaged their highway consultants to design a scheme for a junction improvement that would address the reason for refusal stated in the appeal decision. This process is now complete, and the Highway Authority have removed their objection and issued a letter confirming that they accept the proposed junction improvements subject to planning conditions (document attached). This means that the one reason for refusal on the appeal has been successfully addressed.</p> <p>4) There is a current outline planning application (4/19/2233/001) which has been in the system since July 2019. The Highway Authority letter referred to above is a public document on the planning file. It is accepted that this application has yet to be presented to the Development Panel however, on the basis that the one reason for refusal on the appeal dismissal has been successfully addressed, it is hoped that LPA will be in a position to support the application. It is acknowledged that the application would then be determined by the Members, however if they vote to refuse the application then the applicant will once more appeal the decision. To summarise, it is the applicant's view that there is no substantive reason why this site cannot be included in the Preferred Options 2020 process on the grounds that the one reason for refusal on the appeal dismissal has been successfully addressed with the Highway Authority. I trust you will consider this request as you move forward into the next stage of the preferred options process. Can I also ask that the LPA confirm their reason/s for withdrawing the site from the Preferred Options 2020 process?</p>	
75	Wellbeing Village	The option holder of the Mirehouse Road site is supportive of the proposed status within the Local Plan. The long-term ambition for the site from the Council to deliver a high quality well-being village containing significant landscaping and open space, and accommodation for students and extra care accommodation fits with their ambitions for the site development.	<ul style="list-style-type: none"> Promoted site- no action required

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
36	Wellbeing Village	Mirehouse South Wellbeing Village. The land leading to St Bees Valley is of natural beauty. The installation of circa 700 homes contradicts N5PO Landscape Protection & N8PO Protected Green Spaces.	<ul style="list-style-type: none"> The way the site is referred to within the Local Plan has been amended in light of this comment to avoid confusion – see paragraphs 4.2.2. The long-term ambition for the site is the delivery of a high quality well-being village which will contain a significant amount of landscaping and open space that can also be used by residents of the neighbouring Mirehouse estate. The site will also contain accommodation for students and extra care accommodation. A masterplan will be required at a later date to ensure that any development there is suitable, sustainable and reduces/ mitigates any additional harm to the natural environment.
		We would like to attain support for WE022 to be allocated for housing development in principle. The application is provided with consideration to adjustments made visible within the SHLAA and conversations with the council. Earlier consideration for a larger site WE12 has now been refined recognising the impact on the prominent hillside (SHLAA) and encroachment on the countryside and on that basis the site has been reduced in size and falls outside of the prominent hillside boundary recognised in the SHLAA map and SCLA document. The redefined boundary also ensures countryside encroachment has been addressed. : https://www.copeland.gov.uk/content/copeland-settlement-landscape-character-assessment-2020) Boundaries for the site are provided	<ul style="list-style-type: none"> The site in question is currently part of the Homewood Broad Location, which means it is more suitable for long term development as part of a wider area. The Site has been included in the Discounted Site Profile Document, which provides explanation for why deliverable/ developable

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>below and the application will be followed with the relevant outline planning application where housing type and densities will be offered in accordance with and not to exceed the council requirements. Option agreements have been provided from Heyford Developments, Storey Homes, and Persimmon and Bristol based CJH. CJH support developers with land acquisition that can be developed within a three-year period. Having undertaken due diligence on the site they are now seeking our permission to share the site with existing clients. We remain confident interest to develop the site in the short term remains strong subject to planning consent being provided. Revisions to the Local Plan need to ensure continuum with longer term objectives. Land allocation which remains unused does little to help the borough achieve housing allocation targets. We are also mindful larger sites often require a consortium of developers to fulfil the site potential. Commercial arrangements can be met but the timing of development is more difficult to align. The proposed 5-year housing allocation also provides scope for economic growth and needs to factor unpredicted windfall sites. In terms of economic growth, the 'Energy Coast' creates strong connection between the issue of climate change and the issue of economic change. This reflects the importance of the energy sector in the local economy; and its potential to respond to climate change and a low-carbon strategy. The Britain's Energy Coast Master Plan sets out how Copeland and Allerdale could take advantage of the potential of nuclear, wind, and water energy to become especially important players in this strategy. The energy sector is clearly the key driver in economic terms and is likely to become more so. Sellafield's 10,000 workers - the great majority of them West Cumbria residents - are predominant in an economy with about 66,500 jobs (Copeland and Allerdale Boroughs). In addition, the demand for housing both private and housing association / key worker continues to grow, nationally and regionally. A nationwide issue remains, the lack of land allocated with planning is one of several barriers preventing new homes being built. The economic bounce back anticipated on the basis vaccinations are close to being administered is close. More importantly the UK Government's 10 Point Plan for a "green industrial</p>	<p>sites have been excluded as allocations.</p>

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>revolution” (Nov 2020) is now live. The plan is exceptionally important for economic growth in Copeland. There is now a clear recognition that ambitions for renewable energy (primarily wind generated) capable of supporting the UK energy demands, is unachievable without growth in Nuclear energy. This live initiative is a key enabler for increasing economic development in the borough and generate support for larger infrastructure projects such as the Eastern bypass. If housing targets are to be met it is key to ensure sites are attractive enough for build to commence in the short term and on that basis, we consider this site with the levels of existing interest, is intrinsic to help the council achieve its mission and goals. We are confident Site WE022 does not exhibit any characteristics to match the excluded items in the Interim SHLAA November 2019, those being:</p> <ul style="list-style-type: none"> · Sites threshold of 0.25ha or less (HELAA Assessment - Paragraph 010 –NPPG) · Sites where a minimum of 50% falls within flood zones 2/3 (with the exclusion of town centre regeneration sites that may be acceptable through appropriate design) Sites will remain included if the area outside of FZ2/3 is greater than 0.25ha · Sites with planning permission where development is complete or substantially complete · Sites within a SAC, SPA, Ramsar. <p>Historically site visits were undertaken by the council to provide support for WE10 to be allocated in principal for housing development subject to conditions. Although a new site visit may be required based on reducing the size of the site, the land included in WE022 is deemed to better satisfy the council’s requirements.³</p>	
75	Wn003, Wn004	<p>I have been requested by the landowner to submit the following representations regarding his land on the edge of the Whitehaven settlement. The site received Permission in Principle (Planning Application 4/19/2246/PIP) by way of a planning appeal on 09 July 2020. It is noted that the proposed settlement boundary for Whitehaven does not include the site within the boundary. This should be included within the boundary, as other sites with</p>	<ul style="list-style-type: none"> • The site is contained within the Harras Moor Broad Location, which means it is more suitable for long term development as part of a wider area.

³ More information to support allocation submitted in full response

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>planning permission for residential development are. Attached is the planning approval for the land to the north east of Whitehaven. The landowner also has additional land to the east of the approved development site, which they would want considered for inclusion within the Local Plan either as a housing allocation or as land within the Whitehaven settlement boundary with development potential. This is also attached on a plan. The land is considered suitable for development given the approval for adjacent land and the shared boundary with the Bay Vista estate, and the close proximity to Whitehaven Town Centre, the main settlement in the Borough. With regards to the potential landscape impact of the site, in the Planning Inspector's appeal decision, he commented that 'The appellant has submitted an image taken from South View Road that shows a long-distance view of the appeal site and at the site visit I saw that the proposed development would be viewed in the context of the adjacent existing built development of the settlement.'</p>	<ul style="list-style-type: none"> The site has been included in the Discounted Site Profile Document, which provides explanation for why deliverable/ developable sites have been excluded as allocations.

Key service centres (Millom, Egremont, Cleator Moor)

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
Millom			
158	HMI2	<p>Ahead of your deadline today for representations to the above, we can confirm the following in relation to site at Moor Farm, Millom (as per the attached site layout drawing):</p> <p>-The statements set out in my previous submission, below, remain sound. We as an investor and developer are committed to working with the LPA to bring this site forward for housing development as soon as possible, and have the necessary agreements in place with the landowner to achieve this.</p> <p>- We are working closely with the LPA to progress pre-application works,</p>	<ul style="list-style-type: none"> Promoted site- no action required

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>including on design, and baseline technical studies. We support the proposed settlement hierarchy, as set out in draft policy DS2PO, which identifies Millom as a KSC.</p> <p>-We support the allocation of land at Moor Farm, Millom as a regeneration site as set out in table 14, and in Appendix B.</p> <p>-We would point out however that Appendix B does not seem to reflect the full extent of the land that we are in discussions with the LPA over (the eastern part of the site appears to be missing from that plan). Our land interests are set out in the attached, and we are reliant on the full extent of that land to achieve a number of things, including potential pedestrian linkages to the existing communities to the east.</p> <p>-We support the site's allocation for housing as set out in Appendix A, along with the amendment to the settlement boundary therein.</p> <p>-We are confident that this is a deliverable site, and expect to make a hybrid planning application for the full site as soon as the local plan is adopted.</p> <p>We would be grateful if you would consider this a duly-made representation in support of the local plan POC.</p>	
168	HMI2	<p>We have reviewed the proposed housing allocation located in Millom (site ref. HMI2, Moor Farm). The site is situated in an area that has experienced historic integrated flooding, and as such it is imperative that a considered approach to sustainable drainage in line with surface water hierarchy is made at the earliest opportunity in the planning and design of development. Early pre-application discussion with ourselves and the Lead Local Flood Authority is imperative in this case.</p>	<ul style="list-style-type: none"> Continued engagement will be carried out with the Utilities Provider and LLFA to ensure that development reduces and mitigates any negative impacts on flood risk in the area. This will be highlighted through the Housing Allocations Profiles document.
179	Mi041	<p>Sport England are concerned that this site would bring houses into close proximity of a playing field site, namely an artificial pitch at Millom School. In this instance there could be risk of prejudicial impact on the playing field from</p>	<ul style="list-style-type: none"> This site is not a draft allocation but could potentially be delivered as a future windfall site. Prejudicial impact on the playing

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		nuisance to the dwellings from noise and lighting. Paragraph 182 of the NPPF applies.	field would be considered through any future planning application.
Egremont			
178	HEG2, HEG3	<p>We have been instructed by our client to prepare and submit comments in respect of the draft plan. Our comments mainly relate to policies within the Development Strategy, Economic Context and Employment, and Housing Chapters.</p> <p>However, these representations also support the future allocation of the following residential allocations which are solely within our clients ownership, along with the expansion of the Bridge End Industrial Estate, in Egremont:</p> <ol style="list-style-type: none"> 1. HEG2 2. HEG3 <p>Based on the above, our comments also relate to Appendix A of the Local Plan 2017-2035 which contains maps showing the preferred settlement boundaries for each settlement within the proposed hierarchy along with the proposed housing allocations and sites which have planning permission for 5 units or more at 31st March 2020 within each of these settlements.</p> <p>We would also like to take this opportunity to confirm that we also support the proposed settlement boundary at Egremont.</p> <p>Our client would like to work closely with the Council to support and help deliver sustainable development in the Key Service Centre of Egremont. We should be pleased if the comments below would be taken into account during the preparation of the Local Plan and would ask that we are kept informed of all future consultations during the Local Plan process.⁴</p>	<ul style="list-style-type: none"> • Promoted site- no action required
137	HEG1	This site is available for development immediately.	<ul style="list-style-type: none"> • Promoted site- no action required

⁴ More detail provided to support site in full response

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
179	HEG1	This site has been used as a playing field in the past and goal posts can be seen from satellite images. In order to bring the site forward for development there would need to be mitigation in place to replace the playing field and comply with paragraph 97 of the NPPF and Sport England's Playing Fields Policy.	<ul style="list-style-type: none"> This is highlighted through the Housing Allocations Profiles document. Development would need to accord with Local Plan Policies relating to the loss of playing fields.
137		<p>Below is the Summary & Conclusions from a 17 page Planning Statement Document submitted</p> <p>This Planning Statement has demonstrated that the land to the south of Grove Road, Egremont is suitable, achievable and available for allocation in the forthcoming Copeland Local Plan 2017 – 2035. The proposed site is located within the proposed settlement boundary extension for Egremont in the Copeland Local Plan Preferred Options Draft.</p> <p>The proposed development will carefully consider the built form of the surrounding residential development. The proposed site is adjacent to existing development and is contained within long standing and enclosing boundary features. Careful consideration will be given to a landscaping scheme to reduce the visual impact from key views and integrate the development into the surrounding landscape.</p> <p>This site is available for delivery immediately, has the involvement of a national house builder and more importantly is in a location that is commercially viable. This site will make an important contribution to the aspirations of the Copeland Local Plan. In conclusion, the site is in a sustainable location and is therefore suitable to be taken forward as a housing allocation in the forthcoming Local Plan.</p>	<ul style="list-style-type: none"> Site is deliverable and has been included within the draft settlement boundary extension for Egremont
		<p>Groundwater Protection Zones</p> <p>United Utilities can see that proposed housing allocation HEG2 Gulley Flatts East, Queens Drive is partially located in groundwater Source Protection Zone (SPZ) 1 immediately adjacent to Gulley Flats</p>	<ul style="list-style-type: none"> This is highlighted in the Housing Allocations Profiles document.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>Borehole. With respect to the site selection process, we feel it is important to highlight that allocations for development are more appropriately located away from locations which are identified as Groundwater Source Protection Zone 1 (SPZ1), within close proximity to a source of drinking water abstraction. Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on DEFRA's Magic Map website. We would also be happy to provide details if that would be helpful. United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. Accordingly, we also recommend the following specific policy is considered within the emerging Local Plan in regards to groundwater protection:</p> <p>"Proposals within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'The Environment Agency's approach to groundwater protection' or any subsequent iteration of the guidance. Proposals within Groundwater Source Protection Zones will be expected to conform to the following:</p> <p>RISK ASSESSMENT - a quantitative and qualitative 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 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 stations and attenuation features).</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		CONSTRUCTION MANAGEMENT PLAN - 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 Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided."	
137		<p>Below is the Summary & Conclusions from a 17 page Planning Statement Document submitted</p> <p>This Planning Statement has demonstrated that the land to the south of Grove Road, Egremont is suitable, achievable and available for allocation in the forthcoming Copeland Local Plan 2017 – 2035. The proposed site is located within the proposed settlement boundary extension for Egremont in the Copeland Local Plan Preferred Options Draft.</p> <p>The proposed development will carefully consider the built form of the surrounding residential development. The proposed site is adjacent to existing development and is contained within long standing and enclosing boundary features. Careful consideration will be given to a landscaping scheme to reduce the visual impact from key views and integrate the development into the surrounding landscape.</p> <p>This site is available for delivery immediately, has the involvement of a national house builder and more importantly is in a location that is commercially viable. This site will make an important contribution to the aspirations of the Copeland Local Plan. In conclusion, the site is in a sustainable location and is therefore suitable to be taken forward as a housing allocation in the forthcoming Local Plan.</p>	<ul style="list-style-type: none"> Site has been included in the Discounted Site Profile Document, which provides explanation for why deliverable/ developable sites have been excluded as allocations.
Cleator Moor			

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
179	HCM3	This site is a former school site and a playing field lies adjacent to it. Sport England are concerned about bringing this site forward without an assessment of the likelihood of any prejudicial impact on the playing field as a result of developing the site for housing.	<ul style="list-style-type: none"> This is highlighted in the Housing Allocations Profiles document
	HCM1	<p>I am responding to the Council's 8 week public consultation on the Copeland Local Plan 2017-2035: The Preferred Options Draft. As a long standing resident of Cleator, My client has an active interest in the planned development of Cleator and Cleator Moor. He wishes to support any development that has a positive impact for the present and future residents of the area. It is in this context that My client wishes to raise observations in relation to the suggested allocation of land to the south of Cleator Moor at Jacktrees Road (Site Reference HCM1). The allocation at Jacktrees Road proposes an indicative yield of 127 dwellings and, therefore, it is clearly of strategic importance in the context of the planned development of Cleator Moor. In light of the site's importance the Council should satisfy itself that it is truly deliverable. The Jacktrees Road allocation was previously used as railway sidings associated with localised mining in the immediate area. The Ordnance Survey Map published 1899 clearly identified the land as accommodating the Jacktrees Iron Ore Pit. My client advises that it is also widely known by residents that since its previous use for mining purposes the site has had a variety of alternative uses, albeit it now lies in agricultural use.</p> <p>In light of the site's historical use, the Council should satisfy itself that the site is capable of being developed. As a minimum, the Council should seek appropriate ground investigation reports to demonstrate that the ground is capable of being built on, as well as the reports investigating the possible presence of contamination. It would be disappointing for the planned development of Cleator Moor if such issues were brought to light following the allocation of the site and it transpired that the site could not be developed. Should that occur it would undermine the Council's spatial strategy. In light of the fact that the Jacktrees Road allocation is the largest allocation for Cleator</p>	<ul style="list-style-type: none"> CBC is aware of historic mining uses. This is highlighted in the Housing Allocations Profiles document.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		Moor it is entirely appropriate for the Council to demonstrate beyond any doubt that the site is capable of being developed.	

Local Service Centres

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
Arlecdon and Rowrah			
7	HAR2	<p>OBJECTION to outline planning application for the erection of nine detached dwellings with new access on land opposite Arlecdon Parks Road HAR02/AR18. Applicant Sean Close Ref:4/18/2504/001</p> <p>1) Copeland Local Plan 2017 -2035 - We object and cannot understand why area HAR02 has been allocated to the plan. The council itself has refused planning in the same areas on numerous occasions for the same applicant. The council has refused due to highways and drainage and other criteria. The councils own strategic flood risk assessment in 2007 ref 6.5.9 states that Parks Road Arlecdon have flood problems and the foul water systems and culverts have insufficient capacity. This has been totally proven by later floods post 2007. The above plans criteria states that areas which will increase flood risks and have access problems should not be put on the plan. Since 2007 climate change has got much worse and Arlecdon Road and Parks Road at higher sea level areas are causing more significant problems as their drainage cannot take the required capacity on a daily basis causing Bridgefoot and Tilekiln significant flood risks as the water runs from the highway over unsuitable systems downhill to our properties. Tilekiln totally objects to receiving all the surface water from the proposed development. The development would urbanise and thus erode the character of this area. This expansive development would also destroy the views of the fells which contribute positively to the character of the areas. United Utilities and Cumbria Highways and the Councils Flood Engineer know and have been shown all the problems. These inadequate capacity and outdated drainage systems are constantly overflowing or being cleared of blockages and pressure washed. They cannot take anymore volume. Parks road flooding proves this. Are United utilities and Highways Dept. being asked the correct and relevant questions. The evidence is there to be seen.</p> <p>2) A5086 Highway Safety - We totally object to the above application, firstly due to the</p>	<ul style="list-style-type: none"> • Comments noted. • Site has now been granted outline planning permission (4/18/2504/001), has therefore been taken out of the Local Plan and is no longer an allocated site.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>hazards and risks associated with access and egress from the newly proposed development onto the A5086 Arlecdon. This main road is very congested with cars and HGV's constantly speeding. These issues have been previously identified by the Highways Agency, resulting in refusal of numerous planning applications by the above applicant. The Highways Agency also reported poor visibility splays, steep gradients and off-street parking issues. As shown on the aerial map (Figure 3.1 of the ecological survey), which was supplied by Mr Close, cars park both on the pavement and all the way down Parks Road, causing limited visibility of all oncoming traffic and pedestrians. The access to the proposed development would also be directly next to a bus stop, used by school buses on a daily basis and where children have to cross an already congested and dangerous road. This alone poses a significant risk to life. There is also a T Junction and 2 access lanes in the vicinity of the proposed entrance. There are far more cars on the roads since the planning applications No 04/04/2048 & 04/08/2483 and weather conditions are much worse. There is also a huge increase in racing cyclists using the road which. Building such a development could amount to 500 additional vehicles entries and exits to the A5086 on a weekly basis. This will vastly and significantly increase the risk of a serious accident or fatality both whilst being built and on completion.</p> <p>3) Drainage and Surface Water Issues - Parks Road has had issues with foul water drainage, surface water and significant flooding in both the past and present. The councils own 2007 Strategic Flood Risk Assessment (SFRA) states that the foul water system and culverts have insufficient capacity. The drains constantly block both on the main road and on numerous soakaway areas. United Utilities and Cumbria Highways regularly have to clean and inspect these drains. This has again been identified by the Councils Engineers which also contributed to the refusal of past applications by Mr Close. What is the correct site size 0.339Ha or 0.29Ha. Building on the field in question would cause significant surface water and drainage problems for the already over utilised drainage systems. It could also cause our property to have major surface water problems and risk of flooding. We already get a lot of surface water running towards our property as a result of being situated at the base of sloping surrounding grounds and off the highway. There is only one drain to deal with all this water. The drainage plan supplied has been worked out incorrectly. The average rainfall is much higher between approximately 1240mm and 1450mm yearly rainfall over the past 20 years on average. A much larger storage tank would thus be required. We are also not confident such a huge tank would fit in the area on the plan shown. There is also no legal access or right of way to maintain, clean or repair such a system. Who would be</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>held responsible If any of the system is electrically managed, this itself causes a risk as Arlecdon lost power on seven occasions in one weekend several months ago. The plan shows both foul and surface water joining in to the original overburdened and over capacity drainage system. The main principle design of a swain / soakaway is that it is at the lowest part of a development thus causing no risk or issues if problems or faults arise. This swain is located directly above / behind a bungalow and above Bridgefoot and Tilekiln putting all three properties at risk. Where will the "Building work drain" water go to as shown on the plan.</p> <p>4) Contaminated Land -The land in question is very close to a suspected old tile works site as reported by the Environmental Agency in previous applications. No assessments have been carried out. The land has also been used to illegally dump tonnes of building materials and other such items over numerous years. The Environmental Agency were informed and prohibited such activity. The land has unknown hazards i.e. asbestos, lead, unknown liquids and glass to name a few.</p> <p>5) Development of Land - In my opinion the strategic housing land availability assessment has not done extensively enough and although consultation processes have not been fully completed as yet, site HAR02 is totally not suitable and should therefore be discounted from the Copeland local plan. The organisations stated including council consultants raise significant issues in their decisions and have on numerous previous planning applications recommended refusal due to the mentioned reasons in all above sections. In our opinion there is no demonstrable need for such a development, there has been over 20 houses for sale in Arlecdon for many years. Several of the houses that still remain for sale are large 4 bed detached properties. There are also numerous houses left unoccupied and available for rent. This shows lack of interest in relocating to Arlecdon, which is a small rural village. The lack of services in and around the village also discourage young families from wanting to move to Arlecdon. The only public house in the village has also received planning permission to be transferred from business use to domestic. The next village, Frizington currently started a very large housing development, this village is a lot closer to local amenities and schools. The development HAR02 would urbanise and thus erode the character of this area. This expansive development would also destroy the views of the fells which contribute positively to the character of the surrounding areas.</p> <p>6) Noise and Light Pollution and weather conditions -The proposed development will cause noise and light pollution for years to come, causing myself, neighbours, residents on Parks Road and surrounding properties nothing but stress and suffering. Weather</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>conditions including rain, ice, and snow cause significant hazards throughout the year on the busy A5086 main road. The site will have a steep sloping entry / exit causing high risk in wet and frosty conditions. Spillage such as mud, debris etc from the building processes as shown at the Rheda development in Frizington would also increase risk to the public and vehicles.</p> <p>7) Information required - The council states that they have been in correspondence with United Utilities and the Highway Department who report they have no known flood or foul water issues. This is totally incorrect and untrue. Parks road was flooded in October 2005 and this was highlighted by a Copeland councillor in the Whitehaven news report. The councillor also states other previous surface water issues. There has also been numerous other road and gulley flood issues as reported in the Evening News and Star 2017. United utilities are constantly cleaning / jetting the foul water systems mentioned. They have known problems with flow and capacity and have completed such work at least one hundred occasions over the years I have lived here. The problems with surface water and foul water is going to be increased massively with this proposed new development by connecting directly into the systems / pipework and fields that are already over capacity with the evidence already stated. The surface water drain in the field the planned water is going to is currently damaged and collapsed in areas. Mr Corletts and Mr Watsons fields are already constantly saturated. This proposal will only amplify the current problems and could also cause our properties flood problems if any pipework blocks or collapses or as stated cannot take the extra volumes of surface / foul water. I already get a huge amount of water from the A5086 road and from a neighbouring property who have put drainage channels in putting their problem water down to myself. There is also no information on how access will be gained for building purposes. The lane used for access to Bridgefoot, 1 and 2 Wynfield and Tilekiln must not be used under any circumstances to access the land in question, for the same reasons above. There have also been no contaminated land assessments undertaken. There is no information given, if the plots are to be sold for self builds or they are all to be built by Mr close or if the field will be sold as is to another developer.</p> <p>I still cannot understand why this site was not removed from the plan. I have looked at all the criteria from the plan document and the site fails on most -Flood issues - Shown by your flood risk assessments , flooding of homes and your drainage engineers - Highways - Previous planning applications rejected due to road hazards , elevation , visibility - Road gullies - United Utility known issues - spoke personally to UU who have known issue on</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>parks road - Infrastructure , Housing needs , etc - Please can you inform me what is happening and why this is still being considered</p> <p>Photos submitted as an example of the massive problems parks road has with flooding</p>	
40		<p>I would like to make the following in respect of the Arlecdon map:</p> <p>a) The settlement boundary for the village is to be extended to incorporate an area of land to the east of the village on land across the main A5086, a site that in my opinion fails to meet a number of your intended policy criteria as identified in red above, in particular:</p> <p>1) The site as you travel along the A5086 provides a panorama of the Lakeland fells and am unable to balance how by allowing Development this protects the intrinsic character and beauty of the countryside and also being detached from the village envelope has a negative impact on the aim of the policy to maintaining settlement character and form.</p> <p>2) You claim to have considered opportunities to extend the boundaries to allow for additional development without causing unacceptable intrusion into the open countryside, which again has been compromised by proposing to include this area of land.</p> <p>3) With the site being separated from the village by the A5086 the site is not physically connected to the existing settlement by any safe pedestrian links and as such would introduce considerable road safety issues with residents having to cross the busy A road to gain access to the village amenities and also any new vehicle access point with visibility proving to be a distinct concern, with only a very short stretch of road between.</p> <p>Therefore the above area of land should not be considered for inclusion in any extension of the village boundaries, with better sites more consistent with the aims and objectives of the new plan being excluded.</p> <p>I particularly refer to land submitted under Ref: AR 029, (Copy of Plan attached) which fits all the relevant criteria to which the new policies refer being:</p> <p>a) This site provides a natural extension of the village and provides a positive connection to the village ensuring safe pedestrian links to the village amenities without having to cross at the busy A5086.</p> <p>b) The site is located in a low lying area and as such will have no detrimental affect or have any visual impact on the environment, with the existing site having existing established hedgerows and fronting a minor road.</p> <p>c) The site will have no detrimental effect on the character and beauty of the countryside and provides a perfect rounding off of the built format of the village whilst maintaining the settlement character and form.</p>	<ul style="list-style-type: none"> • AR029 has been listed in the SHLAA as undevelopable as it is poorly connected to the existing settlement. More information can be found in the SHLAA. • AR008 is also undevelopable in the SHLAA and is therefore not suitable as a boundary extension • The boundary extension Ar001 has been allocated in the Local plan since approximately 2006. It is a brownfield site, and it was considered that the delivery of some housing could provide benefits to users of the C2C route by providing an area of parking as part of the scheme. However, as development has not taken place, and due to there being other potential land constraints, the land has been deallocated. The site has been identified as Protected Open Space and therefore the settlement boundary remains unchanged.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		I would also like to make the following observation on land at Arlecdon Road which has a Ref: AR008 (Copy of Plan attached area of land shown dotted) and although it falls below the area for a large scale development, the request was to amend the existing village boundary to include the site, which is an infill site and would draw a natural conclusion to the built format of Arlecdon Road. It should also be pointed out that the proposed village boundary has been drawn to exclude an existing dwelling and a site on which outline was granted for 2 dwellings and a reserved matters has been approved for 1 of the 2 sites (maps attached to original email)	
Bigrigg			
46		Saturating markets with the over production of houses is not good economic practice The population of Copeland has been in decline since 1981 this trend is predicted to continue by the Office for National Statistics. Bigrigg does not have a local need for any new houses. The creation of Negative Equity and Negative House Values will be devastating for our local economy. Pandemic Unemployment and Brexit Recession will require the people of Copeland to have Economic Resilience not Debt Millstones around their necks. If your plan is to replace Older Houses with Newer Housing Stock, then those Existing House Owners will be economically ruined. Moorside Nuclear Power Station (in Allerdale) is not going ahead, so where are all these extra people coming from? Are you planning on Migration to the area, if so what are they coming here for? The only demographic population growth is in the older age group. Who will not be able to afford to buy or move house since the Pension Reforms as Retiring Couples are now £100,000 worse off. In any case they will want quiet rural idylls not urban sprawl. Loss of Countryside, Greenspaces and Farmland Brownfield sites are required to be used first, not Greenfield sites. We require Farmland for food production. The Countryside in England is being used up for housing at an alarming rate, whilst 75% of housing developments can be on formerly developed land.	<ul style="list-style-type: none"> The SHMA identifies a requirement for 146 new dwellings per annum. Draft allocations at Bigrigg can contribute towards the delivery of this. However, since the PO draft, Bigrigg has moved down a tier in the hierarchy and is now listed as a Sustainable Rural Village. As a result, draft allocation HBI3 has been deleted, reducing the proportion of development allocated in Bigrigg.
Cleator			
25	CI003 CI004	I act on behalf of Lakeland Associates Ltd and I am responding to the Council's 8 week public consultation on the Copeland Local Plan 2017-2035: The Preferred Options Draft. This letter should be read in conjunction with our previous letter dated 21st May 2020, which provides further commentary on the site and my client's intention to develop it for residential purposes. A copy of that letter is enclosed for ease of reference. Appendix A of the Preferred Options Draft identifies the Council's preferred settlement boundaries for each settlement within the proposed hierarchy and the prospective housing allocations.	<ul style="list-style-type: none"> Comments noted. Extending the settlement boundary further north could result in Cleator merging with Cleator Moor Site polygon will be amended to reflect ownership

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>We support the Council's revised settlement boundary for Cleator, which now includes the land formerly identified by Copeland Council as Sites C1003 and C1004 in recognition of the fact that the areas of land in question have extant permissions to be developed for residential purposes. It should be noted, however, that there is a slight inaccuracy on the plan for Cleator, as illustrated on Page 8 of Appendix A, in that part of my client's land, which has planning permission, has not been shaded yellow. We would be grateful if this oversight could be corrected to accurately illustrate the extent of the site that has the benefit of planning permission.</p> <p>We would also suggest that some of the land to the north of the extended settlement boundary could be included within the proposed settlement boundary to allow for further development of a small number of dwellings. It is considered that such an approach could help provide a more organic and natural boundary to the north of the site and Cleator itself, whilst still retaining the gap between Cleator and Cleator Moor, which, we are aware, is of importance to the Council.</p>	
	CI005	The entire area of land at Cleator Mills/Kangol is included as an opportunity area in the Preferred Options document. Gleeson Homes have recently submitted a planning application on the land to the north of Cleator Mills for residential development. This area has previously been approved for residential development by Copeland Borough Council and is within the existing and proposed settlement boundary for Cleator.	<ul style="list-style-type: none"> • Comment noted
Distington			
71	Di013	The site outlined under the SHLAA reference Di013 is not owned in full by our clients; our clients ownership extends to approximately 3.04 acres (1.23 ha) as per the attached plan. The site is a logical extension to the settlement. It is in a sustainable location with access to infrastructure, making it deliverable within the plan period. Positive discussions regarding this site have been undertaken with Copeland Borough Council over a number of years. Specifically, it is noted that in February 2017 the Planning Policy Officer confirmed that in principle, Copeland Borough Council would not have any objections to a housing proposal on this site (please see attached email correspondence). We are submitting this call for sites document on behalf of our client, the Landowner as per the advice received from the council in 2017 With regards to highways, we have also had initial discussions and a site visit with Cumbria County Council to confirm that in principle there are no issues in regards to access for up to 30 houses on our clients site, subject to any design meeting	<ul style="list-style-type: none"> • Comment noted. Part of the site has been included within the Local Plan as a draft allocation (HDI1).

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		the Cumbria Design Guide 1996 For the avoidance of doubt, our clients would like this site to be allocated as a housing site within the local plan. It is confirmed that this site is available and deliverable. (additional passed email correspondence (2017) included with this submission)	
St Bees⁵			
121		<p>Draft Allocations:</p> <ul style="list-style-type: none"> The main issue of concern with the 2020 consultation is the proposed changes to parts of the settlement boundary of the village associated with SHLAA areas SB001 and SB005 to the north west of Abbey Road. We understand there have been a number of individual responses objecting to these specific proposals, and councillors when talking to villagers have found there has been total objection to them. We have found no support. <p>The Parish Council objects to the inclusion of the two SHLAA areas SB001 and SB005 within the settlement boundary for the following reasons:</p> <ul style="list-style-type: none"> Changes to settlement boundaries and consequent possible residential building developments bring no advantages – only detriments. It is not felt that the building of nominally 97 dwellings in areas SB001 and SB005 will materially contribute to the sustainability of the village, which is not in any case showing any signs of unsustainability. Ability of infrastructure (roads, drains, utilities) to cope with more development, when it struggles to cope at the moment. There is nothing in the draft plan which analyses this or guarantees infrastructure improvements would be carried out. Village roads were built before car ownership – roads not able to cope with even current demand. Pinch points at several locations causing gridlock. New development would inevitably increase traffic on unsuitable roads of which Abbey Road is the main example. Obligation to provide highways improvements may be impossible to impose on developers. Currently no safe walking route from Abbey area to station and village core due to lack of pavements. Access from the proposed sites to public roads problematic – fear that traffic would be 	<ul style="list-style-type: none"> Comments noted. Site HSB2 (Sb005) has been removed as a draft allocation. Site HSB1 (Sb001) remains a draft allocation as it remains a deliverable housing site and constraints identified can be mitigated.

⁵ There was a significant number of responses received in relation to the revised settlement boundaries and draft allocations in St Bees. Where a number of responses have reiterated or repeated the same points, they have not all been replicated in this table, but the anonymous respondent reference has been included to show where points have been made frequently. In places, responses have been summarised to prevent duplication. Please note that CBC have taken time to read and consider every response, and that individual responses and how we have dealt with them can be viewed by request

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>routed through existing residential estates. Even if this could be avoided, traffic would still have to use narrow existing roads with no footway, eg; Abbey Road. No compulsory purchase powers available to developers and difficult to see how road access could be created without demolition of properties.</p> <ul style="list-style-type: none"> • Threat to sustainability of tourism due to effect on village landscape and the historic character of the village which would make it less attractive to tourists. Development would detract visually from Heritage Coast viewed from inland. • Further development would create more light pollution and affect 'dark skies' objective • Not following the principles of past St Bees planning which were to reduce visual impact, and siting of housing within easy walking distance of village core. 	
135, 166, 236		<p>Settlement hierarchy:</p> <ul style="list-style-type: none"> • I do not believe that St Bees meets the requirements to be classed as a 'Local Service Centre'. The village shop and the café on the beach cannot be classed as a broad range of services, and whilst there is a train station, the village is not well connected to other areas due to the lack of bus services, or walking and cycling routes. • St Bees in recent years has had more than its fair share of development and is now classified as a large village without the infrastructure and facilities of a large village. Please don't let the developers turn our unique village into a town. 	<ul style="list-style-type: none"> • Criteria for assessing settlements within the hierarchy is included in the Settlement Hierarchy and Development strategy paper 2021. This outlines the criteria that have resulted in St Bees being classed as a Local Service Centre.
10, 11, 12, 14, 16, 18, 19, 21, 23, 24, 26, 38, 42, 43, 48, 49, 52, 54, 56, 58, 59, 61, 62, 66, 67, 78, 79, 83, 89, 90, 92, 93, 95, 96, 97, 99, 102, 105, 116, 119, 121, 135, 143, 146, 147, 151,		<p>Concerns surrounding roads, safety and accessibility in St Bees:</p> <ul style="list-style-type: none"> • St Bees roads are totally inadequate both in and out of the village as they have very poor capacity • At busy times drivers tempers flare especially on the Main Street whilst they try and negotiate the almost impossible roads. Access and exit even from the larger estates especially Abbeyvale are like 'dicing with death'. • No pavements along Abbey Road (very dangerous) or inadequate pavements as on the Private School Road corner. • The current pedestrian connections are inadequate and dangerous for current residents, let alone any new housing. • Secondly there are a lot of narrow roads the lead down to the beach and over to Sandwith. This will have a hazardous impact on pedestrians and such as young families in the village, 	<ul style="list-style-type: none"> • The roads in St Bees have been assessed and considered through the Copeland Transport Improvement Study. Transport interventions to improve the deliverability of the allocations are identified within the document. • Accessibility of the sites has been looked at through the phase 1 and phase 2 SAA assessments. Any development proposals on these sites will be required to take these documents into consideration and

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
163, 182, 184, 186, 187, 191, 204, 205, 206, 207, 210, 211, 212, 223, 224, 227, 228, 233, 235, 236, 237, 238, 239, 240, 241, 245, 246, 247		<ul style="list-style-type: none"> The village is handicapped by being such a long distance from a main highway making it difficult to travel to work and return home. SAFE PARKING: Lack of Safe Parking which is a problem all over St Bees Village. Traffic in the village is already a considerable problem, particularly at school starting and finishing times and when Sellafield employees are en route to or from work, when very many people use St.Bees as a through route As there is no bus service from the village and only a village Post Office, residents have to travel outside the village for work as well as groceries and medical requirements. Any further housing developments will lead to increases in traffic both on the B5345 heading north and south and over Outrigg towards Egremont. As a result of increased additional traffic flowing through the village and the real danger to pedestrians a 20 m.p.h. speed limit has already had to be introduced on roads entering the village, trained volunteers have been found to monitor this problem using speed guns. It is felt that the development of areas SB001 and SB005 will impose an unacceptable sustained increase in the volume of road traffic. The village has a serious traffic problem both from drive through and internally generated traffic. The village is on one of only two classified roads to Sellafield, where a site occupancy of 10,000 worker presents some serious traffic flow issues. For SB001/5 The bottleneck of Abbey Road's east end, where no widening is feasible due to existing buildings, and the poor alignment and layout of Abbey Road is a great concern. The road is heavily used, and is overdue significant re-engineering to have a pavement along its length and be of a suitable width for the volume of traffic it currently carries. However, if done, this would only be possible at the west end of the road because of constraints of existing buildings at the east end. Recent ribbon development on this road has not resulted in any planning-based enhancement to the road, and some of it has reduced further capability for pavements and road widening. For the 2020 draft It is not obvious how the assessment of road capacity or the feasibility of access to public roads has been carried out. It is felt this is being pushed into the future, whereas it should be a more visible part of the SHLAA process, and subject to scrutiny now. It not felt adequate that land should be designated without demonstrable chances of good access 	mitigate transport issues accordingly.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> The SB001 and SB005 sites fail to meet the objectives of policy DS7PO (Design Standards for new developments): <ul style="list-style-type: none"> a. They do not take account of the local context; b. They do not encourage walking and cycling; c. There are no safe pedestrian routes to services; d. They are on the margins and therefore do not enhance social interaction. At peak times, it can take almost 30 mins to pass through the centre on the village after the train has passed through due to the volume of traffic, the narrow roads and the number of parked vehicles. Any increase in traffic through the village will only exacerbate this problem and make the situation unbearable. Development traffic in the form of heavy equipment, diggers, bulldozers, and the requirement for articulated lorries would prove to be an absolute nightmare to the normal flow of traffic, which is bad enough as it is 	
102, 119, 227, 228	HSB1	<ul style="list-style-type: none"> If Firth Drive/Solway Rise is used as an entry/exit road this will be problematic due to homeowners cars habitually parked on these roads leaving room for only single file traffic to pass through. 	<ul style="list-style-type: none"> Access has been assessed through the Copeland Site Access Assessment document and is considered to be deliverable.
212, 227, 228	HSB2	<ul style="list-style-type: none"> If Scalebarrow is to be used as an entry/exit road, it is a single track road with no passing places at the lower end and currently cars have to reverse on a regular basis to allow passage. Traffic is already a problem. Access to HSB2 zone can only be achieved from Scalebarrow. This will be deadly junction and I'm amazed it is being considered 	<ul style="list-style-type: none"> The allocation has now been deleted.
10, 11, 12, 21, 38, 42, 43, 47, 48, 49, 52, 54, 56, 58, 59, 61, 79, 83, 84, 89, 90, 97, 99, 105, 116, 119, 135, 143, 146, 151, 163, 208, 212,		<p>Concerns surrounding the requirement for new homes in St Bees:</p> <ul style="list-style-type: none"> I am a resident of St Bees and I am totally opposed to boundaries being moved as I don't wish to live in a village with further housing development St Bees is already an over populated village and this makes living and working from here increasingly difficult West Coast Mining has been given local go ahead but NOT guaranteed by the Government, as green issues and government targets are a huge issue. You cannot plan a housing strategy that relies on a possible new plant (Moorside) as this week the government have declared wind power is the only way forward for the U. K. It doesn't look probable that any new builds are planned for 	<ul style="list-style-type: none"> The requirement for new homes in the borough has been identified through the SHMA. The standard methodology is not deemed high enough to provide adequate homes for Copeland's population, and does not reflect delivery in recent years. This lower figure would also have a significant prejudicial impact on economic growth in the borough.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
233, 236, 239, 240, 241, 247, 253		<p>Sellafield and old facilities are being shut down as redundant. Do we need new houses, there are actually empty properties in the Village</p> <ul style="list-style-type: none"> Using the standard methodology for calculating housing need, there is only a need for 11 dwellings per year in Copeland. By 2035 this equates to 165 houses. I fail to be convinced by your arguments, therefore, that Copeland requires 2520 new dwellings with 504 of these in Local Service Centres. Copeland has a declining population and does not need or require any more houses The statement that there are nearly 1000 empty properties in the area is lamentable and the Council should create a task force to tackle this problem. Many young people are struggling to get on the housing ladder and a scheme get these young involved with the right support will benefit the whole community and help to retain young people in the area. Given that there are many sites which offer house building opportunities in Copeland which do not adversely impact local communities, it seems unnecessary to create the inevitable ill feeling and local war of attrition in which the community would almost certainly engage with the Council and the Planning Department. Consuming open countryside and agricultural land for general block development of large-scale housing estates without provision for improvements to local infrastructure or taking into account anything to do with local housing already available. For example at time of writing the boundary change to St Bees is for around 95 to 100 additional houses where there are 17 properties on the market in St Bees and 11 additional properties being developed on Lonsdale Terrace. Where is the demand for this? 	<ul style="list-style-type: none"> West Coast Mining and Moorside are aspirations for the council – please see the Economic Development Needs Assessment (EDNA) for further information regarding how they have been factored in when calculating housing need.
10, 11, 12, 16, 18, 21, 26, 38, 39, 41, 42, 43, 47, 48, 49, 52, 54, 56, 58, 59, 61, 66, 78, 83, 89, 90, 91, 92, 93, 95, 96, 97, 99, 102, 105,		<p>Concerns surrounding Infrastructure and services in St Bees:</p> <ul style="list-style-type: none"> The Village School is already full to capacity, with continual complaints from residents over parking and lack of parking area this is demonstrated in a recent article on the front page of the Whitehaven News featuring the village school Headmistress apologising to residents for the parking chaos and lack of spaces. the primary school is well attended and any may struggle to accommodate any further children. Considering that this school is well thought of and has high league table results and OFSTED results, do you really want to jeopardise this? 	<ul style="list-style-type: none"> Schools, utilities and services are being considered through the Infrastructure Delivery Plan, which will highlight where there are downfalls and where additional services need to be provided to accommodate demand.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
116, 119, 135, 143, 146, 151, 163, 182, 184, 191, 206, 210, 211, 220, 223, 233, 236, 237, 238, 239, 240, 241, 245, 246, 247		<ul style="list-style-type: none"> Impact on the school which is already at full capacity (Infant and Junior). More Houses mean more people/families with children of school age. Where will these extra children be taught? Will the school have to expand to accommodate all these extra pupils? Also, more traffic congestion at school start and finishing times. * St Bees Village runs only one shop, totally inadequate for a full village. We have No pharmacy, No Doctors, No garage, No Police Station, No Fire station and none planned in the foreseeable future *St Bees Village is totally unsuitable for any development strategy or inward development or facilitating any growth we haven't got the capacity. * Inadequate transport. * NO bus service. * Irregular train service. * No taxi service. * Not sufficient infrastructure. The village has one main store serving the whole village. In 1996, although a rarity, the village was completely cut off from the rest of the county (due to adverse weather conditions), and as a result, was reliant on the local lifeboat service to get goods to villagers, there is no easy access to any public services no infrastructure to cope with young people leading to boredom and vandalism which has increased in the village as you maybe able to check with the complaints to the police There is no bus service and the train service is very poor so the road traffic would increase. As there is no bus service from the village and only a village Post Office, residents have to travel outside the village for work as well as groceries and medical requirements. Any further housing developments will lead to increases in traffic both on the B5345 heading north and south and over Outrigg towards Egremont The village economy has low commercial reliance on local shopping, there being only one small shop in the form of the Post Office and general store, which is on the Main Street. For residents of SHLAA SB001 and SB005 it would be difficult to access; due to remoteness, poor parking and the lack of a safe walking route round Abbey corner. It consequently attracts the bulk of its custom from the Main Street area, rather than from the north west of the railway line. It is felt that 	<ul style="list-style-type: none"> Existing services such as shops, public transport etc have been considered for every settlement and contributed towards developing the settlement hierarchy. In this sense, the scoring given to St Bees shows that it is a sustainable settlement and can accommodate the level of growth planned there. Following these comments, another village services survey was carried out to account for any changes to service provision. The conclusion remained that St Bees was a Local Service Centre.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>residents would be reliant on car shopping, and that Whitehaven would naturally be patronised by SB001/5 residents.</p> <ul style="list-style-type: none"> • I grew up in a St Bees with less than half of today's population but with many more shops and amenities. Fish and chip shop, bank, petrol station, hairdressers, charity shop etc. I know that there are so many arguments for the disappearance of these but I feel it is wrong for the population to increase without the necessary amenities and the sense of community that these create. • Any increase in population should be seen as the trigger to re-route bus services to include the village again. 	
67, 91, 102, 105, 116, 119, 135, 146, 204, 211, 220, 245, 246, 253		<p>Concerns surrounding utilities in St Bees</p> <ul style="list-style-type: none"> • Electricity, we often lose our electricity and poor internet connections are we not added to problems with (increased). • the infrastructure cannot take anymore, there is already an ongoing issue in relation to electricity supply, sewage and internet capacity, therefore this will have a major impact especially that working from home will be more of the norm. • As already alluded to, the village's infrastructure can barely support the houses in the village now. There are ongoing issues with regular power outages; to date, we have experienced 12 power cuts this year alone. These power cuts are not always related to poor weather or planned maintenance. • (HSB1) Would the broadband infrastructure be improved throughout the village to increase the broadband speeds to everybody bearing in mind the present very aged copper cable network currently in place? Expanding the network without replacing the cables would undermine all speeds in the village 	<ul style="list-style-type: none"> • Discussions have taken place with utilities providers as part of the site allocation process surrounding capacity and network issues. These indicate that there are no capacity or network issues within the village.
18, 20, 26, 56, 62, 66, 79, 81, 84, 90, 91, 102, 105, 135, 146, 204, 210, 212, 220, 224, 235		<p>Flooding and drainage concerns:</p> <ul style="list-style-type: none"> • More housing means lack of fields and green areas for water absorption and water runoff. Flooding is already a serious problem in St Bees, heavy rainfall causes problems now with flooding across the village, what will it be like with yet more housing? Twice already, during October 2020, the roads have been cleared of debris due to flooding, (Check with CCC and CBC Highways Departments who will confirm this). • Having lived in the village for over forty years, my first recollection of flooding homes was in November of 1999. Flooding is now an ongoing problem and fear 	<ul style="list-style-type: none"> • Engagement with utilities providers, LLFA and CBC flood risk officer have been carried out to determine where there are significant flood risk issues. The Council has also produced a Strategic Flood Risk Assessment. This evidence does not indicate that the allocations should not be taken forward.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>for many residents of the village, particularly since the development of more & more properties</p> <ul style="list-style-type: none"> • (HSB1) With the known problems existing with respect to drainage volumes from both sewage and rainfall/storm water in the village, how is it proposed to drain this new site without causing significant problems to the existing Beach Estate and village infrastructure? • Experience in Copeland from block development is that this increases surface flooding from run-off. No proposed development in this proposal will improve this. In all expectation it will get worse. 	<ul style="list-style-type: none"> • Developers would need need to submit information regarding surface water drainage as part of any future planning application.
26,250		<p>Archaeological concerns</p> <ul style="list-style-type: none"> • A Full Archaeological survey of the green fields where housing development is proposed, as in drought conditions walls and dwellings can visibility seen from above. There may well be many artefacts buried here that maybe of National Significance and once exposed it may be that the site cannot be developed due to its Archaeological Importance. There could possibly be other burials like the St Bees Man waiting to be discovered, and other treasures from the medieval past. • There is an Archaeological possibility of burials at Scalebarrow and hidden Priory artefacts on land proposed for development. This land was originally Demesne land (or Home Farm) for the monks of St Bees Priory and should be preserved. Attached is a copy of an extract from the St Bees News April 1988 written by Dr J Todd recording a kiln I found in my garden 	<ul style="list-style-type: none"> • Comments have been provided by from CBC Conservation Officer and CCC Archaeology Officer to determine if these areas require archaeological work prior to potential development. Further information can be found in the Housing Allocations Profiles Document and Heritage Impact Assessments.
10, 11, 12, 21, 26, 38, 42, 43, 47, 48, 49, 52, 54, 58, 59, 61, 66, 79, 83, 89, 90, 105, 116, 119, 121, 135, 143, 146, 163, 191, 233, 236, 237.		<p>Landscape concerns</p> <ul style="list-style-type: none"> • GREEN AREAS: Loss of Green fields • ENVIRONMENT: Overall Environmental Impact on an area of outstanding Natural Beauty. • Building a large number of new houses, on a hill, on prime agricultural land that causes increased commuter traffic and an increased flood risk is clearly counter to these objective • We do not want our green, agricultural land swallowed up with unsuitable house building. • Harm to setting of conservation area (surrounding green/yellow hilltops) • The two areas SB001 and SB005 are on land that is highly visible from the historic Priory area, and overlooks the "green wedge" in the valley, as well as being 	<ul style="list-style-type: none"> • In the absence of sufficient suitable brownfield land in St Bees, greenfield sites have been selected for allocation. • All allocations have been assessed through the Settlement Landscape Character assessment and Open Space assessment to ensure that development avoids high quality Greenfield land that has important landscape value.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
238, 239, 240, 241, 247		<p>prominent in the views of the St Bees Heritage Coast area from several gateway entrances to the village. Whilst there are some existing buildings adjoining those areas, the infill of SB001 and SB005 would change the character of one of the key attractive parts of the village. Buildings would extend to the skyline, and would be overbearing, whereas at the moment the built landscape is broken up by pleasant areas of green fields. This high visibility is a consequence of the unique nature of the St Bees Sandstone landscape area, which is characterised by deep valleys with rolling open vistas so that hillside building developments are visually very intrusive. We would wish to preserve this important existing local landscape from this kind of change.</p> <ul style="list-style-type: none"> • The Heritage Coast which now extends from Whitehaven to St Bees, is one of these natural assets that is highly valued by the Copeland and St Bees Head is a key feature of this part of the coast. The picture of St Bees Head is an iconic feature of the village and is pictured in all its publicity – and yet, despite Copeland Landscape Settlement Study (July 2020) stating that development on prominent hill sides and within strategic green infrastructure should be avoided, we have here in St Bees a proposal to build a housing estate on a hill, within a mile of an important landscape feature. • What was the criteria used to choose these sites, surely there are brown field sites available within Copeland? 	
26, 91, 105, 191, 204		<p>Wildlife concerns</p> <ul style="list-style-type: none"> • Any planned developments in the village will have a huge impact on the local wildlife and fauna. St Bees Head supports the only cliff-nesting bird colony, and there are also an abundance of wildflowers, butterflies and moths. Further housing in the village will almost definitely have a negative impact on the local flora and fauna. • St Bees is a rural village leading to nowhere, with many environmental constraints and areas that need to be protected for future generations. We have the RSPB nature reserve, and the marine conservation zone. The centre of the village is also a conservation area 	<ul style="list-style-type: none"> • All draft allocations have been subject to an ecology assessment, which has highlighted any potential for development to impact on the natural environment and habitats. Where there are potential effects on ecology, the reports make recommend mitigation and specific surveys that will be required at application stage. Please see the Housing Allocation Profile document for further information.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
23,24, 29, 97, 148		St Bees Tourism Industry <ul style="list-style-type: none"> As you will find in countless travel reviews this a huge draw for the thousands of tourists that visit every year. To further develop this tourism gem would be tantamount to sacrilege and surely detrimental to the Copeland tourist trade! I can see the reviews now "St Bees used to be a beautiful village...now just another town by the sea!" "Avoid St Bees like the plague unless you want to spend your holiday stuck in horrendous traffic!" The fact is that people do not want to leave a town to holiday in a town. It is the equivalent of Cornwall council suggesting building a housing estate in the middle of St Ives, Inconceivable! Surely it is of benefit to the council and area as a whole to fight to preserve their greatest local assets, like St Bees, to the best of their abilities in order for it to continue to serve as a wonderful holiday destination for the hundreds of thousands of visitors it will continue to draw over the coming years. I implore you to consider this when making your final decision on this matter With its many special features; the beach, coast to coast walk, nature reserve, cliff-top walks, priory, historic public school, golf course and other green spaces it is a gem of a place which is a draw for both locals and visitors. For the sake of the villagers, the people of Copeland and the Tourism industry which is so important to our region it is vital that any housing developments are conditional on provision of the appropriate infrastructure. 	<ul style="list-style-type: none"> Building the right homes in the right places can help to bring economic growth to an area. This is likely to help support the tourism industry in St Bees further. The Infrastructure Delivery Plan, Transport Improvement Study and Housing Allocation Profiles documents highlight what infrastructure will be required to support new development.
26, 67, 191, 250		Ownership concerns: <ul style="list-style-type: none"> You should already have copies of the Sworn Statements from St Bees Old Boys, myself included, that we and the Village helped and supported St Bees School (Charitable Status) ready to purchase the land and buildings associated with Abbey Farm in order to stop any further development subsequent to the development of houses at Abbey Vale. (See attached letter I wrote over 2 years ago for the record). Developers will have, by then, allowed, curtesy of the school, land that the village rightfully owns, the land was bequeathed to the village Private School on an understanding that the land would never be sold or developed but retained and preserved. I think this is a selfish and hazardous idea from the Private school who will see the financial gains yet has not positive/social impact within the village 	<ul style="list-style-type: none"> We are not aware of any land ownership issues that may prevent allocation of the site for housing.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> A point of information on access to this land from Solway Rise. I believe that St Bees School does not own the small strip of land which lies between the end of the road and the HSB1 field itself. This is the old mill race and its freehold is held by others. 	
74	HSB1 HSB2	Sites HWH4, HWH5, HSB1 and HSB2 are all located in very close proximity to the St Bees Heritage Coast. High priority should be given to protecting the setting of the Heritage Coast when considering proposals in these locations, including through suitable layout, design and landscaping.	<ul style="list-style-type: none"> This will be highlighted through the Housing Allocation profile document and the setting of the Heritage Coast will need to be considered through the planning application process
44		Sb004 and Sb023 Sb004 and Sb023 have been withdrawn from this submission.	<ul style="list-style-type: none"> Sb004 and Sb023 have now been marked as unavailable in the SHLAA.
44		Sb018 Sb018 is the site closest to the road and has been discounted on 2 grounds. The first is that it is not available and the other is access. The site is clearly available, and this information was given in January 2020 to Copeland LDF and therefore this reason can be discounted. The second reason relating to access. A draft scheme was submitted that shows that visibility can be provided, and a previous highways officer had no objections in writing to the proposal in relation to the access. All of those documents have previously been submitted in support of this site allocation. ⁶	<ul style="list-style-type: none"> The site has been reassessed in the SHLAA and is now considered to be developable. The site now forms part of housing allocation HSB3.
26	HSB1	The question of the Sustainability of St Bees Private School, when all their land assets are sold to (Housing Developers), to fund the future of the school, in my opinion, does not make very good business sense. I would ask the question to St Bees Private school at this point of re-launching that if they need to sell land assets for the schools future funding does not read for a very good future.	<ul style="list-style-type: none"> Comment noted.
14		Any housing development should be confined to anything for which permission has already been granted or individual small infill plots	<ul style="list-style-type: none"> Comment noted

⁶ More information was submitted as part of this response and can be viewed by request. The full report will be taken into consideration during decision making

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
20, 116		There are many more locations in Copeland more suitable for housing developments other than what was once a small village. St. Bees has developed on such a scale over recent years, now being classified as a large village, reiterated; without the facilities of a large village.	<ul style="list-style-type: none"> St Bees is classed as being a Local Service Centre within the settlement hierarchy. The settlement hierarchy policy (H4PU) outlines the amount of development that will be directed to each tier in the hierarchy.
44	HSB1	<p>There appears to have been several in some case random settlement extensions which appear to be able to allow further housing development. The LDF department at Copeland have confirmed that "In some cases, there were sites on the edge of a settlement which appeared suitable but there was insufficient evidence to support their allocation (e.g. ownership was unclear). In such cases, where a site appeared suitable, but was not allocated for that reason, the settlement boundaries have been drawn around such sites to allow them to come forward as windfall development in the future."</p> <p>This appears to be the approach that has been taken for HSB1 in the PO document as this was discounted due to highways objection but part of the site has been scheme to come forward. That site would require a historic building to be demolished to allow the access to run between two properties to serve the site. This approach is one that is not accepted within Copeland and has generally led to refusals e.g. 4/18/2266/001. Why is it therefore accepted to allow HSB1 to be developed by demolishing a property between two properties to create an access when there are better sites within St Bees? The development of HSB2 would result in the loss of the roadside hedgerow due to the narrow road network which would have a negative impact on the landscape character and biodiversity of the area as indicated on image below.</p>	<ul style="list-style-type: none"> The site access assessment proposes that alternative access is achieved to this site.
47		It would make more sense (if you think more housing is needed), to build in Egremont which at least has a decent road system etc.	<ul style="list-style-type: none"> Egremont already has 3 draft allocations, in line with its position as a Key Service Centre in the Settlement Hierarchy. The amount of housing that can be delivered within the town is dependent upon the availability of suitable sites.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
253		I am writing to object to the proposal to change St Bees village boundaries, by what criteria was used to decide these changes. In these uncertain times of Covid a lot of elderly residents are not aware of these changes as we are unable to hold public meetings or meet to discuss. This is a breach of our human rights.	<ul style="list-style-type: none"> Our full Statement of Community involvement, including all the methods we have used to consult with the public during the pandemic, can be viewed here: https://www.copeland.gov.uk/content/statement-community-involvement
79		A number of properties in the village are currently being used as second homes and holiday lets. Clearly some holiday lets are useful and appropriate for the village. The development at Stonehouse Farm is a good example. However, of the six new houses built at Rowan Terrace one is already a holiday let as are two on the, as-yet-unfinished estate at Seacote Gardens. Some of the apartments on Fairladies and a number of the terraces on Main Street are being used as holiday accommodation. In fact, there are more than 14 properties advertised on Booking.com. This does not suggest a village in need of more building. Domestic housing being used as holiday rental not only takes housing away from local needs, it is also noisy and disruptive to neighbours. A policy to reduce second homes and holiday rental properties in the village would be better for the village than a new housing estate.	<ul style="list-style-type: none"> Comment noted. Unfortunately, the sale of dwellings for second homes is outside of the planning remit. The Council is aware that this is an issue that national government are currently considering.
56		This plan does not fulfil any of the needs of the villagers and only benefits St Bees Private School and they only seem to cater for overseas students. St Bees Private school does absolutely nothing for the village or villagers.	<ul style="list-style-type: none"> Comment noted.
89		In short, this is a very stupid plan which is threatening, yet again, to impose an unwanted development on the village. It is contrary to your own stated objectives, undemocratic and poorly thought through. A cynical person would look to who would benefit from the development. Who is the developer and what links do they have to the decision makers? If you have any integrity and wish to salvage any trust of the residents of St Bees, you will reject this plan and uphold the will of the people. DO NOT EXPAND THE VILLAGE BORDERS!	<ul style="list-style-type: none"> Comment noted. The role of an allocation is to identify land to meet development needs. Any landowner is able to submit land for consideration and sites are selected in terms of their constraints and deliverability. Developers wishing to build on allocations are still required to undertake the full planning process before development can commence.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
93		<p>The increased traffic has already led to an increased rate of erosion of the sandstone buildings in the St. Bees conservation area, including the original sandstone frontage of our house on Main Street, Built in 1840.</p> <p>I see no evidence in the plan that this particular proposed development is linked to the need for a cycleway running through the POW Valley to Whitehaven. The policy talks of H6PO the layout promotes walking and where appropriate cyclin- linking with existing footpaths and Cycleways. (Regardless of this proposal there is an urgent need for safe cycle routes as an alternative to car journeys on the busy B5345). I also see no evidence that this proposal considers the impact on the amenity value of St. Bees and is considered given the villages key position on the 'heritage coast', the Coastal Path and the Coast to Coast walk.</p>	<ul style="list-style-type: none"> St Bees and Whitehaven Heritage Coast is protected through policy N7PU. Comment regarding cycleways has been noted, additional text surrounding the cycle schemes we aim to support has been included in the connectivity chapter.
95		<p>One of the stated aims of the planning group is to address the mental wellbeing of Copeland residents. As a former Mental Health Manager of West Cumberland Hospital, and Rector of the Parish of Whitehaven for 20 years, I fail to see how this can have a favourable impact on the mental wellbeing of the people of Copeland.</p>	<ul style="list-style-type: none"> Comment noted. A Health and Wellbeing policy has been incorporated into the Publication draft.
102	HSB1	<p>There are a number of very pertinent reasons for this objection which raises relevant questions with respect to how the number of '58 houses' capacity was reached.</p> <p>1. Although a figure of '58 houses' has been decided on, what thoughts have been given to the number and routes for additional roads into the proposed estate?</p>	<ul style="list-style-type: none"> The figure of 58 dwellings is based on an indicative yield of 25 dwellings per hectare, which is the standard figure used to calculate the potential yield of housing allocations in the Local Plan. If a developer were to submit an application on the site, they could apply for an alternative number and this would be dealt with through the development management process.
105		<p>Current examples of large scale developments in and around St Bees (eg. Fairladies and Edgehill Park) suggest there would be a lack of sensitivity for any future large developments and therefore further erode the character of this beautiful village</p>	<ul style="list-style-type: none"> New development will be approved in accordance with the new Local Plan once adopted. A criterion has been included in Policy H6PU which outlines the requirement for the design, scale

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			<p>and appearance of developments to be appropriate to the locality.</p> <ul style="list-style-type: none"> The Settlement Character Landscape Assessment will also help to guide development to areas where there will be a reduced impact on landscape character
97, 105		(Further development of St Bees would result in) An increase in light pollution from dwellings and additional estate lighting	<ul style="list-style-type: none"> A criterion has been added to policy DS6PU: Design and development standards which states that development should use appropriate external lighting that does not create light pollution and helps maintain dark skies.
105		Increased pollution during construction activities, eg. dust, fibres, wood particles, and noise. This is of particular concern adjacent a young childrens' nursery.	<ul style="list-style-type: none"> A new policy has been introduced to the Publication draft regarding air quality.
121		We are currently grappling with the provision of off-street car parking to help with sustainability of the existing village core. At the moment the very poor parking capacity in the Main Street area is a threat to the sustainability, both in terms of denying easy access to the village shop, and in deterring people from living in the Main Street. Consequently, St Bees Parish Council has a current project to extend the car park by the station by up to 30 spaces, which is currently working at capacity. This would have a considerable effect on the problem. This would use land in public ownership unsuitable for development, which was earmarked for parking as long ago as the 1976 plan. The extension would also benefit additional rail users, and could be a site for electrical vehicle charging, for which provision will be difficult along the Main Street.	<ul style="list-style-type: none"> Comment noted

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
121, 184, 206		<ul style="list-style-type: none"> Our proposed level cycle track to Whitehaven along the St Bees Valley is not mentioned. This project was first mooted in 2000, when a very favourable Sustrans report was commissioned by CCC/CBC but not acted upon. St Bees Parish Council is now trying to revive this project which fits firmly under the heading of improved connectivity. This has universal support from family bikers and commuters. It is felt that more specific reference should be made to these projects in the Plan, not least because the Constituency MP and CCC Highways Dept have both advised that inclusion would considerably enhance ability to attract funders, and "get them on the radar". We also see these as home grown and worthy initiatives which would materially contribute to the sustainability of the community. Supplementary material will be submitted with this response to inform the Plan authors. There are major opportunities to meet the requirements of this policy. There needs to be the provision of safe cycleways through the village but particularly the provision of a new cycleway running along the Pow Beck valley to link the village to other communities without having to use narrow, steep and winding roads which all carry heavy traffic and which all have inherent dangers. There is mention of a link to Hadrian's Cycle Way but this does not link to St Bees village. It links at its closest to the Cycle Route 72 junction at the road junction of the Linethwaite Road with the A595, some two miles away from the village. A link along the valley to Mirehouse would carry cycle and pedestrian traffic into Whitehaven or out on the Route 72. Such a link also has the advantage of being a relatively level route without the difficulties of the steep hills which cyclists currently need to ride before reaching a dedicated cycle route. It would also be used by pedestrians wanting to walk out of the village. The only safe pedestrian route at the moment is over the cliffs or along footpaths which pass through many fields and which are wet and boggy for much of the year. Those routes are also much longer than a direct valley route would be. The benefits are also reciprocal: residents in Whitehaven and beyond would have safer and easier cycle or pedestrian access to the beach, a major attraction especially in summer months, when pedestrians regularly walk along the busy and narrow B5345. 	<ul style="list-style-type: none"> Comment noted. Cycling routes that the Council would support in principle have now been included within the Local Plan, including the St Bees to Whitehaven Route.
143, 221		<ul style="list-style-type: none"> My house on Abbott's way would also end up overlooked and I would lose my privacy which I feel is something I paid for when purchasing my house on Abbott's 	<ul style="list-style-type: none"> A criterion has been included in policy H6PU: New housing development, which states that

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>way only 11 months ago. This would therefore decrease my property value and put strain on my family finances.</p> <ul style="list-style-type: none"> • Objection to expansion of housing behind Abbey Road, St Bees re. Copeland Local Plan Preferred Options. With a potential move to Abbey Road, St Bees where we would not be overlooked any new development would threaten our privacy 	<p>privacy will be protected through distance and good design. The policy also states that development must have no unacceptable overbearing impact on neighbouring residents due to scale, height or proximity.</p>
44	Sb004 Sb018 Sb023	<p>The following points are brought forward to summarise the key highlights identified within the document.</p> <ul style="list-style-type: none"> • Suggested layout, proposed road layout, Flood Risk Assessment, Drainage, Desk Top Study and run off calculations have previously been submitted which show the commitment to the site and that the site can be developed. • Local Builder interested in the site • No flood risk or drainage issues as indicated in assessment reports. • Site previously within settlement boundary • Suitable access and visibility display previously agreed with Highways • Indicative layout shows levels are acceptable on site • Withdrawal of site Sb004 and Sb023. • Reduced size of Sb018 • Small Scale developable area • Landscape enhancement as you enter settlement • Avoids the need to go through St Bees <p>(This exec summary is part of a larger 11 page document submitted)</p>	<ul style="list-style-type: none"> • Comments noted. Sb004 and Sb023 have been marked as unavailable in the SHLAA
75	HSB1	<p>The landowners still wish to have this site considered for allocation for residential development and will look to sell the site to a developer if allocated. The land is now no longer required for the use as part of the reopened School, due the operational size of the School currently, the ongoing maintenance and future business plan.</p> <p>There has been significant and on-going developer interest in the site since the commencement of this Local Plan process, and an agreement is close to being reached with a developer to progress a planning application on the site.</p>	<ul style="list-style-type: none"> • Comment noted
	Sb028	<p>The landowners would like to have this site as detailed on the attached plan included within the settlement boundary for St Bees and will look to sell the site to a developer if included. The land is not required as previous, as the owner now no longer actively farms</p>	<ul style="list-style-type: none"> • Comment noted. Part of this site now forms allocation HSB3.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>the land.</p> <p>Access into the site would be from the existing point of access on to the B5345 Egremont Road between St Bees village and Egremont.</p> <p>The site adjoins another suitable area of potential development land that adjoins the previous Local Plan St Bees settlement boundary and also fronts residential dwellings on the west side of Egremont Road. It is well located in relation to the village and is in walking distance to the centre. It is therefore considered a sustainable housing site for allocation.</p> <p>There is considerable developer interest in St Bees, which demonstrates that this is a suitable location for housebuilders to construct and sell houses. The village is considered one of the most desirable places within Copeland to live due to the transport links to both Sellafield and Whitehaven, the beach and the range of facilities on offer within the settlement. It is one of the most sustainable settlements in Copeland.</p> <p>The site could be suitable as a larger area of land, or as frontage development.</p>	
	Sb016	<p>The landowners would like to have this site as detailed on the attached plan included within the settlement boundary for St Bees and will look to sell the site to a developer if included. The land is not required as previous, as the owner now no longer actively farms the land.</p> <p>Access into the site would be from the existing point of access on the Outrigg road between St Bees village and Egremont.</p> <p>The site adjoins the previous Local Plan St Bees settlement boundary and also the residential dwellings on the south side of Outrigg and is well located in relation to the village centre. It is therefore considered a sustainable housing site for allocation. There is considerable developer interest in St Bees, which demonstrates that this is a suitable location for housebuilders to construct and sell houses. The village is considered one of the most desirable places within Copeland to live due to the transport links to both Sellafield and Whitehaven, the beach and the range of facilities on offer within the settlement. It is one of the most sustainable settlements in Copeland.</p>	<ul style="list-style-type: none"> This site has been listed as undevelopable in the SHLAA due to access and topography issues. Therefore we are not proposing to expand the settlement boundary here.
Drigg and Holmrook⁷			

⁷ As with St bees, here was a significant number of responses received in relation to the revised settlement boundaries and draft allocations in Drigg and Holmrook. Where a number of responses have reiterated or repeated the same points, they have not all been replicated in this table, but the anonymous respondent reference has been

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
63, 64, 113, 114, 118, 145, 156, 160, 164, 165, 176, 181, 234, 252		<p>Drigg and Holmrook as a settlement cluster</p> <ul style="list-style-type: none"> • Drigg and Carleton Parish Council oppose the clustering of Drigg and Holmrook into a Local Service Centre and consider that they should be classified as two separate Sustainable Rural Villages. This is based on the knowledge of how the two communities have developed and interact. The Council consider that this latter classification is also a better fit with the settlement hierarchy criteria contained in the Options Plan document. • The Parish Council consider that the two villages should be clearly separated by the creation of Protected Green Spaces; one between Smithy Banks (as now exists) and Groundy Croft Lane; one in the open area to the east of Church Stile Farm; also, an additional area at the railway end of the LLWR site which might be returned to the community at a future date. • From Drigg to any of Holmrook's services is over a mile, this is over the proximity markers for walking and there is no public transport. From Holmrook to get to 3 of Drigg's services is over a mile, namely the train/public house/craft shop café. This is over the proximity markers for walking and there is no public transport. The pavement that runs from Holmrook to Drigg is not continuous it finishes one side of the road at the pinch point at the Church. Just prior to this a pavement commences on the other side of the road. Where it starts near the Church it does run continuously all the way down to Stubble Green but Stubble Green seems to have been missed off for unexplained reasons. Little of this pavement is 2 meters wide, some parts not even 1 meter wide, not all in a good state of repair and not good for pushchairs or wheelchairs. • Page 46 of the Preferred Options Draft states under preferred hierarchy that 'where two or more settlements are connected to safe, accessible walking routes 	<ul style="list-style-type: none"> • CBC have noted the comments objecting to the clustering of Drigg and Holmrook and have now de-coupled the villages, making the settlements two separate Sustainable Rural Villages.

included to show where points have been made frequently. In places, responses have been summarised to prevent duplication. Please note that CBC have taken time to read and consider every response, and that individual responses and how we have dealt with them can be viewed by request.

Please also note that a number of responses relating to Drigg and Holmrook spoke about the conclusions listed in the Sustainability appraisal. These have been expanded on further within the 'evidence base' section of this report

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>of less than a mile and/or frequent bus or train service, they have been grouped together as a cluster'. A safe walking route is described as 'one that has street lighting and a continuous pavement that is at least 2 metres wide'. Drigg and Holmrook do not meet this criteria.</p> <ul style="list-style-type: none"> • I expect that the authority is seeking to overcome the scoring shortfalls by pursuing a strategy to cluster, which I also wholly object to, because it falls outside the criteria, due to: <ul style="list-style-type: none"> ○ From Drigg to any of Holmrook's services is over a mile, this is over the proximity markers for walking and there is no public transport. ○ From Holmrook to get to 3 of Drigg's services is over a mile, namely the train/public house/craft shop café. This is over the proximity markers for walking and there is no public transport. ○ The pavement that runs from Holmrook to Drigg is not continuous it finishes one side of the road at the pinch point at the Church. Just prior to this a pavement commences on the other side of the road. ○ Where it starts near the Church it does run continuously all the way down to Stubble Green but Stubble Green seems to have been missed off for unexplained reasons. ○ Little of this pavement is 2 meters wide, some parts not even 1 meter wide, not all in a good state of repair and not good for pushchairs or wheelchairs. ○ Drigg is within the 3 miles to a Local Service Center already – Seascale - officially recognised acceptable distance to access key facilities and many other services. ○ Holmrook is within 3 miles to a Local Service Center already – Gosforth - officially recognised acceptable distance to access key facilities and many other services. • I currently live in Drigg and view the two villages very much as separate communities each with its own identity. • Both villages should remain as they currently are rural sustainable villages open to some sympathetic and reasonable development in line with the current character of the village with input from residents after all we do live here and must live with whatever is implemented, unlike Copeland whom it would be only interested in hitting targets for housing in any way possible. 	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> Both villages should remain separate entities. 	
35, 64, 114, 118, 160, 165, 181, 203, 230, 234, 252		<p>Settlement scoring</p> <ul style="list-style-type: none"> LLWR is not a major employer for the residents of Drigg village and 3 points for walking distance is incorrect. This would indicate that most people at Drigg worked there and this is not the case. Scores for accessibility to services are over stated Non compliant footpaths and lighting, dangerous road junctions, especially at A595. Drigg and Holmrook each have a pub and a community centre. I believe the points are therefore less as a LSC than they would be if the villages were classified as individual SRVs. The correct figure would be 19 points not 23 points The combined Drigg & Holmrook settlement service score of 23 puts it second only to Seascale in terms of points but in terms of actual services the two are incomparable. Seascale has a school, doctor, pharmacy, library and gym (and much more choice in terms of convenience stores). By merely adding the settlement service scores together for Drigg and Holmrook there is a double count of public houses (2 points), community centres/village halls (2 points) and other stores (1 point). Additionally, Drigg gains a score of 3 points for having LLWR on the outskirts of the village but this Company only employs one or two people from Drigg or Holmrook, the majority of the workforce living elsewhere in Copeland and driving to work. Drigg on its own does not qualify as a Local Service Centre it has an over inflated mark of 12. <ul style="list-style-type: none"> LLWR has been marked as a major employer for the residents of Drigg village and within walking distance, this would be indicative that most of the Drigg residents work there, this is not the case and a very big assumption to make. There is 1 person who works there that lives in Drigg and it is not due to the lack of available housing it is due to the nature and history of employment there, not many vacancies, LLWR offices elsewhere. However, LLWR does contribute significantly to the carbon footprint of the village as the employees are not local and drive to work. 	<ul style="list-style-type: none"> The number of points assigned to employment uses has now changed – please see the Settlement Hierarchy and Development Strategy Update for further information. Comment regarding double counting has been noted – as the two settlements are no longer being taken forward as a cluster, the points assigned to each reflect the services within each respective village.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> ○ When looking at services, there is no grocery store/services within the Drigg village which is essential for normal day to day life, this would be the service most utilised in lists provided. ○ Other villages have more services than Drigg and these are not being elevated (namely Calderbridge, which has missing points for Mill Garage basic food stores etc, it also has allotments although they too have an over inflated score for LLWR being a major employer at Pelham House. Holmrook on its own does not qualify as a Local Service Centre as it scores 11 marks some of which are debatable dependant on where the boundary is drawn and by whom. 	
2, 118, 120, 156, 215, 218, 230, 234, 252		<p>Utilities/ Infrastructure</p> <ul style="list-style-type: none"> ● Building on greenfield site in Drigg where utilities are already at their max is a totally unacceptable plan on so many levels when will Copeland Council get it right ? ● Access issues and no mains sewerage. Stay head sewage system cannot accommodate any more, hence all would need septic tanks. And where would this grey water go. ● With this many houses how many children will there be in the village and by return will there be enough local education infrastructure to support that number of children in Seascale /Gosforth primary schools?? ● Lack of infrastructure: <ul style="list-style-type: none"> ○ Roads are narrow and have several pinch points ○ Land and sewerage drainage are lacking or non-existent plus, frequent excess surface water ○ No school ○ No shop ○ No doctors ○ No dentist ○ Drigg has at least 8 working farms with livestock and farm vehicles regularly using the B5344, ● OBJECTION Whilst I appreciate that there is a need for affordable housing in this area, and I have no problems with this being built on the sites outlined, as the owner of two properties within this area I am extremely concerned that there is a lack of waste water treatment facilities throughout the area. The existing homes cannot (by reason of geography alone) comply with the 	<ul style="list-style-type: none"> ● Discussions have been held with utilities providers surrounding capacity issues. Any problems have been identified within our Housing Allocation Profiles document to ensure they are dealt with at planning application stage.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		2020 regulations concerning septic tanks and their run-off, so without building a wastewater treatment plant I can't see how new builds could ever comply. This issue needs to be addressed before any plans for additional housing are considered.	
114		<p>Flood/ drainage concerns</p> <ul style="list-style-type: none"> Why the misleading title? A planning application was raised on this agricultural field in July 2019 so Copeland BC know that this location is linked to the Southerly planning application (4/19/2240/001 Outline application for residential development for up to 16 dwellings including approval of access. Land adjacent to Southerly, Drigg, Holmrook). <p>I am aware that Cumbria County Council have written to CBC to advise that they cannot support this protracted planning application due to the drainage and flooding issues and subsequently the applicant has withdrawn the application. A major development on this agricultural field would be contrary to Policy DS5PO: Development Principle, Mitigation of and adaption to climate change where one of the criteria is listed as 'a development must, where possible, be located on sites where there is no risk of flooding and where development does not increase the risk of flooding elsewhere'.</p>	<ul style="list-style-type: none"> Draft allocation has now been deleted.
114, 118		<p>Traffic/ access issues</p> <ul style="list-style-type: none"> traffic flow through the village which at certain times feels like a race track .If both plans go ahead 54 extra houses (approx. 2 cars per household =up to 100 cars)could be using the road . Any major development would require more car journeys through the village given the lack of services available within a reasonable walking distance. LLWR regularly send out letters regarding large /wide loads and ensuring cars are not blocking the roads – more letters & more chances of unfortunate blocks. 	<ul style="list-style-type: none"> Access issues have been considered through the SAA to identify deliverability of sites. The Copeland TIS outlines transport improvements that may be necessary to allow the allocations to come forward.
113		The Parish Council recognise that there is a need for some future residential building in the Parish and believe that there are some potentially suitable areas. For example, the area between Wray Head and the B5344 (opposite bus stop); roadside infill, for example, adjacent to Southerly in Drigg. Also, at Hill Farm, Holmrook, which would have the advantage of being a brownfield site development.	<ul style="list-style-type: none"> Many sites have been considered through the SHLAA process. The ones brought forward are considered to be the least constrained, with many other sites being considered to be undevelopable. The availability of

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		The Council consider that there are other brownfield sites not yet identified in Copeland's desktop exercise, which could preserve the use of valued agricultural land,	<p>brownfield land does not necessarily make it suitable for development.</p> <ul style="list-style-type: none"> Land at Hill farm has now been included as an allocation (HDH3), replacing the previous allocation HDH1
113		<p>The Parish Council are opposed to the building of estate type developments which could change the rural and agricultural character of the Parish. The Council consider that any development needs to be of an appropriate size and scale, such that the sustainability of the community is enhanced by providing access to sheltered accommodation and affordable homes, either for starter homes or to provide an opportunity for downsizing to create a 'flow' of accommodation in the community.</p> <p>This opinion is consistent with the Drigg and Carleton Community Led Action Plan, last published from the community questionnaire feedback in 2016, which since then, has been regularly reviewed and updated. The Parish Council have received 13 written responses to the Consultation all of which are also consistent with this response. Many of these responses will also have been sent directly to Copeland.</p>	<ul style="list-style-type: none"> All development must be in line with H7PU, housing density and mix, which outlines that development must be of an appropriate scale and density, and meet the housing need requirements as set out in the SHMA.
64, 114, 118, 165, 175	HDH1	<ul style="list-style-type: none"> HDH1 (DH004) referred to in Copelands documents as Meadowbrook is the same land as Planning application 4/19/2240/001 LAND ADJACENT TO "SOUTHERLY", DRIGG, application for up to 16 houses. There have been many local objections to this development which has been prevalent been active for approx. 16 months by many of the residents. The main objection is due to the current and well-known flooding issues in the area of the development. The last update was the Count Highways Department are not able to support the development due to local flooding issues and the applicant has now withdrawn the application. Why all of a sudden HDH1 which for the last 18 months has been changed by Copeland council from land adjacent to Southerly (plan for 16 houses)to land north of Meadowbrook (plan for 32 houses) to me this stinks of Copeland doing what it wants not what local people want . 	<ul style="list-style-type: none"> HDH1 has now been deleted.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
22, 229		Support inclusion of Drigg and Holmrook as a local service centre. Support allocation of site HDH1 North of Meadowbrook as a housing allocation. I am the owner of the land.	<ul style="list-style-type: none"> • Comment noted. • HDH1 has now been deleted however due to constraints and the villages no longer form a cluster.
35		I do not support the Copeland Local Plan for this area, if Holmrook and Drigg become Local Service Centres there does not appear to be any benefits for the villages or the residents unless they are landowners. It does seem however that we would lose the ability to provide feedback on any local development applications for sites within the boundary/adjacent land	<ul style="list-style-type: none"> • Drigg and Holmrook no longer form a Local Service Centre. • Any applications on allocated sites or windfall sites would still be subject to the full planning application process, during which any objections or feedback to the proposal would be received by the Council
64		Dh005 is identified as not developable or deliverable. It should therefore be outside the defined settlement boundary (DSB) of Drigg and not inside it as proposed. So too should be the woodland to the east of it.	<ul style="list-style-type: none"> • Comment noted. This site has now been removed from the settlement boundary.
64		As regards the DSB of Drigg, the proposed boundary does not reflect the reality on the ground as defined by the roadside signs at both ends of the village and the local understanding of what constitutes Drigg. To assist your understanding I have attached a map with a revised DSB proposal.	<ul style="list-style-type: none"> • Comments noted and the boundary has now been amended to partially reflect this. In terms of the sites Dh003 and Dh010 we are not proposing to bring these into the settlement boundary.
118,		<p>Drigg is the only village in the plan with housing allocation out of the 2 villages but we do need to remember that Holmrook has the extension to Smithy Banks with 16 dwellings already approved. Within the newly defined boundary for Drigg on the plan will be approx. only 100 houses - with both the Meadowbrook (Southerly) and Wray Head would be an additional 54 houses in total: -</p> <ul style="list-style-type: none"> • Increase of 54% growth in dwellings in a small agricultural village. If it is only Wray Head then it would 22% growth. • Total number of additional people in Drigg village will also grow exponentially, with very few services and facilities on offer. 	<ul style="list-style-type: none"> • Comment has been noted. HDH1 has now been deleted and replaced with HDH3 Land at Hill Farm, meaning there is now one allocation in both Drigg and Holmrook.
118		HDH2 has Natterjack toads, threatened by habitat loss and is strictly protected by British law	<ul style="list-style-type: none"> • The site has been subject to ecology assessment and the

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
			findings are included within the Housing Allocations Profiles document. Relevant surveys will be required at planning application stage.
164		It did not help our community's assessment of the openness, transparency and selflessness of this process that the Parish Council was privately briefed by a senior strategic planner. Reports from some of those who were fortunate enough to attend say that they were told, in answer to questions, that hierarchy status was not a matter of benefit or adverse impact but of the application of a rule based assessment using points for services.	<ul style="list-style-type: none"> • All Parish Councils were offered the opportunity to meet virtually with Copeland's Planners to give them a full view of the Local plan process and enable them to produce a well informed response. • Due to Covid- 19 restrictions at the time of consulting, we were unable to carry out public meetings. However, a full explanation of the consultation methods we used are available through our statement of community involvement. • The Hierarchy is based on a point based system, which enables a fair assessment of every settlement in the hierarchy.
164		<p>Because evidence is deemed to be crucial, we also created a simple website and organised a straightforward survey related to walking times and distances, the collated results of which are attached for reference. We intend that the group and the website will stay in place until the results of the final draft consultation are known and the Planning Inspector has validated the 2017-2035 Local Plan.</p> <p>With regard to our survey, we received 47 completed replies. A further 11 replies were not fully completed and the data has not been provided. Residents of Holmrook provided 20% of the responses. The rest were provided by residents of Drigg or the surrounding countryside. The distance between one end of Drigg and the other is 1.5 miles (30 mins walk) according to Google Maps. From one end of Drigg to the other end of Holmrook is 2</p>	<ul style="list-style-type: none"> • Drigg and Holmrook are no longer being taken forward as a cluster. One reason for this is due to the concerns that respondents had with walking safely between the two settlements. • The walking distance is based on whether services could be reached safely by walking, rather

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		<p>miles (40 mins walk) The survey therefore focussed on people's understanding of actual times and distances from their home to service locations, since these add to the evidence based justification for classifying a Cluster Local Service Centre. In our opinion the headlines from the survey are as follows:</p> <p>a. 85% of respondents rarely or never walk to the Filing Station and the co-located Convenience store but 80% sometimes or frequently drive there. Comment: This is probably because the primary function is the sale of vehicle fuel, compounded by the distance of the facility from Drigg. The store, which is located on the A595 outside the village and in the Lake District National Park, largely serves passing business traffic and tourism locations in Wasdale and Eskdale.</p> <p>b. Only two people frequently walk to the Railway Station, with its collocated craft/coffee shop and pub. Comment: This probably indicates that there is no one using Drigg and Holmrook's only public transport provision to commute daily to work.</p> <p>c. Comment: Few people say they walk to any service that is over half a mile from their home and some observe that the journey is almost always two way and therefore double the distance and time reported.</p> <p>d. Comment: The estimates of the time taken for individuals to walk from home to a service varies considerably, with some remarking on the significance of their age and health as a factor.</p> <p>The survey, while only informal, certainly does not contradict the view that the distances between people's home and services largely and sometimes significantly exceeds both the stated desirable and the maximum times and distances set in the Local Plan for determining a settlement's place in the expanded hierarchy that the Local Plan proposes. In fact, we believe it supports that view and we would be grateful for that to be taken into account in the final draft with the same consideration and flexibility that has been applied to Lamplugh, Parton and Lowca, noting that the quality and continuation of footpaths is a factor both there and here.</p>	<p>than whether residents of a settlement walk those routes.</p>
		<p>Drigg is an agricultural village with at least 6 working farms inside your proposed settlement boundary. I do not support the idea of defining the settlement boundary for Drigg, since it will make it harder to maintain the agricultural character of the village at a time when farming is under severe financial pressure. If the boundary of the village must be defined then it should be redrawn to include the whole (and no more) of the existing village but from the Red House at Stubble Green on the road to Seascale to Cloudbase on</p>	<ul style="list-style-type: none"> Settlement boundaries are drawn to prevent settlement sprawl and help direct development to the most sustainable locations. They do not impact on agricultural use.

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		the road to Holmrook. Fields with no prospect of development or delivery, such as that north and east of Meadowbrook, Drigg should be left as countryside.	<ul style="list-style-type: none"> Allocation HDH1 has now been deleted and the boundary has been redrawn.
165		<p>We have the iconic Church on the brow of the hill, 2 listed buildings (Drigg Hall & Rose Cottage) where incidentally the Meadowbrook (Southerly) development would sit between. As well as the Gables, The Meadows (Georgian property dating back to 1810). There are individual designed houses interspersed either side of the roadside with a pavement running down one side of the village. It is quiet, rural and if you read the 2016 Community Plan, that is why most current residents moved here.</p> <p>There is room for some sympathetic and small-scale development, for affordable housing and sheltered housing for the elderly, as per community plan, but this is too much, and the identity of the village will be totally lost amidst housing estates. It is noted that there are a couple of brownfield sites - one within Holmrook (Hill Farm) and one within Drigg (back of the Victoria Hotel) - both of which have either already been put forward or are going to be put forward for potential development. Both should be looked at favourably before building on any Greenfield sites.</p> <p>The wind turbines and allocation in the local area as some of the land has not been ruled out of being inappropriate for this use. Is there any further information available in regard to the plans for wind turbines in this area?</p> <p>Any further installations of wind turbine farms in the area would not be welcome by residents with no land to rent out, it would spoil the views of the fells – it would be like looking out to the Solway Firth.</p>	<ul style="list-style-type: none"> Heritage issues have been assessed by the CBC Conservation officer and details are included within the Housing Allocation Profiles and Heritage Impact Assessment documents. Hill farm has now been included as an allocation in the plan, and the land behind the Victoria Hotel is within the settlement boundary to allow for potential future windfall development The Wind Energy Technical Paper has been updated and sets out the methodology for identifying suitable land for wind energy developments. Any wind energy development would be subject to a planning application and residents would have the opportunity to give their views on the proposal.
175		I support development of land inside the settlement boundary, specifically the field behind the Victoria Hotel, HDH2 and the field to the north of HDH2, on the opposite side of the B5344, if the developments contained the appropriate housing stock the village requires;	<ul style="list-style-type: none"> Comment noted.
175, 176, 219		Affordable homes; To attract and retain young people/families, to help make the village a sustainable community; currently, the majority of young people in the village when leaving home, cannot afford to live here; all of my sons who have left home, have had to buy properties away from Drigg, as there were no affordable or appropriate housing stock available.	<ul style="list-style-type: none"> Policy H8PU requires all development of 10 dwellings or more to provide 10% of dwellings as affordable.

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		Specialist older person homes; There are a relatively high percentage of older people in the village, and through the Community Led Plan, there was strong indication they wanted to stay in the parish, but there wasn't appropriate housing stock to down-size to. This type of housing could free up the 3-4 bedroom family homes in the village being occupied by elderly persons.	<ul style="list-style-type: none"> Policy H12PU outlines support for development which provides specialist residential establishments e.g. for the elderly population
175		The landowners respectfully request that this parcel of land known as Town Green, remains, as it always has been, within the settlement boundary for any future consideration for planning and to be listed within the Strategic Housing Land Availability. Town Green is identified on the current Community Led Plan as a potential area for development. The Community Led Plan, which every parishioner had the opportunity to respond to, drew no negative remarks regarding potential development on that site. Several responders actually identified the site as one which was acceptable and they would support for development. Planning consultations over the years have continued to assess this land as a site that would/could be developed and I see no reason why this should change at this time.	<ul style="list-style-type: none"> Dh005 has been listed in the SHLAA as undevelopable due to its intrusion into the open countryside and lack of pedestrian links. Therefore it has been removed from the settlement boundary. More information can be found in the SHLAA.
181	HDH1	A public meeting was held in Drigg Parish Hall on 19 August 2019 to discuss the Southerly planning application which was attended by 33 members of the public, including the applicant (a record of names / addresses of attendees has been kept). This meeting resulted in a set of minutes and a spreadsheet review of the planning application when assessed against criteria listed in the national framework guidelines and Copeland BC's interim housing policy. The criteria were scored according to the following scale: -2 (strong disbenefits) -> 0 (neutral) -> 2 (strong benefits). A summary of the discussions of the criteria and their scores are given below. The record of comments against each criteria from the public meeting are provided in the attached file. A) SCALE: Scale is incompatible with the size of the village Score of minus 2 B) SERVICES AND FACILITIES: Most services are not within walking distance for average person and inaccessible without a car (no bus). Score of minus 2 C) HIGHWAYS AND TRANSPORT: B5344 is already at saturation point at key times of the day. Score of minus 1 D) INFRASTRUCTURE CAPACITY: Extra burden on school or social care / no suggestion there are any steps offered to mitigate. Current well documented flooding issues affecting B5344 and adjacent houses will be exacerbated by development. Score of minus 2 E) SAFE ACCESSIBLE ENVIRONMENT / GOOD ACCESS TO RANGE OF FACILITIES: Few services within walking distance, no pavements will result in car journeys. Score of minus 1 F) FLOOD RISK ZONE 3A/3B: Flooding in flood risk zone 3a/3b is	<ul style="list-style-type: none"> Comments noted. Allocation has now been removed from Local Plan.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>impacted by adverse impacts upstream of flood risk 3a/3b. Score of minus 1 G) LAKE DISTRICT NATIONAL PARK Not relevant / not scored H) AFFORDABLE HOUSING: None in outline application. Score of zero I) EXECUTIVE HOUSING: There are 7 executive style houses in the application. Need is not demonstrated due to the empty properties (in Drigg) and the time taken for houses to sell. Score of minus 1 J) DESIGN: Incongruous in context of Drigg's historic and agricultural buildings (in particular "The Gables" is adjacent). Score of minus 1 K) INTRUSION INTO OPEN COUNTRYSIDE: In this context it is a significant intrusion. Valuable agricultural land - in constant use. Score of minus 2 L) LANDSCAPE: Proposal incorrectly states there are no hedges on boundaries - stretches along road will be removed. Score of minus 1</p> <p>M) MASTER PLAN: A Master Plan has not been provided - guidance states Major Developments should be accompanied by a Master Plan (more than 10 houses = major development) - what houses would be provided in next 5 years. Score of zero other issues: RESIDENTIAL AMENITY: Any development should not make environment worse however this will severely impact neighbouring properties. Score of minus 2 ENVIRONMENT AND BIODIVERSITY: Field is rich in wildlife. Score of minus 2 this evidence was provided to both Drigg & Carlton Parish Council (Minutes of Drigg & Carlton Parish Council meeting of Tuesday 10 September 2019) and were emailed Copeland Planning Department in response to the application. Drigg and Carlton Parish Council also received 25 signed emails and letters and as many emails regarding the application, every one of the correspondence was in opposition to the application; there were none received in favour. (Minutes of Drigg & Carlton Parish Council meeting of Tuesday 10 September 2019. Drigg & Carlton Parish Council also expressed their objection on these grounds to Copeland BC. Despite having submitted this community led analysis of this application to CBC, the Planning Department have ignored local knowledge and views and this application was allowed to drag on for over 12 more months until the applicant (probably temporarily) withdrew his application. I would now like to add further points in the context of the site now being identified in the Local Plan (Developable site HDH1 /DH004) – proposal for 32 houses)</p>	
124		<p>Policy DS3PO - 'Settlement Boundaries' states that development within the boundaries will be supported and that 20% of the Council's proposed housing requirement will go to the Local Services Centres. With this in mind and having grown up in Holmrook and Drigg and seen the local landscape change with the loss of many local businesses and the closure of the local school, I whole heartedly support new developments of various housing types.</p>	<ul style="list-style-type: none"> Comments noted.

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		This would help keep pace with demand and support the existing businesses, especially hospitality and those that have suffered throughout the Coronavirus pandemic. The LLWR is also a significant influence on the local community providing much needed jobs and business, any new housing in Drigg in particular would be supported by myself. This could potentially cater for LLWR employees and ease the flow of week day traffic through the village of Holmrook from the A595. Attached is the preferred options draught appendices document for Drigg and Holmrook dated 08/09/2020	
Frizington and Rheda			
4		<p>Please explain the full reason why on the Frizington Local Plan it shows a draft area extending behind 56 to 80 Frizington Road, Frizington. CA26 3QU After interviewing local residents all of them think it a bad idea. This is a hunting ground for local Barn Owls. Bats fly along the fields marked for food and live locally in sheds and roost at 62 Frizington Rd and garden sites. The houses at the bottom of the hill along 56 to 80 Frizington Rd, would be subject to considerable run off effect.</p> <p>There is also a water course behind the gardens of the earmarked site. The fields are excellent for wildlife and a footpath runs across the site. Also the houses receive solar gain from the east which could be excluded by development. No one wants development on this land apart from the potential monetary gain of a vendor we imagine? Please advise who suggested this as a Draft local development area? Copeland Council Planning Dept., kindly advice who owns the earmarked Draft local plan land behind 56 to 80 Frizington Rd.</p>	<ul style="list-style-type: none"> The land mentioned here is undevelopable and is not proposed to be brought into the settlement boundary. More detail can be found in the SHLAA.
	Fr047	<p>The landowners would like to have this site as detailed on the attached plan included within the settlement boundary for St Bees and will look to sell the site to a developer if included.</p> <p>Access into the site would be from the existing point of access on to Yeathouse Road leading into Frizington.</p> <p>The site adjoins the previous Local Plan Frizington settlement boundary and also residential dwelling curtilage on both sides, and is well located in relation to the village centre. It is therefore considered a sustainable housing site for allocation. Frizington is a sustainable settlement, and is classified as a Local Service Centre in the Local Plan because of this. The inclusion of this within the settlement boundary could make a logical amendment as it would also then bring the cemetery into the village boundary.</p>	<ul style="list-style-type: none"> This site has been listed as undevelopable in the SHLAA due to landscape issues and encroachment into the countryside. Development in this area would be contrary to the SLCA and therefore is unsuitable for inclusion within the settlement boundary.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
137		<p>Below is the Summary & Conclusions from a 17 page Planning Statement Document submitted</p> <p>This Planning Statement has demonstrated that the land at South Park, Rheda is suitable and available for allocation in the forthcoming Copeland Local Plan 2017-2035. The proposed site directly adjoins the Preferred Options settlement boundary for Frizington and Rheda.</p> <p>The proposed development will extend the settlement to a logical boundary, continuing the pattern of development on the western side of the driveway that runs through Rheda Park. It will be sympathetically integrated into the local landscape and will not cause any harm to the rural character of Rheda and the surrounding area.</p> <p>The site is available for delivery immediately and more importantly is in a location that is commercially viable. This site will make an important contribution to the aspirations on the Copeland Local Plan. In conclusion the site is in a sustainable location and is therefore suitable to be taken forward as either a housing allocation in the Copeland Local Plan</p>	<ul style="list-style-type: none"> This site is undevelopable due to being heavily wooded and there are also access concerns. There are sufficient sites within this tier to meet identified needs.
Haverigg			
	Ha017	<p>Sport England are concerned that this site would bring houses into close proximity of a cricket pitch where there is risk of prejudicial impact of the new development on the cricket pitch, particularly with matters of access, parking and risk of ball strike. Paragraph 182 of the NPPF applies. There is recent case precedent in the case of ball strike risk and not considering this as part of a planning application determination process. Paragraph 182 of the NPPF applies</p>	<ul style="list-style-type: none"> Comment noted. This will be dealt with at planning application stage and proposals will need to accord with policy SC4PU.
Seascale			
126		<p>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 down-size but, there are very few 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 property's to allow people to down size is what is needed and would free up large properties for families.</p>	<ul style="list-style-type: none"> All proposals for residential development need to demonstrate how they are meeting local housing needs and aspirations as set out in the SHMA.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
126		<p>Proposed site HSE2 - Parish Council Strongly Object</p> <p>The Parish Council supported local residents in the objections when this was brought forward a number of years ago and only the phase one was developed. A flood alleviation scheme was to be explored to use attainment tanks upstream to reduce volume before arriving at the development, but this has not been progressed. There is a planned scheme to upgrade the piping in the culvert through the Fairways and enlarge the pipes that pass through the field behind the Health Centre. But this will still not alleviate the flooding problem. The site is also outside the village development boundary and the Parish would not want to see any further extension to the North. 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.</p>	<ul style="list-style-type: none"> The SFRA does not highlight any significant flood risk issues, but states that a site-specific flood risk assessment would be required prior to development.
126		<p>Seascale Parish Council would like to put forward the land behind Seascale Health Centre: Seascale Parish Council identified this site (coloured green on the attached map) several years ago as ideal for smaller/retirement type properties. It is situated right next to and within walking distance of most of our village amenities (Health Centre, Library, and shops). It also benefits from good access to the main Gosforth Road and the flood alleviation mentioned above would cover this site. The site is currently lying fallow and sits inside our development boundary. We have spoken to the landowner who is happy for this to be included and will confirm in writing.</p>	<ul style="list-style-type: none"> The Council has assessed and considered the piece of land submitted and it is now an allocated site (HSE3)
129		<p>Can I please request, as the land owner, that the land located at the rear of the Seascale Health Centre be included in the plans for Seascale Boundary.</p>	<ul style="list-style-type: none"> Comment noted
126		<p>HSE1: Parish Council support part development</p> <p>We believe that this site offers some opportunity for development, but as it sits outside the development boundary, we would not support the whole of the proposed site inclusion. Most of the southerly parts of the site that are adjacent to Whittriggs Beck are allowed to flood to protect the water treatment plant downstream. It does have benefit of good access via Gosforth Road and is reasonably close to the village amenities.</p>	<ul style="list-style-type: none"> Comment noted. HSE1 has been deleted from the allocation list due to the number of constraints.
	HSE1	<p>Development next to Wastewater Treatment Works (WwTW)</p> <p>Our review of the proposed allocations has revealed that proposed housing allocation HSE1, Land West of Santon Way, is immediately adjacent to Seascale Wastewater Treatment Works</p>	<ul style="list-style-type: none"> Comment noted. HSE1 has been deleted from the allocation list due to the number of constraints.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>(WwTW). It is important to explain that there should be two significant considerations for sites proposed next to a WwTW. These are:</p> <p>1. WwTW are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental requirements. Maintaining a buffer is therefore desirable to respond to any requirements. As a waste management facility, it is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. The wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site. The position of UU is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new housing sites that are not close to a wastewater treatment works. If you are assessing the suitability of sites within close proximity of an existing treatment works, we would like to engage with you at the earliest opportunity to discuss the sites in further detail to ensure development is planned in the most appropriate way and with the required impact assessments.</p> <p>This position is in line with the Agent of Change principle set out at paragraph 182 of the NPPF and paragraph 005 of The National Planning Practice Guidance: Water supply, wastewater and water quality.</p>	
	HSE1	<p>The site lies adjacent to a cricket pitch and the issue of prejudicial impact on the cricket pitch needs to be considered. The matter of ball strike risk needs to be considered as part of either the allocation process or the planning application. If the ball strike risk assessment report advises that mitigation needs to be put in place to protect the residential development from cricket balls then it should be secured as part of the planning application and constructed and maintained in perpetuity at the developers expense. Paragraph 182 of the NPPF applies</p>	<ul style="list-style-type: none"> • The site is no longer an allocation.
	HSE2	<p>The site lies adjacent to a playing field site and the issue of prejudicial impact on the playing field needs to be assessed and considered either as part of the allocation or planning application process. If mitigation is required, then it should be secured as part of the planning application and constructed and maintained in perpetuity at the developers' expense. Paragraph 182 of the NPPF applies.</p>	<ul style="list-style-type: none"> • The adjacent playing field is referred to in the Housing Allocations Profiles document and development must comply with Policy SC4PU. Sport England will be consulted if a planning application is submitted on this piece of land

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
90, 94, 200, 201		<p>1) given that Cumbria highways are opposed to any intensification of use of the lane accessing black how, the whole of black how including the small field between Santon way, the drive and the black how access lane should be removed from the development boundary.</p> <p>2) appendix a page 19 Seascale boundary any proposal by a developer to increase the boundary in the bailey ground, black how or fernstock hill areas should be refused. Developers have already tested these areas and plans have been refused based upon the effect on the local amenity.</p>	<ul style="list-style-type: none"> The Seascale settlement boundary is not being extended to include this site.
Thornhill			
	HTH1	In this instance the resulting development of this site would surround the playing field on all 4 sides by residential development. The site lies adjacent to a playing field site and the issue of prejudicial impact on the playing field needs to be assessed and considered either as part of the allocation or planning application process. If mitigation is required, then it should be secured as part of the planning application and constructed and maintained in perpetuity at the developers' expense. Paragraph 182 of the NPPF applies.	<ul style="list-style-type: none"> This has been highlighted in the Housing Allocation Profiles document and will be considered further at planning application stage. Proposals must comply with Policy SC4PU.

Sustainable rural villages

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
Beckermeth			
44	HBE1 HBE2	<p>Inappropriate extension of settlement boundary</p> <p>Inappropriate access. There are two access points one between two properties which has limited visibility in both directions. The second access has restricted visibility due to the railway embankment</p> <p>HBE1 - In relation to HBE1. My Mam and Auntie live on Sellafield road. Although the access to HBE1 directly off the road is a suitable access although visibility is restricted speed in that location is relatively low, the negative factor is that it is encouraging additional traffic on the Sellafield Road which has restricted visibility as indicated on the images below. Cars usually park along this road resulting in vehicles meeting in the</p>	<ul style="list-style-type: none"> Comments have been noted. Transport and access issues have been assessed through the TIS and SAA, which outline improvements that could be made to improve the deliverability of a site. Please refer to these for more details.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>middle of the road on the corner. Vehicles park on the road when using the Reading Rooms located around the corner. It is considered that the scale of the development on HBE1 if allowed should be reduced in scale to not encourage a large number of vehicle movements along Sellafield Road.</p> <p>HBE2-This is a good site that has good direct access onto the road and minimal residential impact</p>	
33	Be009 Be010	<p>Representations to Copeland Council 'Call for Sites' Exercise – Land at Mill Lane & East of Bankfold, Beckermat</p> <p>Adams Planning & Development Ltd are writing on behalf of our client in order to submit representations on two parcels of land identified as Be009 and Be010 on the Beckermat plan provided within the Interim SHLAA, November 2019 (see Appendix A). We have subsequently enclosed a Part 1 Call for Sites form with associated appendices which provide further clarity on the suitability of the landholdings for accommodating residential development. The form clarifies that there are no known technical constraints to delivering new housing on each parcel of land. We note that within the emerging Local Plan Beckermat is identified as a Sustainable Rural Village that can support a limited amount of growth to maintain the health of the community, and we believe these landholdings are particularly well-suited for accommodating family-sized residential accommodation due to the fact that our client's landholding (see Title Plan in Appendix C) is located directly opposite the Primary School and Nursery. Furthermore, we would note that should the Council feel that the Sustainable Rural Village is only sufficiently large to accommodate Be009 as a future housing allocation, it would be prudent to also include a small portion of the land within Be010 to enable access off Morass Road. We would welcome discussions with the planning policy team on the appropriate portion of land to include in due course.</p>	<ul style="list-style-type: none"> Both sites Be009 and Be010 have been assessed as undevelopable in the SHLAA as the majority of the site is located within flood zone 2. Therefore they are not suitable to be allocated for development.
72	Be020, Be020/a Be028	<p>The site Be020 has been identified by Copeland Borough Council as a potential development site; it can be confirmed that this is available for development. The site comprises of agricultural land and woodland.</p> <p>Due to the size of the proposed site the adjacent two fields (see attached plan) should be included in order to make this more viable. With regards to the woodland within Be020 please note the Owner would be prepared to incorporate the keeping of this woodland in</p>	<ul style="list-style-type: none"> Be020, be020/a and Be028 have all been assessed as undevelopable in the SHLAA. Development on these sites would present an unacceptable intrusion into the open

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>line with any development and could form some open amenity space. Please note that the name of Be020 would read more relevant as 'Land at Briar Cottage to the east of Nursery Road'.</p> <p>Please note that there is information about the above additional two fields and two further fields below under 'new sites'. We are happy to discuss all this form further, if required.</p> <p>The land as outlined on the attached plan provides an opportunity to have sustainable, strategic development within Beckermeth. Beckermeth would be a suitable location for a strategic development as it is close to the main employment areas in Copeland, and any new development would benefit from the services and public transport links provided by this local centre. The site offers the opportunity to make a logical extension at the eastern end of the settlement, similar to those that have already been made at the western end of the settlement. The suitability of the site is highlighted by part of the site being identified as a potential housing site. Allocating additional land surrounding the site Be020 would allow more economies of scale and ensure the site is deliverable.</p>	<p>countryside. Cumbria County Council have also objected to any development on this site due to access constraints, primarily the ability for the site to provide pedestrian access.</p>
Ennerdale Bridge			
167, 142		<p>I have been a resident of Ennerdale Bridge for 26 years. I am writing this response in a personal capacity; I am not an 'agent'!</p> <p>1. I find the Local Plan consultation response format quite hard to respond to – it uses language like 'agent' & 'sites' and makes you feel like this is for developers, and businesses not aimed to be as accessible to interested residents</p> <p>2. In respect of the Addendum report: Copeland Local Plan Preferred Options Draft Appendices Addendum Document Copeland Local Plan Preferred Options Addendum Document – October 2020 3 – Ennerdale Bridge</p> <p>a. I consider the settlement limits that are currently agreed for Ennerdale Bridge should be retained unaltered</p> <p>b. In respect of the proposed settlement limits for Ennerdale Bridge I object to the extension of the settlement limits as proposed for Vicarage Lane.</p>	<ul style="list-style-type: none"> • Comment 1 is noted. The 'agent' field is optional, and the 'sites' field is so that it is clear as to which specific site is being discussed. However, the format of the response form has been reviewed. • Comment relating to the settlement boundary at Ennerdale Bridge have been considered, and subsequently, site En001 has been removed from the boundary. • The settlement scoring for Ennerdale bridge has been reviewed through the updated

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>c. Development, especially north of the village settlement boundaries lies on rising ground in and therefore elevated and prominent. Any development upwards in these areas would be visually prominent and harmful to the settlement character and setting. A Planning Inspector has commented previously on the harms of development on these south facing slopes.</p> <p>d. The Copeland Settlement Landscape Character Assessment Part 2 – Landscape Character and Sensitivity Assessments identifies Ennerdale Bridge as 11a Upland fringe. "Protect village fringes from unsympathetic development". "Conserve the rural character of the existing small road network" "Dispersed, discreet settlement pattern sensitive to unsympathetic expansion and redevelopment"</p> <p>e. There are more sympathetic development options WITHIN the current settlement boundaries with some infilling along the roadside on road frontages which would be more in keeping with the settlement character. (Though this is not within the Planning Authority of the Copeland Borough Council)</p> <p>f. There is a derelict industrial greenhouse site within centre of village that would definitely be improved through development. It has lain there an eyesore for 25 years plus.</p> <p>g. Development within the current settlement for local needs would better meet the aspirations of local residents as expressed in the Community Led Plan [• The original questionnaire • The summary report • Spreadsheet analysis of household profiles • Spreadsheet analysis of questionnaire responses • Summary of written/expansive replies to the questionnaire I recommend reading the qualitative comments in response to Q5 to hear the residents voices]</p> <p>h. The settlement character would be harmed by inappropriate housing estate developments (there is one on Vicarage Lane already that is fortunately built in flat of valley and well concealed along river and mature trees from many views reducing significantly its negative impact) and you see little of it passing along Kirkland Road.</p> <p>i. Very small scale 2-3's would be more in keeping for local needs than. The village is a small and tranquil, it does not suit more suburban 'estates'.</p> <p>3. Living in a village where the LDNP boundary cuts through the village and only a small part is outside the LDNP I welcome the Duty to Co-operate referred to in paragraphs 4: 4.11 and 4.12, page 19</p>	<p>Settlement Hierarchy and Development Strategy Update, and the settlement is still considered as a sustainable rural village.</p> <ul style="list-style-type: none"> • Support for design policies welcomed.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>a. There should be a consistent approach to ensure the whole settlements development is consistent and in keeping with the whole character of the settlement being developed in sympathetic way.</p> <p>b. I particularly welcome hearing: “The Local Plan Publication Draft will be accompanied by Statements of Common ground which will demonstrate that there has been effective cooperation to suitably address cross boundary issues” and “We will continue to work with our colleagues in neighbouring districts to ensure that the proposals in our Local Plan avoid harm to, and where possible support, their objectives” – I think this is particularly important for Ennerdale Bridge if it is confirmed to be a tier 3 settlement largely within the boundary of the LDNP.</p> <p>c. As a village where the largest portion is within the National Park I would be in favour of the LDNP boundary shifting in order to have whole settlement considered by a single planning authority to remove possibility of cross border issues.</p> <p>d. I also feel that there are clearer protections for appropriately sympathetic development with the LDNP system. For example: LDNP Supplementary Planning Document on Landscape Character:</p> <p>i. “The type, design and scale of development, and the level of activity, should maintain and, where possible, enhance local distinctiveness, sense of place and tranquillity. In assessing development proposals, the highest level of protection will be</p> <p>4. Local Plan Preferred Options Draft -Settlement hierarchy Topic Paper</p> <p>a. The score sheet on here p33 for Ennerdale is inaccurate – the school is at capacity already. So should score 1. There has not been a bus service to Ennerdale Bridge village for few years so given that this was scored in 2019 someone made an error. That score should have been zero.</p> <p>b. Scored correctly at the time of the 2019 survey that would give the total score of 9 and have put it into the ‘Other Rural Villages’ category. This is my view is as to where it should fit in order to preserve the quiet tranquil settlement that it is at the mouth of the Wild Ennerdale Valley; otherwise there is risk that the settlement could be subject to inappropriate scale of development that would be harmful to its character and setting.</p> <p>c. I think the scoring for settlement hierarchy should take higher account of connectivity to larger centres in real time – could the transport available be feasibly used for work and secondary school and part time jobs, and easily for the doctors or hospital? Reducing car</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>reliance for regular trips and necessary trips would be welcome in terms of sustaining the environment.</p> <p>d. "The railway line through Copeland is an important link between settlements" – but the further west you are of that railway line the less relevant it is to residents – especially those who have no bus service, or very limited bus service and so much time required for connections. You need faster links to main connection points across Cumbria not just in the borough.</p> <p>e. Ennerdale Bridge is a car reliant community. Therefore, it is questionable to what degree it can become a Sustainable community environmentally. It has no mains sewage; no mains gas; the costs of living here are higher because it requires running a car and paying for petrol this therefore makes it a less suitable place for affordable housing.</p> <p>f. Having children here growing up they are disadvantaged by not having viable and affordable public transport options, i.e a bus route that connected them to part time jobs (cost of transport is also a barrier for 16 year olds and those in full time education that is not recognised in Cumbria), and as a student getting to train stations – practically for young person's going to interviews for college /university etc transport connections needed to be made with Penrith as such slow rail connections to Whitehaven bound trains from Carlisle adds unnecessary time to journeys and makes it near impossible to get there and back in a day, which is costly. But these comments likely not relevant to this consultation but are relevant to sustainability generally for families in rural areas.)</p> <p>g. Coaches cannot access Bowness Knott. The roads are difficult for safe cycling (and definitely difficult ones to encourage children to cycle on – the log lorries don't slow down for anyone!) and the roads are used for industrial, commuting and residential traffic</p> <p>5. Other Aspects in the Local Plan - It is welcome to see many aspects in the plan especially those that focus on the quality of design and importance of design in the health and well-being of residents. I also support measures to for carbon neutral development and environmentally friendly building. Plus being forward thinking and challenging in terms of building to mitigate impacts of climate change. Having SPD guidance to support policy clarity and implementation is a good idea. As is ensuring there is adequate enforcement of new standards.</p>	
167		Adding to the comments I submitted yesterday (if that is possible) on the emerging Copeland Local Plan:	<ul style="list-style-type: none"> Comments noted. The removal of the allocation in Ennerdale Bridge

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>I notice that there is a conflict in this Local Centre approach arising from the settlement of Ennerdale Bridge being largely within the Lake District National Park in respect of understanding of local need. Having clarity over the interpretation of this for a settlement unevenly split between the two planning authorities is important</p> <p>In the LDNP definition Ennerdale classed as a Rural Village- housing is for local need. The Local Centre Classification would mean that housing is to meet general and local needs. There needs to be a whole settlement plan approach</p> <p>Within the emerging local plan document there is reference to a Duty to cooperate (paragraphs 4: 4.11 and 4.12, page 19). There needs to be an approach to ensure the whole settlements development is consistent, and balanced and in keeping with the whole character of the settlement and setting.</p> <p>Identifying Ennerdale Bridge as a Local Centre and a place for a limited amount of development needs to consider that it is a small village by character, and that the development needs to take place balanced across the whole settlement area not be over focussed only on the area that is within the planning jurisdiction of Copeland Borough Council. As ultimately given the landscape this would result in upwards sprawl of the settlement on south facing fell fringe slopes which would have detrimental impact on the character and setting of Ennerdale Bridge - as identified by a prior Planning Inspectors Appeal decision.</p> <p>Development needs to be small in proportion to the actual amount of the settlement that is within CBC planning jurisdiction. And importantly it has to be land that in principal is well suited for building on without harming settlement or setting or relationship with World Heritage Site. Decisions need to be cognoscente of overall development within the settlement. It is not clear whether that is a factor taken account of?</p> <p>The literal village centre of Ennerdale lies within the LDNP boundaries as do all the services that the settlement has to offer so real consideration needs to be taken to avoid the land above the Croasdale Beck (CBC planning jurisdiction) of Ennerdale Bridge not becoming the rural sprawl area as this would be harmful and furthest from the centre of the village - the school being the natural centre. Ennerdale Bridge is by far the smallest in population terms listed as a Village Centre and I feel that there needs to be some recognition of a proportionate approach related to size and character of the settlement - and possibly a sub category created? Had the survey in relation to services recorded the school at capacity, and the fact that there hasn't been a bus service in the village for some years - then it would have been classed as another village. So it is marginal. If you</p>	<p>and subsequent reduction in the settlement boundary means that any development in the village would be small scale windfall development, which would be expected to align with the policies within the local Plan, including those that ensure high quality design.</p> <ul style="list-style-type: none"> • Ongoing duty to cooperate conversation will be held with the LDNPA.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		look at the list of other Village Centres many have services that have not been considered as part of the village survey - i.e. Mains gas, mains sewage; fast broadband connections What's more people like it being a small village and tranquil - preserving that important. The better opportunities for development in this settlement lie within the existing settlement boundaries but and mostly within the LDNP boundaries Moves for the whole settlement to be within the LDNP boundaries would make sense	
		The inclusion of Ennerdale Bridge as a sustainable rural village is supported, as it is a suitable village for growth of appropriate scale in terms of residential development, in order to support the existing services and maintain the community.	<ul style="list-style-type: none"> Support welcomes.
103		Regarding the settlement boundaries, it may be most appropriate to consider Ennerdale Bridge's settlement boundary as a strategic cross boundary issue through our Duty to Cooperate discussions. The area of Ennerdale Bridge in the Park does not have a settlement boundary so discussions regarding the most appropriate solution would be helpful in order to protect the setting of the National Park and also for community understanding of the planning framework.	<ul style="list-style-type: none"> Comment noted. Duty to Cooperate meetings will continue to be held with the LDNPA to ensure that cross boundary issues are resolved.
10, 130, 131, 132, 133, 185, 198,		Object to Settlement boundary being extended in Ennerdale. Page 3 of local plan appendices addendum document dated October 2020 shows map with "Draft Settlement Boundary added". I object to this and any other suggestions of extending the Boundary. Ennerdale is mostly in the LDNP so any area outside it comes under pressure for extending the Settlement Boundary. The SHLAA Sept 2020 document page 117 states a yield of 29 on this vicarage lane site -deliverable 1-5 years. This is unacceptable . Any development should be very small scale one or two houses that will blend in and entirely sited within the existing Settlement Boundary.	<ul style="list-style-type: none"> Comment noted- settlement boundary extension removed following the deletion of the allocated site.
192		I have noted that the CBC Settlement Hierarchy and Development Strategy paper dated September 2020 appears to contain errors within the scoring matrix that has been used to rank the settlements within the Borough. Page 27 of this paper shows a Settlement Hierarchy Table 10 and notes that Ennerdale Bridge scores 12 points. However the Settlement Hierarchy points grid on Page 33 shows a score of 11 not 12 for Ennerdale Bridge. In addition the Settlement Hierararchy Grid shows that Ennerdale Bridge scores 3 points for a School with capacity and scores 1 point for a frequent bus service. It is my	<ul style="list-style-type: none"> Errors have been noted and the revised Settlement Hierarchy and Development Strategy Paper has been updated accordingly.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		understanding that the School is currently at or close to capacity, which should have resulted in a score of 2 . In addition the number 217 Cockermouth to Frizington bus operated by J B Pickthall, that use to call at Ennerdale Bridge on Wednesdays only, ceased to run prior to November 2019 after a local Parish Council consultation on usage. As such, whilst Ennerdale did have a very infrequent bus service this has not been the case for at least 12 months and so this one point score should also be deducted. That would leave a correct score of 9 for Ennerdale Bridge making it an "Other Rural Village" and not a Sustainable Village in the Settlement Hierarchy Grid.	
153		The Preferred options document includes para 12.3.4 The preferred Settlement Boundaries are identified in Appendix A and on the Proposals Map. Boundaries are based on clearly delineated curtilage edges or landscape features (both natural and unnatural) such as hedgerows or roads. The proposed extension is not based on clearly delineated curtilage edges or landscape features. The existing settlement boundary is based on clearly delineated curtilage edges i.e. the rear boundaries of properties that front onto Vicarage Lane. We object to the proposed extension to the settlement boundary and require that the existing settlement boundary be retained.	<ul style="list-style-type: none"> • Comment noted- settlement boundary extension removed
		<p>Sustainable Rural Villages</p> <p>As discussed at paragraphs 2.11 – 2.13, We are generally supportive of the introduction of ‘Sustainable Rural Villages’ to the settlement hierarchy. However, as per paragraphs 2.8 to 2.10 above, they do not agree with the identification of Ennerdale Bridge within this tier. It is considered that the other settlements identified are well-connected in terms of proximity to Whitehaven and the key employment areas and therefore are able to accommodate a level of growth proportionate to their location and services and facilities they provide. Such villages can play an important role in the life of the Borough, providing day-to-day services and facilities which can be accessed by people particularly in rural areas. Explicitly identifying them within the hierarchy provides clarity about the nature of their role and function. In line with paragraphs 77 and 78 of the NPPF, the provision of development within these areas will support the continued vitality and viability of rural communities and assist in meeting the specific needs of these settlements.</p> <p>We however, do not agree with the policy wording which states the amount of housing to be delivered in ‘Sustainable Rural Villages’ and also ‘Other Rural Villages’ will be “limited” to the amount outlined in the accompanying table which sets a “maximum”</p>	<ul style="list-style-type: none"> • Comment noted- settlement boundary extension removed • The cap on housing has now been removed to allow for flexibility and to ensure conformity with national planning policy. Other Local Plan policies will prevent sprawl into the open countryside and village cramming.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		amount of housing development that can be delivered in these areas. Providing such limitations to the amount of growth that can be delivered in these areas fundamentally does not accord with paragraph 59 of the NPPF and the Government's objective to significantly boost the supply of homes. As such, we request the policy wording and accompanying table is amended to remove these restrictions and to instead refer to minimum dwelling numbers within these settlements.	
Moresby Parks			
44	Mp010	<p>The following points are brought forward to summarise the key highlights identified within the document.</p> <ul style="list-style-type: none"> • Site Mp010 (Round Close Farm) classed as Developable in SHLAA 2020 and developable in the 6 to 10-year category. • 12ha Employment site within Moresby • Mp010 site is within walking distance of the employment site and thus sustainable. No need for car or bus to access employment site from Mp010. • Moresby Parks forms part of Whitehaven Rural sub area, allowing housing in Moresby Parks reduces pressures on Whitehaven infrastructure. • The Copeland Local Plan 2013-2028 Site Allocations and Policies Plan – Land for development preferred options January 2015 identified small to medium sites in Moresby Parks would be supported. The development of upper site would be a small site and lower site a medium site. • Principle of Highways acceptable and confirmed by Highways Authority (response in Appendix 1). Three possible access points from, Red Lonning, Round Close Park and Moresby Parks Road. • Drainage Strategy, Flood Risk Assessment, Coal Risk Assessment, Phase 1 Desk Study and Speed Surveys already carried out on lower site showing commitment to the site and that the site can be developed. • Moresby Parks is underserved in relation to Open Space provision, the undevelopable portion of the lower site could provide this natural greenspace Open Space provision. 	<ul style="list-style-type: none"> • Comment noted. However, CBC have decided not to allocate Mp010 for residential development. Reasons for this decision can be viewed in the Discounted Site Profile document.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<ul style="list-style-type: none"> • Landscaping to enhance the entrance to the village to provide a wider benefit • Option of upper or lower site or a combination • Housing need in Moresby Parks is for semi-detached and detached dwellings with 3 bedrooms. • Site is available and the landowners have confirmed availability and deliverability. • Local Builder and National Builder interest has been expressed on the site. <p>(This exec summary is part of a larger 11 page document submitted)</p>	
Moor Row			
140	Mo026	<p>I object to the inclusion of this field, used for agriculture, being included within the settlement boundary. It was included some years ago and taken out due to better sites within the village being available and it being difficult to develop out. This field is enclosed by allotment gardens on John Street; private roads/track leading to Blair Howe; and the Moor Row to Woodend road. Due to private ownership the only access is from the Moor Row to Woodend road. As we know this road is narrow, heavily used in normal traffic conditions by Sellafeld traffic travelling from Hensingham to Sellafeld, and is not of an acceptable standard in terms of visibility, capacity and volume of traffic to cope with new developments accessing onto it. As the highway authority will verify the level of traffic travelling through the village and its lack of capacity to deal with such is a major concern with the highway authority continuing exploring different methods to deal with pedestrian safety, traffic speed and capacity. Basically any development should be on the outskirts of the village along Scalegill Road (as is proposed) and kept within that area. The rest of the village should not be opened up to the risk of further development.</p> <p>The field is used for arable farming and this should not be lost. The field is part of the countryside and should not be put at risk of encroachment,</p>	<ul style="list-style-type: none"> • Comment noted. Mo026 has now been removed from the settlement boundary at Moor Row.

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>The field allows opens views to a significant number of houses onto the western Lake District, now a World Heritage Site. Whilst I appreciate the destruction of long established views over spectacular scenery is not a material planning consideration it is, in my opinion, something which should be taken into account when considering the number of housing allocations needed and whether other sites, not interfering with established views over a World Heritage Site, can be used. The view is magnificent and unless the site is absolutely required, with no other alternatives existing, then it should not be put at risk of development. The Wath Brow application was an example of how planning can go wrong. There, a developer comes along, to develop a relatively few number of houses, but destroys the views, again of the World Heritage Site, to a large number of residents. It is not acceptable and proposals of this nature should not, in law, be permitted. Perhaps it is time for a petition on the Government web site asking for a law which does allows established views, by a significant number of houses of a World Heritage Site, AONB, or other significant view to be a material planning consideration. Looking at other parts of the village there are by far more suitable sites within the village, along Scalegill Road, which could be used. The proposed allocations along that road which make sense in terms of highway safety, access, close to other new developments and available infrastructure. I would suggest that all new possible development is located along that road. The shape of a village is not relevant. It may be the case that you have included the field to give the village some circular shape. There are plenty of villages, perhaps most, which are not circular. The shape of a village should not be a material factor in including the field. Given its access difficulties and risk of water runoff I am curious, other than making the village look more circular, why the field has been included within the settlement boundary. If it is simply to make the village look more circular or just a convenient infill site then this would be seriously disappointingly, if not challengeable in law, and morally untenable given the destruction of views which potentially might come about. In allocating land in the village please also note the lack of amenities – now no bus service in/out of the village, one bakery, one beauty shop, two garages, one school, one</p>	

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>church and one working men's club. The bakery only offers a very limited choice of non-bakery items. Effectively there is no shop in the village nor any bus service in/out to get to shops. Apart from the highway issue and the otherwise general unsuitability of this agricultural field all I can do is plead for some mercy and sympathy that the views we enjoy of a World Heritage Site are not put at risk and are protected. I would ask that the village settlement boundary is left as it is running along the rear of the gardens along John Street and excluding the field. I would also ask that the gardens opposite 39 to 59 John Street are designated as allotment/garden land in the same manner as those at the rear of 1 to 11 John Street are and afforded additional protection from development. Finally I support the allocation of the housing sites along Scalegill Road – HMR1 and HMR2. Those proposals are logical, off a main road which can take increased traffic capacity and which is safe, nearer service media, nearer the main bus route and will not result in loss of significant views across a world heritage site. I would suggest that the proposed settlement boundaries, excluding the field opposite John Street, are enough to facilitate an appropriate level of proportional growth within the plan period. I thank you for not designating the field opposite John Street for housing. This shows common sense. I would ask you to go one step further and keep it out of the settlement boundary for highway, drainage and agricultural reasons. If that fails please exclude it for moral reasons of not destroying World Heritage Site views enjoyed by a large number of Copeland residents, a view we should all be proud of.</p>	
	HMR1	<p>The site lies adjacent to a playing field site. Sport England are concerned about bringing this site forward without an assessment of the likelihood of any prejudicial impact on the playing field as a result of developing the site for housing.</p>	<ul style="list-style-type: none"> • Comment noted. Reference to the playing field has been included in the Housing Allocation Profile document and will be considered further at planning application stage. Proposals must accord with Policy SC4PU.

Other rural villages

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
Kirksanton			
150		Kirksanton has been assessed and identified within the new tier of “Other Rural Settlement”. Referring to CBC Scoring System [Settlement Hierarchy Topic Paper page 34, 2019], Kirksanton’s total score is 6 , based on Village Hall 2 points; Public House 2 points; Employment[Individual] 1 point; Public Transport Bus Route Infrequent 1 point. This is inaccurate. There is and has been for over two decades NO bus service through or to the village. The bus shelter is used for the benefit of local children using the school bus service. The pub The King William 1V ceased to be a pub a few years ago and had been functioning as a Steak Grill House for limited hours. It has had two fires in the last 12 months and currently remains closed. Kirksanton’s Settlement Score should be potentially 3 or 4 at the most if the King Billy Grill reopens in the future. Under this revised scoring Kirksanton should be outside the Other Rural Villages Tier in Open Countryside Tier as a smaller settlement. Additionally the population given of 134 must include residents within the care home as a quick headcount of the locals is no more than 95	<ul style="list-style-type: none"> Settlement scoring has been reviewed and altered, and Kirksanton remains as a sustainable rural village. The reasoning behind this can be seen in the Development Strategy and Hierarchy paper.
Summergrove			
30, 34, 50, 5377, 88, 94, 98, 115, 231	HSU1	I write with reference to Copeland local plan 2017 to 2035 preferred options consultation. I strongly object specifically to the inclusion of land to the south west of Summergrove HSU 1 with indicative yield of 80 dwellings and the change of the use of the site from employment land to housing land. The land has been earmarked for employment land, specifically for Westlakes Science and Technology Park, by Copeland Borough Council for a number of years. In fact it is the only remaining land into which Westlakes Science and Technology Park could expand, to create more opportunities for local employment on the internationally recognised site. I am very confident that the UK government are committed to nuclear power and they will shortly confirm the building of a new nuclear plant on the Moorside site. This will definitely require more office and employment space which would be ideally sited on the land which your plan intends to give up to residential housing. The site has previously been the focus of a residential housing application 4/19/2126/OF1 and I refer you to specific objections to that proposal from Dominic Waugh MRTPI, technical director planning and development from Fairhurst Engineering Consultants and from Adam Smith director Vectos (North) Ltd. both of which	<ul style="list-style-type: none"> Comments noted. The application mentioned here was assessed against the adopted Core Strategy, which listed Summergrove as open countryside. Under the new hierarchy and strategy Summergrove is now considered as a ‘Rural village’, meaning that a small amount of development would be permitted there. The previous application on the site was for 200 dwellings, which is considered to be too large for a settlement of this size. The

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>you will have on file. Also, which you will have on file, is a report on 7/5/19 from Karen Adams, Copeland Borough Council strategic planner, to Chris Harrison highlighting the reasons why a residential housing development should not be approved on the said site. Particularly being an unsustainable development and not complying with the National Planning Policy Framework, hence could not be supported by the Strategic Planning team of Copeland Borough Council. This land should continue to be allocated for employment use for Westlakes Science and Technology Park expansion and not given up to residential building land, of which there is an abundance in other more suitable areas from your preferred options list, considering the current local plan requirement of 277 and the proposed new standard method of 154 dwellings for Copeland.</p>	<p>indicative yield has now been reduced to 80 dwellings, which would provide a lower density to match the existing rural feel of Summergrove.</p> <ul style="list-style-type: none"> Any development on this site would be expected to be of high quality design, and take into account the factors listed within the Housing Allocations Profiles Document to ensure that development is as sustainable as possible. In addition to this, the site is directly connected to Westlakes, one of Copeland's main employers, which contributes towards the sustainability of the site.
70	HSU1	<p>Instructed by the owners of Land at Summergrove HSU1.</p> <p>I note that the site is to be included as a proposed draft housing allocation. The site is considered to be a sustainable option for new housing development which will deliver a range of high quality family type housing which will meet identified local housing needs and address the imbalance in the local housing market. The site is in a desirable location adjacent to existing housing development at Summergrove but located within close proximity to the principle settlement of Whitehaven and key service centre of Cleator Moor.</p> <p>The site is considered to be highly deliverable with significant developer interest. As you will be aware there is a current pending application for 196 houses submitted by Storey Homes. This application remains pending. It is the landowners understanding that the principle of development on the site is accepted but concerns exist regarding the scale of the development proposed. The landowner favours an alternative scheme which would significantly reduce the scale of development. A development on this scale of approximately half the proposed density is likely to be acceptable and easily</p>	<ul style="list-style-type: none"> Comment noted

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		accommodated within local infrastructure. A phased approach is also preferred. This would involve the initial phase of development commencing adjacent to Summergrove Park, Pools Close and extending south. This would allow early delivery of housing but with the ability to deliver a steady supply of high quality family housing throughout the planned period. Opportunities exist on site for considerable enhancements to create a high quality living environment.	
36, 87	HSU1	<p>The land in question is currently Greenfield Land with regular agricultural use. This land has a diverse amount of Wildlife, Fauna and Recreational use. Over the 28 years we have lived on Summergrove Park we have seen and enjoyed a full range of Wild Life. Wild birds including Curlew, Owls, Falcons. Wild Life including Red Squirrels. Deer, Rabbits, Hedgehogs, Frogs, Newts, Field mice, and Voles. We were happy with the Science Park development for its Environmental design which would then accommodate the existing wildlife. Surely we should treasure and maintain the Science Park development, which would have the potential to provide employment for future generations.</p> <p>This proposed out of town development on this greenfield site is totally contrary to the advice of good Local Government guide lines as it does not link to Whitehaven in anyway. There is no public transport - Bus Service</p> <p>There are no easy or safe pathways for walking or cycling to town, No local shops, and very poor link roads. At the present time there is very heavy usage on this very narrow road between Keekle and Moor Row of cars, vans, and lorries. This Development would cause even more pollution as there would be even more traffic on a road which is very narrow especially at the proposed access to this development and does not meet current modern development standards.</p> <p>We ask that you do not include this Development at Summergrove and leave it as it was in the previous Local Plan as a further Science Park development for future job opportunities.</p>	<ul style="list-style-type: none"> • The site has been considered through the Habitats Regulations Assessment and ecological surveys are likely to be required at planning application stage. • Pedestrian links would be improved as part of any future development. • Opportunities to expand the Westlakes Science Park are identified in the economy section.
36, 189	HSU1	I object to the proposed 80 dwelling allocation to summergrove ref HSU1 (MO028). The land has insufficient highway infrastructure and will significantly increase the highway hazard on Dalzell Street. The land is adjacent to westlakes science park and should be retained as current employment/industrial use with access from westlakes not adding to Dalzell Street hazard	<ul style="list-style-type: none"> • The area around Westlakes has been assessed through the Transport Improvement Study, and recommendations will be made through that to improve the

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
			road infrastructure and decrease capacity issues
The Hill			
222	Th001	This site is ideal for development, it is a brown field site in the center of the village. Easy road access to the A5093, approx. 1 mile to railway station.i Could fulfill a need for local housing , no risk of flooding.	<ul style="list-style-type: none"> The site has been assessed as part developable through the SHLAA due to access issues. It may be suitable for a small level of well-designed windfall development, but is not considered suitable as an allocation and preferable sites within this tier of the hierarchy are available.

Other site related comments

Respondent reference(s)	Site/policy ref	Comment	How this will be addressed
		<p>In the light of the covid-19 lockdowns and resulting job losses, it would appear there should be a greater drive sustained job creation, rather than housing developments. The plan proposes substantial housing developments along the A5086 corridor, at Arlecdon, Frizington, Cleator Moor and Cleator, but little in the way of substantial job creation opportunities. There are numerous other shortfalls to this proposal.</p> <p>Sustainable transport consists of a reasonable bus service. Your local plan lists 'local service centres' as being no more than a mile away from of a bus service. For some Cleator residents it is well over a mile. Google maps evidence the distance as 1.4 miles and with a weekly food shop this cannot be considered a viable transport option. There is no rail connection.</p> <p>Your plan lists also lists Cleator as a 'local services centre' because it has a shop. It has a village store and as excellent as this little store is, it cannot provide all your household needs. Apart from a Church and some playing fields the village has no other services, such as a primary school, a GP surgery, Post Office etc. Therefore, all the residents must</p>	<ul style="list-style-type: none"> Cleator has been categorised as a cluster with Cleator Moor due to the connections between the two settlements. It is considered that the two are of suitable walking distance. Scoring criteria has been listed through the Development Strategy and Settlement Hierarchy paper, which explains the scoring for Cleator. This has been updated following the Preferred options consultation. Transport issues relating to sites have been considered through the

		<p>use transport for these, to travel to work and if they require more than what the village store can sell. Your housing development plan will not only exacerbate the traffic problem, but also serious shortages in other vital services. Additional housing developments should also have adequate secondary schools within a reasonable distance catered for. At present, there are schools which are already oversubscribed, and children are having to travel ever further away for their education. Seascale is but one village which experiences this problem.</p> <p>Although the road was upgraded to an 'A' it does not meet this standard through parts of Copeland. Three villages (Cleator, Frizington and Rowrah) have residential properties which lie along this stretch of this road that are not only without designated laybys, alternative parking or driveways but are also without front gardens. These residents have no other alternative but to park their vehicles on the road. Subsequently, it cannot seriously be classed as an A road, when for significant stretches, it can only be a single lane. This "traffic calming measure" adds to driver frustration and cars legally parked there are being damaged by vehicles coming from each direction and not giving way. My neighbour has had three cars written off, damage possibly caused by A bars/bullbars or HGV's. My car has had its front offside wing dented on two occasions. I strongly suspect we are not the only ones who have had their vehicle damaged. The guilty party invariably does not stop to leave details. Indeed how can they when there is nowhere to park except of a double yellow line further up the road?</p> <p>At present, there are bottlenecks and gridlock at rush hour. It is understood the Kangol site is to become a 600-space car park for Sellafield employees. Whilst this is useful to meet</p> <p>Sellafield's wishes to reduce its onsite parking and will also reducing the traffic along the A595, it will however, exacerbate the traffic congestion, as drivers will be diverting from a main trunk road onto minor/residential roads to access this car park located on a substandard A road. For example Wath Brow Corner, will have additional traffic coming from the Whitehaven area and from Ennerdale (instead of using the Fell Road). Cleator Gate and</p> <p>Cleator are also likely to have additional traffic congestion, as you propose to develop the Jack Trees end of this road. Whilst it is acknowledged there is substantial traffic use on the A595, much of this is due to Sellafield, and in the scheme of things, temporary, and not a viable justification to shift traffic off a trunk road onto minor roads. The quality of life is diminished by the constant traffic running less than 5' away from the windows of people's homes. Your proposals to add developments along this route will only add to the traffic levels and further diminish the quality of life for those living there. It is worth</p>	<p>TIS, ad will be dealt with and mitigated at Planning application stage</p> <ul style="list-style-type: none"> • The option of recommending all new housing development is near to two transport links is not feasible nor sustainable. This would direct all new development to a select few settlements in the borough, resulting in economic decline in those areas not benefitting from development. It is recognised that there are issues with public transport in the borough, which have been covered in the Local Plan connectivity chapter as well as the TIS. • The brownfield sites in Whitehaven that have been mentioned here have mostly been listed as opportunity sites in the Local Plan. This provides the flexibility for them to be used for a range of uses. Many of these sites are constrained by flood risk issues. However, if a developer were to overcome these issues, we would welcome future development.
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		<p>noting the A595 through Copeland but has only a handful of residential properties with only a footpath separating them from the traffic.</p> <p>Will there be enough school and GP places for all the additional residents? Your local plan acknowledges the need for these, but your maps showing where you are looking to develop (with the exception of Frizington) only refers to housing developments.</p> <p>Alternate Proposal</p> <p>I would recommend all proposed housing developments are located near more than one public transport link. Whitehaven has 2 rail stations, there are multiple bus routes that go north, south or east. There are numerous supermarkets and having families in easy walking distance of shops could help regenerate the shopping centre. Also an amendment to your development incorporates the equivalent infrastructure to support this. There are brown field sites in Whitehaven, particularly near the harbour, however I note these are not being considered. These sites could be used for housing developments, or are these brown field sites being held in obedience for when the UK takes back control of its fishing industry and larger facilities are required? This would be sustainable job creation and commendable. And if this is being considered, why is it not in your local plan? If it is not being considered, why is it not being considered?</p>	
177		<p>Please refer to 1920-005A Options Appraisal.</p> <p>Please refer to drawing 1920-005-SK01 P2 Proposed Site Plan.</p> <p>The documents above outline the appraisal of the decision to propose development within the village and illustrate the scale of development which is appropriate for the village.</p> <p>Broadly, the applicants are long standing residents of Couderton and currently reside on one of several farms within the village. The farm is underutilised economically as the applicants are of retirement age. The options analysis explains the decision process which is guided by the primary wish to remain within the village. Development of the proposed site allows the applicants to vacate the farm to allow this to be operated on a commercial basis via sale or lease. There is a lack of supply of market housing within the village. The proposed site plan demonstrates a single house can maintain the grain of the village. The large plot provides a natural stop to the village which is bounded on 3 sides by</p>	<ul style="list-style-type: none"> These comments have been noted, and the sites at Couderton have been included and assessed within the SHLAA. However, the village does not have enough service provision to be considered within the settlement hierarchy, and therefore is within the open countryside. Allowing development of this scale in Couderton would be contrary to the development strategy and previous appeal decisions elsewhere in the borough.

		<p>existing residential properties to the south & West. The development would improve access and visibility to/ and from the village with the provision of new passing place on the highway.</p> <p>The positioning of the building with a large plot does not detract from the openness of the countryside. The proposed development will incorporate modern design and technology to provide an environmentally neutral dwelling to Passive Haus standards. Despite being registered for the Local Authority Self Build scheme for 6 months, no sites have been suggested. This site is within the applicant's ownership, this is available for development immediately.</p> <p>In the short term, this will help the council fulfil its objectives to close its shortfall of executive homes in the borough. Although outside the development boundaries identified by the Local Plan, the scale of development is appropriate and enhanced by the economic benefits to the rural economy by bringing the existing farm into full commercial use. We urge the SHLAA committee to look favourably upon the proposed site and include this within the next local plan housing allocation sites.</p>	
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Appendices

Appendix 1: Preferred Options Consultation Poster



The poster is set against a green background. At the top left is the Copeland Borough Council logo with the tagline 'Proud of our past. Energised for our future.' Below this, the main heading reads 'What will Copeland look like in 15 years time? See what we think and share your views!'. The text continues: 'Copeland Borough Council is in the process of developing a new Local Plan. In 2019 we consulted on the Issues and Options Draft of the Local Plan which set out what we thought were the main issues facing the Borough and identified a number of alternative options for addressing these issues. We have taken your feedback on this document into account and this has helped inform the Preferred Options Draft of the Local Plan. The Preferred Options Draft sets out:' followed by a bulleted list: '• Which areas should be protected from development', '• Where development should go,', '• How much development there should be and', '• What type of development it should be'. To the right of the list are two illustrations: 'GET INVOLVED' with five raised hands in various colors, and a row of five colorful houses. Below these is a thumbnail image of the 'Copeland Local Plan 2017-2035' document. At the bottom, it states 'The consultation runs from 21st September to 15th November 2020'. A section titled 'For further information please' provides contact details: 'Visit: www.copeland.gov.uk;', 'Market Hall, Whitehaven and Copeland Offices, Millom (On an appointment basis subject to opening hours and covid19 restrictions)', 'Email: localplanconsultation@copeland.gov.uk', and 'Call: 01946 598300'.

Copeland
borough council
Proud of our past. Energised for our future.

What will Copeland look like in 15 years time? See what we think and share your views!

Copeland Borough Council is in the process of developing a new Local Plan

In 2019 we consulted on the Issues and Options Draft of the Local Plan which set out what we thought were the main issues facing the Borough and identified a number of alternative options for addressing these issues.

We have taken your feedback on this document into account and this has helped inform the Preferred Options Draft of the Local Plan. The Preferred Options Draft sets out:

- Which areas should be protected from development
- Where development should go,
- How much development there should be and
- What type of development it should be

GET INVOLVED

Copeland Local Plan 2017-2035
A Vision for the Future

The consultation runs from 21st September to 15th November 2020

For further information please

Visit: www.copeland.gov.uk;

Market Hall, Whitehaven and Copeland Offices, Millom (On an appointment basis subject to opening hours and covid19 restrictions)

Email: localplanconsultation@copeland.gov.uk

Call: 01946 598300

Appendix 2: News Coverage of Preferred Options Draft



News

Views are sought on future plans

COPELAND Council is looking to the public for views on how to protect and enhance the borough's natural and built environment.

The local authority is currently running a public consultation in advance of the finalisation of its new Local Plan - the overarching strategy by which the council approaches decision making.

As part of this, the council is seeking views from residents on how best biodiversity and the diversity of landscapes in the borough can be protected, as well as the green spaces found across the area.

The authority is also looking for input on its plans for conserving and enhancing the borough's heritage assets.

A spokesman for Copeland Council said that the strategies to be adopted as part of the new Local Plan are "particularly important" for ensuring "important assets are protected for the use of future generations, as well as for the improved health and wellbeing of our residents.

"In order to ensure that the views of our communities and residents are considered and incorporated into future drafts of the Local Plan, it is important that we receive as much feedback as possible."

News

Speak your mind about future plans

THE deadline is approaching to have your say on the future of Copeland.

Copeland Borough Council is developing a plan to guide investment and development in the borough until 2035.

The consultation, which closes next Monday, gives residents and interested parties the opportunity to comment on a draft of the plan, ahead of final publication in 2021.

Issues under consultation in



■ Coun Andy Pratt says 'this is one of the most important documents the council will produce'

this 'preferred options' draft include the number of new-build homes the council should be aiming for, the locations and boundaries in which housing and employment developments should take place, and town centre regeneration. Other issues include the natural environment and heritage.

Councillor Andy Pratt, portfolio holder for Environment, Place and Inclusive Communities, said: "This is one of the most important documents the council will produce and we are actively encouraging our community to contribute."

Twitter: @newsandstar facebook.com/newsandstar

Residents encouraged to share views

RESIDENTS in Copeland are being encouraged to share their views on the council's new strategy for the coming decade and beyond.

Copeland Council has launched a public consultation to field the opinions of residents as it puts together a new Local Plan.

This is the authority's overarching strategy which will guide its decisions on development and investment until 2035.

The eight-week consultation launched yesterday and will give residents the opportunity to comment on a draft of the plan.

The plan's final publication will take place next year.

Issues the plan covers include: the number of new-build homes the council should aim for in the borough; the locations and boundaries in which housing and employment developments should take place; and town centre regeneration.

Other issues include the natural environment and heritage assets, as well as opportunities for improved leisure and tourism.

It also includes a focus on the community facilities and improvements to connectivity that the council hopes will enable Copeland to flourish following the Covid-19 pandemic.

Councillor Andy Pratt, portfolio holder for environment, place and inclusive communities, said



VIEWS: Residents are being encouraged to share their views on the council's strategy

Picture: Jim Davis

that the Local Plan is one of the most important documents the council produces.

"We are actively encouraging our community to contribute to the process," he said.

"The new Local Plan will set an effective and robust development strategy for the whole borough;

guiding inward investment, facilitating growth and forming the basis on which planning applications will be determined for the next decade-and-a-half.

"Feedback received during the previous 'issues and options' stage have already been taken on board as we enter this next part

of the process.

"All comments we now receive on the content of the draft preferred options are vital in helping us understand the views and opinions of our residents and communities, allowing us to incorporate these into our policies and proposals."

YOUR VIEWS

What do you think? Have your say on this and other articles by visiting our website or comment via our Facebook

