

Copeland Local Plan 2021-2038

Statement of Common Ground between Copeland Borough Council (CBC) and Cumbria County Council (CCC)

Introduction

This Statement of Common Ground has been prepared jointly between Copeland Borough Council and Cumbria County Council. Cumbria County Council work alongside Copeland Borough Council through the Local Plan process and are the decision making authority for several aspects of planning outside of Copeland's remit, including Highways (Local Road Network), Education and Minerals and Waste, as well as being the Lead Local Flood Authority.

The purpose of a Statement of Common Ground is to set out the confirmed agreements with regard to strategic cross- boundary issues between the two Local Authorities. This is the result of early, meaningful and continuous engagement between the Local Planning Authorities. The Statement also highlights any areas where the two authorities have been unable to reach agreement (See Appendix A).

The statement is intended to assist the Inspectors during the examination of the Copeland Local Plan to show where effective co-operation and agreement on key issues has taken place. For more information on how Copeland has engaged with key stakeholders throughout the Local Plan preparation process, please see the Duty to Co-operate Statement.

The two organisations have been working together throughout the preparation of the Local Plan in respect of seeking agreement on strategic and cross-boundary planning issues. All details of cross- boundary issues and how ongoing engagement has been achieved has been captured through the Duty to Cooperate Report.

The Local Authorities agree on the following matters:

General

1. CCC have provided a consultation response at every stage of the Local Plan process. See Appendix A for a full list of comments provided at Publication Draft stage and CBC's suggestions for addressing these. This approach has been agreed between the two authorities.

Housing

1. The need to ensure the delivery of necessary infrastructure to allow for the housing growth identified in the Copeland Local Plan through jointly agreed planning obligations. Evidence supporting the Local Plan will form the starting point when identifying requirements.

Economy

1. It is important to recognise the importance of Westlakes Science and Technology Park and Leconfield Industrial Estate as strategic employment locations to support the growth of Copeland and the wider Cumbrian economy.
2. The need to work jointly, where appropriate, with Cumbria County Council to maximise the benefits of the Borderlands initiative and Town Deals funds, and any future funding bids.
3. The need to work together to maximise the benefits of the nuclear sector to the West Cumbrian economy and supply chain and to recognise other opportunities for economic diversification through supporting the development of tourism and the wider energy industry.

Infrastructure

1. That there is likely to be an increase in demand for school places in south Whitehaven and that available school places are not considered to be in appropriate locations in close proximity to housing allocations. The two authorities will continue to explore all options to meet the anticipated increased demand and produce an Education Topic Paper to support the Local Plan.
2. The evidence base for the Local Plan as set out in the Copeland Transport Improvement Study (CTIS), which was produced jointly by the two authorities, and the Site Access Assessment paying attention to Travel Demand Management priorities for the Borough's strategic sites and maximising opportunities for railway investment. Also acknowledging evidence produced by CCC, including the Local Cycling and Walking Infrastructure Plan (LCWIP) for Whitehaven and the wider Cumbria Transport Infrastructure Plan (CTIP).
3. Identified and agreed infrastructure schemes that support the delivery of the Local Plan and consider infrastructure requirements holistically enabling greater opportunity to secure appropriate contributions (as evidenced through the CTIS).

Minerals and Waste

1. Both Councils have been actively engaged during the preparation of both the Minerals and Waste Local Plan and the Copeland Local Plan.
2. CBC have taken account of the Mineral Safeguarding Areas in plan making and decision making, and have identified where any allocated sites may affect a MSA within the Site Allocation profiles to ensure they will be considered when development comes forward.

Archaeology

1. That development of the Local Plan draft site allocations are unlikely to have a significant impact on archaeological assets and Scheduled Ancient Monuments. Future engagement will ensure any potential issues are highlighted and mitigated against.

Flooding

1. CCC have been involved at every stage of the Local Plan preparation in their capacity as Lead Local Flood Authority (LLFA), including the production of the Copeland Level 1 Strategic Flood Risk Assessment. Flood risk and drainage has been considered on all draft allocations and any impacts will be mitigated through future planning applications.
2. Development of allocated site HMI2 at Millom cannot commence until a drainage solution is secured to address existing and future development pressure on the dual foul and water system in Millom. CBC and CCC will continue to work with United Utilities and other key stakeholders to develop the drainage solutions to enable the delivery of this site.

Signed on behalf of Copeland Borough Council

Name and Position: Chris Hoban, Strategic Planning Manager

Signature: 

Date: 28/07/2022

Signed on behalf of Cumbria County Council

Name and Position: Michael Barry, Senior Manager Economy and Place

Signature: 

Date: 15/09/2022

Appendix A: CBC Response to CCC Publication Draft Comments

Please note that whilst CBC can put forward suggested main and minor modifications to policies and sites in the Local Plan Publication Draft at the time it is submitted to the Planning Inspectorate, these may or may not be taken forward by the Inspector. If they are taken forward, they will be subject to a public consultation during the Examination in Public.

Key: Proposed additional wording in bold, proposed deletion in ~~strike through~~, notes in *italics*

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response		CCC Response	CBC Response/Action 25 th Aug 2022
1a	Table 1 Developments outside the Local Plan remit	The role of Cumbria County Council as planning authority needs to be made clearer in “Education and other County Council development” and the last column saying, “Applications for schools, educational facilities and other County Council developments (e.g. libraries) are determined by Cumbria County Council.”	<i>Proposed Minor Modification</i> Table 1, row 4 (education), explanation column Decisions relating to Schools and other educational facilities come under the remit of Cumbria County Council Applications for schools, educational facilities and other County Council developments (e.g., libraries) are determined by Cumbria County Council.		Agreed	-
1b		The final column of the Minerals and Waste row, needs to be amended to say, ‘Minerals and waste matters come under the remit of Cumbria County Council as minerals and waste planning authority. Applications are determined in accordance with the Cumbria Minerals and Waste Local Plan’	<i>Proposed Minor Modification</i> Table 1, row 3 (Minerals and Waste), column 3 (explanation) Minerals and waste applications in the borough are covered by the Cumbria Minerals and Waste Local Plan 2015-2030. The Council has considered whether any of its allocations will affect Mineral Safeguarding Areas. Minerals and waste matters come under the remit of Cumbria County Council as minerals and waste planning authority. Applications are determined in accordance with the Cumbria Minerals and Waste Local Plan.		Agreed	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
1c		In respect of Minerals and Waste Planning, the reference should read: Minerals and Waste Planning (including Low Level Waste Repository at Drigg and radioactive waste matters at Sellafield).	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>Table 1, row 3, column 1</td> <td>Minerals and Waste Planning (including Low Level Waste Repository and radioactive waste matters at Sellafield)</td> </tr> </table>	Table 1, row 3, column 1	Minerals and Waste Planning (including Low Level Waste Repository and radioactive waste matters at Sellafield)	Agreed	-
Table 1, row 3, column 1	Minerals and Waste Planning (including Low Level Waste Repository and radioactive waste matters at Sellafield)						
1d		The explanation in respect of NSIPs has an error in the final sentence. It looks like there was an intention to refer to a later paragraph number. Or the word 'in' should be deleted.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>Table 1, row 5, column 3, 2nd sentence</td> <td>More information can be found in below.</td> </tr> </table>	Table 1, row 5, column 3, 2 nd sentence	More information can be found in below.	Agreed	-
Table 1, row 5, column 3, 2 nd sentence	More information can be found in below.						
2	Table 3 Local Plan evidence base	Request to add Whitehaven parking Strategy to evidence base list	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>Table 3, additional row</td> <td>Whitehaven Parking Strategy</td> </tr> </table>	Table 3, additional row	Whitehaven Parking Strategy	Agreed	-
Table 3, additional row	Whitehaven Parking Strategy						
3a	4.2.1 Longer term growth aspirations	Para 4.2.1 explains that the Key Diagram identifies a number of Broad Locations where growth can be delivered if at the Local Plan review stage it becomes apparent that there are insufficient specific deliverable sites to deliver the Local Plan Strategy. The key for the Key Diagram does not annotate any areas of Broad Location for growth, apart from an undefined annotation at Moorside	<p><i>Proposed Minor Modifications – text added to clarification</i></p> <table border="1"> <tr> <td>4.2.1</td> <td>In the longer term, Figure 3 the Key Diagram also identifies a number of potential Broad Locations. In terms of housing, these are broad areas of search where growth could be delivered if at the Local Plan Review stage, it becomes apparent that there are insufficient, deliverable sites to deliver the Local Plan Strategy. It is highly unlikely that all potential Broad Locations for housing would be required.</td> </tr> </table> <p><i>For info: Nuclear new build is factored into the 200dpa growth scenario which is planned for through the allocations etc (see</i></p>	4.2.1	In the longer term, Figure 3 the Key Diagram also identifies a number of potential Broad Locations. In terms of housing, these are broad areas of search where growth could be delivered if at the Local Plan Review stage, it becomes apparent that there are insufficient, deliverable sites to deliver the Local Plan Strategy. It is highly unlikely that all potential Broad Locations for housing would be required.	The diagram does not annotate the areas of Broad Locations for Growth. Will the updates to the key include names of all Broad Locations?	We are proposing a modification to Fig 3 to make this clear. As the Broad Locations are just areas of search for the longer term (and will only be brought forward at Local Plan Review stage IF required) they do not need to be given names. This would make them look like allocations if we did that
4.2.1	In the longer term, Figure 3 the Key Diagram also identifies a number of potential Broad Locations. In terms of housing, these are broad areas of search where growth could be delivered if at the Local Plan Review stage, it becomes apparent that there are insufficient, deliverable sites to deliver the Local Plan Strategy. It is highly unlikely that all potential Broad Locations for housing would be required.						

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3b		<p>It is considered that the Local Plan needs to provide a clear explanation as to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient and undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.</p>	<p><i>trajectory) without needing any broad locations for housing. These would only be brought forward at Local Plan review stage as the paragraph states.</i></p> <p><i>Strategic Employment Sites of Westlakes and Leconfield are shown on fig 3 for context in light of para 4.2.4 although these are allocations rather than broad locations. Proposed updates to the Key to make that clearer.</i></p>	<p>Would like clarification about how growth scenarios have been developed.</p> <p>Would like clarification on whether growth scenarios are separate to Broad Locations.</p>	<p><i>The Growth Scenario relates to Policy H2 (i.e. delivery of 200 dwellings a year to support economic growth). This is explained in paragraph 13.4.20 and in the SHMA. Whilst 146 dwellings will be used as the housing requirement when calculating the 5 year housing land supply, the 200 dwelling per year is what is being provided for through the housing allocations. Broad locations are explained in section 13.8 of the LP. These are not allocations but are broad areas of search and will only be brought forward at Local Plan Review stage IF there is a need for one or more of them (ie if evidence suggests there is an issue with one or more of the allocations coming forward). They will ONLY be allocated at that stage following appropriate assessments</i></p>

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					<i>(inc highways, landscape etc) and following relevant consultations.</i>				
4	4.2 Longer term growth aspirations	The Local Plan needs to be cognisant that to date no funding for the delivery of this route has been confirmed through the Department of Transport Route Investment Strategy (RIS) nor have National Highways confirmed a preferred route. The maps need to be clear that the route is a broad corridor and potential junction locations for the Whitehaven Eastern Relief Road identified are indicative only. The development of appropriate route options for this scheme by National Highways would include extensive design work and further public consultation.	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="904 496 1624 922"> <tr> <td data-bbox="904 496 1021 715">Figure 3, Key</td> <td data-bbox="1021 496 1624 715">Housing Broad Locations Employment Broad Locations Well-being Village Broad Location Allocated Strategic Employment Sites CMIQ Growth Area Whitehaven Relief Road (Indicative Route)...</td> </tr> <tr> <td data-bbox="904 715 1021 922">4.2.5, last sentence</td> <td data-bbox="1021 715 1624 922">This is shown The indicative route of the relief road and potential key junctions are shown in the diagram on the following page Figure 3. The development of appropriate route options for this scheme by National Highways would be subject to extensive design work and further public consultation.</td> </tr> </table>	Figure 3, Key	Housing Broad Locations Employment Broad Locations Well-being Village Broad Location Allocated Strategic Employment Sites CMIQ Growth Area Whitehaven Relief Road (Indicative Route)...	4.2.5, last sentence	This is shown The indicative route of the relief road and potential key junctions are shown in the diagram on the following page Figure 3. The development of appropriate route options for this scheme by National Highways would be subject to extensive design work and further public consultation.	There remains ambiguity around funding secured for the delivery of the WRR. Suggest text needs to clearly state that no funding has yet been confirmed.	<i>The Local Plan already makes a case for the relief road in paragraph 4.2.5</i>
Figure 3, Key	Housing Broad Locations Employment Broad Locations Well-being Village Broad Location Allocated Strategic Employment Sites CMIQ Growth Area Whitehaven Relief Road (Indicative Route)...								
4.2.5, last sentence	This is shown The indicative route of the relief road and potential key junctions are shown in the diagram on the following page Figure 3. The development of appropriate route options for this scheme by National Highways would be subject to extensive design work and further public consultation.								
5	Figure 3 Longer term growth aspirations	Figure 3: Longer Term Growth Aspirations needs to make clear in the key what are Local Plan Allocations and what are long term growth aspirations e.g. Local Plan Strategic Employment Allocations are conflated with other broad term locations for employment; Well Being village and further housing. Figure 3: Longer Term Growth Aspirations also needs to clearly	<i>Proposed Minor Modification – Key to be amended (see above)</i>	See comment in relation to ID 3b	<i>See Comment in relation to ID 3b</i>				

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		identify the locations referred to in the explanatory paragraphs					
6	Longer term growth aspirations	Figure 3, the Well Being Village, shown as Longer-Term Growth Aspirations is located on a Minerals Safeguarding Area for sand and gravel. Additional sand and gravel resources will be required before the end of the Cumbria Waste and Mineral Plan period (2030), as current permitted reserves are insufficient to maintain the required landbank of at least 7 years supply. It should be noted in the explanatory text that Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>4.2.3</td> <td>...in the area to help inform a masterplan. It should also be noted that the site is located on a Minerals Safeguarding Area for sand and gravel. Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences.</td> </tr> </table> <p><i>Note: This is also covered by Table 1 which explains that Minerals and Waste are not under CBC remit.</i></p>	4.2.3	...in the area to help inform a masterplan. It should also be noted that the site is located on a Minerals Safeguarding Area for sand and gravel. Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences.	Agreed	-
4.2.3	...in the area to help inform a masterplan. It should also be noted that the site is located on a Minerals Safeguarding Area for sand and gravel. Cumbria County Council and Copeland Borough Council need to reach agreement on whether prior extraction of the mineral should be carried out before development commences.						
7	Minerals Safeguarding Areas	In respect of proposed Site Allocations and Opportunity Sites the issue of minerals safeguarding should be identified as part of any Site Assessment so that developers are aware from the outset of the need to consider the prior extraction of any known mineral resource before any non-minerals development is permitted to take place.	<i>No change required - This is already covered in the site profile doc which forms an appendix to the Local Plan.</i>	Agreed	-		
8	DS1PU	Strategic Policy DS1PU would be improve by additional criterion	<i>No change required – this is already covered in Policy DS5PU.</i>	Agreed	-		

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	Presumption in favour of Sustainable Development	which also considers the delivery of appropriate infrastructure necessary to mitigate the impacts of the development			
9	DS2PU Reducing Impact of Development on Climate Change	An additional criterion should be included which states developments must ensure that they do not increase traffic congestion that may lead to the reduction in air quality.	<i>No change required – this is already covered in Policy DS11. (ID 21. Policy DS11 already says that proposals “must not give rise to unacceptable levels of air pollution”. This includes pollution from a number of sources including traffic congestion.)</i>	CCC consider this needs to be repeated in Reducing Impacts of Climate Change policy (See ID 21 also)	<i>Proposed additional bulletpoint to be added to policy that says: "Measures to ensure the development does not increase traffic congestion that may lead to a reduction in air quality"</i>
10a	DS3PU Settlement Hierarchy	Para 5.4.11 refers to ‘an update to this document was produced earlier this year’. For clarity it is suggested that reference is made to the month and year in which the update was completed.	<i>No change required – Minor modification proposing paragraph 5.4.11 is deleted as it is no longer required.</i>	Agreed	-
10b		In addition, in the interests of transparency and consistency, it would be helpful for the Copeland Local Plan 2021-2038 to refer to the Village Services Survey 2021 by its current given name of ‘Settlement Hierarchy & Development Strategy Paper Update 2021.	<i>No change required – these are two separate documents, the survey informs the Paper.</i>	Agreed	-

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		Cumbria County Council request that additional text is added to explain how the Copeland Local Plan will continue to monitor and update the Village Services Survey and the content of policy DS3PU, should the position change once again within the next two years. Without doing so, the policy could quickly become out of date before the Government's suggested five-year Local Plan review takes place.	<p><i>No change required - The Village Services survey is updated every year and is made available on the Councils website. The Development Strategy and Settlement Hierarchy paper will not be updated annually as it has been produced to support the Local Plan. Monitoring shows that there is little change annually in the level of services. However any changes will be considered when producing the next Local Plan Review.</i></p> <p><i>Policy H3PU sets out how we will monitor the strategy over the Plan period.</i></p>	Agreed	-
11	DS4PU Settlement Boundaries	Strategic Policy DS4PU advises that development outside of the settlement boundaries will only being accepted in a number of cases. Cumbria County Council request that the policy should make reference to accessibility and include criterion that is clear and consistent in respect of the assessment of a development's impact on the local highway, education and flood risk.	<i>No change required – The Policy already mentions accessibility and additional criterion relating to highways and flood risks creating duplication with other policies in the Local Plan.</i>	Agreed	
12	DS6PU Design and Development Standards	The Local Plan Publication Draft contains a number of inconsistent statements within a number of policies in respect of the assessment of a development's impact on the local highway, flood risk and linkages to sustainable transport and active travel modes. The Local Plan policies and explanatory text need to follow a clear and consistent approach to	<i>Proposed main modification</i>	CCC comments on highway safety / capacity and sustainable transport have not been addressed	<p><i>No need to reference sustainable transport here as all development is required to conform to policy CO4: Sustainable Transport which also addresses active travel</i></p> <p><i>The modification addresses the impact of</i></p>

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		<p>how this is worded or there needs to be a specific Development Management Policy or revisions made to Policy DS6PU: Design and Development Standards. This would avoid the need to repeat references throughout a number of polices.</p> <p>A specific policy/or revision should include the following criterion and state that development should:</p> <ul style="list-style-type: none"> • not give rise to severe impacts on highway safety and/ or a severe impact on the capacity of the highway network. Should a development create such an impact then mitigation measures will be sought. • not be in an area of flood risk and will not increase the flood risk on the site or elsewhere. • encourage the use of sustainable transport (public transport) and active travel (walking and cycling) modes. <p>Cumbria County Council is happy to discuss the approach and agree appropriate wording.</p>	<p>Policy DS6, criterion e</p>	<p>Create layouts that provide safe, accessible and convenient pedestrian and cycling routes that encourage walking and cycling based on Active Design principles and connect the development provide connections to existing walking and cycling routes where possible</p>		<p><i>highway safety and capacity, however minor change proposed to the mod so that it says</i> "Should a development create such an impact then mitigation measures will be sought." rather than the current wording <i>"Appropriate mitigation will be sought where such impacts are likely"</i></p>
			<p>Policy DS6, criterion f</p>	<p>Provide safe, accessible and convenient pedestrian routes not give rise to severe impacts on highway safety and/ or a severe impact on the capacity of the highway network and allow for safe access and manoeuvring of refuse and recycling vehicles. Appropriate mitigation will be sought where such impacts are likely.</p>		
			<p><i>Note: It's not considered necessary to include reference to flood risk here as it is covered by Policy DS8PU.</i></p>			

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13	6.2.11 IDP	6.2.11 makes reference to 'charging'. It is suggested that this is amended to read, "...electric vehicle charging....".	<i>Proposed Minor Modification</i> 6.2.11 ...highways and transport (including walking and cycle routes), electric vehicle charging...	Agreed	-
14	DS5PU Planning Obligations	is suggested that Strategic Policy DS5PU should state that developer contributions will be sought to mitigate the impact of development where it meets the tests	<i>Proposed Main Modification</i> Policy DS5, first sentence The Council will secure the following infrastructure provision/enhancements through planning obligation to mitigate the impact of development where it is	Agreed	-
15a	DS6PU Design and Development Standards	It is suggested that reference is made within the supporting text in respect of providing walking and cycling building upon the work of undertaken as part of Copeland Transport Improvements Study.	<i>No change required - This is already covered under 'active design'</i>	Agreed	
15 b		In addition it is suggested reference should be made in the supporting text to ensure that development supports the outcomes and schemes of Whitehaven's Local Cycling and Walking Infrastructure Plan (LCWIP). The final LWCIP will include a priority pipeline of scheme information including cycling and walking improvements to accompanying the network route maps.	<i>No change required – This is already covered in the connectivity chapter</i>	Agreed	
15c		It is also suggested reference should also be made in the supporting text to the adopted Cumbria Development Design Guide (2017) which takes into account national standards and includes guidance in	<i>No change required – already covered in connectivity chapter</i>	Agreed	

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		relation to sustainable drainage systems as well as detailed guidance in relation to highways.					
16	DS7PU Hard and Soft Landscaping	Policy DS7PU should include the provision of SUDs features in landscaping where possible	<i>No change required – already covered by Policy DS9PU. The Policy also already talks about reducing surface water.</i>	Agreed	-		
17	6.6.4 Reducing Flood Risk	Para 6.6.4 states that the Cumbria Coastal Strategy (April 2020) sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. This is incorrect. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>6.6.3</td> <td>...and sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.</td> </tr> </table>	6.6.3	...and sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.	Agreed	-
6.6.3	...and sets out how Cumbria County Council will manage the risks of coastal flooding and erosion in the county. The Environment Agency has a national and regional overseeing role working with Coastal Protection Authorities. Copeland Borough Council is a Coastal Protection Authority and oversees flood and coastal erosion on the Copeland coast. Responsibility for managing each section of coastline lies with the landowner/ asset owner.						
18	DS8PU Reducing Flood Risk	Criterion a) of Strategic Policy DS8PU should be amended to: “Directing development to allocated sites outside areas of flood risk” deleting where possible;	<i>No change required - it is not always possible to do this, for example a number of the Opportunity Sites are within areas of flood risk and will require mitigation before development can commence.</i>	Agreed	-		
19	6.6.9 Sustainable Drainage	“All new development must incorporate sustainable urban drainage in accordance with Policy DS9PU below, unless it is shown that	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>6.6.9</td> <td>Where possible and appropriate all new development must incorporate SuDs in accordance with Policy DS9PU below</td> </tr> </table>	6.6.9	Where possible and appropriate all new development must incorporate SuDs in accordance with Policy DS9PU below	Agreed	-
6.6.9	Where possible and appropriate all new development must incorporate SuDs in accordance with Policy DS9PU below						

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		this would not be appropriate in the particular location.”					
20	DS9PU Sustainable Drainage	Policy DS9PU should be amended to: “New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate”. The second sentence should be amended to read, “Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for <i>landscape</i> , biodiversity and recreation.”	<p><i>Proposed Main Modification</i></p> <table border="1"> <tr> <td>Policy DS9</td> <td>Where appropriate New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate. Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for landscape, biodiversity and recreation</td> </tr> </table>	Policy DS9	Where appropriate New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate . Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for landscape , biodiversity and recreation	Agreed	-
Policy DS9	Where appropriate New development must incorporate sustainable drainage systems unless it can be demonstrated that this is not appropriate . Drainage systems should be well designed with consideration given to the additional benefits they can provide as spaces for landscape , biodiversity and recreation						
21	DS11PU Protecting Air Quality	Policy DS11PU should be amended to include: “Applications for major new development must include details showing that the development will not lead to traffic congestion that would result in unacceptable levels of air pollution	<i>No change required - This has been covered elsewhere in the plan. Policy DS11 already says that proposals “must not give rise to unacceptable levels of air pollution”. This includes pollution from a number of sources including traffic congestion.</i>	Agreed			
22	7.3.2 Defining Copeland’s Economy	As of July 2021 SL confirmed that there are approximately 6,300 staff (now close to 6,000) who have been relocated. Section 7.5.3. mentions SL off-siting as part of the EDNA and major employment site packages so it should be recognised at 7.3.2 that SL off-siting is already well underway.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>7.3.2</td> <td>Copeland is home to Sellafield Ltd., which has approximately 12,000 people working on the Sellafield site, and many thousands more working in the supply chain. The number of Sellafield Ltd employees working in West Cumbria is approximately 10,000 of which around 7,000 work on the Sellafield site. In terms of the supply chain, there are also many thousands working in West Cumbria - both on the Sellafield site and in satellite premises throughout West Cumbria. It occupies a prominent...</td> </tr> </table>	7.3.2	Copeland is home to Sellafield Ltd., which has approximately 12,000 people working on the Sellafield site, and many thousands more working in the supply chain. The number of Sellafield Ltd employees working in West Cumbria is approximately 10,000 of which around 7,000 work on the Sellafield site. In terms of the supply chain, there are also many thousands working in West Cumbria - both on the Sellafield site and in satellite premises throughout West Cumbria. It occupies a prominent...	Agreed	-
7.3.2	Copeland is home to Sellafield Ltd., which has approximately 12,000 people working on the Sellafield site, and many thousands more working in the supply chain. The number of Sellafield Ltd employees working in West Cumbria is approximately 10,000 of which around 7,000 work on the Sellafield site. In terms of the supply chain, there are also many thousands working in West Cumbria - both on the Sellafield site and in satellite premises throughout West Cumbria. It occupies a prominent...						

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23	7.4.1 Moving Forward – Economic Growth	Para 7.4.1 suggest omitting the hyperlink (or just include it as a footnote), as this may not always be available during the life of the local plan	<i>Proposed Minor Modification – hyperlink changed to footnote.</i>	Agreed	-
24	E1PU Employment sites and allocations	It is suggested that reference is made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development.	<i>No change required - This is already covered elsewhere</i>	Can it be confirmed where this is covered elsewhere exactly?	<i>Covered under pages 44 and 45 which relate to all types of development and in paragraph 7.5.8.</i>
25	7.5.2 Location of employment	The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g.	<i>Paragraphs 7.5.2 to 7.5.5 explain the employment land requirement and how this has been calculated and paragraphs 13.4.12 to 13.4.20 explain how the housing requirement and growth figures have been calculated. This will be explained further in the Employment and Housing Topic Papers. The housing growth scenarios is planned for through the housing allocations etc (i.e., the 200 dwellings per annum figure) in order to provide housing choice. The timeframes for these sites being delivered is shown in the housing trajectory.</i> <i>In terms of the Broad Locations these will only be considered at Local Plan review stage. Modifications in Section 4.2 discussed above will make this clearer.</i>	Can it be confirmed what else would trigger the growth scenarios?	<i>The growth scenario is what is being planned for through the LP. In terms of Broad Locations, as these fall outside settlement boundaries they can only be "triggered" through a Local Plan Review.</i>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		Nationally Significant Infrastructure Projects, such as Nuclear New Build.			
26	E4PU Cleator Moor Innovation Quarter	<p>Cumbria County Council recognises the importance of this site. The site has the potential to support Sellafield Ltd., in its delivery of the Sellafield Travel Plan – which Cumbria County Council is in full support of, and the strategic importance of Leconfield aligns with other economic development regeneration priorities in Cleator Moor, notably its inclusion as a key strategic project within the Cleator Moor Town Investment Plan.</p> <p>It is however important to note that it is considered due to the scale of the proposed site there will potentially be land assembly and site preparation issues. It is therefore important that clear evidence is provided by Copeland Borough Council to demonstrate that the site is deliverable.</p> <p>Cumbria County Council will continue to work with Copeland Borough Council in a proactive manner to try and achieve the ambitious goals for this site. The scale and timing of how the site will come forward needs to be investigated in detail once Cumbria</p>	<i>No change required - This will be covered at planning application stage.</i>	No mention of travel demand management in the Local Plan.	<p><i>Proposed additional mod -extra sentence to 7.7.15:</i></p> <p>Consideration will also need to be given to the Transport Improvement Study 2021 and developers will be required to demonstrate how traffic demand will be managed to mitigate potential impacts on the highway.</p>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		<p>County Council is in receipt of a suitably scoped Transport Assessment considering the transport impact, for both vehicles and non-vehicular usage, of the site for this development. Cumbria County Council is currently working with the applicant to agree the scope for this assessment.</p> <p>The same response applies for drainage proposals for the site. Cumbria County Council will be in a position to comment on these matters once in receipt of a Drainage Strategy and Flood Risk Assessment for the site. Cumbria County Council would expect the site proposals to conform to the best practice sustainable drainage systems principles and recommends the applicant engages in pre-application discussions with the Council to agree the scope of the Flood Risk Assessment.</p> <p>Copeland Transport Improvements Study (CTIS) 2021 recommends that, where traffic demand is likely to exceed the available road capacity, even after a capacity improvement, travel demand management measures will need to be adopted in</p>			

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		order to deliver some of the Local Plan sites and mitigate potentially significant impacts. The Study goes on to further recommend that a wide range of measures could be delivered at sites to manage the timing and volume of vehicles arriving / departing from site. This could be through restricting parking permits to drivers with at least one additional passenger (car share) or by providing dedicated bus services to key origins/destinations (park and ride).					
27	E6PU Opportunity sites	Strategic Policy E6PU needs to reference that the Opportunity Sites need to have further assessment undertaken to consider the transport impact, drainage and flood risk assessment and depending on the defined use of the site, an assessment of education provision.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>7.9.4</td> <td>...and the Council will require the use of a Masterplan to ensure the required infrastructure and mitigation are in place and the site is developed holistically. This must be supported by further assessments including those which consider transport, drainage and flood risk impacts.</td> </tr> </table> <p><i>Note: No change required with reference to education as this is already covered in the obligations section.</i></p>	7.9.4	...and the Council will require the use of a Masterplan to ensure the required infrastructure and mitigation are in place and the site is developed holistically. This must be supported by further assessments including those which consider transport, drainage and flood risk impacts.	Agreed	<i>No modification proposed- development plan ought to be read as a whole. Any development would have to accord with the relevant policies regarding transport, drainage and flood risk</i>
7.9.4	...and the Council will require the use of a Masterplan to ensure the required infrastructure and mitigation are in place and the site is developed holistically. This must be supported by further assessments including those which consider transport, drainage and flood risk impacts.						
28a	RE1PU Agricultural Buildings	There is repetition in criterion a). Suggest deleting the word 'demonstrable'.	<p><i>Proposed Main Modification</i></p> <table border="1"> <tr> <td>Policy RE1PU, criterion a</td> <td>A demonstrable clear need to the building in relation to the functional operations of the agricultural business is demonstrated;</td> </tr> </table>	Policy RE1PU, criterion a	A demonstrable clear need to the building in relation to the functional operations of the agricultural business is demonstrated;	Agreed	-
Policy RE1PU, criterion a	A demonstrable clear need to the building in relation to the functional operations of the agricultural business is demonstrated;						

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28 b		There is nothing in the supporting text to explain what the issue is with ammonia emissions (criterion e) and how these arise from farm buildings.	<i>Proposed Minor Modification</i> 8.3.1 It is also important that new agricultural development does not have a negative impact upon air quality therefore measures to reduce ammonia emissions will be required where appropriate. Further information regarding the issue can be found on pages 56 and 57.	Agreed	-
29a	CC1PU Large scale energy developments	Suggest amending the last sentence of the second paragraph of the policy to read, “ <i>Impacts on the following, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively: etc</i> ”. The bullet points are ‘receptors’, not ‘impacts’.	<i>Proposed Main Modification</i> Policy CC1PU, second paragraph The following impacts, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively... Careful consideration should be given to siting, scale and design of the development and associated infrastructure to avoid individual and/or cumulative impacts on the following...	Agreed	-
29 b		The previous sentence needs an ‘and’ before ‘battery stores’ and the energy types should be in lower case.	<i>Proposed Main Modification – sentence amended as suggested</i>	Agreed	-
29c		In the third paragraph, add ‘is’ after ‘harm	<i>Proposed Main Modification, paragraph amended as recommended</i>	Agreed	-
30	CC2PU Wind energy developments	Suggest that the 4th paragraph of the policy is amended to read, “Proposals will only be considered suitable where it can be demonstrated that <i>relevant</i> planning impacts identified by local	<i>No change required to 4th paragraph re addition of word relevant - current wording reflects Para 54 of the NPPF.</i> <i>Main Modification Proposed to 2nd paragraph to ensure consistency with changes to CC1 above</i>	Agreed	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022				
		communities during consultation have been fully addressed.”	<table border="1"> <tr> <td>Policy CC2PU, second paragrap h</td> <td>The following impacts, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively...Careful consideration should be given to siting, scale and design of wind energy developments and associated infrastructure to avoid individual and/or cumulative impacts on the following...</td> </tr> </table>	Policy CC2PU, second paragrap h	The following impacts, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively... Careful consideration should be given to siting, scale and design of wind energy developments and associated infrastructure to avoid individual and/or cumulative impacts on the following...				
Policy CC2PU, second paragrap h	The following impacts, caused by siting, scale or design, should be avoided where possible and should be considered individually and cumulatively... Careful consideration should be given to siting, scale and design of wind energy developments and associated infrastructure to avoid individual and/or cumulative impacts on the following...								
31a	Nuclear strengths	Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand. Suggest amending to read, “Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the ‘Clean Energy Coast’.”	<table border="1"> <tr> <td colspan="2"><i>Proposed Minor Modification</i></td> </tr> <tr> <td>Strength s box</td> <td>Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the ‘Clean Energy Coast’.</td> </tr> </table>	<i>Proposed Minor Modification</i>		Strength s box	Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the ‘Clean Energy Coast’.	Agreed	-
<i>Proposed Minor Modification</i>									
Strength s box	Copeland is recognised as the Centre for Nuclear Excellence and a key player of the 'Clean Energy Coast' brand Copeland is recognised as the Centre for Nuclear Excellence and lies at the heart of the ‘Clean Energy Coast’.								
31b		Query reference to Drigg as this is purely a waste site and therefore falls within the scope of the Cumbria Mineral & Waste Local Plan.	<i>No change required re Drigg - The LLWR is still a strength for Copeland and is linked to nuclear waste. The role of CCC at LLWR is highlighted earlier on in the document.</i>	Agreed	-				
31c		The availability of land at and adjoining Sellafield for new nuclear development is an opportunity.	<i>No change required re land at and adjoining Sellafield.</i>	Agreed	-				
32	Nuclear challenges	Ageing population means there is a need to attract additional working age population in to support nuclear sector. Suggest amending to read, “Ageing population means there is a need to attract more people of working age.”	<table border="1"> <tr> <td colspan="2"><i>Proposed Minor Modification</i></td> </tr> <tr> <td>Challeng es box</td> <td>Ageing population means that there is a need to attract additional working age population in to support the nuclear sector Ageing population means there is a need to attract more people of working age to Copeland</td> </tr> </table>	<i>Proposed Minor Modification</i>		Challeng es box	Ageing population means that there is a need to attract additional working age population in to support the nuclear sector Ageing population means there is a need to attract more people of working age to Copeland	Agreed	-
<i>Proposed Minor Modification</i>									
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33a	Nuclear Opportunities	Correct spelling of 'produce'. Lower case 's' for 'small'.	<i>Proposed Minor Modifications, wording to be changed as recommended.</i>	Agreed	-
33b		Opportunities could be made more general, e.g. "Opportunities for the development of new nuclear development, including small or advanced modular reactors to produce net zero carbon electricity, a demonstration project for nuclear fusion and large new nuclear generation."	<i>No change required - important to relate this back to the ambition for net zero carbon and additional suggested wording re. demonstration projects and large new nuclear are covered in the Clean Energy Park opportunity box</i>	Agreed	-
33c		Reference to the 'Cumbria Nuclear Prospectus' has different titles (see para 10.2.2 and 10.3.1). It would also be useful to state when was it agreed and published.	<i>Proposed Minor Modification</i> 10.2.2 The 'Cumbria Nuclear Prospectus': Energising the Energy Coast, August 2020...	Agreed	-
33d		For clarity it is requested that a sentence be inserted explaining that development at Sellafield is controlled by two planning authorities and that Cumbria County Council is responsible for waste related development at Sellafield.	<i>No change required – this is already clear from Table 1</i>	Agreed	-
33e		Within para 10.3.6 reference to Cumbria County Council as a partner should be made.	<i>Proposed Minor Modification</i> 10.3.6 Partners including the NDA, Sellafield Ltd, Cumbria County Council and the Council with support from	Agreed	-
34		10.4.1 Moorside	Para 10.4.1 should be amended to read "...identified in the National Policy Statement...". Change second sentence to read, "The NPS is expected to be updated during	<i>Proposed Minor Modification</i> 10.4.1 The Moorside site, located north of Sellafield, is identified in the National Policy Statement for Nuclear Power Generation (EN-6) 2011 as a potential	Agreed

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022				
		2022.” This will make the text more meaningful throughout the life of the plan.	<table border="1"> <tr> <td data-bbox="900 288 1010 360"></td> <td data-bbox="1010 288 1612 360">location for a new nuclear power station. The NPS is expected to be updated later this year during 2022.</td> </tr> </table>		location for a new nuclear power station. The NPS is expected to be updated later this year during 2022.				
	location for a new nuclear power station. The NPS is expected to be updated later this year during 2022.								
35	10.4.2 Moorside	Para 10.4.2 is historic and needs rewording. Whilst the original NuGen proposals were for up to 3.8 GW of new electricity generating capacity, they were followed by Kepco’s plans for up to 3GW and both proposals were withdrawn. The second sentence could say “Any proposal for a new nuclear power station is likely to require significant infrastructure works, including railway improvements along the Cumbrian Coast Line, marine loading facility, highway improvements and worker accommodation.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td data-bbox="900 459 1010 954">10.4.2</td> <td data-bbox="1010 459 1612 954">The detailed proposals at Moorside are still to be defined but two latest previous proposals (now withdrawn) set out in May 2016 are were made, for up to 3.8GW and 3GW of new electricity generating capacity. This involves supporting infrastructure works, including railway improvements between Corkickle and Mirchouse, a Marine Off loading Facility, highway improvements and worker accommodation. Any proposal for a new nuclear power station is likely to require significant infrastructure works, including railway improvements along the Cumbrian Coast Line, marine loading facility, highway improvements and worker accommodation.</td> </tr> </table>	10.4.2	The detailed proposals at Moorside are still to be defined but two latest previous proposals (now withdrawn) set out in May 2016 are were made , for up to 3.8GW and 3GW of new electricity generating capacity. This involves supporting infrastructure works, including railway improvements between Corkickle and Mirchouse, a Marine Off loading Facility, highway improvements and worker accommodation. Any proposal for a new nuclear power station is likely to require significant infrastructure works, including railway improvements along the Cumbrian Coast Line, marine loading facility, highway improvements and worker accommodation.	Agreed	-		
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36	10.4.3 Moorside	Para 10.4.3 should be amended to read, “The Council believes that the Moorside site can play a fundamental role in the delivery of.....”. Delete the second sentence as the figures quoted relate specifically to the redundant NuGen proposals.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td data-bbox="900 954 1010 1121">10.4.3 , first sente nce</td> <td data-bbox="1010 954 1612 1121">“The Council believes that the Moorside site is fundamental to can play a fundamental role in the delivery of.....”.</td> </tr> </table> <p><i>Proposed Minor Modification - Second sentence amended rather than removed as suggested, figures are important for context</i></p> <table border="1"> <tr> <td data-bbox="900 1121 1010 1382">10.4.3 , secon d</td> <td data-bbox="1010 1121 1612 1382">Previous proposals have indicated that this could involve an This includes an anticipated peak of 6,500 workers during construction, 1,000 permanent staff when operational and additional opportunities during maintenance and outage periods.</td> </tr> </table>	10.4.3 , first sente nce	“The Council believes that the Moorside site is fundamental to can play a fundamental role in the delivery of.....”.	10.4.3 , secon d	Previous proposals have indicated that this could involve an This includes an anticipated peak of 6,500 workers during construction, 1,000 permanent staff when operational and additional opportunities during maintenance and outage periods.	Agreed	-
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ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
			sentence		
37	10.5 Clean Energy Park	It is suggested that the explanatory paragraph explains that to achieve the vision of the Cumbria Nuclear Prospectus a number of investment proposals are being developed around the concept of a Cumbria Clean Energy Park, primarily at the Moorside site	<p><i>Proposed Minor Modification</i></p> <p>10.5.1 In preparation of achieving In order to help achieve the vision of the Cumbria Nuclear Prospectus...</p>	Agreed	-
38	10.6.1 Industrial Solutions Hub	Para 10.6.1 should be reworded to "The Industrial Solutions Hub (ISH) – a flagship initiative by Sellafield and its business partners – seeks to.....etc". As currently written it is unclear.	<p><i>Proposed Minor Modification</i></p> <p>10.6.1 The flagship initiative by these partners, the Industrial Solutions Hub (ISH) The Industrial Solutions Hub (ISH), a flagship initiative by Sellafield and its business partners, seeks to...</p>	Agreed	-
39	10.7.1 New Nuclear Technologies	<p>Para 10.7.1 states that the Local Plan supports the deployment of any of the following new nuclear technologies in Copeland in accordance with the criteria set out in the nuclear policies in Table 10: New Nuclear Technologies.</p> <p>Specific reference also needs to be made to the assessment and identification of strategic infrastructure requirements needed to facilitate the delivery of the development which will need to be considered as part of any consenting process</p>	<i>No change required - This is covered elsewhere in the Plan</i>	Can it be confirmed where this is covered elsewhere exactly?	<i>Covered under policy DS5</i>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
40	10.8.1 Other supporting developments	Para 10.8.1 it is recommended that abbreviations like AI and R&D are written in full or added to the list of abbreviations in the plan. Clarification is required by what is meant by first bullet, "integration of RAI projects into local planning as a supporter to new policy"?	<p><i>Proposed Minor Modifications – phrases added to abbreviations list as suggested</i></p> <p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="904 424 1608 528"> <tr> <td data-bbox="904 424 1025 528">10.8.1 , first bullet</td> <td data-bbox="1025 424 1608 528">Integration of RAI projects into local planning as a supporter to new policy</td> </tr> </table>	10.8.1 , first bullet	Integration of RAI projects into local planning as a supporter to new policy	Agreed	-
10.8.1 , first bullet	Integration of RAI projects into local planning as a supporter to new policy						
41	10.9.1 Supporting development of nuclear sector	Para 10.9.1 should be amended to: "Where proposals for large scale nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will be considered by the Planning Inspectorate and decided by the Secretary of State." Amend second sentence to read, "The Council will be consulted on such applications as a 'host authority' under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below:"	<p><i>Proposed Minor Modification – wording as suggested however with the word "determined" used instead of "decided".</i></p> <table border="1" data-bbox="904 655 1608 1082"> <tr> <td data-bbox="904 655 1025 1082">10.9.1</td> <td data-bbox="1025 655 1608 1082">Where proposals for large nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will fall under the remit of the Planning Inspectorate be considered by the Planning Inspectorate and determined by the Secretary of State. The Council as both local Borough Council and the Local Planning Authority will be consulted on such applications and our starting position will be as set out in the nuclear Policies where relevant will be consulted on such applications as a 'host authority' under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below</td> </tr> </table>	10.9.1	Where proposals for large nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will fall under the remit of the Planning Inspectorate be considered by the Planning Inspectorate and determined by the Secretary of State. The Council as both local Borough Council and the Local Planning Authority will be consulted on such applications and our starting position will be as set out in the nuclear Policies where relevant will be consulted on such applications as a 'host authority' under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below	Agreed	Modification amended – "determined" replaced with "decided" as requested.
10.9.1	Where proposals for large nuclear development are Nationally Significant Infrastructure Projects (NSIPs) they will fall under the remit of the Planning Inspectorate be considered by the Planning Inspectorate and determined by the Secretary of State. The Council as both local Borough Council and the Local Planning Authority will be consulted on such applications and our starting position will be as set out in the nuclear Policies where relevant will be consulted on such applications as a 'host authority' under the Planning Act 2008 and our starting position will be as set out in the nuclear policies, where relevant, below						
42a	NU1PU Supporting development of the nuclear sector	Strategic Policy NU1PU should be amended as follows: "The Council will support and encourage the development of the nuclear sector, including new nuclear missions, within Copeland where the following criteria are met: a) Proposals are will be in accordance with relevant	<p><i>Proposed Main Modification</i></p> <table border="1" data-bbox="904 1118 1608 1273"> <tr> <td data-bbox="904 1118 1025 1273">Policy NU1PU, criterion a</td> <td data-bbox="1025 1118 1608 1273">Proposals are will be in accordance with relevant National Policy and Government Guidance;</td> </tr> </table>	Policy NU1PU, criterion a	Proposals are will be in accordance with relevant National Policy and Government Guidance;	Agreed	-
Policy NU1PU, criterion a	Proposals are will be in accordance with relevant National Policy and Government Guidance;						

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		National Policy and Government Guidance;					
42 b		In relation to criterion b), it is not clear what is meant by 'where appropriate'. An explanation of when it will or won't be appropriate is required?	<i>No change proposed – each application will be dealt with on its own merits and it would be difficult to list all potential applications where this would be appropriate. Proposals where it wasn't appropriate however would include certain minor applications, changes of use applications etc.</i>	Agreed	-		
42c		Is the statement relating to Sellafield needed, as there is a separate policy for Sellafield development? This statement also risks implying the proposals will be supported irrespective of other policies in the plan, notably NU4PU.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>Policy NU1PU, paragraph 4</td> <td>The Council will work proactively with Cumbria County Council and Sellafield site operators in the development and management of nuclear and associated facilities/infrastructure.</td> </tr> </table>	Policy NU1PU, paragraph 4	The Council will work proactively with Cumbria County Council and Sellafield site operators in the development and management of nuclear and associated facilities/infrastructure.	Agreed	-
Policy NU1PU, paragraph 4	The Council will work proactively with Cumbria County Council and Sellafield site operators in the development and management of nuclear and associated facilities/infrastructure.						
42 d		Suggest explaining somewhere the shared planning responsibilities for the Sellafield site (Copeland Borough Council and Cumbria County Council). This would help to contextualise the need for joint working between the Councils.	<i>No change required - Planning responsibilities are set out elsewhere in the plan.</i>	Agreed	-		
		Clarification is required as what is meant by "proportionate and meaningful contribution to local economic, social and environmental strategies/priorities.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>New paragraph 10.9.2</td> <td>Policy NU1 requires that all nuclear sector related development makes a proportionate and meaningful contribution to the local economic,</td> </tr> </table>	New paragraph 10.9.2	Policy NU1 requires that all nuclear sector related development makes a proportionate and meaningful contribution to the local economic,	Agreed	-
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ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022				
			<p>social and environmental strategies/priorities. This could be through the production of Social Impact Strategies and/or through S106 contributions where these are required to mitigate any negative impacts and make the proposal acceptable. Development by Sellafield Ltd within the Sellafield site boundary will be exempt from this requirement as existing provisions are already in place.</p>						
43	10.10 Nuclear decommissioning	Para 10.10.2 should be amended to read: "The safe treatment <i>and storage</i> of low level, intermediate level and high-level waste."	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="902 667 1608 762"> <tr> <td data-bbox="902 667 1003 762">10.10.2, last bullet</td> <td data-bbox="1003 667 1608 762">The safe treatment and storage of low level, intermediate level and high level waste</td> </tr> </table>	10.10.2, last bullet	The safe treatment and storage of low level, intermediate level and high level waste	Agreed	-		
10.10.2, last bullet	The safe treatment and storage of low level, intermediate level and high level waste								
44	10.11 General nuclear energy and associated development and infrastructure	<p><i>10.11 Nuclear Energy Sector Development and Infrastructure Strategic Policy NU3PU: General Nuclear Energy and associated</i></p> <p>Amend criterion a) as follows: "The development is sited on a designated employment site or on a suitable site within settlement boundaries or <i>is justified as an otherwise be accompanied by a justifiable exceptional need case.</i>"</p> <p>Amend criterion b) as follows: "Any new energy infrastructure The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;"</p>	<p><i>Proposed Main Modifications</i></p> <table border="1" data-bbox="902 802 1608 1385"> <tr> <td data-bbox="902 802 1256 1129">Policy NU3PU, criterion a</td> <td data-bbox="1256 802 1608 1129">The development is sited on a designated employment site or on a suitable site within an identified settlement boundaries boundary or is justified as an otherwise be accompanied by a justifiable exceptional need case</td> </tr> <tr> <td data-bbox="902 1129 1256 1385">Policy NU3PU, criterion b</td> <td data-bbox="1256 1129 1608 1385">Any new energy infrastructure The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;</td> </tr> </table>	Policy NU3PU, criterion a	The development is sited on a designated employment site or on a suitable site within an identified settlement boundaries boundary or is justified as an otherwise be accompanied by a justifiable exceptional need case	Policy NU3PU, criterion b	Any new energy infrastructure The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;	Agreed	-
Policy NU3PU, criterion a	The development is sited on a designated employment site or on a suitable site within an identified settlement boundaries boundary or is justified as an otherwise be accompanied by a justifiable exceptional need case								
Policy NU3PU, criterion b	Any new energy infrastructure The proposal will minimise potential impacts on the borough's landscape and natural environment, and the health and amenity of its community and visitors;								

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		<p>Amend criterion c) as follows: “Sites must be <i>The proposal is located,</i> developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities.”</p> <p>There is lack of clarity on the circumstances when a positive legacy will be required.</p>	<table border="1"> <tr> <td data-bbox="902 288 1256 555">Policy NU3PU, criterion c</td> <td data-bbox="1256 288 1610 555"> Sites must be The proposal is located, developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities </td> </tr> </table>	Policy NU3PU, criterion c	Sites must be The proposal is located, developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities		
Policy NU3PU, criterion c	Sites must be The proposal is located, developed and designed, to minimise any adverse impacts and where relevant must be capable of leaving a positive legacy for the borough and its communities						
45	10.12	<p>Para 10.12.2 is inconclusive and doesn't explain what the Council is trying to ensure. Should be amended as follows: “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 possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority.</p>	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td data-bbox="902 655 1010 1018">10.12.2</td> <td data-bbox="1010 655 1610 1018"> <p>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 possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority.</p> </td> </tr> </table>	10.12.2	<p>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 possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority.</p>	Agreed	-
10.12.2	<p>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 possible, development is in line with Government policy, regulatory frameworks and the remit of the Council in its role as a Local Planning Authority.</p>						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
46a	Policy NU4 Nuclear development at SL	<i>Policy NU4PU: Nuclear Development at Sellafield</i> Should be amended to read: a) All nuclear development (other than monitoring, maintenance and investigatory work necessarily done off-site) shall be sited within the existing Sellafield site boundary unless Criterion b) applies.	No change appears to be proposed here by CCC	Agreed	-
46 b		b) Where any proposed development is outside the Sellafield site it shall be sited on a designated employment site or on suitable sites within settlement boundaries in accordance with the principles set out in Policies DS3PO and DS4PO, unless or otherwise accompanied by a justifiable exceptional need case.	<i>Proposed Main Modification</i> Policy NU4PU criterion b Where any proposed development is proposed outside the Sellafield site it shall be sited on a designated employment site or on suitable sites within an identified settlement boundaries boundary in accordance with the principles set out in Policies DS3PO and DS4PO, unless or otherwise accompanied by a justifiable exceptional need case ⁴³ .	Agreed	-
46c		e) Proposals include provision for necessary adequate infrastructure to support the new development.	<i>Proposed Main Modification</i> Policy NU4PU, criterion e Proposals include provision for necessary adequate infrastructure...	Agreed	-
46 d		g) Proposals shall include satisfactory measures for carbon offsetting, via off-site/other agreed compensatory means Where it has been demonstrated that they cannot be achieved on site, they shall be achieved via off-site /other agreed compensatory means.	<i>Proposed Main Modification, criterion to be deleted at the request of SL – this goes beyond what is required under the NPPF and what is expected of other large employers in the borough</i> Policy NU4PU, criterion g Proposals shall include measures for carbon offsetting via off-site/other agreed compensatory means where it has been demonstrated that they cannot be achieved on site	Agreed	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022				
46e		The policy needs a caveat somewhere explaining that this policy does apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan. Or make it clear that the definition of 'radioactive material' does not include radioactive waste. Criterion c) could otherwise imply that radioactive waste cannot be imported for management, treatment or storage at Sellafield.	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="902 328 1608 592"> <tr> <td data-bbox="902 328 1010 592">10.12.4 (new paragraph after 10.12.3)</td> <td data-bbox="1010 328 1608 592">This policy does not apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan.</td> </tr> </table> <p><i>Note: Proposed Main Modification at the request of SL, criterion c to be deleted</i></p> <table border="1" data-bbox="902 687 1608 986"> <tr> <td data-bbox="902 687 1010 986">Policy NU4PU, criterion c</td> <td data-bbox="1010 687 1608 986">With the exception of irradiated fuel and nuclear materials, no radioactive material is imported for treatment or storage on the Sellafield licensed site unless the proposal represents the best practical environmental option and is an interim proposal pending agreement on a national disposal route.</td> </tr> </table>	10.12.4 (new paragraph after 10.12.3)	This policy does not apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan.	Policy NU4PU, criterion c	With the exception of irradiated fuel and nuclear materials, no radioactive material is imported for treatment or storage on the Sellafield licensed site unless the proposal represents the best practical environmental option and is an interim proposal pending agreement on a national disposal route.	Agreed	-
10.12.4 (new paragraph after 10.12.3)	This policy does not apply to proposals for radioactive waste which is covered by policies in the Cumbria Minerals and Waste Local Plan.								
Policy NU4PU, criterion c	With the exception of irradiated fuel and nuclear materials, no radioactive material is imported for treatment or storage on the Sellafield licensed site unless the proposal represents the best practical environmental option and is an interim proposal pending agreement on a national disposal route.								
46f		Is it not clear whether this policy is intended to cover all aspects of development at Sellafield, or whether other plan policies also apply. As written, criterion g) does not require carbon offsetting on site. The suggested wording corrects this.	<i>Proposed Main Modification, criterion G to be deleted at the request of SL – this goes beyond what is required under the NPPF and what is expected of other large employers in the borough, see comment above</i>	Agreed	-				
47	NU5PU Nuclear demolition	<i>10.13 Nuclear Demolition</i> Policy NU5PU: Nuclear Demolition Should be amended as follows:	<i>Proposed Main Modification - Policy proposed for deletion as it goes beyond what can be covered under a Prior Notification application.</i>	Agreed	-				

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		<p>3) Shall not Not adversely affect any ecological assets unless it can be demonstrated that appropriate mitigation or compensation (on or off site) can be provided; and</p> <p>4) Shall not Not give rise to other adverse impacts, including those relating to the disposal of demolition waste, unless it can be demonstrated that they can be adequately mitigated.</p> <p>The word, 'shall' does not need to be repeated as it is in the first line of the policy. Cumbria County Council has previously asked for waste arising from demolition to be referenced as the quantities (and impacts) can be significant.</p>	<p>Policy NU5PU</p> <p><u>Policy NU5PU: Nuclear demolition</u></p> <p>Demolition of buildings or structures on the Sellafield site shall conform to the following principles:</p> <ol style="list-style-type: none"> 1) Demonstrate an acceptable method of demolition. 2) Provide full details of a programme of restoration of the site and /or redevelopment. 3) Shall not adversely affect any ecological assets unless it can be demonstrated that appropriate mitigation or compensation (on or off site) can be provided. 4) Shall not give rise to other adverse impacts unless it can be demonstrated that they can be adequately mitigated. 		
48	11.2.6 Retail and Leisure	<p>Para 11.2.6 refers to Spatial Frameworks for Whitehaven (draft - not yet adopted) and the Key Service Centres being produced. The paragraph goes onto add, developments which help to achieve the ambitions within these documents will be supported by the Council. The strategy and guidance provided by these Spatial Frameworks needs to be more articulated in policy if they are to be used as a basis for decision making. The draft Spatial Frameworks were</p>	<p><i>No change required - The reference to the frameworks highlights the document's importance. No need to replicate parts of the Framework within the Policy.</i></p>	Agreed	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		produced in 2018. Before they are adopted, Cumbria County Council would like to review the Spatial Frameworks to ensure that any further assessment which has been done to inform the preparation of the Local Plan has been considered.					
49	11.7 Local service centres, sustainable villages and rural villages	The explanatory paragraphs could be improved by the addition of a section to emphasise the importance of improving transport infrastructure to access Local Service Centres, Sustainable Villages and Rural Villages.	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>11.7.2</td> <td>...and takes any opportunities available to make a location more sustainable, for example through improvements to public transport provision to better connect locations to Key Service and Local Service Centres.</td> </tr> </table>	11.7.2	...and takes any opportunities available to make a location more sustainable, for example through improvements to public transport provision to better connect locations to Key Service and Local Service Centres.	Can it be clarified why the 'rural villages' suggestion been excluded from amended text? Agreed	<i>The proposed wording refers to linking locations (including those in the lower tiers) to key and local service centres as these two tiers are where most of the services are.</i>
11.7.2	...and takes any opportunities available to make a location more sustainable, for example through improvements to public transport provision to better connect locations to Key Service and Local Service Centres.						
50	12.3 Opportunities and challenges	It is considered that the supporting text in relation to opportunities should refer to the opportunity for diversification.	<i>No change required – this is already covered within the text.</i>	Agreed			
51a	T2PU	The wording of the policy could be simplified if the words, 'The proposal' were removed from each criterion and added to the introductory sentence, as follows, "Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and	<p><i>Proposed Main Modification</i></p> <table border="1"> <tr> <td>Policy T2PU</td> <td>Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported in principle where the proposal:</td> </tr> </table>	Policy T2PU	Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported in principle where the proposal:	Agreed	-
Policy T2PU	Opportunities for tourist development in close proximity to the coastline (with the exception of areas designated as undeveloped coast) of an appropriate type and scale will be supported in principle where the proposal:						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		<p>scale will be supported where the proposal:</p> <p>Suggest rewording criterion d) as follows, “The proposal enhances the offer for both onshore and offshore visitors.....etc”. This ensures the wording flows with the above revision and avoids repetition of the word ‘opportunities’.</p>					
51 b		The last sentence of the policy could also be reworded as additional policy criteria.	<i>No change required</i>	Agreed	-		
51c		In addition it is suggested that this policy is mindful of the recommendations of the Cumbria Coastal Strategy, (April 2020).	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>12.4.6 (amended to 12.4.7)</td> <td>Certain types of development that enhance Copeland’s tourism offer may be acceptable along the developed coastline, such as those are set out in Policy T2PU. When determining the acceptability of proposals consideration will be given to the Cumbria Coastal Strategy 2020 (or any document that replaces it)</td> </tr> </table>	12.4.6 (amended to 12.4.7)	Certain types of development that enhance Copeland’s tourism offer may be acceptable along the developed coastline, such as those are set out in Policy T2PU. When determining the acceptability of proposals consideration will be given to the Cumbria Coastal Strategy 2020 (or any document that replaces it)	Agreed	-
12.4.6 (amended to 12.4.7)	Certain types of development that enhance Copeland’s tourism offer may be acceptable along the developed coastline, such as those are set out in Policy T2PU. When determining the acceptability of proposals consideration will be given to the Cumbria Coastal Strategy 2020 (or any document that replaces it)						
52	13.4 The housing requirement	The Local Plan refers to differing Growth Scenarios i.e. Baseline CE; Baseline- Experian; Growth Scenario Midpoint; Growth Scenario which will influence the quantum and distribution of development within the Local plan. This an important point that needs a clear explanation in relation to how the Growth Scenarios were developed, particularly in relation to housing	<p><i>Proposed Minor Modifications – See also comments earlier in table Further information will also be provided in the Employment and Housing Topic Papers.</i></p> <table border="1"> <tr> <td>13.4.18</td> <td>...could only be justified if all of the additional aspirational projects identified in the Employment Development Needs Assessment, listed in Table 9 on page 67 of this Plan, came forward which the SHMA notes “is unlikely to happen during the plan period”</td> </tr> </table>	13.4.18	...could only be justified if all of the additional aspirational projects identified in the Employment Development Needs Assessment, listed in Table 9 on page 67 of this Plan , came forward which the SHMA notes “is unlikely to happen during the plan period”	See comment in relation to ID 3b	<i>See earlier comments relating to Broad Locations</i>
13.4.18	...could only be justified if all of the additional aspirational projects identified in the Employment Development Needs Assessment, listed in Table 9 on page 67 of this Plan , came forward which the SHMA notes “is unlikely to happen during the plan period”						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		and employment allocations, opportunity sites and broad location of growth sites. It is also important that the Local Plan articulates what else would trigger the growth scenarios (other than there being insufficient, undeliverable sites) e.g. Nationally Significant Infrastructure Projects, such as Nuclear New Build.			
53a	H3PU	This policy would benefit from a clear articulation of the anticipated phasing of housing allocation in the plan period. This would support the phasing and delivery of key infrastructure.	<i>No change required – phasing is shown in the housing trajectory which forms an appendix to the Local Plan.</i>	Agreed	
53b		At the end of part 4 of the policy, suggest rewording as follows, “... in accordance with the NPPF (or other relevant national policy).”	<i>No change required – wording not considered necessary.</i>	Agreed	-
54	H4PU Housing delivery	It is anticipated that in relation to Whitehaven there will be a pressure on school places in the south of the town. A site previously identified for a new school at the Rhodia site by a developer is unsuitable and there is a need to develop a clear plan for the provision of capacity through developer contributions to support the planned level of housing growth. Linked with the IDP, Cumbria County Council will commit to work with	<i>Comment noted.</i>	Agreed	

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		Copeland to develop a solution prior to the submission of the Local Plan.					
55	13.7.5 Housing allocations	Para 3.7.5: Cumbria County Council is the Local Highway Authority and Lead Local Flood Authority. Amend to read as follows, "Specialist advice from key stakeholders, including Cumbria County Council as the local highway authority and Lead Local Flood Authority, and United Utilities was also considered."	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>13.7.5</td> <td>Specialist advice from key stakeholders, including Cumbria Highways, the Lead Local Flood Authority Cumbria County Council as the local highway authority and Lead Local Flood Authority, and United Utilities was also considered.</td> </tr> </table>	13.7.5	Specialist advice from key stakeholders, including Cumbria Highways, the Lead Local Flood Authority Cumbria County Council as the local highway authority and Lead Local Flood Authority , and United Utilities was also considered.	Agreed	-
13.7.5	Specialist advice from key stakeholders, including Cumbria Highways, the Lead Local Flood Authority Cumbria County Council as the local highway authority and Lead Local Flood Authority , and United Utilities was also considered.						
56	13.7.6 Housing allocations	Para 13.7.6 states that discounted sites can be considered when the Local Plan is being reviewed if the allocations have not come forward as anticipated. It is important to note that these sites would need to have further assessment undertaken to consider the highways impact, drainage and flood risk assessment and an assessment of any required education provision.	<i>No change required - A new local plan would go through these processes. It is not necessary to add this here.</i>	Agreed	-		
57		Cumbria County Council reiterates concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and surface water drainage system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation	<i>No change required – the issue is likely to have been addressed prior to the adoption of the Local Plan, the developer of the Moor Farm site is aware of the issue and has been in discussion with the county council and the impact upon delivery timescales has been reflected in the housing trajectory. Putting a blanket ban on development within a Key Service Centre is excessive and unnecessary.</i>	For discussion at Local Plan Catch Up meeting to agree the position	<i>The Council is aware of the issue and a solution is being progressed with UU, CCC and the developer. The site has been added to years 6+ in the trajectory on this basis but may come forward sooner if the issue is resolved sooner.</i>		

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		<p>scheme could put too much pressure on an already overburdened system. A Risk Management Authority (RMA) Outline Business Case (OBC) is being developed to seek approval to deliver a Flood Risk Management Scheme to protect properties in Millom and Haverigg. Progression to detailed design, consents, land agreements etc is expected between May 2022 and May 2023. It is considered that phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until phase 1 has commenced.</p> <p>Whilst the scheme will be designed to take into account the proposed development in the Local Plan, it is however considered that developer contributions will be required to ensure the scheme is deliverable. The estimated cost of phase 1 will be known by April 2022 and which can find into the updated to the IDP and final viability assessment to conclude</p>			<p><i>The Council can provide evidence of progress to the Inspector in the form of emails from the developer and/or the LLFA/UU during the examination if required.</i></p>

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		what an appropriate contribution from all the developments will be.					
58a	13.8 Broad locations	As set out in the requirements of the Town and Country (Local Planning) (England) Regulations 2012, a review of the local plan would warrant consultation. It is also important to note that reference needs to be made to the assessment of the highway impact; drainage and flood risk and additional education provision which the development within the areas will create	<i>No change required – the need for consultation is set out in the regulations and the requirement for such assessments is a given.</i>	Agreed	-		
58 b		The paragraph also states that most of the Broad Locations are linked to a growth corridor on the edge of Whitehaven that would be created by the construction of the Whitehaven Relief Road. There is an opportunity here to better evidence future growth and economic benefit to better articulate the case for investment for the Whitehaven Eastern Relief Road and improve the foundations of the business case	<i>No change required - the benefits of the relief road has been covered elsewhere within the Local Plan. Whilst the Local Plan will provide a hook for potential funding a full business case will be required.</i>	Agreed			
59a	H10PU Allocated sites for gypsies and travellers	Amend wording to read, “Planning applications for the development of new or the extension of existing gypsy and traveller sites will be supported where <i>they accord</i> with the Development Plan and <i>meet</i> the following criteria: etc”	<p><i>Proposed Main Modification</i></p> <table border="1" data-bbox="902 1150 1615 1321"> <tr> <td data-bbox="902 1150 1048 1321">Policy H10PU</td> <td data-bbox="1048 1150 1615 1321">Planning applications for the development of new or extensions of existing Gypsy and Traveller sites will be supported where it they accords with the Development Plan and meets the following criteria:...</td> </tr> </table>	Policy H10PU	Planning applications for the development of new or extensions of existing Gypsy and Traveller sites will be supported where it they accords with the Development Plan and meets the following criteria:...	Agreed	-
Policy H10PU	Planning applications for the development of new or extensions of existing Gypsy and Traveller sites will be supported where it they accords with the Development Plan and meets the following criteria:...						

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59 b		Amend criterion f) so that it reads correctly alongside the other criteria: "Pitch size, type and parking is designed in accordance with national guidance;"	<i>Proposed Main Modification</i> Policy H10PU, criterion f Pitch size, type and parking provision will be are designed in accordance with national guidance...	Agreed	-
60	H12PU Residential establishment s...	for clarity it would be beneficial if the policy referred to other Adult Social Care groups, such as young people with disabilities.	<i>No change required – such housing as the policy covers 'specialist' housing</i>	Agreed	-
61a	SC1PU Health and wellbeing	The County Council supports Strategic Policy SC1PU as it will provide opportunities for a healthy lifestyle and to enable residents to live in their own home for longer. It isn't however clear the policy states that says supports will be provided to new development that produces a Health Impact Assessment. The Health Impact Assessment should be used to shape the polices within the Local Plan and isn't for a new development to provide. It is considered that it should be clear in the Local Plan and should be linked to outcomes that can be monitored, for example model shift and active travel	<i>Proposed Main Modification</i> Policy SC1PU, bullet 10 Producing a Health and Impact Assessment and Equalities Impact Assessment to support the Local Plan which identifies the impacts of the policies within it on health and equality	Can it be clarified why this has now been removed altogether?	<i>This has been removed because the HIA and EIA have now been produced to support the Local Plan.</i>
61 b		It is also considered that the policy could go wider in terms of securing developer contributions beyond the types of facilities listed within the policy, to include seeking developer	<i>Proposed Main Modification</i>	Agreed	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		contributions to health facilities such as surgeries and hospitals where possible.	<table border="1"> <tr> <td>Policy SC1PU, new sentence after list of bullets</td> <td>The Council will seek developer contributions where appropriate towards new or improved sports, recreational and community facilities taking into account needs identified within its Sports and Playing Pitch Strategies and other relevant documents.</td> </tr> </table> <p><i>Note: Surgeries and hospitals will be covered by community facilities.</i></p>	Policy SC1PU, new sentence after list of bullets	The Council will seek developer contributions where appropriate towards new or improved sports, recreational and community facilities taking into account needs identified within its Sports and Playing Pitch Strategies and other relevant documents.		
Policy SC1PU, new sentence after list of bullets	The Council will seek developer contributions where appropriate towards new or improved sports, recreational and community facilities taking into account needs identified within its Sports and Playing Pitch Strategies and other relevant documents.						
61c		In addition the policy should cross reference to specialist housing, supporting people within their communities for longer via adaptations and specialist housing etc.	<p><i>Proposed Main modification, last bullet is a repetition of an earlier bullet and therefore to be replaced with following wording:</i></p> <table border="1"> <tr> <td>Policy SC1PU, last bullet</td> <td>Contributes to the creation of 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 Supports and enables people to live within their communities for longer via adaptations and specialist housing</td> </tr> </table>	Policy SC1PU, last bullet	Contributes to the creation of 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 Supports and enables people to live within their communities for longer via adaptations and specialist housing	Agreed	-
Policy SC1PU, last bullet	Contributes to the creation of 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 Supports and enables people to live within their communities for longer via adaptations and specialist housing						
62	N5PU Protection of water resources	Cumbria County Council request the inclusion in the policy which explains that new discharge into a watercourse (or work with it) may require consent from Cumbria County Council as the Lead Local Flood Authority or the Environment Agency, depending on whether it is main river or not.	<i>No change required - This has been covered in supporting text.</i>	Can it be clarified where in supporting text has this been covered exactly?	<i>15.12.7 in the Publication Draft includes the requested wording</i>		
63	N7PU St Bees and Whaven Heritage Coast	Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to	<i>Minor Modification Proposed – CCS to be referred to in 12.4.6 (see earlier modification) and is already discussed in the flood risk section of the Local Plan</i>	Agreed	-		

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.					
64	N8PU The undeveloped coast	Cumbria County Council request the inclusion of reference to principle of the policy of Cumbria Coastal Strategy 2020 which sets out to allow infrastructure providers and the coast protection authorities to comprehensively quantify the risks and associated damages of coastal flooding and erosion and plan long-term future investment.	<i>See comment above.</i>	Agreed	-		
		Reference to the St Bees and Whitehaven Heritage Coast appears to duplicate the policy content of N7PU.	<i>No change required.</i>	Agreed	-		
65a	BE6PU Advertisements	Cumbria County Council request that the following additional sentence is added to Policy BE6PU, "They should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority".	<p><i>Proposed Minor Modification Proposed - Additional supporting text in paragraph 16.9.1</i></p> <table border="1" data-bbox="904 1066 1610 1329"> <tr> <td data-bbox="904 1066 1010 1329">16.9.1</td> <td data-bbox="1010 1066 1610 1329">The following policy sets out the Council's approach to advertisements both within and outside areas of Special Advertisement Control. The Area of Special Advertisement Control is where additional restrictions are placed on the display of adverts. Advertisements should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority.</td> </tr> </table>	16.9.1	The following policy sets out the Council's approach to advertisements both within and outside areas of Special Advertisement Control. The Area of Special Advertisement Control is where additional restrictions are placed on the display of adverts. Advertisements should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority.	Agreed	-
16.9.1	The following policy sets out the Council's approach to advertisements both within and outside areas of Special Advertisement Control. The Area of Special Advertisement Control is where additional restrictions are placed on the display of adverts. Advertisements should not be placed on (or overhanging) the highway without the explicit approval of the Local Highway Authority.						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
65 b		Amend to add the word 'the' in the first sentence of the policy after 'where'.	<i>Proposed Main Modification – amend as suggested</i>	Agreed	-
66	17.3.5 Communications	In respect of para 17.3.5, Connecting Cumbria is now about the delivery of the broader Digital Infrastructure Strategy not just the superfast contracts with BT where deployment is now complete. Connecting Cumbria is now working with several fibre broadband providers and as such specific mention of BT should be removed. Amend to read, “....a partnership between Cumbria County Council and broadband providers.”	<i>Proposed Minor Modification</i> 17.3.5 The connecting Cumbria project is a partnership between Cumbria County Council and BT broadband providers.	Agreed	-
67	17.3.7 Communications	Openreach plan to provide full fibre broadband in Egremont commercially and so a subsidy for broadband is unlikely to be compliant with State Aid guidance. To align with the Egremont Place Plan reference should read: “The Egremont Place Plan states that Egremont is well place to attract investment with its digital connectivity	<i>Proposed Minor Modification</i> 17.3.7 The Egremont Place Plan states that Egremont is well placed to attract investment with its digital connectivity. In addition to this The Council are working with private sector providers....	Agreed	-
68	Figure 12 Major Road Network	It is suggested that Figure 12: Major Road Network in Copeland is improved to show clearer annotation of the road network in Cumbria. (see map in response)	<i>Minor Modification proposed – map to be replaced</i>	Agreed (subject to the map reflecting clearer annotation of the road	-

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
				network in Cumbria)			
69a	17.4.3 Transport Networks	In respect of paragraph 17.4.3 and discussion regarding the Whitehaven Relief Road, please refer to Cumbria County Council's comments set out above in response to the Longer-Term Growth Aspirations.	<i>See earlier comment</i>	Refer to paragraph 17.4.3 and note historic DfT comments which encourage the Local Plan to emphasise the case for the Whitehaven Relief Road	<i>No change required. The benefits of the relief road are set out in para 4.2.5</i>		
69 b		Suggest amending third sentence to read, "It is anticipated that the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough."	<i>Proposed Minor Modification</i> <table border="1"> <tr> <td>17.4.3</td> <td>It is anticipated that this will the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and provide a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough</td> </tr> </table>	17.4.3	It is anticipated that this will the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and provide a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough	Agreed	-
17.4.3	It is anticipated that this will the road would reduce congestion around the town, provide greater resilience to the strategic road network, support development projects and provide a new growth corridor for Whitehaven, and improve connectivity for the rest of the borough						
70	17.4.4 Transport Networks	Para 17.4.4; suggest amending last sentence to read. "The route of the Cumbrian Coast Line is shown in Figure 13 below". Figure 13 does not actually show the line of the railway. Cumbria County Council request that the route be shown and a key	<i>Proposed Minor Modification</i> <table border="1"> <tr> <td>Figure 13</td> <td>Railway stops along the Cumbrian Coast Rail route</td> </tr> </table>	Figure 13	Railway stops along the Cumbrian Coast Rail route	Agreed	-
Figure 13	Railway stops along the Cumbrian Coast Rail route						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		provided for the stations that are depicted.					
71	17.5.4 Planning for Transport	Para 17.5.4 needs to be more specific about the Cumbria Transport Infrastructure Plan which has now been adopted. The Cumbria Transport Infrastructure Plan (CTIP) sets the policy framework for transport and connectivity in supporting sustainable and inclusive growth in Cumbria for the period 2022–2037. It is the council’s Local Transport Plan . It sets out a vision for improving transport and infrastructure in Cumbria that provides for the needs of residents, businesses and visitors. The CTIP has three broad objectives, which are further split into nine action areas. These action areas detail the ambitions and proposals for improving transport in Cumbria. The last sentence of the para “It will sit alongside, and support the Cumbria.” should be deleted.	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="904 395 1608 655"> <tr> <td data-bbox="904 395 1010 655">17.5.4</td> <td data-bbox="1010 395 1608 655">Cumbria County Council have recently adopted the are in the process of producing a Cumbria Transport Infrastructure Plan 2022- 2037 which is currently out to consultation. The Plan will set out sets out the policy framework for the role of transport and connectivity in supporting sustainable and inclusive growth in Cumbria for the period 2022-2037. It will sit alongside, and support the Cumbria.</td> </tr> </table>	17.5.4	Cumbria County Council have recently adopted the are in the process of producing a Cumbria Transport Infrastructure Plan 2022- 2037 which is currently out to consultation. The Plan will set out sets out the policy framework for the role of transport and connectivity in supporting sustainable and inclusive growth in Cumbria for the period 2022-2037. It will sit alongside, and support the Cumbria.	Agreed	-
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72	17.5 Planning for Transport	Section 7.5 should include a paragraph about the development of cycling and walking projects (including the LCWIPs), Active travel is also relevant to Planning for transport and this section provides the context for Policy CO2PU	<i>No change required –Active Travel and the LCWIP is discussed elsewhere in the Local Plan.</i>	Agreed	-		

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		Suggest rewording the paragraph (to remove the emphasis on road transport) as follows, "It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the transport network and sustainable public transport are delivered across the borough, The Infrastructure Delivery Plan (IDP 2022) identifies the Council's priorities for transport, including cycling, walking and highway improvements."	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="904 328 1608 592"> <tr> <td data-bbox="904 328 1010 592">17.5.6</td> <td data-bbox="1010 328 1608 592">It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the road transport network and sustainable public transport are delivered across the borough. The Infrastructure Delivery Plan (IDP 2021 2022) identifies the Council's priorities for transport, including cycling, walking and highway improvements."</td> </tr> </table>	17.5.6	It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the road transport network and sustainable public transport are delivered across the borough. The Infrastructure Delivery Plan (IDP 2021 2022) identifies the Council's priorities for transport, including cycling, walking and highway improvements."	Agreed	-
17.5.6	It is important for Copeland Borough Council to prioritise investment bids to ensure that the most appropriate and effective improvements to the road transport network and sustainable public transport are delivered across the borough. The Infrastructure Delivery Plan (IDP 2021 2022) identifies the Council's priorities for transport, including cycling, walking and highway improvements."						
73	CO2PU Priorities for improving transport networks	It needs to be clear that Policy CO2PU refers to schemes that are not currently funded or have a defined preferred route (Whitehaven Eastern Relief Road) or to general improvements that have not specifically been identified (A595, A5086, A5093). There is considerable work required to identify routes or the extent of land required for these schemes before land could be allocated or safeguarded in a future update to the Local Plan. However, it is recognised that these improvements, would bring significant benefit to Copeland and potentially unlock development land.	<i>No change required, the policy is clear that they are priorities for investment and does not imply they have funding.</i>	Agreed			

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		The final criterion 'Improvements to the local cycle and walking network to encourage active travel' should also refer to strategic cycle and walking networks	<p><i>Proposed Main Modification</i></p> <table border="1" data-bbox="904 331 1608 470"> <tr> <td data-bbox="904 331 1014 470">Policy CO2PU, criterion g</td> <td data-bbox="1014 331 1608 470">Improvements to the local and strategic cycle and walking network, including pedestrian links across the Duddon Estuary, to encourage active travel.</td> </tr> </table> <p><i>Note: Reference to Duddon Estuary added at the request of other consultees</i></p>	Policy CO2PU, criterion g	Improvements to the local and strategic cycle and walking network, including pedestrian links across the Duddon Estuary , to encourage active travel.	Agreed	-
Policy CO2PU, criterion g	Improvements to the local and strategic cycle and walking network, including pedestrian links across the Duddon Estuary , to encourage active travel.						
74	17.7 Active Travel	In emphasising the significance of active travel, Cumbria County Council considers it a good opportunity to refer to electric bicycles within the policy or in supporting text, particularly in terms of the easing some of the perceived barriers around the Cumbria topography	<p><i>Proposed Minor Modification</i></p> <table border="1" data-bbox="904 603 1608 932"> <tr> <td data-bbox="904 603 1014 932">17.7.2</td> <td data-bbox="1014 603 1608 932">The scheme also aims to establish a national electrically- assisted bike support programme, including financial incentives to encourage the use of 'e-bikes'. Increased use of e-bikes would be particularly beneficial in Copeland in assisting with active travel in areas of difficult topography. A 2021 review of the 'Gear Change' report suggests that a number of the ambitions outlined have been a success, with cycling in England increasing by 46% in just one year.</td> </tr> </table> <p><i>Note: footnote with link to be added at end of sentence</i></p>	17.7.2	The scheme also aims to establish a national electrically- assisted bike support programme, including financial incentives to encourage the use of 'e-bikes'. Increased use of e-bikes would be particularly beneficial in Copeland in assisting with active travel in areas of difficult topography. A 2021 review of the 'Gear Change' report suggests that a number of the ambitions outlined have been a success, with cycling in England increasing by 46% in just one year.	Agreed	-
17.7.2	The scheme also aims to establish a national electrically- assisted bike support programme, including financial incentives to encourage the use of 'e-bikes'. Increased use of e-bikes would be particularly beneficial in Copeland in assisting with active travel in areas of difficult topography. A 2021 review of the 'Gear Change' report suggests that a number of the ambitions outlined have been a success, with cycling in England increasing by 46% in just one year.						

75	CO4PU Sustainable Travel	<p>Cumbria County Council requests that greater emphasis on active travel within this policy in terms of ‘positively encouraging’ proposals which make provision for greater connectivity to housing and employment sites using cycling and walking modes of transport. This would further strengthen Copeland’s commitment to active travel and modal shift, rather than simply supporting developments which encourage the use of sustainable modes of transport.</p> <p>Explicit reference should be made in the supporting text to encourage development to support the outcomes and schemes of Whitehaven’s LCWIP.</p> <p>The LCWIP echoes the adopted Cumbria Transport Plan, which recognises the active travel schemes can play in improving health, access to education, employment and services and supporting the local economy. The CTIP places active travel centrally in the aim to develop a ‘Clean and Healthy Cumbria’.</p> <p>The final Whitehaven LCWIP will be discussed at Cumbria County Council’s Local Committee for Copeland in May 2022. It will include priority networks which provide the</p>	<p><i>Proposed Main Modification</i></p> <table border="1" data-bbox="904 260 1610 541"> <tr> <td data-bbox="904 260 1066 541">Policy CO4PU</td> <td data-bbox="1066 260 1610 541"> <p>Proposals must include safe and direct connections to routes that promote active travel, such as cycling and walking routes where appropriate.</p> <p>The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:</p> </td> </tr> </table> <p><i>No change required, this is already covered by paragraph 17.7.3</i></p>	Policy CO4PU	<p>Proposals must include safe and direct connections to routes that promote active travel, such as cycling and walking routes where appropriate.</p> <p>The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:</p>	Agreed	-
Policy CO4PU	<p>Proposals must include safe and direct connections to routes that promote active travel, such as cycling and walking routes where appropriate.</p> <p>The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:</p>						

	<p>core strategic network of main routes intended to facilitate movement in those corridors of highest usage</p> <p>The secondary networks supplement the priority networks and represent key corridors of movement in terms of where people are traveling from and to and are link routes that ensure there is a web of infrastructure designed to connect specific attractors such as education and employment sites to the strategic priority network. The LCWIP aims to prioritise future investment where the most benefits can be realised.</p> <p>The Active Travel schemes identified in the Copeland Transport Improvements generally align to the objectives of the secondary network. Cumbria County Council's response below to the IDP highlights where consideration should be given to secondary network and how these schemes align with the Active Travel Schemes of the Copeland Transport Improvements Study and the delivery of allocated sites.</p>		
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		<p>Cumbria County Council notes the requirement for Transport Assessments and Travel Plan to support developments that are likely to generate a large amount of movement. Cumbria County Council requests that the policy should include requirements for developers to demonstrate a commitment to travel plans or travel demand management in relation to the development of employment sites which would generate a significant impact on the local and strategic road network.</p> <p>In addition, Cumbria County Council advocates that an additional criterion is added which accounts for the Sellafield Travel Plan and how this should be monitored and revised as significant proposals relating to the Sellafield site arise.</p>	<p><i>No change required, this is covered by the policy already and will be a requirement set out in the Local List.</i></p> <p><i>No change required, this is not a Sellafield specific policy and it would not be appropriate to add such criteria.</i></p>	<p>The policy (p251) makes no reference to travel demand management – an outcome of the CTIS.</p> <p>Consider including ‘for developments with major trip generations’</p>	<p><i>No change required- this has been covered by Policy DS5.</i></p> <p><i>No change considered necessary.</i></p>
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		<p>Amend policy CO4PU as follows: “Proposals must include safe and direct connections to cycling and walking routes where appropriate. The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:</p> <ul style="list-style-type: none"> a) Proposals that promote active travel, such as walking and cycling, and those that provide access to regular public transport services; b) Proposals that enable the sustainable movement of freight; c) Proposals that make provision for electric vehicles d) Proposals for the integration of electric vehicle charging infrastructure into new developments. This will have different requirements dependent on the scale of development. e) Proposals that take opportunities available to use disused railway lines to widen sustainable transport choices, encourage active travel within the borough and provide spaces for biodiversity. <p>New development that would prejudice the future use of disused railway lines that are well connected either to settlements, other sustainable travel routes or key tourist facilities within the open</p>	<p><i>No change required- as it is currently worded, the policy encourages connectivity with pavements etc as well rather than specific route</i></p>	<p>Agreed</p>	<p>-</p>
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		<p>countryside for this purpose will only be considered in exceptional circumstances.</p> <p>Development proposals that are likely to generate a large amount of traffic movement will be required to be accompanied by an appropriate Travel Plan and be supported by a Transport Assessment in line with the Cumbria Design Guide (or any document that replaces it).</p>			
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ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
76	CO5PU Transport Hierarchy	Cumbria County Council considers that the policy needs to have some flexibility based on the criteria listed as the priority will depend on the place and its needs. A prescribed one size fits all approach does not work in Cumbria. Modal choice needs to be encouraged but it needs to be in the right context, for example it may not be appropriate for bikes to be always considered ahead of buses.	<i>No change required - the policy does not imply that it is a one size fits all approach. It is clear that this is only required where appropriate. If the hierarchy cannot be achieved, this will be demonstrated through a planning application. The goal is to design developments which do not rely on just vehicular transport.</i>	Agreed			
77a	CO6PU Countryside access	Amend last sentence to read, "Where appropriate, access proposals should make provision for those with limited mobility and comply with the Equality Act 2010". And	<p><i>Proposed Minor Modification</i></p> <table border="1"> <tr> <td>New para. after 17.5.8</td> <td>Where appropriate, all transport and access proposals should make provision for those with limited mobility and comply with the Equality Act 2010</td> </tr> </table>	New para. after 17.5.8	Where appropriate, all transport and access proposals should make provision for those with limited mobility and comply with the Equality Act 2010	Agreed	-
New para. after 17.5.8	Where appropriate, all transport and access proposals should make provision for those with limited mobility and comply with the Equality Act 2010						
77b		Existing public rights of way are protected by law and therefore do not need policy protection but clarity could be provided which states that their inclusion in the policy would allow for the development of the network to safeguard new public access in Copeland.	<i>No change required</i>	Agreed	-		
78	17.12 Electric vehicles	Cumbria County Council suggest that it would be useful to include in the supporting text to the policy that the policy responds directly to the Government's Ten Point Plan for a Green Industrial Revolution and	<i>No change required- This is already covered as a footnote</i>	Agreed	-		

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022		
		<p>aligns with the priorities of the EV Infrastructure Group comprising Cumbria County Council, Cumbria District Councils, Cumbria Local Enterprise Partnership, NHS, Police and other key stakeholders, for the purpose of creating further visibility of electric vehicle infrastructure priorities.</p> <p>Para 17.12.1 Suggest amendment; inserting the word 'use' instead of 'promotion'.</p> <p>There is inconsistency in para 7.12.1 with EV's being referred to as 'Electric Vehicles' and 'electric vehicles'. Suggest lower case is used.</p>			<p><i>Modification proposed to para 17.12.1: A key method for reducing emissions and improving sustainability within the borough is through the use promotion use of Ultra Low Emission Vehicles (ULEV), including Electric Vehicles (EVs).</i></p>		
79	CO7PU Parking standards and electric vehicles	<p>Cumbria County Council welcome the inclusion within the policy Whitehaven Parking Study and it is suggested that reference is made to it in Table 3: Local Plan Evidence Base.</p> <p>Suggest the last line of the policy is amended to read, "... and <i>are</i> situated in appropriate locations". 'Park and Ride Facilities' should be lower case.</p>	<p><i>Proposed Main Modification</i></p> <table border="1" data-bbox="904 1066 1610 1358"> <tr> <td data-bbox="904 1066 1048 1358">Policy CO7PU, second paragraph</td> <td data-bbox="1048 1066 1610 1358">Development will be supported where it accords with the Whitehaven Parking Strategy or any document that supersedes it. Proposals that provide new or improved Park park park and Ride ride Facilities for local employment and development sites will be supported where they will provide demonstrable benefits and will be are situated in appropriate locations.</td> </tr> </table>	Policy CO7PU, second paragraph	Development will be supported where it accords with the Whitehaven Parking Strategy or any document that supersedes it . Proposals that provide new or improved Park park park and Ride ride Facilities for local employment and development sites will be supported where they will provide demonstrable benefits and will be are situated in appropriate locations.	Agreed	-
Policy CO7PU, second paragraph	Development will be supported where it accords with the Whitehaven Parking Strategy or any document that supersedes it . Proposals that provide new or improved Park park park and Ride ride Facilities for local employment and development sites will be supported where they will provide demonstrable benefits and will be are situated in appropriate locations.						

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		Suggest omitting the various abbreviations for different types of electric vehicles as they are not used subsequently.			
Comments on Allocations					
80	HEG3	Safe access does not seem possible at present. Prior to submission the applicant / site promotor needs to demonstrate that access is possible.	<i>Safe access has been identified through the SAA, which CCC have signed off and agreed.</i>	If CBC is happy for the site to be allocated with a condition that splays of 2.4m by 60m must be provided as well as connecting footpath (to the bus stop /nearest footpath) then this should be acceptable. However, it should be noted that either of these conditions could potentially be undeliverable.	<i>Discussed in meeting of 11.8.22 – CBC feel the issue can be dealt with at planning application stage.</i>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
81	HMI1, HMI2 West of Gammerscroft and Moor Farm, Millom	Reiterate concerns which have been raised around development pressure in Millom in terms of the impact any further development will have on the dual foul and water system before a flood alleviation scheme can be secured for the area. Additional housing prior to the implementation of an alleviation scheme would could put too much pressure on an already overburdened system. It is considered that Phase 1 of the scheme will create sufficient capacity for the proposed development in the Local Plan. It is expected that Phase 1 will take approximately 6 months to complete. Therefore, the Local Plan needs to be clear that no development in Millom can commence until Phase 1 has commenced.	<i>Comments noted. No change required – the issue is likely to have been addressed prior to the adoption of the Local Plan, the developer of the Moor Farm site is aware of the issue and has been in discussion with the county council and the impact upon delivery timescales has been reflected in the housing trajectory. Putting a blanket ban on development within a Key Service Centre is excessive and unnecessary.</i>	For discussion at Local Plan Catch Up meeting to agree the position See also ID 57	<i>See comment earlier in table re Moor Farm. CBC is confident that the issues of flooding relating to the site can be addressed allowing development to come forward over the Plan period.</i>
82	HDI2 Land south West Rectory Place, Distington	Site does not appear to be annotated on the Proposals Map.	<i>The site is shown on the Proposals Map</i>	Agreed	-
83	HDH3 Hill Farm, Holmrook	Safe access does not seem possible at present Prior to submission the applicant / site promotor needs to demonstrate that access is possible.	<i>Safe access has been identified through the SAA, which CCC have signed off and agreed.</i>	SAA states “At this time, it is considered that further information is	<i>Discussed in meeting of 11.8.22 – CBC feel the issue can be dealt with at planning application stage</i>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
				<p>required to confirm the deliverability of acceptable access to this site.”</p> <p>Check that CBC’s interpretation of the SAA is the same as CCCs.</p>	
84	HLO1	Solway Road is not part of the adopted highway and is in a poor state of repair. Housing developments of this scale would typically be subject to adoption via s38 agreement.	<i>This issue is highlighted in the Site Profiles doc which forms an appendix to the Local Plan (Appendix F).</i>	Agreed	-
85	OWH05	The boundary of the site includes public highway. CCC object to the allocation of this site until the boundary line is adjusted and does not include public highway.	<i>No change required - Allocation of the site does not override the County Councils rights as part landowner. Amending the site boundary to exclude the highway would create several smaller opportunity sites.</i>	The impression given by the allocation is of a homogeneous piece of land unfettered by any impediment.	<i>Discussed in the meeting of 11.8.22. The decision whether to incorporate the highway or not would depend upon the future use. This is not known at this stage. CBC feel the issue can be dealt with at planning application stage.</i>
86	OEG01	The boundary of the site includes public highway. CCC object to the allocation of this site until the boundary line is adjusted and does not include public highway	<i>No change required - Allocation of the site does not override the County Councils rights as part landowner. Amending the site boundary to exclude the highway would create several smaller opportunity sites.</i>		

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
87	OMI01	Safe access does not seem possible at present	<i>Any future developer would be required to demonstrate safe access can be achieved as part of any planning application in order to satisfy Local Plan requirements.</i>	<p>Although the land is not owned by CCC, some of it is adopted highway. As such it would need removal though either the planning act or Highway act to stop it up or, it should be incorporated within the design / allocation.</p> <p>If the view is that the highways are going to be stopped up then CCC would strongly recommend that this process and potential outcome is</p>	

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
				investigated prior to allocation.	
88	Employment allocations	is noted that the quantum of development for Employment Allocations differs in Table 2 of the IDP to what is in the Local Plan.	<i>CBC to address through the updated IDP.</i>	Agreed	-
89	ES2a/b Leconfield Industrial Estate and Leconfield Eastern Extension	The scale and timing of how the site will come forward needs to be investigated in detail once Cumbria County Council is in receipt of a suitably scoped Transport Assessment considering the transport impact, for both vehicles and non-vehicular usage, of the site for this development. Cumbria County Council is currently working with the applicant to agree the scope for this assessment.	<i>Comments noted</i>	For discussion at Local Plan Catch Up meeting to agree the position This refers to Leconfield Industrial Estate and the Eastern extension. Would like to understand why / why not this is being addressed	<i>Discussed in the meeting of 11.8.22. Whilst the Local Plan encouraged the production of a masterplan for the whole site, this has been preceded by a planning application on a small part of the site. CBC Strategic Planning Team and CCC have worked together to provide advice to the CBC Development Management team regarding the provision of infrastructure.</i>
90		The site is safeguarded in Cumbria County Council's Minerals and Waste	<i>Comments noted</i>	For discussion at	<i>Additional modification proposed – additional</i>

ID	Policy/ paragraph allocation ref	CCC Comments	CBC Response	CCC Response	CBC Response/Action 25 th Aug 2022
		Local Plan (2015-2030) for waste management facilities. This allocation does not preclude the site as an employment allocation. Any proposals for its development need to be mindful of the Mineral and Waste Local Plan allocation and this needs to be explicit in the Copeland Local Plan. Subject to appropriate Development Management considerations/ mitigation.		Local Plan Catch Up meeting to agree the position – As above	<i>sentence to be added to paragraph 7.7.15:</i> It should also be noted that the site is safeguarded in Cumbria County Council's Minerals and Waste Local Plan (2015-2030) for waste management facilities. This allocation does not preclude the site as an employment allocation. Any proposals for its development however do need to be mindful of the Mineral and Waste Local Plan allocation and appropriate mitigation will be required.

