



Copeland Local Plan 2021-2038 Focused Pre- Publication Draft Changes Consultation Response Report

Copeland Borough Council

January 2022

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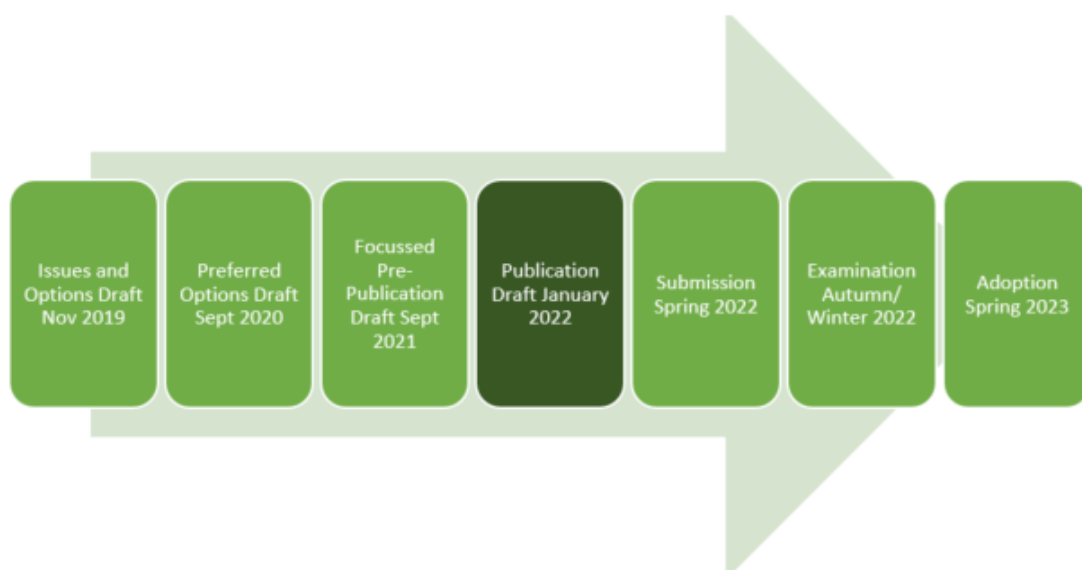
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1.0 Introduction

- 1.1 This report details the representations received to the Copeland Borough Council Focussed Pre-Publication Draft Changes Consultation, which took place between Monday 13th September and Sunday 17th October 2021
- 1.2 The consultation was designed to gain the views and opinions of key stakeholders and members of the public on the most significant changes being considered to the Local Plan, following the production and consultation on the Preferred Options Draft.
- 1.3 Responses received to this consultation, along with additional evidence base documents, the response reports from Issues and Options and Preferred Options Stages, 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:



Pre-Publication Draft Changes 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 here:
https://www.copeland.gov.uk/sites/default/files/attachments/consultation_response_report.pdf.
- 1.9 The responses received through this consultation, combined with a number of evidence base documents and other key corporate documents, informed the Preferred Options Draft of the Local Plan. This draft was designed to set out the Council's Preferred Options for development in the Borough. The Preferred Options response report can be viewed here: <https://www.copeland.gov.uk/content/local-plan-2021-2038-publication-draft-consultation>.
- 1.10 Following the completion of the Preferred Options Draft Consultation and a number of evidence base reports, CBC identified a number of minor changes to update and improve the Local Plan, as well as some more significant changes. This included new or significantly amended policies as well as draft allocations and settlement boundaries that were proposed to be added or removed.
- 1.11 The result of this was a five week long interim consultation entitled 'Focussed Pre-Publication Draft Changes Consultation', which asked for the views and opinions of key stakeholders, employers and members of the public on the more significant changes being considered.
- 1.12 The purpose of this report is to outline the responses received through the Focussed Pre-Publication Draft Changes Consultation, and how these will contribute towards the development of the final draft of the Local Plan, the Publication Draft.
- 1.13 This report is designed to be read in conjunction with the Preferred Options draft and the Focussed Pre-Publication Draft Changes Consultation to provide a full understanding of the responses received.

2.0 Consultation methodology

- 2.1 The Focussed Pre-Publication Draft Changes 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.
- 2.2 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.

- 2.3 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.
- 2.4 Please view the Copeland SCI for an explanation of the consultation methods used during this consultation.

2.0 Representations received and Copeland's response

- 3.1 This section provides an analysis of the responses received to the consultation. Overall, 59 responses were received from members of the public, Parish and Town Councils, developers and local businesses and employers. This generated a large number of separate comments, which can be viewed in the table below.
- 3.2 The table also includes a summary of the Council's response to the comment and any changes that will be made to the plan in light of it. It needs to be noted that not every comment will result in a change within the Local Plan. For example, 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.
- 3.3 A numerical respondent reference number has been provided to protect the anonymity of the respondent.

Representor Number	Comments	Council Response
Chapter 1 – Introduction		
59	Paragraph 1.1.3 – the timetable shows an incorrect date for the Examination in Public (shown as Autumn/Winter 2023). It is assumed this should be 2022 as adoption is expected to be Spring 2023	Amended.
Chapter 2 – Changes to the Development Strategy Chapter		
DS4PO – Strategic Development Priority Projects (Policy not taken forward into the Publication Draft)		
34	Support the proposed deletion of Policy DS4PO and the movement of the supporting text into the Spatial Portrait chapter	Comment noted.
59	It is not clear what the supporting text from the Development Strategy chapter is - it is assumed that the existing wording of DS4PO will be used to create supporting text within the Spatial Portrait chapter	Supporting text is that which supports the policies within a specific chapter. The projects listed in the text supporting policy DS4PO have been deleted along with the Policy and are now referred to in the relevant sections of the Local Plan where they are still relevant, for example reference to the Relief Road is now

Representor Number	Comments	Council Response
		included within the Spatial Portrait chapter, reference to Westlakes Science park is in the economy chapter etc.
59	There is concern about the deletion of this policy as it includes reference to digital infrastructure yet there is no specific detail about how this loss will be captured in other related policies	Digital infrastructure is also referred to in Policy CO1PU and its supporting text. It is also referenced in Policy DS5PU. The deletion of this policy therefore leaves no gaps.
59	It is recommended that there is a policy which requires all developers for all new residential and commercial developments to provide full fibre to the premises. There is a need to facilitate the installation of gigabit capable full fibre broadband infrastructure at all new sites where possible. The earlier developers engage with broadband providers, the cost of provision will be lower	Reference to full fibre has been added to Policy CO1PU.
Policy DS3PU – Settlement Hierarchy		
34	The final policy should remain fluid to take into account any further future changes that may occur to the settlement hierarchy following future iterations of the annual Village Services Survey. It may be appropriate to include a statement in the supporting text setting out that should the function of settlements change or there is a significant change to the pattern of facilities this approach will be reviewed as part of a review of the Plan following adoption	An additional paragraph has been added to support the policy relating to Covid-19 impacts. A sentence has been included here that commits the Council to review the settlement hierarchy as part of any future Local Plan Review.
34	Support Egremont's designation as a Key Service Centre given its location on a Primary A Road and the range of services and facilities included in the town	Comments noted.
39	Any extensions to settlement boundaries should not result in additional adverse impacts upon designated nature conservation sites. The settlement extension at Crook Field in Millom is within a Flood risk zone for a tributary which connects to the Duddon Estuary SSSI, Duddon Estuary Ramsar, Morecambe Bay and Duddon Estuary SPA and Morecambe Bay SAC. If the site is to be developed, then a flood risk assessment and a HRA will have to be submitted.	Comments noted. The Council has decided not to amend the settlement boundary to include the Crook Field after considering comments received during the consultation, particularly in relation to flooding. The site is discussed further in the Discounted Sites document.
42	Policy is restrictive in terms of residential development outside of settlement boundaries even if such development links well, contributes to the vitality of nearby settlements and is considered to be in a highly sustainable location. If	No change considered necessary. As well as identifying and allocating the most deliverable sites to meet growth

Representor Number	Comments	Council Response
	proposed housing allocations do not come forward as expected, then there is little flexibility to deliver windfall sites. The policy is unsound as it contradicts paragraphs 35 and 36 of the NPPF	aspirations, the Local Plan identifies a number of areas where the settlement boundary has been extended to allow for future windfall development. Policy DS4PU allows for additional development outside the boundaries in a number of cases. Development is limited outside settlement boundaries in order to prevent sprawl into the open countryside and ensure the Local Plan strategy is delivered. The Council therefore disagrees with the comments and feels that the policy is both flexible and sound.
43	Welcome the removal of The Hill to the category of Open Countryside	Comments noted.
43	Why has Hallthwaites not been reclassified which is a smaller community than the Hill	Hallthwaites scores more highly in terms of services than The Hill. Further information is included in the Development Strategy and Settlement Hierarchy Update 2022 referred to in the text supporting this policy.
43	Can the Council provide the evidence as to the reclassification of The Green?	See comment above.
59	Gilgarran is identified as an area which is not listed within the revised settlement hierarchy under 'Open Countryside'. For clarity, it is requested that a map is produced to show the areas which are classified as 'Open Countryside'	No change considered necessary. The supporting text notes that any area (including smaller settlements) not listed in the hierarchy are classed as open countryside. All settlements considered, including Gilgarran are listed in the Development Strategy and Settlement Hierarchy Update 2022.
59	It is advised that the Council uses the Villages Services Survey/Settlement Hierarchy and Development Strategy Paper Update 2021 as part of the evidence base to update this policy due to the quickly changing nature of the local and	Additional paragraph has been added to support the policy relating to Covid-19 impacts. A sentence has been included

Representor Number	Comments	Council Response
	national economy. It is suggested that additional text is added to the policy which sets out how the Council will continue to monitor and update the Village Services Survey to avoid the policy becoming out of date	that commits the Council to review the hierarchy as part of any future Local Plan Review.
59	In the interests of transparency, the policy should refer to the Village Services Survey by its current given name of 'Settlement Hierarchy and Development Strategy Paper Update 2021'	The Village Services Survey and 'Settlement Hierarchy and Development Strategy Paper Update 2022' are two different things. An extract from the Survey forms the table with the settlement scores within the Settlement Hierarchy and Development Strategy document. The Village Services Survey, whilst complete, had not been published at the time of the consultation. It will however be available alongside the Publication Draft.
<i>Drigg/Holmrook</i>		
8, 22, 27, 28, 45, 46, 59	Challenge/object to Drigg and Holmrook becoming a Local Service Centre. The classification of Drigg and Holmrook as a cluster will have a disproportionate effect in terms of development in Drigg – as described in the Local Plan and sub documents	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.

Representor Number	Comments	Council Response
8	Twinning Drigg and Holmrook will urbanise a rural area, affect the outstanding views to the National Park and would not be in keeping with the character of the village	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.
22	Not aware of a frequent bus service which contributes to reducing the points for Drigg and Holmrook from 23 to 18. There is no bus service serving Drigg railway station	Comments noted. The Settlement Hierarchy and Development Strategy has been updated to reflect the fact that there is no bus service and the points assigned to each village has been amended accordingly.
22, 27, 28, 45, 46, 59	The distance from the railway station to the local services and facilities is more than the maximum distance people will walk to use the services/facilities (1.6km, 20 minutes). There is no evidence to underpin the Council's claim that people will walk for half an hour to reach a service" is generic and not applicable to the habits of the Drigg / Holmrook populations. Also, there is not a continuous network of pavements to allow people to do this safely, especially in Autumn and Winter; at times, the pavement does not meet the required 2m width as set out in paragraph 12.2.9 in the Local Plan - it can be less than one metre in width. Residents will struggle to get their shopping back up the hill.	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a

Representor Number	Comments	Council Response
		<p>number of pinch points where crossing to continue the footpath is difficult</p> <ul style="list-style-type: none"> The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another. <p>Reference to a 2m pavement has been removed from the Local Plan as, whilst this is aspirational, it is not always achievable. Additional text has been added to clarify that the 1 mile distance criteria relates to the distance between the closest parts of the settlements. The reasons for using this distance are set out in the Settlement Hierarchy and Development Strategy Paper.</p>
28	The settlement service scoring artificially inflates Drigg's score by overestimating the employment opportunities offered by LLWR and the services offered within Drigg – there is no shop selling day to day essentials, only a gift shop	<p>The scoring methodology was revised in light of comments received to the Preferred Options Draft and employment uses that are not as accessible as others now score less than previously. See the Development Strategy and Settlement Hierarchy document for more information.</p> <p>Scores are rightly given for employment uses as not only do they offer employment opportunities but their employers also support local services.</p>

Representor Number	Comments	Council Response
28	The settlement service scoring underestimates Holmrook's score by omitting facilities (Greengarth) and underestimating the importance of other facilities (Riverside garage). Holmrook could be a Local Service Centre without being a "cluster" with Drigg	The Village Services Survey 2021 identifies the services that have contributed towards a settlement score. Riverside Garage was previously included within the scoring and continues to be so. The Greengarth estate has been now been included within the settlement scoring as an employment site. It has only been assigned 1 point as the pavement connection at the village end is poor – please see the Settlement Hierarchy and Development Strategy Update 2022 for further information.
45	Drigg on its own does not qualify as a Local Service Centre as it has an over inflated mark of 12.	<p>Drigg was previously categorised as a Local Service Centre as part of a cluster with Holmrook not on its own. The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.

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45	Holmrook does not qualify as a Local Service Centre on its own as it scores 11 marks, some of which are debatable dependent on where the boundary is drawn	See comments above.
28	Application of the Council's own criteria as stated in the Local Plan show that Drigg and Holmrook do not meet the criteria to be considered a "cluster"	Comments noted.
28	The Council must apply the criteria stated in the Local Plan correctly, and not pick and choose to fit its own purposes (such as service scoring, walking times/distances to services, width and condition of pavements)	Comments noted.
28	The minor benefits to Drigg PC of additional precept which would be raised if the village population was increased are far outweighed by the nuisance of additional traffic and loss of green field amenity	The benefits to the local community include additional affordable housing, increased housing range and choice, additional residents to maintain social cohesion and support local services. Additional housing also helps meet borough-wide housing needs and increases the working age population to support economic growth etc.
28	The main benefits to be gained from the proposal are to landowners profiting from selling land and businesses and to Copeland Borough Council – not to residents of Drigg or Holmrook	See comment above.
28, 45	Proximity of LLWR: Houses in Drigg historically and currently are slow to sell partly due to the proximity of the LLWR. In addition LLWR is a minor employer in the village, with only 2 known employees living within Drigg. The scoring overemphasises the value of LLWR employment in the village. LLWR significantly contributes to the carbon footprint of the village as most employees drive to work.	The scoring cannot consider how many local residents work at local employment sites as this is constantly changing. Points are, however, only assigned to employment uses of a particular scale. The scoring criteria also allocates more points for those facilities that are accessible. Please see the Development Strategy and Settlement Hierarchy Update 2022 for more information. The benefits of an employment use within or on the edge of a settlement include

Representor Number	Comments	Council Response
		employers supporting local services (such as local shops etc) as well as providing employment opportunities.
28, 46	There is no lack of housing in Drigg and no proven need for additional housing	<p>The need for housing in the Borough (and within the sub-areas of the Borough) is set out in the Housing Needs Study and Strategic Housing Market Assessment.</p> <p>Whilst there are a number of properties vacant in any settlement at any one time, this does not suggest there is not a need and this can be for a number of different reasons.</p>
28	Drigg has no playpark - they need to walk from Drigg and cross the A595 to access the park in Holmrook	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.

Representor Number	Comments	Council Response
		The Settlement Hierarchy and Development Strategy Paper has been updated to reflect the fact that the settlements no longer form a cluster and the services that have been awarded point within each village are set out within the document.
28, 45	Drigg has a score of one for having a shop, but this is a craft shop which does not sell groceries - people need to drive outside the village for groceries.	A single point has been given as a reflection of this. Convenience stores that sell groceries etc are given a greater number of points. Please see the Development Strategy and Settlement Hierarchy Update 2022 for more information.
28, 46	New development would create additional traffic. Increased traffic will reduce the number of people who do walk for exercise/leisure	The impacts of additional traffic have been considered through the Transport Improvement Study. Locating an appropriate scale of new developments close to existing services and facilities, rather than in the open countryside, will reduce the need to travel.
28	A cluster is expected to deliver more dwellings (20%) than a 'sustainable rural village' (7%) or 'other rural villages' (3%). Combining the number of houses of allocations HDH1 and HDH2 will result in 54 houses in Drigg alone. In Drigg there are currently 100 units - this would increase the number of houses by 54%, thus increasing traffic	The tiers are expected to deliver these levels of dwellings not the individual clusters or settlements within them. This reflects the fact that some settlements within the tiers are more constrained than others and may not be able to provide as much housing.
28	The village of Drigg has a population of 307 - it is put inappropriately into the same category as St. Bees (1842), Seascale (2107), Frizington (2873) and Distington (1670). These villages are better placed to absorb additional	On its own Drigg would fall within the Sustainable Rural Villages category, however as a cluster with Holmrook it provided the level of services that justified

Representor Number	Comments	Council Response
	development. Drigg has had its settlement ranking artificially increased, with poor justification	<p>it falling into the Local Service Centre category.</p> <p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.
28	Beckermat (population of 692) is in a lower settlement category despite having the same services as Drigg	See comment above.
45	Drigg has a higher ranking than other villages which are bigger and have more services (Bigrigg and Calderbridge) - why are these in tiers below Drigg?	See comment above and see the Development Strategy and Settlement Hierarchy Update 2022 for more information.
28	The scoring underestimates the score of Holmrook by not including the employment opportunities of the garage and omitting Greengarth Business Park	The scoring has been updated and a point has been assigned for Greengarth, This is on the basis that the pavement connection at the village end is poor. Multiple points are not assigned when there is more than

Representor Number	Comments	Council Response
		one of a particular service, however a point has been given for the garage reflecting the fact that it is an “Other Store/service” which sells agricultural machinery etc. Please see the Settlement Hierarchy and Development Strategy Update 2022 for more information.
28, 45, 54, 59	Drigg and Holmrook are two separate villages with their own identities, focal points and facilities - they do not operate as a cluster. Both villages should remain as rural sustainable villages open to some sympathetic and reasonable development in line with the character of the village.	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult • The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.
28	If housing estates were built in Drigg, it would spoil its character and turn it into another generic suburban sprawl	There is a single housing allocation identified for Drigg. Evidence demonstrates that development of the site would not harm landscape or settlement character.

Representor Number	Comments	Council Response
		The Local Plan contains a settlement boundary policy which will prevent suburban sprawl.
28	The church complex is protected within a green wedge - why miss out The Gables which is adjacent to HDH1 and is of similar, non-designated settlement character?	The location of the Green Wedge has been informed by the Settlement Landscape Character Assessment.
28	Why is Drigg Hall not listed as a notable building?	No change considered necessary.
45, 46	Drigg does have a train station but a car is needed to use the station	The Council disagrees with this comment as the station is well positioned in relation to the village.
45	Lighting is inadequate in most areas between Drigg and Holmrook	Comment noted. Street lighting is the remit of Cumbria County Council.
45	Stubble Green which is currently part of Drigg is being cast free for unclear and unexplained reasons	Stubble Green is considered to be a small cluster of buildings rather than a settlement in its own right. There is no continuous pavement connection between the area and Drigg that may justify it becoming a cluster with Drigg.
45	Drigg is within the 3 miles to a Local Service Center already – Seascale - officially recognised acceptable distance to access key facilities (primary school) and many other services	Comments noted. This does not justify the village forming a cluster with Seascale.
45	Holmrook is within 3 miles to a Local Service Center already – Gosforth - officially recognised acceptable distance to access key facilities (primary school) and many other services	Comments noted. This does not justify the village forming a cluster with Gosforth.
46	There would be a loss of greenfield amenity, significantly increasing the village's carbon footprint, contradicting Policy ST1 in a Climate Emergency	The Government require local authorities to meet their basic housing needs as a minimum. Unfortunately, there are an insufficient number of brownfield/previously developed sites within the borough to meet such needs. The Council has therefore identified the least constrained greenfield sites to deliver

Representor Number	Comments	Council Response
		housing and has directed an appropriate level of development to the most sustainable parts of the borough.
54	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, and one in the open area to the east of Church Stile Farm. Also, there is an additional area at the railway end of the LLWR site which might be returned to the community at a future date	Drigg and Holmrook are no longer considered to be a settlement cluster and are now separate settlements in their own right with their own distinct settlement boundaries. A Green Wedge has been identified between the two. Comments noted re area of land close to LLWR site.
54	It is recognised that some residential units are required - there are a number of brownfield sites which could be developed before greenfield, agricultural sites. For example, the area between Wray Head and the B5344 and Hill Farm, Holmrook. There are also opportunities for infill development (e.g. adjacent to Southerly in Drigg)	The Government require local authorities to meet their basic housing needs as a minimum. Unfortunately there is an insufficient number of brownfield/previously developed sites within the borough to meet identified housing needs. The Council has therefore identified the least constrained greenfield sites to deliver housing. Hill Farm has been identified as a housing allocation, however land at Southerly is no longer being taken forward due to concerns over deliverability.
54	Any development should be of an appropriate size and scale - not estate types of developments which could change the rural and agricultural character of the Parish.	The Local Plan contains a number of policies to ensure design is appropriate to its setting, however the NPPF paragraph 130c states that councils “should not prevent or discourage appropriate innovation or change (such as increased densities)”.

Representor Number	Comments	Council Response
54	The new housing in the villages should enhance the sustainability of the community by providing sheltered accommodation and affordable homes, either as starter homes or to provide an opportunity for downsizing.	The Local Plan contains a policy that requires 10% of developments over 10 units to be affordable housing. A number of these should be First Homes as required by the NPPF. Whilst sites are not specifically allocated for sheltered housing, such an application would be considered on its merits.
<i>Ennerdale Bridge</i>		
58	Ennerdale Bridge is physically separated from other Copeland settlements. It has no public transport links and pedestrian links are very poor - it should not be classed as a Sustainable Rural Village as there is high dependency on the private vehicle	Ennerdale Bridge is categorised as a Sustainable Rural Village based on the number of services it contains. Please see the Development Strategy and Settlement Hierarchy Update 2022 for the justification.
58	The settlement boundary for Ennerdale Bridge should not be amended without the full consent of the Lake District National Park Authority given its unique split location and as the majority of its dwellings fall within their jurisdiction	The LDNPA have been engaged through the Local Plan process. The settlement boundary reflects the extent of built development in the village.
Settlement Boundaries - Table 1 – Areas considered for bringing into the Settlement Boundary		
<i>Map 1 – Land south of Derwentwater Close, Millom</i>		
26	Part of this site is a priority habitat - given the recently released evidence about biodiversity decline, the selection of this site is questioned. Also the suitability of the site is questioned as the site is currently being considered as part of Millom's flood and drainage alleviation project and may not be suitable for development	The Council is not extending the boundary to incorporate this site in light of comments received during the consultation, particularly in relation to flooding.
31	Site should not be developed until all flooding issues are resolved	See comment above.
59	Object to this being included in the settlement boundary. All the water originating from the south runs towards the settlement (Bowness Road and Cumberland Road). Water can pool at these locations which connect into the UU sewer system and could cause inundation. The overland flows through this area would cause significant concerns in relation to the ability of the site to	See comment above.

Representor Number	Comments	Council Response
	accommodate these flows whilst adhering to SuDS principals for drainage of the site itself.	
<i>Map 2 – Crook Field, Millom</i>		
20	This site is in Flood Zone 2 and is crossed by an ordinary (non-main) watercourse. Any development at this location must be subject to a site-specific Flood Risk Assessment that demonstrates how the site can be safely developed without causing flood risk elsewhere	The Council is not extending the boundary to incorporate this site in light of comments received during the consultation, particularly in relation to flooding.
26	Although just outside the area of priority habitat, the site appears to have potential to have biodiversity value (semi-natural habitat and watercourses/bodies) and does lie within Network Enhancement Zone 2. Also the suitability of the site is questioned as the site is currently being considered as part of Millom's flood and drainage alleviation project and may not be suitable for development	See comment above.
31	Site should not be developed until all flooding issues are resolved	See comment above.
59	Object to this being included in the settlement boundary - it lies in Flood Zone 2 and is not in accordance with Chapter 14 of the NPPF.	See comment above.
<i>Map 3 – Land south of Fairladies, St. Bees</i>		
15	Do not support this settlement boundary extension as do not support the proposed allocation	Comments noted.
59	No longer have an objection to the inclusion of this in the settlement as recent evidence has been provided from the site promoter showing the site can be adequately accessed and appropriately drained	Comments noted, support welcomed
Settlement Boundaries - Table 2 – Areas considered for removal from the Settlement Boundary		
59	No objection to the removal of any of the sites from the settlement boundary. It is suggested that the site references are provided for greater clarity and accuracy	Comments noted.
<i>Map 4 – Land south of Baybarrow Road, Egremont</i>		
34	Do not support the removal of this land from the settlement boundary. The landowner of the site confirms that they own access down the track running south of Grove Road. Furthermore, access could be gained via the remaining land proposed to be included in the settlement boundary to the west (under different landowners) as part of a wider scheme. Would be happy to liaise with the Council	Comments noted, site is not considered to be preferable to other allocations and is therefore not being taken forward. Please see the Discounted Sites document for

Representor Number	Comments	Council Response
	and County Council Highways regarding this. Including this land would provide more certainty for landowners and provide an opportunity for windfall development.	further information. The site could be considered at Local Plan Review stage.
59	CCC Highways objection remains due to inadequate access	Comments noted.
<i>Map 5 – Land north of Back Bay View, Millom</i>		
31	It is accepted that there are currently access problems limiting the feasibility for development.	Comments noted.
31	No flooding issues here	Comments noted.
59	CCC Highways objection remains due to inadequate access. The road/land does not appear capable of being upgraded	Comments noted.
<i>Map 7 – Land north of Wray Head, Drigg/Holmrook</i>		
50	This site should be included in the settlement boundary - would allow for windfall development in accordance with proposed policy H6PO	There are a number of constraints on the site – these were listed within the consultation document. Given this the site is no longer considered to be deliverable and should therefore not be incorporated within the settlement boundary.
50	The site forms a logical extension to the village without significant landscape impact or negative impact on residential amenity of other properties	See comment above.
50	Suitable access to the site could be achieved	Comments noted.
50	Has train transport links	Comments noted.
50	Close to Sellafield	Comments noted.
50	One of the most sustainable settlements in Copeland - identified as a Local Service Centre by the Council	Comments noted.
50	Well connected to site HDH2	Comments noted.
50	Site is available for development	Comments noted.
50	Site is within the village limit and central within Drigg	Comments noted.
50	Site development is not considered to greatly impact on the character of the village	Comments noted.
50	The site is small scale with existing mature hedgerows to all elevations facing out of the village	Comments noted.

Representor Number	Comments	Council Response
50	Development of the site would round off this area of the village	Comments noted.
50	Better development potential than proposed allocation HDH3 which is not a flat site, had existing derelict farm buildings and may require further work to provide visibility	The Council disagree with this statement, HDH3 is a brownfield site and access (including visibility) has been demonstrated through the Site Access Assessments.
<i>Map 8 – Land North West of Holme Forge, Beckermat</i>		
26	Welcome the removal of this site	Comments noted.
59	CCC Highways objection remains due to inadequate access	Comments noted.
<i>Map 9 – Land at Moor Row, Moor Row</i>		
12	Support the removal of this allocation as the site has poor visibility, capacity and highway safety. The field is currently used for arable farming and allows for views over a World Heritage Site. There are other sites in the village, particularly off Scalegate Road, which are better for development	Comments noted.
26	Welcome the removal of this site	Comments noted.
59	Object to the inclusion of this as an allocation until highway network and capacity improvements can be demonstrated)	Comments noted.
<i>Map 10 – Land behind Vicarage Lane, Ennerdale Bridge</i>		
9	Note the proposal to remove land from the settlement boundary	Comments noted.
26, 58	Welcome the removal of this site	Comments noted.
42	There is no evidence provided by the Council relating to the ecological constraints on the site. Previous submissions by Persimmon have confirmed there are no ecological (or any other) constraints that would prevent housing on the site	<p>Independent consultants have assessed ecology on the site and have produced an Ecological Report which is available on request. A summary of the report is included in the Discounted Sites document.</p> <p>The Housing Trajectory identifies sufficient alternative sites to meet the required housing need within the Sustainable Rural Villages tier without requiring this site, the</p>

Representor Number	Comments	Council Response
		development of which would have negative impacts upon ecology
42	Whilst the River Ehen SSSI lies to the rear of the dwellings on the southern side of Vicarage Lane, there is existing built development between the site and the designation, so development on this site would not extend closer to the SSSI. If mitigation measures are required, these can be identified and secured through a planning application	See comment above.
42	The proposed amended settlement boundary change is unjustified and an objection to the change is raised	Comments noted
42	Including this site in the settlement boundary would allow it to contribute to meeting the housing target of Copeland as it could accommodate 29 units	Comments noted. The site will not be incorporated into the boundary for the reasons set out above and whilst the development would provide 29 units, this is not considered necessary as there are preferable sites elsewhere within the tier that meet the housing need.
42	The site was identified in the 2020 SHLAA as being deliverable	Comments noted – the 2020 SHLAA was produced prior to the ecology assessments.
42	The site is in the ownership of a housebuilder and so could be delivered within 5 years	Comments noted.
42	The site would form a logical extension to the existing settlement and would support local services and facilities	Comments noted.
Policy DS5PO – Development Principles (Policy not taken forward into the Publication Draft)		
34, 59	Support the removal of this policy as it will avoid repetition within the Local Plan	Comments noted.
59	The proposed addition of a health policy is welcome	Support welcomed.
Chapter 3 – Changes to the Development Standards Chapter		
Policy DS10PU – Soils, Contamination and Land Stability		
20	Welcome the inclusion of additional suggested text	Support welcomed.
30	Given the recorded mine features in Copeland, it is recommended that the policy is amended to read as follows:	Policy wording amended as suggested.

Representor Number	Comments	Council Response
	<p>The Council will proactively work with developers and other partners to identify opportunities to remediate contaminated sites.</p> <p>Sustainable construction measures should be used to conserve good quality soils, protect soils from contamination and avoid soil compaction around root protection areas. Development should not result in the loss of best and most versatile agricultural land.</p> <p>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.</p> <p>It is the developer's responsibility to secure safe development and provide the necessary information at the time of the planning application. The minimum information that should be provided by an applicant is the report of a Preliminary Investigation (desk study, site reconnaissance and preliminary risk assessment) or Coal Mining Risk Assessment, where necessary. The findings of this will determine if further investigation is needed.</p> <p>Where contamination and/or land instability issues are identified, development proposals should incorporate appropriate remediation and subsequent management measures to remove unacceptable risks. Full implementation of remediation measures would be secured via planning conditions and these measures are likely to be required prior to commencement of, or the first occupation of the proposed development.</p>	
39	Encourage focusing development sites on previously developed land and avoiding undeveloped land to ensure the soil is protected and the benefits it provides are secure long term. Where undeveloped/greenfield land is put forward for development Natural England would support soil management measures which	Encouragement for brownfield development is included within Policy DS2PU (Reducing the Impacts of

Representor Number	Comments	Council Response
	avoid, mitigate and compensate, including a soil resource plan and adherence to Defra's (2009) 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. Planning applications should provide details of how any adverse impacts on the soil resource can be avoided or minimised.	Development on Climate Change) amongst others. Additional wording added to policy re Defra guidance and avoidance and mitigation and soil resource plans. Surface water management is dealt with in policy DS9PU.
42	The policy should be amended to make specific reference to the potential phasing of any development where it can be demonstrated that land can be remediated safely. Without reference to phasing, the policy wording could be interpreted that a whole site would need to be remediated prior to the occupation of any dwelling. On large, brownfield sites, this may cause viability issues. It is recommended that the policy wording is amended: <i>"Full implementation of remediation measures would be secured via planning conditions and these measures are likely to be required prior to the first occupation of the proposed development of any individual phase"</i>	Policy wording amended as suggested.
Policy DS11PU – Protecting Air Quality		
39	Welcome the inclusion of the Air Quality Policy and that it acknowledges the inclusion of ammonia emissions. To strengthen this policy it is recommended that it includes policy criteria for developments that are industrial developments, combustion sources and those developments that include slurry spreading. While the policy does now include the requirement for planning applications to include measures on how they will reduce ammonia emissions, it would be a useful addition to include a section about designated sites. Within the Copeland boundary there are several designated sites that are over their critical threshold levels for ammonia (see below): - Duddon Valley Woodlands SSSI	Additional supporting text added (6.8.6 to 6.8.8). Reference to industrial developments added to policy. Reference to slurry spreading within the policy not considered necessary as this is unlikely to require planning permission. Additional wording on this issue added to the supporting text (6.8.8).

Representor Number	Comments	Council Response
	<ul style="list-style-type: none"> - 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 - Hallsenna Moor SSSI - Duddon Estuary SSSI - Pillar and Ennerdale Fells SSSI - Duddon Mosses SSSI - Black Moss SSSI - Wasdale Screes SSSI <p>It is also important to mention the impacts to sensitive designated sites from air pollution that are within 200m of transport corridors. Avoidance and mitigations measures should be a requirement at planning stage, for all types of air pollution, and discussed within a HRA at project level if the development is within an IRZ for a European site. Examples of actions that can be taken to reduce ammonia emissions can be found in the Clean Air Strategy 2019.</p>	
43, 59	Welcome the addition of this new policy which is evidenced within the Sustainability Appraisal and upheld by Natural England	Support welcomed.
43	The measures appear to focus on new development - it would be useful to understand what are already areas of concern with respect to air quality (e.g. road traffic)	Information regarding current conditions is included within the supporting text (paragraphs 6.8.1-6.8.3).
43	The locations of new development should be subject to review for proximity to town centres/public transport to minimise new sources of emissions.	This process is carried out when producing the development hierarchy to reduce the need to travel. See Development Strategy and Settlement Hierarchy Update 2022 for further information.
59	This moves towards greater compliance with the NPPF along with providing clarity arounds expectations of the developer to secure safe developer and	Comments noted.

Representor Number	Comments	Council Response
	provide the necessary preliminary investigation information at the time of the planning application	
Chapter 4 – Changes to Copeland's Economy Chapter		
31	Paragraph 4.1 - welcome proposals to encourage development to Haverigg Industrial Estate	Support welcomed.
59	Concerned that the Copeland Transport Improvement Study 2021 has not been included	An additional paragraph has been added re. the TIS linked to Policy E2PU (paragraph 7.5.8).
59	It is strongly recommended that a new Travel Plan policy is introduced into the Pre-Publication version of the Local Plan. The sites included in the Transport Improvement Study should be required to have a Travel Plan, with Travel Demand Measures	The Local Plan already contains a policy that deals with Travel Plans (CO4PU).
59	Supporting text should include the need for all Travel Plans to accord with Cumbria County Council guidance on Travel Plans and the Planning Process in Cumbria: Guidance for Developers (2012) as well as the Council's Planning Obligation Policy (2013)	Additional supporting text has been added as requested (paragraph 17.8.2).
59	Although the Whitehaven Relief Road was not successful as part of Highways England RIS2 bid, the scheme is still under consideration for RIS3. The Local Plan should make reference to the delivery of the relief road and how its delivery would support the delivery of the Local Plan	Reference is made to the relief road in several parts of the Local Plan (including Section 4.2 and Policy CO2PU) as it remains a priority for the Council.
Policy E4PU – Cleator Moor Innovation Quarter at Leconfield		
20	A Level 2 SFRA should be carried out to enable the principle of development to be established at this location and that it won't exacerbate flood risk elsewhere.	Comments noted. It is likely that a site specific FRA will be produced to support a planning application in the near future.
20	A significant portion of the south west of this site extends into Flood Zone 3, defined as having a high probability of flooding. The proposed use is defined as 'Less Vulnerable' which is appropriate development in accordance with Planning Practice Guidance. Flood risk should be managed through careful consideration of site layout and design early in the planning stage through a detailed FRA. Any functional floodplain should remain free of development.	Additional wording incorporated into paragraph 7.7.14
20	Alternatively, the allocation could be amended to exclude the area at risk of flooding or the allocation could be accompanied by a policy to exclude the area	The Council is proposing to keep the land within the site boundary, as it may help

Representor Number	Comments	Council Response
	from development, unless the site specific FRA demonstrates that it can be safely developed	with any SuDS and could contribute to biodiversity net gain on site.
36	Support the inclusion of this policy. It is a strategic site which merits its own policy	Support welcomed.
36	The development of CMIQ on this would accord with numerous local and national strategies including 'Energising the Energy Coast', NPPF, industrial strategies and Council priorities	Comments noted.
36	Would provide employment opportunities, improve skills and life chances and support the town centre	Comments noted.
36	Can provide an alternative to Sellafield related employment and allow diversification	Comments noted.
36	The site has a strategic location within the UK's centre of nuclear excellence	Comments noted.
36	The Leconfield Industrial Estate is Cleator Moor's primary employment site. However, in its current configuration it does not present a commercially attractive proposition due to a low quality environment, its smaller scale and the preferred retention of existing tenants	Comments noted.
36	By providing a range of accommodation opportunities the CMIQ will be able to fulfil a range of business lifecycle needs and help foster the clustering of related supply chain businesses	Comments noted.
36	It is requested that the supporting text includes a clear statement is added which confirms that the Leconfield Industrial Estate and adjacent identified land has been identified as the only location able to meet the objectives and requirements for the ISH and new business cluster	Additional wording added to paragraph 7.7.6.
36	Reference should also be made within the supporting text on the range of uses which will be acceptable within the allocated CMIQ site	Reference added in paragraph 7.7.7.

Representor Number	Comments	Council Response
36	Within the supporting text the CMIQ is referred to as being three areas; it is requested that the CMIQ is referred to as a single distinct area. To separate the CMIQ into three separate areas does not reflect the proposed cross-CMIQ improvements such as additional planting, new foot/cycle path connections and other infrastructure requirements	It is recognised that the three parcels are likely to be developed and are interconnected. However the evidence to support the Local Plan does not provide a strong enough case for the northern area (Area 3) at this time for a single allocation, as the land is not currently in the Council's ownership. The case can be strengthened as more information is developed to support a planning application and it is proposed to redraw the settlement boundary to accommodate all of the proposed site to help strengthen the future principle of development in Area 3. (Paras 7.7.11-7.7.12)
36	<p>To ensure a degree of clarity, certainty and consistency around the extent of the CMIQ area it is requested that the supporting text is amended to read:</p> <p>Figure 1 shows the extent of the CMIQ, which comprises of three development areas that can form the CMIQ at Cleator Moor, which are shown in Figure 1 below:</p> <ul style="list-style-type: none"> • Area 1 – the existing Leconfield Industrial Estate (14.4ha 17.6ha) • Area 2 – land to the east towards Heather Bank and Cleator Moor Medical Centre (4ha approx.) • Area 3 – expansion land to the north, located between Bowthorn Road and Birks Road (14ha approx.) 	<p>There is not sufficient evidence to allocate the land in the EDNA or ELAS while it is not in the Council's ownership, so the policy will continue to focus on the Leconfield Estate first.</p> <p>Area 1 site size amended</p> <p>Area 2 is not 4ha as shown so no change.</p> <p>Area 3 name changed</p>
36	Area 3 is only broadly indicated - to ensure consistency and clarity regarding the extent of the CMIQ allocation it is requested that the plan showing the CMIQ area and the three development areas is amended to reflect the full boundaries in the submitted map (Figure 4)	<p>Map redrawn to show:</p> <ul style="list-style-type: none"> • Area 1 extended to reflect ownership • Area 3 as described rather than oval shape

Representor Number	Comments	Council Response
36	<p>The final paragraph of the introductory text outlines that it is expected that development will be brought forward in accordance with an approved masterplan to enable a comprehensive and coordinated approach to site development and infrastructure provision. It is requested that this text is moved into the policy itself to increase the weight attached to it. It is also suggested that the text is amended to read as follows:</p> <p>“It is expected that Development within the allocated area will be brought forward in accordance with an approved masterplan and site-wide outline planning application a site-wide outline planning application and approved masterplan, which will outline matters such as phasing, design and sustainability requirements, scale and massing and connections through and to the site to integrate it with the wider community. This will enable a comprehensive and coordinated approach to site development and infrastructure provision and ensure that each phase of development is sustainable and integrated with the requirements for the whole site.”</p>	<p>Sentence inserted into policy re Masterplan</p> <p>Requirements regarding site-wide outline planning are not really necessary in the Local Plan.</p>
36	The current introductory text refers to an 'existing allocated site' however no detail is provided as to which area this relates to - clarification is required	Amended to say 'Leconfield Industrial Estate'
36	On adoption, the Copeland Local Plan 2021-2038 will replace the current Development Plan therefore all policies in the emerging Local Plan should therefore only refer to allocations within that document, not reference back to previous policies	As above
36	<p>To refer to the three areas as a single area, it is requested that the policy wording is amended as follows:</p> <p>“Leconfield Industrial Estate and adjacent land parcels Associated Growth Areas will be redeveloped to create the Cleator Moor Innovation Quarter as the location to attract new businesses and investment, develop new markets and increase collaboration and economic clustering. The boundary of the existing allocated site and future Associated Growth Areas are outlined CMIQ is illustrated in Figure 1.”</p>	It is recognised that the three parcels are likely to be developed and are interconnected. However the evidence to support the Local Plan does not provide a strong enough case for the northern area (Area 3) at this time for a single allocation, as the land is not currently in the Council's ownership. The case can be strengthened as more information is developed to support a planning application and it is

Representor Number	Comments	Council Response
		proposed to redraw the settlement boundary to accommodate all of the proposed site to help strengthen the future principle of development in Area 3.
36	The word 'existing' should be removed from references to Leconfield Industrial Estate - including from the title heading "Existing Leconfield Industrial Estate (Area 1)	Wording changed.
36	It is recommended that additional text should be included to provide clarity around acceptable ancillary uses "...a focal point for the development and local community. This could include ancillary uses such as cafes, restaurants and education/training spaces"	Additional wording added to supporting text.
36	Request that the reference to 'Associated Growth Areas' is removed as this implies a Leconfield Industrial Estate first approach. It is suggested the text is replaced by 'Adjacent Land Parcels (Areas 2 and 3)'	The approach is for Leconfield Industrial Estate first, with criteria within the policy outlining when the Associated Growth Areas will be considered.
36	<p>Regarding the 'Associated Growth Areas (Areas 2 and 3) text, the policy wording is objected to. The CMIQ should be referenced as a single district area to allow for a flexible and planned phased approach to development. The need to accommodate existing tenants at Leconfield limits the land that is available immediately. Each parcel of land has distinct physical characteristics which lend themselves to different development responses. To limit the delivery of Areas 2 and 3 until the main Leconfield site has been fully redeveloped could prevent the cluster approach and would not provide the required flexibility. Grouping all the sites as a cluster would be beneficial to enable site wide infrastructure and development plot preparation. It is therefore requested that the policy wording is amended as follows:</p> <p>"It is expected that development will initially be focussed on the existing Leconfield Industrial Estate. However, the development of the Associated Growth Areas as an extension of the Cleator Moor Innovation Quarter will be supported when one of the following can be demonstrated:</p> <ul style="list-style-type: none"> • The Existing Leconfield Industrial Estate has been fully redeveloped; or 	<p>See above comment.</p> <p>The criteria in the policy provide the flexibility to consider the Associated Growth Areas, which are now more clearly defined.</p> <p>The submission made does not provide compelling evidence that the EDNA has missed any forecast demand yet, and it will probably be better demonstrating this through a planning application to justify development in Areas 2 and 3.</p> <p>The policy as written allows for them to be considered within the masterplan and come forward and demands/needs arise.</p>

Representor Number	Comments	Council Response
	<p>• It can be demonstrated that the requirements of the businesses seeking to occupy the Cleator Moor Innovation Quarter cannot be met on the Existing Leconfield Industrial Estate.</p> <p>Development within Area 2 and Area 3 are required to be brought forward in accordance with the site-wide outline planning permission and approved site-wide masterplan.</p> <p>The primary uses on Area 2 will be limited to Use Class E(g) and student accommodation linked to the site. The primary uses on Area 3 will be limited to Use Class B2, Use Class B8 and Use Class E(g) only.</p> <p>Any development will be required to demonstrate how it links to the redevelopment of the existing Leconfield Industrial Estate and retains and where possible enhances existing connections to the wider settlement of Cleator Moor.”</p>	
59	The County Council recognises the strategic importance of the Leconfield employment site in Cleator Moor as a proposed business cluster. There needs to be a balance between the regeneration priorities of Cleator Moor and those for the Leconfield Estate in terms of the necessary transport infrastructure requirements to support growth in Cleator Moor	Comments noted.
59	The scale of the areas proposed for development in and around the Leconfield Industrial Estate are hugely significant and not all areas have been tested in the transport modelling exercise. However, it is noted that there will be Masterplan developed for the area as a whole	Comments noted. Modelling has been undertaken for the Leconfield Industrial Estate site for the purposes of the Plan, and to consider the planned growth at the site that the Local Plan and its evidence base envisages. A Transport Assessment, and possibly further modelling will be required for the masterplanning for all three Areas. Paragraph 7.7.14 identifies the need for further assessments.

Representor Number	Comments	Council Response
59	Further details on the Cleator Moor Innovation Centre are required with regard to a suitably scoped Transport Assessment, Drainage Strategy and Flood Risk Assessment for the site	As above. The assessments have considered the planned growth at the site that the Local Plan and its evidence base envisages. Paragraph 7.7.14 identifies the need for further assessments.
59	Text in the policy should provide details of Travel Plan requirements for the site including active travel infrastructure, improvements to public transport infrastructure and travel demand management	Reference to the Transport Improvements Study is made in para 7.5.8, and specific requirements for Travel Plans etc. can be found in Policy CO4PU.
59	The Leconfield Estate and Cleator Mills sites have been identified as sites which will need a Travel Plan with Travel Demand Measures to reduce the number of expected trips that such sites would normally generate	Policy CO4PU outlines the requirements for Travel Plans.
Policy E5PU – Employment Sites and Allocations		
34	Support the Council's commitment to supporting development on existing employment sites and allocations where it is in accordance with planning policy	Support welcomed.
34	It is considered that the site at Bridge End, Egremont could be extended on land to the west of the existing employment site. The proposed extension land is generally flat in topography and bounds the existing industrial site immediately to the south. The proposed extension site is available, suitable and deliverable for future employment use	Approximately one third of the site is in Flood Zone 3, so not proposing to take it forward at this stage. If the sites in Egremont are developed, or not coming forward as expected then this could be considered in a Local Plan review.
39	In reference to these Employment sites, Haverigg Industrial Estate, Haverigg, it is noted that this is an already established business park. Due to its hydrological link and close proximity to the Morecambe Bay SAC, Morecambe Bay and Duddon Estuary SPA and Duddon Estuary Ramsar it will have to be included in the HRA both at plan level and at project level once these developments are submitted as planning applications. The employment allocation of Energy Coast Business Park is in close proximity to Priority Deciduous Woodland which is linked to the Haile Great Wood SSSI. Therefore, activities proposed in these areas should be sensitive to the surrounding environment.	Both sites have been considered in the HRA supporting the Local Plan and have been screened out as Policy E2PO includes criteria to protect biodiversity.
43	Welcome some elements of the policy	Support welcomed

Representor Number	Comments	Council Response
43	Rather than focus on electric cars, it is feasible that other non-fossil fuels may arise during the Local Plan period and these technologies should be actively supported	Comment noted. Newer technologies can be picked up at the Local Plan Review stage
43	The policy should also look at how existing housing stock can be made more energy efficient and reduce its carbon footprint	The planning authority has limited control over improvements to existing stock, particularly where it is in private ownership, however the affordable housing policy (policy H8PU) identifies that the retrofit and refurbishment of existing stock is one means of bringing empty buildings back into use. The policy allows developers to do this to provide affordable housing where this cannot be provided on site. The re-use of empty buildings is also encouraged in the design policy (DS6PU).
43	Will this policy be reviewed after the COP27 conference?	Discussions at the COP27 conference would support the Council's decision to front load the Climate Change policy and also supports other policies, such as the electric vehicle policy.
59	No objection to remove the hierarchy of employment sites and the inclusion of three employment sites which is evidenced by the EDNA	Comments noted.
59	Development of some of the employment sites will need to consider the findings of the Copeland Transport Improvement Study 2021 in terms of the direct and indirect impacts of sites on capacity and safety issues on the A595, Travel Plans and travel demand measures	Reference to the Transport Improvements Study is made in para 7.5.8 to support Policy E2PU.
59	Welcome the removal of Hensingham Common as a strategic employment site with a view to it being retained as a longer term direction for future employment growth	Support welcomed.
Chapter 5 – Changes to the Climate Change and Clean Energy Chapter		
Policy DS2PU – Reducing the impacts of development on Climate Change		

Representor Number	Comments	Council Response
21	This policy should recognise the role of the historic environment in tackling climate change through the benefits of sympathetic restoration, retention, refurbishment and retrofit of historic buildings. The supporting text of the policy should refer to 2015 Historic England's guidance 'Planning Responsible Retrofit of Traditional Buildings'. If possible, the Council should consider a commitment towards the preparation of further planning guidance	Supporting text amended.
24	The move towards net zero should be set at a national level, rather than a local level. This will ensure consistency, where standards and timetables are universally understood and technically implementable. This prevents the potential risk to the viability of development	The policy will be reviewed as proposed government policy emerges e.g. at submission stage and through the examination. The Council feels it is important to highlight such opportunities to create better, more sustainable developments to developers through the Local Plan.
24	Consider that this policy is more of a statement of intent or vision rather than a policy and do not consider that it is necessary. It repeats a lot of the elements of the policies which are detailed elsewhere in the Plan. It is recommended that this policy is deleted	See comment above.
26	Welcome the changes to the policy, however, there remains a need to consider whether proposals will just reduce the increases in carbon, rather than result in net zero carbon.	At present the Council is unable to go further than support and encourage such measures as there are proposals to set out such requirements within national policy.
26	Developing greenfield land that could otherwise be used for carbon capture, tree planting and habitat restoration and floodwater storage runs counter to the ambitions set out in this policy	The Council has to balance the need to provide homes with climate change goals and aspirations. Unfortunately there are insufficient brownfield sites to meet identified housing needs. The Council does encourage the use of brownfield sites and existing, empty buildings through a number of policies and the largest of our housing allocations is a previously developed site.

Representor Number	Comments	Council Response
26	The carbon footprint of new development needs to be fully assessed, including the losses of opportunities for carbon sequestration and new journeys created/additional energy and resource use	It is difficult to assess the carbon footprint of all development proposed in the Local Plan as this will be dependent upon the specific design, whether any mitigation is required and proposed etc. Requiring an assessment of the carbon footprint of all Local Plan proposals would delay the adoption of the Local Plan significantly. It is important that the Local Plan is adopted in a timely manner to ensure future development is assessed against more up-to-date policy.
34	It is recommended that this policy is deleted as it is considered that it sets out objectives and a vision, rather than setting out policy	The policy will be reviewed as proposed government policy emerges e.g. at submission stage and through the examination. The Council feels it is important to highlight such opportunities to create better, more sustainable developments to developers through the local plan.
39	Welcome the updated Climate Change policy, including Copelands's commitment in achieving a positive contribution to Cumbria's net zero carbon goal. Natural England also welcomes the inclusion of SuDs, avoiding high flood risk areas, the contribution to environmental benefits through the Local NRNs and BNG. There is also the possibility to link the Local Nature Recovery Strategy to this policy, which has a depth of information surrounding key locations for habitat regeneration and enhancement. As well as providing further information on Copelands's inventory of existing habitats that can be enhanced through further connectivity. As mentioned within this policy the provision of green roofs and walls can help to contribute to the environmental outcomes of development. Further Green Infrastructure typologies can be utilised to help mitigate and adapt to the impacts of climate change as well as providing social and economic benefits as well. This	The Local Plan contains a specific Local Nature Recovery Network policy (N2PU) Additional text has been added to support the policy that refers to green infrastructure along with a footnote cross-referencing the natural environment chapter.

Representor Number	Comments	Council Response
	will help create connected and resilient wildlife corridors, sequester carbon, and help people adapt to climate change. The link from this policy and the Green Infrastructure policy should be explained (Policy N9PU).	
40	Support the commitment to addressing the impacts of climate change and achieving net zero carbon by 2037 but would note that most of the guidelines included within this policy are included in other proposed Local Plan policies.	Comments noted. The Council feels that this policy is important to demonstrate the Council's commitment to addressing climate change and other policies provide the detail.
40	Whilst these principles are currently set as guidelines, there is concern that the interpretation may change and it doesn't provide sufficient flexibility for development and could negatively impact on a scheme (i.e. viability). Further clarity in regard to flexibility should be included within the policy.	The Council disagrees with this statement, the policy wording clearly says "encouraged". The Council would like to require developers to include the measures listed however this will be subject to the proposed requirements in national policy.
59	Support the inclusion of a revised policy on climate change, particularly with the focus on supporting development proposals which promote active and low carbon travel. Support the inclusion of the policy towards the front of the Plan, giving it prominence	Support welcomed.
59	The stronger policy wording requiring developers to demonstrate how they have included measures to reduce the impact of development on climate change will make the policy more impactful and enforceable	No change considered necessary. The Council can only encourage rather than require such measures to be considered. Requirements are proposed to be set out in national policy shortly.
59	The terms 'positive contribution' and 'appropriate' should be defined in the supporting text	No change considered necessary. This will be dependent upon the exact proposal.
Policy CC6PU – Nuclear Development at Sellafield (Publication Draft Policy NU4PU)		
22	Support the policy change but it does not take into account the significance of Sellafield's owner (NDA) and the licenced nuclear waste storage facility at Drigg. The LLWR Ltd. Aspiration to vacate Pelham House for a new build at Drigg and the developing investigation via a 16 borehole programme into the feasibility of Near Surface Disposal of higher activity nuclear waste at Drigg both need to be taken	The supporting text has been updated to better reflect the current and future opportunities in the sector. This policy relates to development on the Sellafield site and other nuclear

Representor Number	Comments	Council Response
	into consideration, as well as the Copeland GDF partnership process. It is suggested that where Sellafield is mentioned in the text, "and Drigg" should be added. Sellafield should also be deleted from the policy title	developments will be considered in line with policies NU1PU-NU3PU. Developments regarding radioactive waste at Drigg will be determined in line with the Cumbria Minerals and waste Local Plan,
37	The wording for this policy should be reconsidered so it better reflects what is intended and needs to be achieved. The policy appears to be controlling rather than enabling – it could be reworded to be more comprehensive and clear	The supporting text has been updated to show the Council is looking to enable Sellafield to effectively deliver its mission.
37	Paragraph 1 – to provide context it should be acknowledged that there is a Government national level mission to decommission the Sellafield site and that the Council is, in principle, supportive of the need to reduce the hazards on the Sellafield site so that it can be delivered.	The supporting text has been updated to show the Council is looking to enable Sellafield to effectively deliver its mission.
37	Paragraph 1 - should be noted that Sellafield Ltd. is subject to stringent regulatory controls from the ONR and EA - matters subject to approval under other regulatory/permitting regimes should not be duplicated via planning controls	This has been reflected in paragraph 10.12.1.
37	For clarity, it is suggested that some of the introductory text is amended to read: “The Borough hosts the Sellafield site where a nationally significant decommissioning mission is being delivered in accordance with NDA Strategy 2021 (as required under the Energy Act 2004). The Council recognises the importance of enabling delivery of that mission in order to deliver a safer environment for future generations, and that this mission is carried out within a robust framework of safety, security and environmental regulatory controls which are placed on the operators of the site by e.g. the Office for Nuclear Regulation and the Environment Agency. It is recognised that to facilitate decommissioning and safely store the waste arisings from these high hazard reduction activities, pending a national decision on geological disposal, significant development of the Sellafield site is required. The Council’s approach to dealing with proposals for nuclear development including those related to decommissioning, site remediation and radioactive material management in the Borough is to work with operators of the facilities at the Sellafield nuclear licensed site and Cumbria County Council to ensure that, so far as it is in line with	This has been reflected in paragraph 10.12.1.

Representor Number	Comments	Council Response
	Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority..."	
37, 41, 59	Agree that criteria (a) should be deleted	Support welcomed.
37	Criteria (a) - please confirm what is meant by the 'existing designated Sellafield site boundary'? There are some small anomalies between the nuclear site licence boundary, the site fence at some locations around the site and the former Visitor's Centre site. Sellafield Ltd. is prioritising the use of land within the nuclear site license boundary - need to ensure the boundary in the Local Plan is correct	The Council will work with Sellafield to ensure consistent boundary is used.
37	Criteria (b) - it is proposed that the reference to the 'designated boundary' should be reconsidered.	Wording has been amended to 'Sellafield site'
37	Criteria (b) - the Copeland Local Plan should align with Cumbria County Council's Minerals and Waste Plan (particularly area CO32) Criteria (b) - the term 'exceptional need case' is very subjective. What criteria would be used to assess proposals? What an 'exceptional need case' would look like, recognition of sustainability and how it would manifest at Sellafield is essential to understand	A footnote has been added to help describe 'exceptional need case'
37	Criteria (c) - clarification is needed as to how this falls under the remit of the Local Planning Authority. Sellafield Ltd has a requirement to follow the NDA adopted position. Also, waste matters are generally regulated by the County Council so should it be included in this Local Plan?	The criterion considers radioactive materials rather than waste, and the future treatment options may change in the future. This gives a clear position from the Council should any planning applications be considered for such materials.
37	Criteria (d) - as sustainability and value for money for taxpayers are key factors in design processes along with minimising harmful side-effects and are managed by other permitting/licencing process, it is not expected for these to be scrutinised by the Council as well	This criteria is to ensure that all environmental impacts are considered, including any elements of the development that may fall outside of other permitting/licensing processes.
37	Criteria (e) - support this inclusion. However, it is requested that the wording is amended slightly to provide greater clarity. It is recommended that it could be something similar to "the Council is supportive of development proposals for the	The suggested change is not considered necessary.

Representor Number	Comments	Council Response
	provision of infrastructure to support the nuclear mission and nuclear development proposals"	
37, 41	Criteria (f) - what is meant by 'where relevant'? As Sellafield Ltd. delivers the NDA Strategy, which is subject to public consultation, it is not a matter for the Local Plan as it is not the role of Sellafield Ltd. to reaffirm this position	This criterion has been removed.
37	Criteria (g) - clarity required on the purpose of this. Definitions required for 'adverse effects' and 'positive local social impact'. Under the Energy Act 2004, there are separate obligations on the NDA (which are passed down to Sellafield) with regards to social impact therefore it is considered that this criteria should be removed	The policy has been reworded to focus upon mitigating adverse effects from the development. Social impact issues are covered in Policy NU1PU in the Publication Draft.
37, 41	Criteria (h) - clarity required on: the purpose of this; what is the carbon off-setting of; how would it be measured; what would a satisfactory measure be; how would it be carried out; where could it be done (which areas in Copeland have been allocated for carbon offsetting)? As the core mission at Sellafield is high hazard and risk reduction, sometimes carbon is not the biggest driver in decision making because nuclear safety and security have to be paramount. The NDA has its own carbon reduction targets from Government so there is duplication with this in the Local Plan.	The borough has a target to be net zero by 2037. It may be that most or all of the requirements could already be met by working towards the NDA's own carbon reduction plan, but this criterion is designed to ensure it is considered within developments and planning applications at Sellafield.
41	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.	The supporting text has been updated to give better context and more positive framework for the policy and opportunities in the nuclear sector in general. As a radioactive waste site, the LLWR is covered by the Cumbria Minerals and waste Local Plan.
41	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	The supporting text has been updated to outline core mission.

Representor Number	Comments	Council Response
41	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	The supporting text has been updated to give better context and more positive framework for the policy.
41	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	Section 10.3 outlines activities at Sellafield, as well as the supporting text for the policy.
41	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	The supporting text now describes this.
41	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	This is recognised in supporting text for the chapter.
41	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	Noted.
59	Concerned that the policy is written as though it applies to all development at the Sellafield site. This needs to be qualified since waste related development at Sellafield is considered by Cumbria County Council as waste planning authority and is subject to policies in the Minerals and Waste Local Plan. This should be reflected in the policy	The roles of different authorities has been reflected in Table 1 on page 3 of the Publication Draft
59	Whilst joint working is supported, the reference to Cumbria County Council within the policy would be more appropriate in the supporting text	No change considered necessary.
59	It is not considered appropriate to refer to potential developers by name - it is suggested that the following text is omitted from the policy "...to work with	Developers are not referred to by name in the Publication Draft

Representor Number	Comments	Council Response
	operators of the facilities at the Sellafield licensed nuclear site and Cumbria County Council..."	
59	Criteria (e) - it is suggested that the word 'adequate' is replaced with the word 'necessary' to make it a more seamless process to justify additional infrastructure or improvements required	Noted, but no change proposed
59	Criteria (h) - welcome this inclusion. However, the text should be reworded to read "proposals shall include satisfactory measures for carbon offsetting. Where it has been demonstrated that these cannot be achieved on site, they shall be achieved via offsite/other agreed compensatory means". This makes it clear that off-setting should be secured on site where achievable before considering offsite locations.	Noted, but no change proposed.
59	Criteria (h) - it is suggested that additional text around the mechanism for securing compensation, for example s106 agreements	Noted, but no change proposed
59	Should be made clearer as to whether the policy is intended to cover all matters related to development at Sellafield or whether other Local Plan policies are also intended to apply.	While this policy is focussed on activities at the Sellafield site the Plan should be considered as a whole and other considerations may also apply.
59	Does not reference the need for the Council to work with the County Council as the local Highways Authority and Lead Local Flood Authority	The roles of different authorities has been reflected in Table 1 on page 3 of the Publication Draft
59	An additional criterion should be added requiring which accounts for the Sellafield Travel Plan and how this should be monitored and revised as significant proposals relating to Sellafield arise	Travel Plans are considered in detail in section 17.8 and Policy CO4PU.
Chapter 6 – Changes to the Retail Chapter		
31	Paragraph 6.1 - welcome the recognition that Millom is a Key Service Centre but would appreciate a more explicit commitment to active support	The Local Plan contains a number of references to how the Council will support Millom and the other key service centres.
Policy R7PU – The Key Service Centres (Publication Draft Policy R4PU)		
21	Recommend an inclusion of a policy requirement to protect and enhance the special character and appearance of the three town centres all of which are designated conservation areas for their special architectural or historic interest	Additional criterion added.
21	Support criteria (j) with regards to the repair and renovation of historic buildings	Support welcomed.

Representor Number	Comments	Council Response
59	Support the merging of the three policies, subject to the new policy ensuring the unique nature of each town is not lost	Support welcomed.
59	Criteria (b) refers to a table which is not included in the document	The table is included in the Local Plan.
59	The policy could include clear references to local regeneration initiatives, including Town Investment Plans and Place Plans	Such references are included elsewhere in the Local Plan (e.g. paras 7.9.3, 11.2.7)
Policy R8PU – Retail and Service Provision in Rural Areas		
59	Support the removal of R9PO and R13PO and the incorporation of these policies into the proposed new Policy R8PU	Support welcomed.
59	Support the two amendments proposed to the policy wording	Support welcomed.
Chapter 7 – Changes to the Tourism Chapter		
31	Paragraph 7.1 - support the ambition to the development of tourism in Millom but are concerned about the impact of second home ownership. Would welcome a policy to place limitations on this	Whilst the Council appreciates the problems second home ownership can cause, the Local Plan is limited in terms of the actions it can take to reduce second home ownership within towns and villages. Inclusion of a policy that prevents or limits second homes within towns and villages would run contrary to the NPPF.
59	Would welcome clarity if Tourism Opportunity Sites will remain in the Local Plan to help support CCC's role in identifying adequate infrastructure requirements for any proposals that may come forward for these sites	Tourism Opportunity Sites are no longer included within the Local Plan. Instead the Plan contains Opportunity Areas which are suitable for a range of uses and identifies Tourism Hubs and Gateways.
Policy T1PO – Strengthening the Tourism Offer (Policy not taken forward into the Publication Draft)		
59	The removal of this policy would appear to be in contradiction with the major investment due to be undertaken in Millom through the Town Investment Plan	The Council disagrees, the Local Plan contains a number of other policies that support growth of the tourism sector and a number of Millom specific projects are referenced and supported within the supporting text.
Chapter 8 – Changes to Copeland's Communities Chapter		

Representor Number	Comments	Council Response
31	Paragraph 8.1 - recognise the support for more affordable homes in the area, but the present definitions would still render it difficult for many local people to benefit from it	Comments noted. The Council has to use the definitions for affordable housing as set out in national policy. The Council has however identified a Copeland specific tenure within the affordable housing policy to try to enable more residents to access affordable homes.
42	The Council has not published the draft SHMA or other associated evidence base upon which the proposed housing requirement is based on. Until this evidence is produced, the housing requirement figure is unsound	Comments noted, the SHMA Update is available on the Council's website since October 2021 and all other documents (HNS, SHMA 2019) have been on there for some time prior to the consultation.
42	It is suggested that a target of 300 dwellings per annum is appropriate based upon employment-led growth data. This is supported by the 'Further Technical Critique of Housing Need in Copeland' which was submitted to the Council in November 2020	The SHMA sets out why a 300 dwellings per annum figure is not being taken forward. A target such as this would only be required if all aspirational economic projects occurred within the Plan period. There are significant doubts over a number of them which would require government funding and/or support such as the mine.
42	The current proposed housing target is not positively prepared and does not meet the test of soundness in relation to meeting Copeland's Objectively Assessed Need	The Council disagrees, the requirement is based upon latest evidence of need and significantly exceeds the figure produced by the standard methodology. Government policy states that where councils are aspirational and exceed standard figures, the requirement will be found sound.
59	The housing target should be increased further to ensure a strong housing offer within the Borough and to ensure Copeland is an attractive location for people to live and work in, especially given the declining working age population	See comments above.

Representor Number	Comments	Council Response
59	The supporting text should cross-reference back to Policy DS3PU for clarity and consistency	Additional text added to Policy H1PU regarding settlement boundaries.
59	The updated SHMA should have been made available to view when completed	Comments noted.
59	In the Publication draft, the Council should signpost to the evidence base documents which explains why sites have been removed	Comments noted – a Discounted Sites document will be published alongside the Publication Draft.
59	If further changes to sites are made, the Council should notify statutory consultees as early as possible to prevent unnecessary delays	Comments noted, the Council will always endeavour to do this where possible and where timeframes allow.
59	In the Publication draft, the Council should provide a clear rationale behind any changes from the Preferred Options consultation document	Additional text added throughout the document in relation to this.
59	The justification text for Tables 3 and 4 refers to Appendices 4 and 5 - this should be changed to Appendices D and E	Comments noted.
59	Site names should be included alongside site references and settlement areas for clarity purposes	Comments noted.
59	There is no reference in this chapter to the new policy on health as referenced in the 'Changes to Development Strategy' chapter	Comments noted.
Policy H4PU – Distribution of Housing		
26	Concerned by the significant increase in proposed housing numbers and the impact of this on the landscape and character of settlements lower down the settlement hierarchy	Comments noted. The Council has produced a Settlement Landscape Character Assessment and a Landscape Character Assessment (areas outside settlements) to support the Local Plan. It demonstrates that the housing allocations will not result in significant landscape impacts or harm the character of settlements.
26	How can this increase be achieved at the same time as addressing climate change, reaching net zero Carbon and halting and reversing the decline in biodiversity?	The Council has to balance future housing needs against protection of the environment. It has done so by allocating the least constrained available sites for development and by including policies

Representor Number	Comments	Council Response
		relating to climate change and biodiversity within the Local Plan that all development must adhere to.
34	Support the distribution of housing will be broadly in line with the revised settlement hierarchy set out in Policy DS3PU	Support welcomed.
34	Agree that the proportion of development for Key Service Centres should be at least 30%	Support welcomed.
34	It is considered that the housing requirement should be higher than the figure currently proposed - at least 200dpa not 149dpa. Based on this, the minimum housing target for Key Service Centres should be a minimum of 760dpa in order to meet the objectively assessed need in alignment with the Employment-led growth scenario.	No change proposed. The housing requirement is supported by evidence within the SHMA Update and is deliverable. The Council has identified sufficient sites to meet a higher figure of 200dpa over the plan period to support aspirations.
34	Policy should never set a maximum target for development in settlements as this would not be in accordance with the NPPF and the Government's aim to increase the supply of housing. The Council should remove any references to development being 'limited' in the policy and to remove any 'maximum' figures within the table	The reference to a "cap" on housing numbers has been removed. Upon review it was considered not to comply with the NPPF and there are other planning policies which would prevent sprawl or village cramming.
40	Support the Council's positive approach in identifying that the full need for housing exceeds that set through the standard method.	Support welcomed.
40	It is considered that the minimum housing requirement of 149dpa does not reflect the Council's aspirations for economic growth and does not include consideration of supporting future employment growth. The Council is encouraged to review the housing requirement to ensure it is NPPF compliant. As set out in the Technical Critique (undertaken by Turley's and submitted in response to the Preferred Options consultation), it is considered that the housing target should be 300dpa which reflects the employment led growth scenario	<p>No change considered necessary. The housing requirement is supported by evidence within the SHMA Update and is deliverable. The Council has identified sufficient sites to meet a higher figure of 200dpa over the plan period to support aspirations.</p> <p>The SHMA sets out why a 300 dwellings per annum figure is not being taken</p>

Representor Number	Comments	Council Response
		forward. A target such as this would only be required if all aspirational economic projects occurred within the Plan period. There are significant doubts over a number of them which would require government funding and/or support such as the Mine.
42	Bigrigg should continue to be recognised as a Local Service Centre as this is more reflective of its role in terms of services and facilities. It is a sustainable location, well connected to Whitehaven and can support the delivery of sustainable growth	The Settlement Hierarchy and Development Strategy Update 2022 sets out why Bigrigg is now within the Sustainable Rural Villages tier.
43	There needs to be clearer specification of housing allocations to 'other rural villages'. It is expected that The Green, The Hill and Hallthwaites will need to create approximately 8 houses per rural village? Will these be developed in the settlement boundary? Are the houses to be open market or affordable units? Will the distribution consider the potential disproportionate impact on the character of the villages?	<p>Rural Villages are now expected to provide 108 dwellings between them. As some Rural Villages are more constrained than others this figure cannot be apportioned evenly amongst the villages within the tier. The majority of homes within the tier will be delivered on a single site that is allocated for development within Summergrove that could deliver 80 homes.</p> <p>Rural Villages include Hallthwaites and The Green, the Hill is now considered to be an open countryside location.</p> <p>Housing should be delivered within the settlement boundaries and can be either market housing or affordable housing. Policy H8PU however does require that on sites over 10 units, at least 10% of homes are affordable.</p>

Representor Number	Comments	Council Response
44	Supports the focus of development in Whitehaven. However, the percentage should be increased to 50% in order to support the regeneration, employment and address the towns declining population	The 40% figure directed to Whitehaven is not a ceiling and additional development over and above this will be supported where it accords with the Development Plan. Increasing the figure to 50% would reduce the amount of homes that would be delivered within the more rural parts of the Borough which would mean the Local Plan strategy is not delivered.
45	A cluster is expected to deliver more dwellings (20%) than a 'sustainable rural village' (7%) or 'other rural villages' (3%). Combining the number of houses of allocations HDH1 and HDH2 will result in 54 houses in Drigg alone. In Drigg there are currently 100 units - this would increase the number of houses by 54%, thus increasing traffic and a rise in Drigg's carbon footprint. There is a lack of parking in the village already	Drigg and Holmrook are no longer being taken forward as a settlement cluster. Both villages now fall into the Sustainable Rural Village tier of the hierarchy.
45	We do not need a housing estate of 32 dwellings located in the middle of Drigg village nor another estate of 22 dwellings just down the road to give it character nor reinforce identity in the heart of the village. This is an agricultural village with 8 farms starting at Hill Green and ending at Shepherds Moreside Drigg	Drigg and Holmrook are Sustainable Rural Villages that offer a number of services. New housing development offers may benefits, allowing people to stay within their communities as their needs change, delivering affordable housing and bringing additional residents in to maintain social cohesion and support local services.
45	Drigg and Holmrook – development would take place in between the Church and 2 Listed Buildings which would affect the rurality of the area	Drigg and Holmrook are no longer being taken forward as a settlement cluster. Each will have its own settlement boundary and the villages will be separated by a Green Wedge.
45	Drigg and Holmrook – there is room for some sympathetic, small scale development for affordable and sheltered housing as per the Community Plan	Comments noted.

Representor Number	Comments	Council Response
45	Drigg and Holmrook – should look to build on brownfield sites before greenfield sites - there are brownfield sites available in both Drigg (back of the Victoria Hotel) and Holmrook (Hill Farm)	Hill Farm is now an allocation in the Local Plan and land at Victoria Hotel has been included within the settlement boundary to allow windfall development to come forward. Unfortunately there are an insufficient number of brownfield sites within the borough to meet identified housing needs.
Policy H5PU – Housing Allocations		
24	All sites in the Local Plan should be deliverable over the Plan period and planned to an appropriate strategy	Comments noted.
24	The sites should be spatially distributed and follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas	Comments noted. The hierarchy, and the logic behind it, is set out in the Settlement Hierarchy and Development Strategy Update 2022.
24	There should be a range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels. This will allow small, medium and large housebuilders to access the local market	Comments noted. The Local Plan allocates a range of sites of different types and sizes and the Council is willing to work with developers to enable delivery.
24	The NPPF says that the Council should identify at least 10% of housing of the housing requirement on sites no larger than 1 hectare or else demonstrate strong reasons for not achieving this target. The HBF would be keen to work proactively with the Council on this issue	The housing trajectory demonstrates how many houses will be delivered on sites of less than 5 units. The majority of these are on sites no larger than 1 hectare. A number of housing allocations are also on sites of less than a hectare as shown in the Housing Allocations Profiles document. The Council will also continue to support windfall development on smaller sites.
24	The Plan should supply a sufficient number of sites to meet the Council's housing requirement, 5 Year Land Supply and Housing Delivery Test. It is recommended that the Plan over-allocates to provide a buffer, allowing for any under delivery and a flexible approach	Comments noted. The housing trajectory demonstrates that 4453 homes can be delivered against a growth target of 3400 homes.

Representor Number	Comments	Council Response
26	Concerns outlined in the Preferred Options consultation response for site allocations remain	Comments noted.
34	Support the allocation of housing sites across the Borough, especially in Egremont	Support welcomed.
39	Housing allocations in Cleator Moor should look to avoid the banks and floodplains of the River Ehen SSSI and SAC	Comments noted. Housing allocations avoid such areas.
40	The Local Plan period has been amended to 2038. However, should adoption not occur until 2023, it would mean that strategic policies only look ahead 14 years from adoption; this means that strategic policies should be amended to look ahead to 2039 at the earliest, meaning that the Council would need to plan for more dwellings.	A change is not considered necessary. The housing trajectory demonstrates that 4453 homes can be delivered against a growth target of 3400 homes. If an additional year was added this would equate to a growth figure of 3600 homes.
40	The removal of allocations which may not be deliverable is justified, the Consultation Document has failed to fully set out the reasoning for amending allocations where full planning permission has been granted.	Please see the Discounted Sites document for further information. The removal of an allocation from a site with planning permission would not prejudice the delivery of the site as the principle of development has already been accepted.
42	No allocations are currently proposed in Ennerdale Bridge and the settlement boundary is drawn tightly around the settlement, providing limited opportunity for Ennerdale Bridge to perform its role as a Sustainable Rural Village. It is therefore requested that the Council reverts back to the previous settlement boundary to include 'Land at Vicarage Lane'	The reasons for this are set out in the Discounted Sites document. It is accepted that some villages within a tier do not have the same capacity to deliver homes as others which is why an individual settlement based targets have not been set.
<i>HCM3 – Former Ehenside School, Cleator Moor</i>		
39	This allocation is in close proximity to a tributary of the River Ehen SAC and will need including in the Local Plan HRA and a project level HRA	The site has been considered through the HRA.
<i>HWH2 – Red Lonning and Harras Moor</i>		
33	Welcome the continued allocation of site HWH2	Support welcomed
<i>HWH3 – Land at Edgehill Park (former Marchon Car Park)</i>		
40	This site has been reduced in size and yield to exclude the SHLAA site WS008 as it now has planning permission. This change is objected to as it is not justified by	The removal of an allocation from a site with planning permission would not

Representor Number	Comments	Council Response
	the NPPF or PPG. The site forms part of a Key Regeneration Site (Land at Edgehill Park) which the Preferred Options identifies within the chapter of Strategic Development Priorities and Policy DS4PO. The site, alongside the Former Marchon site, provides wider strategic benefits and the removal of the site divides it into two parts, which may impact on the comprehensive approach. The site should be retained as an allocation as it remains undeveloped and the planning permission is time constrained.	prejudice the delivery of the site as the principle of development has already been accepted. Removal of the allocation ensures the site is not double counted when calculating the housing land supply.
<i>HWH5 – Former Marchon Site, Whitehaven</i>		
44	Support the allocation of site HWH5 as it is sustainably located within the principal settlement. It is capable of immediate delivery and can provide a wide range of housing including C2 (care). The sites deliverability is clearly demonstrated as it is currently the subject of a hybrid planning application for residential, a neighbourhood centre, public open space and transport	Support welcomed.
<i>HWH6 – Land south of Waters Edge Close</i>		
40	Supportive of this draft allocation	Support welcomed.
<i>HCM1 – Land at Jacktrees Road</i>		
40	Supportive of this draft allocation	Support welcomed.
<i>HEG1 – Land north of Ashlea Road, Egremont</i>		
34	Support the allocation of this site	Support welcomed.
<i>HEG2 – Land at Gulley Flatts, Egremont</i>		
34	Support the allocation of this site. Discussions are ongoing with developers in respect of delivering houses on the site. As the sole landowner of the site, can confirm that the site is deliverable and development could occur in the early stages of the Plan. Development of the site relate well to the existing settlement and would help support and regenerate the existing town centre services and facilities. Support the minimum target of 25 dwellings per hectare as it provides flexibility to take into account issues such as viability, the requirement for open space and utilities, but will allow development at a higher density if required	Support welcomed and comments noted.
63	The road infrastructure is currently not fit for purpose. The road from Gulley Flatts to Bookwell cannot accommodate any more traffic - they are small country roads already at capacity, used as a rat run for Sellafield. Despite various road repairs, the road is still in a poor state of repair with potholes	Comments noted. The impact of the allocation on highways infrastructure has been assessed through the Transport Improvements Plan.

Representor Number	Comments	Council Response
63	There are traffic issues at school drop off and pick up times – more traffic will exacerbate the situation	Comments noted. The impact of the allocation on highways infrastructure has been assessed through the Transport Improvements Plan.
63	Appreciate there are housing targets to be met, but ask that the Council considers alternative sites	Comments noted.
<i>HEG3 – Land to south of Daleview Gardens</i>		
34	Support the allocation of this site. Discussions are ongoing with developers in respect of delivering houses on the site. As the sole landowner of the site, can confirm that the site is deliverable and development could occur in the early stages of the Plan. Development of the site relate well to the existing settlement and would help support and regenerate the existing town centre services and facilities. Support the minimum target of 25 dwellings per hectare as it provides flexibility to take into account issues such as viability, the requirement for open space and utilities, but will allow development at a higher density if required	Support welcomed and comments noted.
<i>HDI1 – Land south west of Rectory Place</i>		
26	Welcome the reduction in scale of HDI2 to enable the incorporation of open space	Support welcomed.
<i>HDH2 – Wray Head, Station Road</i>		
26	Welcome the reduction in scale of this site to enable the incorporation of open space and it is unclear why this is not mentioned in Appendix E	Support welcomed.
54	Agree with the inclusion of this site	Support welcomed.
<i>HDH3 – Hill Farm, Holmrook</i>		
3	An extra 60 dwellings is out of proportion to the characters of the villages - a new estate of this size will detrimentally alter the character of the settlements	The Council disagrees with this statement. The site is a brownfield site with existing buildings and represents the only housing allocation within the village.
9	Note the proposal to include additional housing allocations. Paragraph 177 of the NPPF (2021) is relevant regarding sensitive site location and design to avoid or minimise adverse impacts on designated sites. It is suggested that this is included as an informative in any site specific criteria to avoid any conflict should an application come forward on the site.	Comments noted. There are a number of policies relating to sensitive locations and any on site constraints are listed within the Housing Allocations Profiles document.

Representor Number	Comments	Council Response
54	Agree with the inclusion of this site	Support noted.
59	There are reservations about the allocation of this site until it is proven a safe access can be achieved	Comments noted – access to the site has been considered through the Site Access Assessments and is considered to be deliverable.
<i>HSB1 – Land adjacent to Abbots Court, St. Bees</i>		
17	The Council should not be planning for homes based on the possibility of a new nuclear power plant and the West Coast Mining project going ahead. The future is uncertain so large numbers of new homes should not be planned for. There are a large number of homes currently for sale in St. Bees which suggests that there is no need for more homes	<p>The evidence supporting the growth figure of 200 dwellings per year is set out in the Economic Development Needs Assessment. The figure is not purely based on need that may arise from nuclear new build or West Cumbria Mining.</p> <p>There may be a number of reasons why there are homes for sale within the village and a number of empty homes are required to enable market churn.</p>
17	Biodiversity is a current major issue - should not be building on greenfield land and should protect our green infrastructure	<p>Local Authorities are required by government to meet identified housing needs. Unfortunately there are an insufficient number of brownfield sites in the borough to meet such needs therefore the least constrained greenfield sites are being taken forward as housing allocations.</p> <p>New development will be required to demonstrate a 10% net gain in biodiversity as part of their proposals.</p>
17	The village school is regularly oversubscribed. There is continual complaints about lack of parking and safety concerns	The Infrastructure Delivery Plan considers whether a school is over or under

Representor Number	Comments	Council Response
		subscribed and sets out where new or extended provision is required. Any new development would have to demonstrate sufficient off-street parking can be provided.
17	There is a lack of services in St. Bees (no doctors, dentists, bank, chemist, garage, bus service, library, police, fire station etc.). There is a train service, but it is infrequent	The services within the villages have been assessed through the Village Services Survey and are identified within the Settlement Hierarchy and Development Strategy Update 2022.
17, 19	There is a lack of pavements across the village - any additional development are likely to increase traffic and cause conflict between motorised and non-motorised users, especially vulnerable users such as children and the elderly	The impact of additional development upon the highway has been considered through the Transport Improvement Study.
17, 19	To develop more houses will affect a quiet rural area, magnificent vistas and green pastures	The Council has identified the least constrained, available sites within the village.
17, 19	The roads into the village are inadequate and unable to support additional traffic. Main Street in particular is an issue - it is virtually a single track road in places due to parked cars and pinch points which causes numerous daily traffic jams. All accesses and exits into/from St. Bees can be dangerous	The impact of additional development upon the highway has been considered through the Transport Improvement Study. Comments have also been provided by Cumbria County Council Highways department.
17	St. Bees has no large employment opportunities, so most residents have to travel to/from the village which is difficult due to the distance from a main highway	Comments noted.
19	The land is not owned by St. Bees Private School. There is a covenant on the land which says that it will remain as greenfield, and not to be built upon.	Comments noted. The Council has sought legal advice on this matter.
<i>HSB3 – Fairladies Extension, St. Bees</i>		
5, 6, 10, 13, 15, 17, 18, 19, 35, 47, 51, 52, 55, 56, 57, 60	Access to the site is problematic both via Fairladies and Main Street due to congestion, poor parking and driving behaviours. Main Street is narrow cannot cope with any more passing traffic or parked cars. It is used as a rat run by	The impact of additional development upon the highway has been considered through the Transport Improvement

Representor Number	Comments	Council Response
	Sellafield workers and there are more delivery vans and HGVs using the road, often leading to gridlock, especially if the level crossing gates are down. It is likely that an extra 30 dwellings would create at least an extra 60 cars, plus lead to an increase in delivery vehicles	Study. Comments have been also provided by Cumbria County Council Highways department. Any new development will have to demonstrate that a suitable level of off-street parking can be provided.
5, 13, 18, 51, 57	Any access to this site is more dangerous than the deleted allocation of HSB2. The current roundabout is already very busy. A new entrance directly from the B5345 would be from a steep, narrow hill and has the need for regular speed checks. There is an existing junction between the upper and lower levels of the Fairladies Estate where minor incidents occur on the road here. The proposed development would double the amount of traffic through this junction and steep hill.	The impact of additional development upon the highway has been considered through the Transport Improvement Study. Comments have been also provided by Cumbria County Council Highways department.
18, 51, 56	An entrance via the Fairladies Estate would be dangerous - it is close to the school and children play on the currently quiet roads. Would increase traffic levels through the Fairladies Estate. Most of the pavements along the street are the same height as the road due to driveways, posing a risk to pedestrians	The impact of additional development upon the highway has been considered through the Transport Improvement Study. Comments have been also provided by Cumbria County Council Highways department.
5, 6, 13, 15, 18, 19, 32, 35, 47, 51, 52, 55, 57, 60	The current drainage system struggles to cope with the existing Fairladies Estate. Further development would lead to drainage and flooding issues at the entrance to the estate and down Main Street, also along Egremont Road/Nethertown Road and down the path to Seamill House. After heavy rain, water will come through the existing retaining wall behind the townhouses and flats on Fairladies, with water lifting manhole covers. Any new development will increase the number of flood events. Also expect flood events to become more regular due to an increase in extreme weather events because of Climate Change	A Strategic Flood Risk Assessment has been produced and comments have been provided by Cumbria County Council as lead local flood authority. Any application for development on the site would have to comply with Local Plan policies regarding flooding.
5, 47, 57	HSB2 would represent a clear straightening of the village boundary and could be considered infill development. HSB3 is a clear extension of the village boundary.	HSB2 is no longer being taken forward as a housing allocation – the reasons for this are set out in the Discounted Sites document.
6	The site is steep and would involve a massive amount of soil shifting and shoring up	Comments noted.

Representor Number	Comments	Council Response
6, 52	Building on ever decreasing agricultural greenfield compromises biodiversity and wildlife. The field hosts nesting skylarks	<p>Comments noted. Local Authorities are required by government to meet identified housing needs. Unfortunately there are an insufficient number of brownfield sites in the borough to meet such needs therefore the least constrained greenfield sites are being taken forward as housing allocations.</p> <p>Ecology assessments have been carried out on all allocated sites – a summary of these can be found in the Housing Allocations Profiles document.</p>
10, 17, 18, 19, 35, 47, 51, 52, 55	The local school cannot accommodate any more pupils. There is continual complaints about lack of parking and safety concerns. Children may have to be transported to other schools, leading to more traffic	<p>The Infrastructure Delivery Plan considers whether a school is over or under subscribed and sets out where new or extended provision is required. Any new development would have to demonstrate sufficient off-street parking can be provided.</p> <p>Any new development would have to demonstrate sufficient off-street parking can be provided.</p>
10	With the likely increase in tourism in the Coastal Path area, how does the Council propose to respond to existing challenges and issues faced by existing residents?	<p>The evidence base documents supporting the Local Plan provide further information regarding this.</p> <p>Many of the coastal path areas are protected by Local Plan policies, for example the Undeveloped Coast and Heritage Coast policies.</p>

Representor Number	Comments	Council Response
13, 18, 19	The southern end of the village experiences power cuts several times a year. Demand from an extra 30 houses would put extra pressure on the supply	The Council has discussed Local Plan proposals with utilities providers and where capacity issues have been identified these are set out within the Infrastructure Delivery Plan.
13	All four entries into St Bees have pinchpoints, with parking difficulties especially at school times and Sellafield shift changes	Comments noted. The impact of additional development upon the highway has been considered through the Transport Improvement Study. Comments have been also provided by Cumbria County Council Highways department. Any new development would have to demonstrate adequate off-street parking can be provided.
5, 15, 18, 35, 51, 57	Do not support this allocation. The site occupies an elevated position - any development here would have a detrimental visual impact, affecting the village skyline. It would be clearly visible from a wide area, including the Heritage Coast.	Landscape impacts of the proposals are considered in the Settlement Landscape Character Assessment.
15, 35, 55, 57	The services and infrastructure of the village cannot support the new housing. Previous development has been built in St Bees without adequate infrastructure	An Infrastructure Delivery Plan and Transport Improvement Study identify the necessary infrastructure that will be required to support new development in the borough.
17, 19	The Council should not be planning for homes based on the possibility of a new nuclear power plant and the West Coast Mining project going ahead. The future is uncertain so large numbers of new homes should not be planned for. There are a large numbers of homes currently for sale in St. Bees which suggests that there is no need for more homes	The evidence supporting the growth figure of 200 dwellings per year is set out in the Economic Development Needs Assessment. The figure is not purely based on need that may arise from nuclear new build or West Cumbria Mining. There may be a number of reasons why there are homes for sale within the village

Representor Number	Comments	Council Response
		and a number of empty homes are required to enable market churn.
17, 19, 52	Biodiversity is a current major issue - should not be building on greenfield land and should protect our green infrastructure	Local Authorities are required by government to meet identified housing needs. Unfortunately there are an insufficient number of brownfield sites in the borough to meet such needs therefore the least constrained greenfield sites are being taken forward as housing allocations. Developers will be required to demonstrate a 10% increase in biodiversity net gain as part of their proposals.
17, 19, 47, 51	There is a lack of services in St. Bees (no doctors, dentists, bank, chemist, garage, bus service, library, police, fire station etc.). St Bees does not have access to sustainable forms of travel although there is a railway station with services to Carlisle and Barrow. There are limits for travel to Whitehaven for shopping, health facilities and entertainment.	The services within the villages have been assessed through the Village Services Survey and are identified within the Settlement Hierarchy and Development Strategy Update 2022.
17, 19, 55	There is a lack of pavements across the village - any additional development are likely to increase traffic and cause conflict between motorised and non-motorised users, especially vulnerable users such as children and the elderly	The impact of additional development upon the highway has been considered through the Transport Improvement Study.
17, 19	St. Bees has no large employment opportunities, so most residents have to travel to/from the village which is difficult due to the distance from a main highway	Comments noted.
17, 19	To develop more houses will affect a quiet rural area, magnificent vistas and green pastures	The Council has identified the least constrained, available sites within the village.
18	Development on this site would affect the existing 3.5 metre retaining wall and cause physical disturbance to the property adjacent to the wall, affecting ground stability	This issue would need to be considered at planning application stage.

Representor Number	Comments	Council Response
18	New houses on this site would block light to existing properties and would overlook existing houses	There are Local Plan policies that protect sunlighting and prevent overlooking. Any new development would need to be designed in a way so that it accords with such policies.
18	Further development is not in keeping with the historic nature of the village	The impact of the development has been considered through the Heritage Impact Assessments document.
19	Large amounts of residents unaware of Local Plan preparations and various consultations	The Council wishes to engage with as many local residents as possible, however the covid-19 pandemic has limited opportunities for public meetings etc. The Local Plan is advertised on the Councils social media pages, in the press and through emails and letters sent to everyone on the Council's consultation database. We have also provided posters and leaflets to town and parish councils to help raise awareness of the consultation.
19	Decisions on housebuilding should not be based on Government pressure to build more. Houses should only be built in areas which have the infrastructure to accommodate it - St. Bees is not one of these areas	An Infrastructure Delivery Plan and Transport Improvement Study identify the necessary infrastructure that will be required to support new development in the borough.
19, 52, 55	Government says that greenfield sites should not be built upon. Should develop more brownfield land along the A595 corridor before developing greenfield land	Local Authorities are required by government to meet identified housing needs. Unfortunately, there are an insufficient number of brownfield sites available in the borough to meet such needs therefore the least constrained greenfield sites are being taken forward as housing allocations.

Representor Number	Comments	Council Response
19, 55	It is expected that further development will cause additional issues with the current sewerage system	Discussions have taken place with United Utilities throughout the production of the Local Plan and any constraints have been identified within the Infrastructure Delivery Plan. The Local Plan also contains a number of policies to reduce surface water run off to prevent negative impacts upon the sewer system.
35	Object to this as it seeks to extend rather than infill within the existing boundary	Comments noted. Unfortunately there are insufficient, suitable and available sites within the boundary to help meet housing needs.
39	This allocation is in close proximity to the St Bees Head SSSI and the St Bees Heritage Coast. Due to the St Bees SSSI having a variety of isolated bird's colonies, a recreational disturbance assessment should be carried out to assess the impacts.	This issue has been considered through the Habitats Regulations Assessment process. Site specific ecology assessments have also been carried out on the allocated sites.
49	Landowners would like this site to be allocated	Comments noted.
49	Site forms a logical extension to the village without significant landscape impact or negative impact on residential amenity of other properties nearby	Comments noted. No landscape impacts have been identified in the Settlement Landscape Character Assessment document.
49	Suitable access to the site could be achieved	Comments noted. This has been confirmed through the Site Access Assessments.
49	The owner would look to bring the site forward with the adjoining landowner	Comment noted.
49	Transport links to both Sellafield and Whitehaven	Comment noted.
49	Close to the beach and the services in St Bees	Comment noted.
49	One of the most sustainable settlements in Copeland	Comment noted.

Representor Number	Comments	Council Response
51	Would represent a substantial increase in the Fairladies Estate in the order of 50%	Comment noted. The number of dwellings identified in the plan is indicative only.
51	Cycling to any of the local towns is virtually impossible due to poor infrastructure	The Local Plan identifies a number of opportunities to improve cycling links within the borough. These are also listed within the County Council Local Cycling and Walking Infrastructure Plan.
51, 52	New dwellings will increase pollution and have associated environmental damage. Could lead to health issues for residents	The impact of new development on air quality has been considered through the Habitats Regulations Assessment. The Local Plan directs development to the most sustainable areas to minimise the need to travel.
55	Abbey Farm is owned by people from the village - it was bought by residents to avoid any development on the site	Comments noted.
56	New development on this site would block sunshine into the garden until late afternoon and the sea views to the south west	Private views are not a material planning consideration, nor is the impact upon the amount of sunlight received in a garden. The impact on sunlight received by habitable room windows is however an issue which would be considered at the planning application stage.
56	Could affect the stability of the boundary wall between the garden and the road	The Local Plan contains policies relating to land stability (DS6PU and DS10PU). Any planning application for development on the site would need to demonstrate compliance with such policies.
59	CCC is content with the allocation of the first field and, although the total allocation has not yet been tested, the principal of the development is considered acceptable	Comments noted.
60	Any new housing developments need to have full impact assessments	Comments noted.

Representor Number	Comments	Council Response
<i>HBI1 – Land north of Springfield Gardens</i>		
42	Support the retention of this site as an allocation	Support welcomed
<i>HBI3 – Springfield Farm</i>		
42	This site should remain as an allocation. It has been identified in the SHLAA as being suitable and deliverable for housing	The reasons for removing the allocation from this site are set out in the Discounted Sites document. Further information has been received regarding the site's deliverability since the SHLAA was produced.
42	Represents a logical extension to proposed housing allocation HBI1	See comment above.
42	There are no constraints to delivering housing on the site	See comment above.
42	The site is in a suitable and sustainable location for housing development	See comment above.
42	Housing could be delivered on the site in the short term	See comment above.
42	Delivering housing on this site would provide additional housing to meet the higher housing need	A sufficient number of alternative, less constrained sites has been identified to meet the growth figure.
Policy H8PU – Affordable Housing		
24	If the Council does not intend to meet the NPPF required 10% affordable home ownership requirement, this should be evidenced	Comments noted – the justification for an alternative tenure is set out in the SHMA Update 2021. Additional supporting text added on this issue for clarity. See pages 156 and 157.
24	The PPG states that First Homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units. The 40% affordable home ownership split in the Local Plan should allow for this	See above
33	Note the inclusion of and additional wording to the policy and how it may affect the viability of major residential sites, necessitating the drafting and submission of site specific viability assessments to accompany planning applications	Comments noted.
43	Welcome the intention that developments should incorporate 25% of units for First Time Homes	Support welcomed.

Representor Number	Comments	Council Response
44	The policy should allow a more flexible approach to affordable housing provision and not set a prescriptive tenure split. It should recognise that where brownfield sites are allocated a viability analysis may be required to show that the provision of affordable housing may compromise deliverability	The Policy is flexible as it does allow for alternative tenure splits where appropriate.
Table 3 – Allocations brought into the Local Plan		
<i>Map 14 – HSE3 – Seascale</i>		
59	There are reservations about the allocation of this site until it is proven a safe access can be achieved	Comments noted – the access has been considered through the Site Access Assessment work that identifies it to be deliverable.
Table 4 – Allocations removed/amended in the Local Plan		
<i>Map 16 – HWH1 – Whitehaven</i>		
59	No objection to the deletion of this allocation	Comments noted.
<i>Map 17 – HAR1 – Arlecdon/Rowrah</i>		
59	No objection to the deletion of this allocation	Comments noted.
<i>Map 18 – HDH1 – Drigg/Holmrook</i>		
22	In addition to character and surface water issues identified in Table 4, there are also issues relating to small sewage system discharge potential and riparian owner's rights and responsibilities.	Comments noted – full reasons for discounting the site are set out in the Discounted Sites document.
22, 46	Do not support leaving the site within the settlement boundary given the presumption in favour of sustainable development for land within the settlement boundary	The site has been removed from the settlement boundary.
22, 26, 46, 54	Welcome the removal of this site	Support welcomed.
27	Initially development in Drigg was confined to 'parallel' building next to the village road (no building on greenfield land). This appears to have changed but the amended plans are confusing about site HDH1 as there was recently an application for several dwellings. Is the development viable or not?	The site is no longer being taken forward as an allocation for the reasons set out in the Discounted Site document.
28, 45	HDH1 site is unsuitable for the same reasons as adjacent “undeliverable” site DH3013, i.e.: biodiversity value, in open countryside, settlement character (The Gables) and known flooding issues. Why is HDH1 better than DH3013?	Neither site is being taken forward as an allocation.

Representor Number	Comments	Council Response
28	The protected “Green wedge” should extend west to incorporate The Gables and the majority of the HDH1 field as it is surrounded by open countryside and would protect the character of The Gables	The Green Wedge has been informed by the Settlement Landscape Character Assessment.
28	Drigg already has its own character and sense of place – that of a rural agricultural village – and does not require being turned into a “cluster”	<p>The Policy team have considered responses received and are no longer taking Drigg and Holmrook forward as a settlement cluster for the following reasons:</p> <ul style="list-style-type: none"> • The settlements are separated by a green wedge • The pavement between the two villages is narrow in parts with a number of pinch points where crossing to continue the footpath is difficult <p>The community view is that the villages operate separately, rather than as a cluster, and are distinct from one another.</p>
28	Development on the site would have an adverse impact on the setting of the Lake District National Park	<p>The impact of development on the setting of the Lake District National Park has been considered through the Landscape Character Assessment and Settlement Landscape Character Assessment documents.</p> <p>The setting of the LDNP is also protected under policy N6PU amongst others.</p>
28	If housing estates were built in Drigg, it would spoil its character and turn it into another generic suburban sprawl	There is a single housing allocation identified for Drigg. Evidence demonstrates that development of the site would not harm landscape or settlement character.

Representor Number	Comments	Council Response
		The Local Plan contains a settlement boundary policy which will prevent suburban sprawl.
28	There would be significant and demonstrable harm to the landscape character	The Council disagrees with this statement. The impact of development upon landscape has been considered through the Landscape Character Assessment and Settlement Landscape Character Assessment documents. Important landscapes are also protected under policy N6PU amongst others.
28	House overlooks the development site - informed that only a small part of the site could be developed under the current Local Plan. Was not informed by the Council that the policy could change	Site HDH1 has now been removed and the reasons for this are set out in the Discounted Sites document. The Local Plan is currently in its draft stage as set out in the introduction chapter.
28, 45, 46	The site was subject to a planning application for 16 houses. It is unsuitable due to local flooding issues, is in Flood Zone 3A/3B and this will only be exacerbated. It is not supported by County Highways for this reason. The site should not be allocated for housing until this issue has been sorted out. The area last flooded on 9th October, a week after the annual clean/flush by Highways	Site HDH1 has now been removed. The reasons for this are set out in the Discounted Sites document.
28	The field has experienced pluvial flooding - there is a water course which runs along Watery Lonning and discharges into the drainage system outside 'Southerly'	Comments noted. Site HDH1 has now been removed.
28	Any domestic property will require a connection to a water supply and therefore would add significantly to the flows leaving the site and to potential environmental effects downstream. There is no evidence that permission has been obtained from landowners to discharge additional water and there is no evidence of spare capacity. No up to date survey of the drainage system on the B5344 has been conducted.	Comments noted. Site HDH1 has now been removed.

Representor Number	Comments	Council Response
28	A meeting was held in August 2019 to discuss the planning application - a number of issues were raised which have not been addressed	Comments noted. Site HDH1 has now been removed.
28	The scale of the development is too big	Comments noted. Site HDH1 has now been removed.
28	The site is not located within walking distance to local services and there is no public transport. It is not sustainable development	Comments noted. Site HDH1 has now been removed.
28	B5344 is already at saturation point at key times of the day	Comments noted. Site HDH1 has now been removed.
28	Infrastructure capacity - extra burden on schools and social care - no mitigation measures included	Comments noted. Site HDH1 has now been removed.
28	Few services within walking distance, with no pavements will lead to more car journeys	Comments noted. Site HDH1 has now been removed.
28	There is no lack of housing in Drigg and no proven need for additional housing, especially executive housing. The current planning application on the site does not include any affordable housing	The Council disagrees with this statement. Local Authorities are required by government to meet identified housing needs. These are set out within the Local Plan and are informed by evidence such as the Strategic Housing Market Assessment and Housing Needs Study. Whilst site HDH1 has been removed and is no longer being taken forward there is still a need for new housing in the village and this is being met by housing allocation HDH2.
28	Design of new houses likely to be incongruous in the village's historic and agricultural character	Site HDH1 has now been removed. The design of the new homes in the borough has not been determined. Any new development would need to comply with relevant policies relating to design.
28	Intrusion into the open countryside	Comments noted. Site HDH1 has now been removed.
28	The site is valuable agricultural land which is in constant use	Comments noted. Site HDH1 has now been removed.

Representor Number	Comments	Council Response
28	Visual amenity of the village will be damaged	Comments noted. Site HDH1 has now been removed.
28	Site needs a Master Plan as the number of houses constitute a major development	Comments noted. Site HDH1 has now been removed.
28	Would need to deliver biodiversity net gain	Comments noted. Site HDH1 has now been removed.
28	There would be severe negative impacts on neighbouring properties	Comments noted. Site HDH1 has now been removed.
28	Development on the site would result in loss of private amenity for neighbouring residents	Comments noted. Site HDH1 has now been removed.
28	The current road system is inadequate to serve additional traffic. It is close to a blind bend near the village hall where there have been several near misses	Comments noted. Site HDH1 has now been removed.
28	The site has biodiversity value - it is surrounded by hedges and adjacent to woodland	Comments noted. Site HDH1 has now been removed.
28	It has settlement character - it is adjacent to The Gables, visible from the B5344, bridlepath PROW and footpath PROW running across the field from B5344	Comments noted. Site HDH1 has now been removed.
28	Fewer adjacent houses than DH002, DH008 and DH009 which are also protected due to reasons of settlement character, landscape protection and biodiversity value	Comments noted. Site HDH1 has now been removed.
28	There are more suitable brownfield sites in both Drigg and Holmrook - these should be developed before greenfield sites	Comments noted. Site HDH1 has now been removed.
45	The allocation has been deleted but this is not reflected in the settlement boundary map on page 43 - however it is shown on the map on page 50. Why are the maps different and which map is correct?	Comments noted. Site HDH1 has now been removed and the site is no longer incorporated into the settlement boundary.
45	The site should not be allocated for 32 houses, rather the boundary should be redrawn to allow infill development	Comments noted. Site HDH1 has now been removed.
59	No objection to the deletion of this allocation	Comments noted. Site HDH1 has now been removed.
62	Object to the removal of the site as an allocation	Comments noted. Site HDH1 has now been removed, the reasons for this are set out in the Discounted Sites document.

Representor Number	Comments	Council Response
62	A recent planning application on the site was withdrawn due to drainage issues not being resolvable in the short term. A report from CCC on this issue is imminent and it is considered premature to remove this allocation until the report is published and given due consideration	Comments noted. Site HDH1 has now been removed.
62	The reference to landscape character is not understood - there is no evidence presented that this is an issue and it was not raised as an issue when the planning application was being considered	Comments noted. Site HDH1 has now been removed.
<i>Map 19 – HFR1 – Frizington</i>		
59	No objection to the deletion of this allocation	Comments noted
<i>Map 20 - HSB2 – St. Bees</i>		
15	Support the removal of this allocation	Support welcomed
26	Welcome the removal of this site	Support welcomed
48	Landowner support for allocation	Comments noted – evidence suggests proposed allocations are less constrained and preferable. Reasons for discounting site will be set out in Discounted Sites document.
48	Site infills an area of land between the dwellings at Monk Hill and Abbey Vale	Comments noted
48	One of the most sustainable settlements in Copeland	Comments noted
48	Transport links to both Sellafield and Whitehaven	Comments noted
48	Close to the beach and the services in St Bees	Comments noted
48	There is an objection from CCC Highways as access would be from Scalebarrow. However, access from Abbey Road can be improved with regards to visibility. Opportunities are available to improve the road with increasing the width using part of the site frontage	Comments noted – evidence suggests proposed allocations are less constrained and preferable. Reasons for discounting site will be set out in Discounted Sites document.
59	No objection to the deletion of this allocation	Comments noted
<i>Map 21 – HSE1 – Seascale</i>		
59	No objection to the deletion of this allocation	Comments noted
<i>Map 22 – HBI1 – Bigrigg</i>		

Representor Number	Comments	Council Response
59	There needs to be clarification as to which site is being removed - the reference in the first column is HBI1 whereas the site reference in the 'Reasoning' column is HBI3. However, as Bigrigg has been moved down a tier, there is no objection to this	Comments noted - Reasons for discounting site will be set out in Discounted Sites document.
Chapter 9 – Changes to the Health, Sport and Communities Facilities Chapter		
31	Paragraph 9.1 – comments on health and wellbeing projects are welcomed but would like explicit commitment for support for such projects in the Millom area	Support welcomed. Additional references made to Millom projects throughout the document.
Policy SC1PU – Health and Well-Being		
9	<p>Currently, the draft text reads as a strategy, rather than a policy that DM officers could use in assessing applications. It is suggested the text could be amended to read as follows:</p> <p>The Council will promote health and well-being in the borough by supporting new development that:</p> <ul style="list-style-type: none"> • delivers high quality, safe developments, • enhances our natural environment, through improved air and water quality, • promotes active travel, • protects or delivers new open spaces, sports, cultural and community facilities or seek developer contributions for such facilities, • support access to open spaces and the countryside, • improves health, social and cultural well-being • create spaces for food growing, • opens up educational facilities for community use and securing such use through Community use Agreements where appropriate, • create mixed communities through new or improved developments that are located in areas with access to key services to reduce social isolation and create community resilience 	Policy reworded as suggested.
21	Welcome the reference to cultural wellbeing.	Support welcomed.

Representor Number	Comments	Council Response
25, 43, 59	Support the Council's commitment to improving health set out in this policy and the commitment to work at a local level to improve health and wellbeing	Support welcomed.
39	Welcome the inclusion of the natural environment and improvements to air and water quality.	Support welcomed.
39	Highlighting the importance of multi-functional Green Infrastructure for its social, economic and environmental benefits could be included within this policy, especially the positive effect green infrastructure implementation can have on mental health in urban areas.	Reference to green infrastructure has been added to the criteria. The importance of GI on health and well-being is set out in the natural environment chapter.
43	To strengthen the policy, it would be appropriate to make reference to community plans developed via Parish Councils	Community Plans are referred to in the Introduction chapter.
43	For clarification, will the requirement to produce a Health Impact Assessment and Equalities Impact Assessment apply to Nationally Significant Projects?	NSIPs are not dealt with by the Local Planning authority.
59	Consider that the policy could go wider in terms of seeking developer contributions beyond the types of facilities listed in the policy (e.g. surgeries and hospitals)	No change considered necessary as these uses would come under community facilities already referred to. Additional wording added to obligations policy specific to health facilities.
Policy SC4PU – Impact of new development on sporting facilities		
59	New policy addition noted	Comments noted.
Chapter 10 – Changes to the Copeland's Places Chapter		
Policy N7PU – St. Bees and Whitehaven Heritage Coast		
21	Support the wording of this policy	Support welcomed.
26	Welcome the creation of a dedicated policy for the heritage coast	Support welcomed.
26	The policy should be future proofed so that it will apply to the extension area once ratified and include wording to protect the extension area from any development that would compromise the extension in the meantime	Policy title now contains name of extended heritage coast. Additional supporting text added re the extension.
29	Welcome the inclusion of a new policy specifically covering the Heritage Coast. As the only nationally designated landscape in the area, this area of coastline is a valuable local asset that should be protected and enhanced accordingly	Support welcomed.

Representor Number	Comments	Council Response
26, 29	It is disappointing that it only refers to 'St. Bees Heritage Coast' and not the agreed 'St Bees and Whitehaven Heritage Coast' which includes both the existing and approved defined extension area of the Heritage Coast. The decision to extend the Heritage Coast was taken by the Council in April 2019 and marked the culmination of many years of partnership work between the Council, the National Trust and Natural England. The extension was supported by the preparation of a detailed landscape character assessment. The policy should be amended to refer explicitly to the 'St Bees and Whitehaven Heritage Coast' to provide protection to both the existing area and its agreed extension. Without this, the extension area would be under threat of inappropriate development	Policy title now contains name of extended heritage coast. Additional supporting text added re the extension.
39	Welcome the incorporation of a new policy to ensure that development does not harm the Heritage Coast	Support welcomed.
39	The term 'preserve' could be changed to 'conserve' in order to ensure the ongoing protection of the Heritage Coast	Wording amended as suggested.
42	Whilst the need to protect and enhance the Heritage Coast and its setting is acknowledged, it is important to note that it is already characterised by built development, including modern built development. Further built development in these areas that does not further harm/influence the Heritage Coast and its setting should therefore not be restricted. The policy should take a flexible approach when assessing the potential impact on the Heritage Coast and its setting, accounting for local development context. Text should be added to the policy which reads "Developers should also demonstrate the benefits of development proposals and the positive impacts they would bring to the Heritage Coast, which will be weighed in the balance of any identified harm, where relevant". This would make the policy NPPF compliant and provides clear expectations	Comments noted. No changes considered necessary – the council will take into consideration policies elsewhere in the plan that promote housing development when carrying out the planning balance.
59	Support the inclusion of this policy. The principle of the policy aligns with the Cumbria Coastal Strategy 2020	Support welcomed.
Policy N5PU – Protection of Watercourses		
20	Suggest that the term 'water resources' is used to replace 'watercourses' as it includes surface, ground and coastal waters	Wording amended as suggested.
26	Welcome the proposed new policy	Support welcomed

Representor Number	Comments	Council Response
39	This additional policy is welcomed to ensure the protection watercourses from wastewater treatment pollution	Support welcomed
39	There is also a need to protect watercourses from farm surface water runoff and pollution runoff, plans to limit and mitigate surface water runoff into watercourses should be included within planning applications. This policy may want to list the designated sites within Copeland that have water-based designated features and are therefore sensitive to development impacts	Supporting text expanded. Surface water run-off is dealt with under policy DS8PU and DS9PU.
59	Support the new policy but would welcome the inclusion of wording in the supporting text around any new discharge into a watercourse (or work with it) may require consent from Cumbria County Council or the Environment Agency	Wording added as suggested.
Policy N9PU – Green Infrastructure		
21	Support the preparation of a Green Infrastructure Strategy and would welcome involvement in its preparation	Support welcomed.
26, 39, 59	Welcomes the inclusion of this policy and the creation of the Green Infrastructure Strategy for the Local Plan area.	Support welcomed.
39	It is advised that the following will help to increase GI throughout the Copeland district: <ul style="list-style-type: none"> • A 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 infrastructure network. • Establishing principles or standards for high quality green infrastructure, providing clear expectations for development proposals. • Existing standards include the Accessible Natural Greenspace Standard. • We note that the new National Green Infrastructure Standards are in production and can be utilised as a resource to aid the creation of clear objectives within the GI Strategy for Copeland. 	Comments noted – this information will be helpful when producing the GI Strategy
59	It is suggested that the policy could go further in stating the requirements of developers to support green infrastructure through developer contributions	GI is already listed as a potential developer contribution in policy DS5PU.
Policy N14PU – Community Growing Spaces		

Representor Number	Comments	Council Response
26, 59	Welcome the proposed new policy	Support welcomed.
43, 59	Welcome the introduction of this policy as a positive step and it complements Policy SC1PU – it is suggested there should be a cross reference to proposed new Policy SC1PU	Support welcomed – additional supporting text added.
59	It would be helpful to see supporting explanatory text around how 'disused' sites would be defined and how the Community Asset Transfer process would work in practice if such spaces are to be managed/maintained by town or parish councils or community groups	Link added to Asset Transfer process guidance. Not considered necessary to define “disused”.
Chapter 11 – Changes to the Copeland’s Connectivity Chapter		
Policy CO4PU – Sustainable Travel		
26, 43, 59	Welcome the changes to this policy	Support welcomed
43	The policy could be strengthened with reference to the need to upgrade appropriate paths capable of supporting multiple users leading to a change in designation supported by appropriate engineering	Change not considered necessary. Paragraph 6.4.5 discusses active and inclusive design and paragraph 17.10.4 discusses provision for wheelchair users, families with pushchairs and the visually impaired.
43	Safe travels for walkers and cyclists, rather than vehicles, needs to be a provision all the way along a designated active travel route. Focussing on active travel for new developments alone is not enough if they lead to an end point with interactions with roads. Providing a through, safe travel route to key destinations should be the requirement for new developments	Comments noted. The Transport Improvement Study identifies a number of opportunities to better connect sites with wider destinations.
59	It is recommended that rail infrastructure priorities are emphasised in the policy wording or supporting text. Network Rail (with support from CCC and the LEP) is currently developing an outline business case for the Cumbrian Coast Line which could lead to enhancements which would help address longstanding socio-economic challenges and issues	This is covered in paragraph 17.5.5 and Policy CO2PU.
59	There should be more detail on bus infrastructure priorities in response to the Department for Transport's National Bus Service Strategy 2021. Cumbria County Council has compiled the Bus Service Improvement Plan 2021 which supports the aspirations of the draft Cumbria Infrastructure Plan 2022-2037	This is covered in paragraph 17.6.6 (new paragraph)

Representor Number	Comments	Council Response
59	To help address climate change, it is recommended that the Local Plan includes the aspirations of the emerging Cumbria Transport Infrastructure Plan	The Transport Improvement Plan is referred to in new paragraph 17.6.6.
59	Would welcome greater emphasis on active travel in terms of actively encouraging proposals which make provision for greater connectivity to housing and employment sites using cycling and walking.	Active travel is covered in sections 14.5.7-14.5.11 and 17.7 and Policies R4PU, H6PU, SC1PU, CO4PU and CO6PU.
59	Developers should be required to demonstrate a commitment to travel plans/travel demand management in relation to the development of employment sites	Section 17.8 relates to Travel Plans and they are identified as a potential planning obligation in Policy DS5PU.
59	Would be a good opportunity to reference electric bikes in the policy	Additional wording relating to electric vehicles (including electric bikes) added to the policy – criteria c and d.
59	Supporting text should reference priorities such as Local Walking and Cycling Plans, Hadrian's Wall Cycling and Walking Corridor and the Town Investment Plans for Cleator Moor and Millom	LCWIP and Hadrian's wall project added to the list of opportunities within the tourism chapter (page 122). Hadrian's Wall also mentioned in paragraph 14.5.8 and 17.7.4. Several references to town investment plans and town deal projects throughout the plan.
Policy CO7PU – Parking Standards and Electric Vehicle Charging Infrastructure		
24	Supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock in line with the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings, which ended on 7th October 2019	Support welcomed.
24	It has been recognised that there may be possible impacts on housing supply where the requirements are not technically feasible or would render the development unviable. There may be a requirement for a power supply upgrade due to increased demand on the electricity network.	Comment noted. The requirement for electric vehicle charging points will soon become a national requirement, therefore the wording of the policy will be reviewed as this becomes law.
24	It is not necessary for the Council to include this policy due to the Government's proposed changes to Building Regulations	The changes will not come into place for some time, the policy therefore requires the provision of such infrastructure in the

Representor Number	Comments	Council Response
		meantime, helping to address climate change.
33	Note the inclusion of and additional wording to the policy and how it may affect the viability of major residential sites, necessitating the drafting and submission of site specific viability assessments to accompany planning applications	Comments noted.
34	Whilst the achievement of net zero carbon by 2037 is supported, it is questioned if this policy is necessary due to the Government's proposed changes to Building Regulations on this topic	The changes will not come into place for some time, the policy therefore requires the provision of such infrastructure in the meantime, helping to address climate change.
42	Welcome the addition of further information and requirements relating to the provision of electric vehicle charging infrastructure. However, in line with Planning Practice Guidance, the policy should clarify the specification of infrastructure that is expected to be required and the level/calculation of any commuted sums that may be required.	This information is not yet available and as technology is regularly upgraded it would be difficult to do so whilst keeping the policy up-to-date.
42	Should be tested as part of a whole Plan viability exercise to ensure that cumulative costs do not undermine the delivery of the Plan.	Comments noted, the policy has been tested through the Local Plan Viability Assessment.
59	Welcome amendments to policy which now includes Electric Vehicle Charging Infrastructure	Support welcomed.
59	Supporting text should reference the Government's Ten Point Plan for a Green Industrial Revolution which aligns with the priorities of the Electric Vehicle Infrastructure Group	Reference now included in paragraph 17.12.2.
Other Comments		
General Comments		
2	<p><u>Harras Park Farm, Whitehaven</u></p> <p>There is a telecommunications mast on the hill at Harras Park Farm. Due consideration should be given to the mast in any allocations surrounding the hill. If the mast needs to be moved, it will be dependent on an alternative location being available, with more masts being required should coverage reduce</p>	Comments noted – the location of the mast was noted during officer site visits.

Representor Number	Comments	Council Response
3	Recognise the need for additional housing in the countryside, particularly for affordable housing	Comments noted.
3	Support the removal of some housing allocations and the reduction of some settlement boundaries	Support welcomed.
3	Why do we need new housing when there are many houses and shops stood empty which could be reused and repurposed? This would protect the countryside from development	The Local Plan encourages the reuse of existing buildings where possible, although this is challenging as many are within private ownership. However the Strategic Housing Market Assessment and Housing Needs Study identifies that new homes are required to meet identified needs.
3	New properties are often bought as second homes, pushing up property prices for the locals, rendering the whole exercise futile and destructive	Comments noted. The Council understands that this is an issue that national government is currently considering however at present planning policy cannot prevent the purchase of a property as a second home.
8	<p><u>Wind Energy Paper</u></p> <p>Strongly object to the land between the B5433 and A595 being designated for wind turbine development. This will urbanise a rural area, affect the outstanding views to the National Park and would not be in keeping with the character of the village. Previous plans said this area was sensitive to tall infrastructure - what has changed?</p>	Comments noted. The Wind Energy Technical Paper Update 2022 discusses the methodology used when identifying Suitable Areas for Wind Energy.
45	<p><u>Wind Energy Paper</u></p> <p>Some of the land in the area has not been ruled as being inappropriate for wind turbine development. Is there any further information available in regard to the plans for wind turbines in the area? Any further turbines would spoil the views of the Fells and would not be welcomed by residents</p>	<p>Comments noted – please see the Wind Energy Technical document 2022 for further information.</p> <p>Private views are not a material planning consideration.</p>

Representor Number	Comments	Council Response
8	Why is there a need to prepare a new Local Plan for Copeland given that Local Government Reorganisation is set to occur in April 2023 which will create a new Council area?	The Core Strategy is partly out of date and a new Plan is required to help direct development within Copeland. Local Plans must be reviewed 5 years from adoption and the Local Plan will be reviewed at that stage as part of a wider local authority.
11	Consultation is noted. Any land currently used for educational purposes which is proposed to be appropriated or have its use changed will require consent by the Secretary of State for Education	Comments noted.
22	<u>Drigg</u> Drigg's proposed defined settlement boundary does not match the local definition of Drigg as evidenced by the road signs	Comments noted.
23	<u>Playing Pitch Strategy</u> No reference to any of the amateur rugby league clubs and facilities in Copeland, despite the completion of a survey in September 2021. There are amateur rugby league clubs at Distington, Lowca, Hensingham, Kells, Wath Brow, Frizington/Arlecdon and Millom but the Study on references to any playing facilities are the football pitches adjacent to Lowca and Millom ARLFC	An update to the Playing Pitch Strategy is currently being produced which will take into account both summer and winter sports. This will be available prior to the submission of the Local Plan to the Planning Inspectorate. The current PPS does not include information regarding rugby league as the work was paused due to the Covid-19 pandemic.
25	<u>Policy H23PO (Publication Draft Policy SC5PU)</u> Following representations made to the Preferred Options, it is noted that the Policy has remained unchanged. The policy currently fails to take into account that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. It is requested that an additional criterion is added to the policy which states 'd) the loss or change of use of existing facilities is part of a wider public service estate reorganisation'. This would allow a flexible approach for public service providers when considering a change of use to non-community uses	Criterion D has been amended as suggested.

Representor Number	Comments	Council Response
31	Would seek improvements to transport links in the area, particularly the A5093 at Kirksanton where there are very narrow stretches of road and two railway crossings create accident danger points. The narrowness of the road at The Green in Millom can cause serious problems given the narrowness of alternative routes	Policy has been amended to include Improvements to the A5093.
37	Are any allocations going to be made for potential additional park and ride facilities, offices, research and development facilities and warehousing?	None are specifically identified within the Local Plan.
40	<p><u>Viability</u></p> <p>The viability of the Local Plan should be carefully considered as a whole ahead of the Publication draft. The Stage 2 Viability assessment should take into account future changes to national policy including enhancement to Part L of the Building Regulations and other existing and emerging policy and statutory requirements (e.g. achieving 10% biodiversity net gain). The Study needs to robustly test all emerging policies of the Local Plan and any existing and future national requirements so as to clearly evidence they do not result in onerous requirements that would prohibit development being brought forward. Flexibility for viability should be able to be applied at the planning application stage</p>	Comments noted. A Stage 2 Viability Assessment has been produced to support the Local Plan.
42	<p><u>Viability</u></p> <p>As the Stage 2 Local Plan Viability is still ongoing, Persimmon is unable to comment on the overall viability of policies within the Draft Local Plan or be confident that the policies will not include onerous requirements which will hinder the delivery of sustainable development</p>	Comments noted.
40	<p><u>Infrastructure Delivery Plan</u></p> <p>The emerging Local Plan should look to undertake a full review of existing school capacity in Whitehaven appraise the need for new school places and identify the preferred location and means of delivery for provision. Story Homes has provided a site for a school and a contribution of £350,000 and is currently awaiting confirmation from the County Council about its intentions to provide a school on the site. Stage 1 of the IDP identifies that there are schools in the south of Whitehaven which have capacity which could accommodate extra demand.</p>	Comments noted.

Representor Number	Comments	Council Response
40	<p><u>Infrastructure Delivery Plan</u></p> <p>It is considered that the plan making process provides the most appropriate mechanism for identifying the need for infrastructure, ensuring that the requirements are reasonable, necessary and directly related to Local Plan development. The Local Plan's evidence base should assess the need for differing types of infrastructure, the preferred location in Copeland and the most appropriate method of delivery.</p>	Comments noted.
41	<p><u>Policy CC5PO</u></p> <p>We would request that the Plan formally allocates both the Sellafield and LLWR sites to include B1, B2 and B8 uses in order to 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</p>	<p>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.</p> <p>The site is identified on the Proposals Map.</p>
44	<p><u>Policy H1PO</u></p> <p>Support the principles of this policy. However, it should recognise that the renewal of existing houses to improve quality can often lead to the demolition of such units, therefore increasing the overall net housing requirement. Any additional housing needs arising from housing renewal schemes should be focussed in the principal settlements and on sites that are capable of delivery in the most sustainable locations (e.g. HWH5)</p>	Comments noted. Demolitions are taken into account in the housing trajectory and housing will be directed to settlements in line with the settlement hierarchy.
44	<p><u>Policy H2PO</u></p> <p>Support the ambitious approach to housing provision, however it is considered that the annual housing target could be higher at 350dpa with the additional development to be concentrated in Whitehaven to address population decline and bring investment in services, infrastructure and employment into the town</p>	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

Representor Number	Comments	Council Response
		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.
44	<p><u>Policy H3PO</u></p> <p>Generally supportive of the proposed monitoring measures. The policy should set a clear test to assess whether prospective de-allocated sites are achievable, available and deliverable. Where sites are de-allocated, new development should be directed towards principal settlements and sustainable sites</p>	Comments noted.
44	<p><u>Policy H3PO</u></p> <p>The policy should make provision for safeguarded land to provide fallback sites to make up any shortfall in housing arising from the de-allocation of housing land. The southern area of site HWH5 is currently being considered as part of the West Coast Mining scheme - if this doesn't get approval, the area will be in need of regeneration. It is proposed that this area should be safeguarded as future development land to provide necessary fallback land if required</p>	Comments noted. The Cumbria Mining site has now been identified within the Local Plan as an Opportunity Area which could be suitable for a number of uses.
44	<p><u>Policy H7PO</u></p> <p>Generally supportive of the flexible approach to housing development - a prescriptive approach to housing mix should be avoided</p>	Support welcomed.
53	<p>The Defence Infrastructure Organisation safeguarding have an area of interest in MOD Eskmeals. There are two Explosive Safeguarding Zones that surround MOD Eskmeals - the Inhabited Building Distance (IBD) and the Vulnerable Building Distance (VBD). The IBD is defined as a yellow line on the statutory safeguarding map. Within this safeguarding zone the MOD monitors the management and use of development to maintain public safety and persons living, working or congregating for long periods of time. The VBD is defined as a purple line on the statutory safeguarding plan. Within this zone all buildings should be deemed as being 'non vulnerable' that is of robust design and construction so that should an</p>	Comments noted.

Representor Number	Comments	Council Response
	explosion occur at the MOD storage facility, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants.	
53	Within the statutory consultation areas associated with Weapon Ranges are Technical Safeguarding zones that are designed to regulate the height of development and materials used in construction and introduction of sources of electro-magnetic fields and other types of technical installations supporting operational defence or national security requirements	Comments noted.
53	Where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Local Authorities are required to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.	Comments noted. Additional wording added to the Wind Energy Technical document.
53	The Council needs to consult the MOD on Local Plan policies which may have an effect on any identified safeguarding area which consists of structures or buildings exceeding 15.2m above ground level or any development within the explosive safeguarding zones around MOD Eskmeals	Comments noted.
59	<u>Policy CC6PO</u> For criteria (d) of this policy, it is considered that minimising impacts from the development of sites goes beyond 'location' and should also include other planning aspects of the proposal. It is therefore suggested that the text is amended to read "the proposals must be located, developed and designed to minimise any adverse impacts..."	Policy now NU3PU. Wording amended as suggested (now criterion c).
59	<u>Policy CC6PO</u> Clarity is required to explain that the Council is not the determining authority but would have a 'host authority' role	Paragraph 10.9.1 added which explains the Council's role where we are not the decision maker. Table 1 also discusses this.
59	<u>Policy CC4PO</u> It is not clear what links the Local Plan has to the LLWR site - criteria (d) should be deleted. It is also unclear as to why there is reference to 'materials' as this	Policy now NU1PU. Criterion D has been deleted.

Representor Number	Comments	Council Response
	appears to go beyond matters that relate to development and therefore is not appropriate for the Local Plan	
59	<u>Policy CC8PO</u> The text should be amended as it is silent on the impacts of demolition on other interests of acknowledged importance	Policy now NU5PU. Additional criterion relating to ecological assets. Other interests of importance (such as landscapes etc) are covered by over relevant planning policies.
Seeking Settlement Boundary extensions not included in the Focussed Consultation document		
1	<u>Kirksanton</u> Seeking a settlement boundary extension to include the former nursery garden. A small number of houses could be accommodated on this site which would support services in Kirksanton without creating adverse impacts	No change considered necessary. See Discounted Sites document for further information.
38	<u>Frizington and Rheda</u> The Policies Map fails to include an extant permission within the proposed boundary (permission reference 4/18/2426/001).	Frizington and Rheda map amended accordingly.
38	Unsure as to why allocation HFR1 has been removed but remains in the settlement boundary and this approach has not been taken for the land north to Rheda Park which has an extant consent (a reserved matters application will be submitted before January 2022)	Frizington and Rheda map amended to include Rheda site with extant permission.
Seeking Allocations not included in the Focussed Consultation document		
4	<u>Millom (Crook Pool, Devonshire Road)</u> <ul style="list-style-type: none"> Brownfield site which should be an allocation. Has previously been granted planning permission for 10 dwellings (4/76/0771/003) The Council has previously expressed a view that the land should be considered for housing (18/12/1982) Site investigations carried out in 1986 and 1994 have shown that the site is suitable 	The reasoning for not taking the site forward is set out in the Discounted Sites document.

Representor Number	Comments	Council Response
	<ul style="list-style-type: none"> Development of the site would provide housing close to local services, would relate well to existing housing, reduce fly tipping and resorting the site 	
7	<p><u>Elizabeth Crescent, Whitehaven</u></p> <p>The site should be an allocation. A previous planning application was dismissed at appeal due to an objection from the Highway Authority. Work was carried out to resolve this objection relating to junction improvements and a revised application is currently being determined by PINS</p>	The appeal on the site has been dismissed. The site is not considered deliverable due to the issues identified and there are a sufficient number of preferable sites to meet the identified housing need in Whitehaven. The site has been identified as forming part of a larger Broad Location in the Local Plan.
14	<p><u>Field 4586, Distington</u></p> <p>Requests justification as to why this submitted site has not been included as an allocation</p>	The reasoning for not taking the site forward is set out in the Discounted Sites document.
16	<p><u>Grove Road, Egremont</u></p> <ul style="list-style-type: none"> Seeking to include this site as an allocation (SHLAA reference EG003) Site is under one ownership and is available and suitable for development. Advanced discussions are ongoing with Persimmon Homes = an indicative layout shows the site could accommodate 105 homes 	The reasoning for not taking the site forward is set out in the Discounted Sites document.
54	<p><u>Drigg</u></p> <p>It is considered that the field behind the bus stop (in the centre of Drigg village) should be included for sustainable or sheltered housing</p>	All available sites that have been considered can be found in the SHLAA document which sets out whether they are considered to be deliverable or not.
61	<p><u>Land off Victoria Road, Whitehaven</u></p> <p>Site has had planning permission in the past (4/19/2246/PIP) for three dwellings. Seeking for an allocation on the site for 10 dwellings. It is considered that a suitable access can be achieved, and the site can deliver in the first five years of the Plan - there has been considerable interest from developers. It is considered</p>	Application 4/19/2246/PIP was refused. The site is identified in the Local Plan as forming part of a larger Broad Location.

Representor Number	Comments	Council Response
	that a suitable scheme can be designed to reduce the greenfield run off and improve the current surface water runoff rate	

Comments on Settlement Hierarchy and Development Strategy Paper

Representor Number	Comments	Council Response
9	Ennerdale Bridge is defined as a village in the LDNP Local Plan. An additional row should be added entitled 'Villages in Copeland under the Development Management jurisdiction of the LDNPA for accuracy	Additional wording added as requested.
9	For clarity, the heading 'Rural Service Centres in Copeland under the jurisdiction of LDNPA' should be amended to read 'Rural Service Centres in Copeland under the Development Management jurisdiction of the LDNPA'	Additional wording added as requested.

Comments on the Integrated Assessment

Representor Number	Comments	Council Response
26	The Integrated Assessment document must be updated to assess the changes in Policy H4PU and they should only be taken forward if it can be demonstrated that the proposed increase can be achieved whilst also maintaining local landscape and settlement character, reaching net zero carbon and reversing the decline in biodiversity	Comments noted. An updated IA has been produced to support the Publication Draft.
28, 45	<p><u>HDH1</u></p> <ul style="list-style-type: none"> Noted that the site has possible harm on surrounding NHDA's Biodiversity is not Unknown it needs to be negative as it is surrounded by hedges and some woodland with more natural habitat than DH013 which is negative Flood risk is not U it needs to be negative as there is a well-known flooding issue on the site 	Comments noted. Site HDH1 has been deleted.

	<ul style="list-style-type: none">• Climate change is not U it needs be negative as any local shops or services are not accessible by public transport nor within 1-mile walking distance thus increased use of cars• Accessibility is not positive it should be negative due to lack of pedestrian access or public transport• Landscape and heritage are not Unknown, this is an intrusion into the countryside, again part of the reasoning behind DH013 being rejected. It is not in keeping with the linear characterisation of the rest of the village, which is In Fill Housing, not housing estates. This piece of land is between 2 Grade II listed buildings• There is no mains sewerage in in middle of the village - how big a treatments work would need to be installed in the middle of the village to cope with 32 dwelling and I do believe there are issues with the main sewerage around the Wray Head area• Health and Wellbeing - this will have a negative impact on the current residents of Drigg who via the 2016 Community Plan state. "It is fair to say that the vast majority of people made very positive comments about the Parish, referring to the peace and tranquillity, the community spirit and the stunning scenery"	
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