

Rep ID: 37 / 38	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6c	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The map does not illustrate the historic environment.

Full Response: The map does not illustrate the historic environment.

Changes : The map should highlight some of the key heritage assets in the area.

Council's Response: Noted. The locality area diagram provides a broad/indicative overview of the area, and therefore, it is not appropriate (or possible at this scale) to include most heritage assets. The Site Allocation process will produce a Proposals Map that will clearly show heritage assets and designations.

Change : No

Action: No further changes required.

Rep ID: 37 / 39	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6c	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Page 45 of the Plan has a specific section on the built and historic environment. However, this is much generalised and does not pick out anything that is considered to be of a priority or of particular importance.

Full Response: Page 45 of the Plan has a specific section on the built and historic environment. However, this is much generalised and does not pick out anything that is considered to be of a priority or of particular importance.

Changes : Specific reference to aspects of the historic environment (following an assessment being recommended for paragraphs 104 to 109) should be included here.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accepted

Action: A summary of the historic environment has been added.

Rep ID: 43 / 5	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S6c

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO dispute comments related to the bus service.

Full Response: The group feel that the majority of residents do not agree with the statement Cockermouth is served by regular bus services, a belief that will undermine approaches to public transport and the encouragement of it's use by our residents. To commute to Carlisle daily you can only do it if you work a 9-5 job as the bus arrives at 8.48am and leaves at 17.40. If you start work prior to 9am you cannot use a bus service. Shops closed at 17.30, and staff do not get away in time for the 17.40 and would face waiting till 8pm for the next one! Going to West Cumberland hospital there is only one direct bus there and back, with only a 15min stop.

Changes :

Council's Response: Whilst the Council agrees that certain areas of the Plan Area, particularly rural, would benefit from improved bus services, it does not consider the level of bus service serving Cockermouth could be regarded as 'irregular'. Cockermouth is served by several routes and is therefore considered to be a sustainable settlement and key service centre.

Change : No

Action: No action required.

Rep ID: 43 / 6	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S6c

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO feel more clarity is required regarding the tests of viability and affordable housing.

Full Response: It is felt the Council is not clear enough in relation 'subject to viability' in relation to affordable housing, as there is no clarity in relation to what measure and who's judgement this will be by. It is felt the current 1999, amended 2006, local plan section on this in relation to Cockermouth should still apply.
 5.7.5 Perhaps the most serious housing problem in Cockermouth is concerns the issue of affordable housing. The popularity of Cockermouth as a place to live forces house prices up such that people on lower incomes are unable to buy or rent dwellings. The Housing Strategy attempts to define affordability as £35-40,000 for house purchase and £35 per week for rent.
 As should the equally important issue re allocation of housing land for Cockermouth 5.7.2...such as requirement could only be met by making some substantial allocations on the periphery or the town. As the town is surrounded by high quality landscape any such allocation must have a detrimental impact. This would put the character of the town as an attractive modest sized market town in jeopardy

Changes :

Council's Response: Comment noted. Facilitating the delivery of affordable housing is a key aim of the Plan and the approach is considered to be appropriate and fully consistent with the NPPF. Viability can be an important consideration in the delivery of development and therefore must be considered where it is highlighted as an issue. Where viability is called into doubt the onus is on the developer to provide the evidence to demonstrate that this is the case.

Change : No

Action: No action required.

Rep ID: 43 / 7	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: S6c	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO are concerned about the lack of material on transport infrastructure.

Full Response: This is an area of huge concern, as the Council has completely omitted to include the road traffic infrastructure, and the impact of future developments on road infrastructure and traffic flow. This is an essential component of this heading area, and must be addressed in the plan. It is flawed at present by it's lack of mention and consideration here.

Changes :

Council's Response: Transport infrastructure is referred to within bullet 2 of the Sustainable Communities and Infrastructure heading. Improvements to the accessibility to and within Cockermouth are sought through improvements to car parks, public transport and cycle networks.

Change : No

Action: No action required.

Rep ID: 58 / 8	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S6c	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects as the area based localities do not align themselves with the HMAs and do not agree with growth targets.

Full Response: Housing - No justification/evidence base relating to a 10% housing figure for Cockermouth, with an average of 30 homes per year. Cockermouth is identified as the settlement with the greatest affordable housing need and the overall supply figures need to address how this will be delivered. The identification of Branthwaite as a Limited Growth Village where housing will be allowed is supported however the overall housing number percentage for LGV's is not substantiated, and the overall housing requirement is challenged.

Changes :

Council's Response: Noted.

The spatial strategy and settlement hierarchy has been developed using a robust methodology which takes into account local need, aspiration and core services which contribute towards a sustainable community.

Allerdale Local Plan (Part 2) - will determine the level of growth appropriate to each settlement within the hierarchy, setting out explicit housing numbers per settlement.

Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required.

Rep ID: 58 / 20	Company/Organisation: Story Homes	Document: LP
Name:		Policy: S6c

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects as the area based localities do not align themselves with the HMAs and do not agree with growth targets.

Full Response: Page 43 Policy S6C Cockermouth. The identification of Cockermouth being an attractive residential location which has led to high house prices and will result in affordability issues are noted and supported to a certain degree by evidence, however it should be noted that Cockermouth is not identified as being of high value in the Council's Viability Assessment documents but one of a moderate value. This has implications in relation to viability issues and is discussed in the Council's own viability assessment evidence. The reference in paragraph 106 of the need to consider providing more land in the development plan thus requiring settlement boundary review is noted. This, however, should be undertaken as an intrinsic element of this Local Plan to demonstrate the ability to deliver the amount of housing required to meet housing needs, and runs contrary to the PDL prioritisation being sought elsewhere in the plan

Changes :

Council's Response: Noted.

The spatial strategy and settlement hierarchy has been developed using a robust methodology which takes into account local need, aspiration and core services which contribute towards a sustainable community.

Allerdale Local Plan (Part 2) - will determine the level of growth appropriate to each settlement within the hierarchy, setting out explicit housing numbers per settlement.

Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: Issues regarding PDL have been clarified.

Rep ID: 18 / 3	Company/Organisation: The Ramblers	Document: LP
Name: Mr I Brodie		Policy: S6d

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: Whilst in principle the Ramblers support the Council's policy on enhanced coast access it is considered that the Plan fails to represent Government policy consistently throughout the Plan and that incorrect wording is used with reference to the English Coastal Route.

Full Response: The Ramblers support the Council's policy in having regard to Government policy on enhanced coast access. However, the wording within the Local Plan fails to represent Government policy and is inconsistently applied throughout the Plan. The incorrect wording is found under Natural Environment under Workington (page 38); Maryport (page 42); Wigton (page 50); and Silloth (page 54). It is wrongly omitted from Aspatria (page 58). The incorrect wording is "Support the development of the Cumbrian Access project, which seeks to establish an unbroken public right of way along the coast of Britain."

Changes : The above quoted wording should be replaced in the four noted places and added to page 58: "Support the development of the English Coastal Route which seeks to establish an unbroken walking route along the coast of England, and to provide enhanced and secure access to the coastal margin." It is also our view, to add clarity, the following wording would be useful. "The Council will seek to protect and enhance the English Coastal Route from inappropriate development and, where suitable opportunities arise, as with the redevelopment of the Workington Ironworks site, to seek to enhance the route through planning gain".

Council's Response: Accept that the title of the Coastal Access route should be amended.

Change : Yes

Action: Correct the title of the England Coastal Route throughout the plan.

Rep ID: 33 / 6	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N Winter	Policy: S6d	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: S6d - Sustainable communities and infrastructure. Improve bus passenger waiting environment. Some bus stops have no pole or flag to identify a safe place to wait for the bus. Bus shelters, raised kerbs, bus gates all create an environment conducive to ease of accessing the bus safely. The bus will help reduce traffic movement volumes if properly supported.

Full Response: S6d Sustainable communities and infrastructure Improve bus passenger waiting environment. Some bus stops have no pole or flag to identify a safe place to wait for the bus. Bus shelters, raised kerbs, bus gates all create an environment conducive to ease of accessing the bus safely. The bus will help reduce traffic movement volumes if properly supported.

Changes : Adopt these points, suitably worded to ensure effective delivery

Council's Response: The purpose of this policy is to highlight and address the priority issues and opportunities for each specific locality. It is not intended that this policy would address specific topic issues in detail. However, it is important to note that the Plan should be read as a 'whole'. Policy S22 (Transport Principles) specifically supports improvements to the transport network, including bus services associated infrastructure.

Change : No
Action: No action required.

Rep ID: 37 / 40	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6d	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

Full Response: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

This section gives a better general portrait of the built heritage of Wigton than the other area descriptions, which is welcomed. However, more could be made of the contribution that it makes to the character of the area, to the quality of life of its communities and to the economic well-being of the area. What are the important assets in the area?

There is some reference to the rich historical landscape of the WHS and we welcome the policy to protect it and its archaeological remains.

Page 50 of the Plan aims to protect, safeguard and enhance the heritage of Wigton Town Centre and the villages ensuring that all development respects to and relates to its context. We would also welcome the introduction of a policy, which relates to some specific heritage assets, where appropriate. This section needs to be consistent, the area description refers to a medieval street plan but the policies do not refer to this. In addition, there is no mention of the rich Georgian heritage in the area description, however, there are proposals to protect and enhance it in the policies.

Page 49 of the Plan in the section on the natural environment refers to landscape character and protecting the setting of the Lake District National Park (which is supported). Again, this is the first time that this is mentioned as of importance and should be highlighted more in the area description.

The Plan should make specific references to the historic environment in the area based policies and not just the built and historic environment section.

Changes : The Plan should be expanded to include a description of the historic environment in Wigton and an assessment be made of its character and the contribution it makes to the area.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.
Action: A summary of the historic environment has been added.

Rep ID: 37 / 41	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6d	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The map does not illustrate the historic environment properly.

Full Response: The map does not illustrate the historic environment properly.

Changes : The map should better highlight some of the key heritage assets in the area.

Council's Response: Noted. The locality area diagram provides a broad/indicative overview of the area, and therefore, it is not appropriate (or possible at this scale) to include most heritage assets. The Site Allocation process will produce a Proposals Map that will clearly show heritage assets and designations.

Change : No

Action: No further changes required.

Rep ID: 58 / 9	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S6d	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects as the area based localities do not align themselves with the HMAs and do not agree with growth targets or affordable housing requirement

Full Response: Housing - No justification/evidence base relating to a 10% housing figure for Wigton, with an average of 30 homes per year.

20% affordable housing requirement is not viable as supported by the councils own viability study. See further comments on affordable policy. The identification of unresolved Cross Boundary Issues regarding delivery of affordable housing demonstrates that the plan does not at this time meet the Duty to Cooperate set out in the Localism Bill.

Changes :

Council's Response: Noted.

The spatial strategy and settlement hierarchy has been developed using a robust methodology which takes into account local need, aspiration and core services which contribute towards a sustainable community.

Allerdale Local Plan (Part 2) - will determine the level of growth appropriate to each settlement within the hierarchy, setting out explicit housing numbers per settlement.
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required.

Rep ID: 60 / 6	Company/Organisation: REG Windpower	Document: LP
Name: Mr Matt Olley	Policy: S6d	

Support/Object: Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Further to REG's Preferred Options representations, it is noted that the area policy for Wigton still does not refer to renewable energy. This is not consistent with delivering the Strategic Objectives of the plan (SOle and SOlf), which actively seek to promote renewable energy and low carbon energy production in the Borough. Policy S6d is therefore unsound as it would not be effective (i.e. it will not deliver the draft objectives of the Core Strategy) and it is not consistent with the pro-renewable energy stance of the NPPF. Whilst REG have particular interest in Wigton where they currently operate and seek to expand their operations, it is considered all Area Based Policies should include an additional section on renewable energy:

Full Response: Further to REG's Preferred Options representations, it is noted that the area policy for Wigton still does not refer to renewable energy. This is not consistent with delivering the Strategic Objectives of the plan (SOle and SOlf), which actively seek to promote renewable energy and low carbon energy production in the Borough. Policy S6d is therefore unsound as it would not be effective (i.e. it will not deliver the draft objectives of the Core Strategy) and it is not consistent with the pro-renewable energy stance of the NPPF. Whilst REG have particular interest in Wigton where they currently operate and seek to expand their operations, it is considered all Area Based Policies should include an additional section on renewable energy:

Changes : Renewable Energy
 Maximise renewable energy development at sites where impacts are (or can be made acceptable).

Council's Response: Noted. As suggested the Plan's actively seeks to promote appropriate renewable energy and low carbon energy production across the Plan Area. There is no added benefit in repeating policy.

Change : No

Action: No action required.

Rep ID: 6 / 2	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S Hemsley-Rose	Policy: S6e	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S6e

Full Response: Our members generally support this policy. It is our opinion that the wind energy developments at Hellrigg and Westnewton should be included in this policy. Hellrigg already has an impact on the area and the consented scheme at Westnewton will certainly do so when it is constructed.. The Solway Coast Area of Outstanding Natural Beauty and its setting require additional protection as a result of these developments.

Changes :

Council's Response: Whilst support for this policy is noted - the Council do not consider it appropriate to reference specific developments or sites within this strategic policy.

Change : No

Action: No action required.

Rep ID: 18 / 4	Company/Organisation: The Ramblers	Document: LP
Name: Mr I Brodie	Policy: S6e	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: Whilst in principle the Ramblers support the Council's policy on enhanced coast access it is considered that the Plan fails to represent Government policy consistently throughout the Plan and that incorrect wording is used with reference to the English Coastal Route.

Full Response: The Ramblers support the Council's policy in having regard to Government policy on enhanced coast access. However, the wording within the Local Plan fails to represent Government policy and is inconsistently applied throughout the Plan. The incorrect wording is found under Natural Environment under Workington (page 38); Maryport (page 42); Wigton (page 50); and Silloth (page 54). It is wrongly omitted from Aspatria (page 58). The incorrect wording is "Support the development of the Cumbrian Access project, which seeks to establish an unbroken public right of way along the coast of Britain."

Changes : The above quoted wording should be replaced in the four noted places and added to page 58: "Support the development of the English Coastal Route which seeks to establish an unbroken walking route along the coast of England, and to provide enhanced and secure access to the coastal margin." It is also our view, to add clarity, the following wording would be useful. "The Council will seek to protect and enhance the English Coastal Route from inappropriate development and, where suitable opportunities arise, as with the redevelopment of the Workington Ironworks site, to seek to enhance the route through planning gain".

Council's Response: Accept that the title of the Coastal Access route should be amended.

Change : Yes

Action: Correct the title of the England Coastal Route throughout the plan.

Rep ID: 19 / 4	Company/Organisation: Associated British Ports - Port of	Document: LP
Name:	Policy: S6e	

Support/Object: Support Sound/Unsound: Unsound Positively Prepared: No Effective:
 Legally Compliant: Justified: Consistent:

Summary: Policy S6e set out an area based policy relating to Silloth. In respect of Silloth's economy, the policy recognises the importance of the Port of Silloth to the economy of Silloth and the economy of the wider Allerdale area. ABP supports this.

Full Response: Policy S6e: Silloth Area Policy Policy S6e set out an area based policy relating to Silloth. In respect of Silloth's economy, the policy recognises the importance of the Port of Silloth to the economy of Silloth and the economy of the wider Allerdale area. ABP supports this. As stated above, the Port is a significant generator of direct and indirect employment in Silloth and the wider area and is vital piece of infrastructure for many local businesses and industries, including the agricultural industry in Allerdale and wider a field. It is therefore an essential economic resource for Silloth and the wider Allerdale area, and it is appropriate that the Local Plan recognises its importance. The previous draft of the Local Plan (Part 1) (then called the Core Strategy) did not identify the Port of Silloth on the key diagram for Silloth. ABP objected to this and requested that the Port was shown on the key diagram to reflect its importance to the local economy. ABP supports the identification of the Port on the key diagram for Silloth in the Pre-Submission Draft of the Local Plan (Part 1). With regard to housing development, as with Policy S3, Policy S6e only proposes to deliver 3% of Allerdale's overall housing growth to Silloth. This represents an average of 9 dwellings per annum over the plan period. ABP objects to this level of housing growth in Silloth as it is considered that this is too low. Silloth is designated as a Key Service Centre in the Local Plan. This designation reflects the fact that its service and employment offer serves a wide area. In order to ensure the continued support of this service and employment offer, and to improve this offer, it is considered vital that a higher level of housing development is delivered to Silloth. This housing growth will provide a larger population in Silloth to support these services and employment. ABP therefore requests that the level of housing growth in Silloth should be increased to a similar level to the other Key Service Centres in Allerdale (10-12%). In light of the above, ABP considers that in relation to housing growth in Silloth, Policy S6e is unsound as it is not positively prepared, as required by the NPPF.

Changes :

Council's Response: Comments noted. The level of housing growth directed to Silloth is considered to be appropriate for the settlement.

Change : No

Action: No action required.

Rep ID: 19 / 5	Company/Organisation: Associated British Ports - Port of	Document: LP
Name:	Policy: S6e	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective:
 Legally Compliant: Justified: Consistent:

Summary: Policy S6e set out an area based policy relating to Silloth. In respect of Silloth's economy, the policy recognises the importance of the Port of Silloth to the economy of Silloth and the economy of the wider Allerdale area. ABP supports this.

Full Response: Policy S6e: Silloth Area Policy Policy S6e set out an area based policy relating to Silloth. In respect of Silloth's economy, the policy recognises the importance of the Port of Silloth to the economy of Silloth and the economy of the wider Allerdale area. ABP supports this. As stated above, the Port is a significant generator of direct and indirect employment in Silloth and the wider area and is vital piece of infrastructure for many local businesses and industries, including the agricultural industry in Allerdale and wider a field. It is therefore an essential economic resource for Silloth and the wider Allerdale area, and it is appropriate that the Local Plan recognises its importance. The previous draft of the Local Plan (Part 1) (then called the Core Strategy) did not identify the Port of Silloth on the key diagram for Silloth. ABP objected to this and requested that the Port was shown on the key diagram to reflect its importance to the local economy. ABP supports the identification of the Port on the key diagram for Silloth in the Pre-Submission Draft of the Local Plan (Part 1). With regard to housing development, as with Policy S3, Policy S6e only proposes to deliver 3% of Allerdale's overall housing growth to Silloth. This represents an average of 9 dwellings per annum over the plan period. ABP objects to this level of housing growth in Silloth as it is considered that this is too low. Silloth is designated as a Key Service Centre in the Local Plan. This designation reflects the fact that its service and employment offer serves a wide area. In order to ensure the continued support of this service and employment offer, and to improve this offer, it is considered vital that a higher level of housing development is delivered to Silloth. This housing growth will provide a larger population in Silloth to support these services and employment. ABP therefore requests that the level of housing growth in Silloth should be increased to a similar level to the other Key Service Centres in Allerdale (10-12%). In light of the above, ABP considers that in relation to housing growth in Silloth, Policy S6e is unsound as it is not positively prepared, as required by the NPPF.

Changes :

Council's Response: Comments noted. The level of housing growth directed to Silloth is considered to be appropriate for the settlement.

Change : No

Action: No action required.

Rep ID: 37 / 42	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

Full Response: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development. This section gives a better general portrait of the built heritage of Silloth than the other area descriptions, which is welcomed.

Better (wording) reference should be made to the conservation area's name, and that the town centre has a number of listed buildings, which need to be detailed and highlighted if any are of particular importance. There is no need to state that these are protected.

However, more could be made of the contribution that it makes to the character of the area, to the quality of life of its communities and to the economic well-being of the area.

What are the important assets in the area? The Plan should make specific references to the historic environment in the area based policies and not just the built and historic environment section.

Changes : The Plan should be expanded to include a description of the historic environment in Silloth and an assessment be made of its character and the contribution it makes to the area.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.

Action: A summary of the historic environment has been added.

Rep ID: 37 / 43	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The map does not illustrate the historic environment properly.

Full Response: The map does not illustrate the historic environment properly.

Changes : The map should highlight some of the key heritage assets in the area.

Council's Response: Noted. The locality area diagram provides a broad/indicative overview of the area, and therefore, it is not appropriate (or possible at this scale) to include most heritage assets. The Site Allocation process will produce a Proposals Map that will clearly show heritage assets and designations.

Change : No

Action: No further change required.

Rep ID: 37 / 44	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There is some reference to the rich historical landscape of WHS but there is no indication as to the importance of this to the town. This will be a major tourism asset and key component of the local economy.

Full Response: There is some reference to the rich historical landscape of WHS but there is no indication as to the importance of this to the town. This will be a major tourism asset and key component of the local economy.

Changes : The Plan should be expanded to include a description of the historic environment in Aspatria and an assessment be made of its character and the contribution it makes to the area.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.

Action: A summary of the historic environment has been added.

Rep ID: 37 / 45	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome the promotion of the town as a tourist destination, recognising the importance of the WHS.

Full Response: We welcome the promotion of the town as a tourist destination, recognising the importance of the WHS.

Changes :

Council's Response: Noted

Change : N/a

Action: No further action required.

Rep ID: 37 / 46	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome the opportunity for enhancement of the town's heritage assets. The paragraph refers to the Green, however, there is no mention of this in the area description (page 51) and no assessment has been made on its significance.

Full Response: We welcome the opportunity for enhancement of the town's heritage assets. The paragraph refers to the Green, however, there is no mention of this in the area description (page 51) and no assessment has been made on its significance.

Changes : The Plan should be expanded to include an assessment be made of its character and the contribution it makes to the area.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.

Action: A summary of the historic environment has been added.

Rep ID: 37 / 47	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome reference to the WHS and conservation of its Outstanding Universal Value. However, we are unsure what reflect WHS status means as a strategic policy. Preference would be to refer to the aims and objectives of the Management Plan when consider

Full Response: We welcome reference to the WHS and conservation of its Outstanding Universal Value. However, we are unsure what reflectWHS status means as a strategic policy. Preference would be to refer to the aims and objectives of the Management Plan when considering development opportunities.

Changes : Amend policy to include reference to the aims and objectives of the Management Plan. Delete word Reflect.

Council's Response: It is accepted that the term 'reflect' is unclear, therefore, the text has been amended appropriately.

Change : Accepted

Action: Changes made as requested

Rep ID: 58 / 10	Company/Organisation: Story Homes	Document: LP
Name:		Policy: S6e

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects to housing growth figures and affordable house requirement

Full Response: Housing - No justification/evidence base relating to the percentage distribution of housing growth
 The affordable housing requirements are not viable as evidenced by the Councils own Viability study. See further comments on affordable policy.

Changes :

Council's Response: Noted.

The spatial strategy and settlement hierarchy has been developed using a robust methodology which takes into account local need, aspiration and core services which contribute towards a sustainable community.

Allerdale Local Plan (Part 2) - will determine the level of growth appropriate to each settlement within the hierarchy, setting out explicit housing numbers per settlement.
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required

Rep ID: 64 / 4	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope		Policy: S6e

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Full Response: Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Changes : Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Council's Response: Accept suggested change.

Change : Yes

Action: Amend policy to include suggested word changes.

Rep ID: 6 / 3	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
	Name: Mis S Hemsley-Rose	Policy: S6f

Support/Object: Support **Sound/Unsound:** Sound **Positively Prepared:** Yes **Effective:** Yes
Legally Compliant: Yes **Justified:** Yes **Consistent:** Yes

Summary: FORCE suport Policy s6f

Full Response: Our members generally support this policy. It is our opinion that the consented wind energy schemes at Westnewton and Hallbank, together with numerous existing developments such as the four wind turbines at Lanrigg, should be included in this policy. The already have (or soon will have) an impact on the area. Hadrian's Wall World Heritage Site and its setting require additional protection as a result.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 7 / 6	Company/Organisation: Network Rail	Document: LP
Name: Ms D Clark	Policy: S6f	

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:	Justified:	Consistent:	

Summary: Believe that this policy should contain reference to potential impacts of new development upon railway safety, efficiency and the implications of development near level crossings

Full Response: The Local Plan states as follows:

Aspatia Area Policy. Work with partners to support the improvement and integration of bus and rail services and improved parking and cycle facilities at the railway station;
In response to the above sections we have the following comments.

(1) Level Crossings owned and operated by Network Rail within the Allerdale Council Area

Included as attachments to this response is a location map of the level crossings within the Allerdale Council area, as well as a spreadsheet containing a list of the level crossings and their locations (for convenience and accuracy this is under eastings and northings).

Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

By a proposal being directly next to a level crossing

By the cumulative effect of developments added over time

By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route

By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway

By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads

By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs

By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing

By any development that alters a primarily agricultural use level crossing to residential usage (e.g. from use by a farmer to proposed use by a residential development).

As a result of increased patronage over crossings, Network Rail could be forced to implement measures such as linespeed reductions, crossing upgrades and occasionally diversion. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings.

Changes : Network Rail would request that the Allerdale Council Local Plan Part 1 in going forwards includes a specific policy on level crossings.

(1) Proposals affecting level crossings will require consultation with Network Rail and approval of plans

(2) Developers via S106 or CIL contributions provide funding for any enhancements and mitigation measures required by Network Rail to ensure the safety, operation, performance and integrity of the railway are not impacted by developments.

(3) Developments impacting level crossings will not proceed until full consultation and approval is obtained from Network Rail.

(4) Network Rail requests that we are consulted at the pre-application stage by developers and councils to determine the impact upon our level crossings of proposals and that agreement is reached as to mitigation measures, including S106 / CIL funding, prior to planning permission being sort.

(5) Proposals should be accompanied by a Transport Assessment or Traffic Impact Assessment that includes taking specific note of level crossings in the Allerdale Council area, in consultation the Network Rail Level Crossings Team for input into the compilation of the Transport or Traffic Assessment prior to submission as part of the planning application.

Council's Response: Policy S22 Criteria b has been revised to include policy in relation to the issues highlighted. This will ensure that safety of level crossing is considered through the Development Management process and Site Allocations Process (Allerdale Local Plan (Part2)). It is not considered appropriate to have a specific policy in the local plan at a strategic level.

Change : Partially accept

Action: Policy S22 has been revised to address the concerns raised in the representation.

Rep ID:	8 / 2	Company/Organisation:	Aspatia Rural Partnership	Document:	LP
		Name:	Cllr B Finlay	Policy:	S6f

Support/Object: Support **Sound/Unsound:** Sound **Positively Prepared:** Yes **Effective:** Yes
Legally Compliant: Yes **Justified:** Yes **Consistent:** Yes

Summary: The Aspatia Rural Partnership support Polict S6f, however, suggest that Blennerhasse has (in error) been ommitted from the list of villages.

Full Response: The Aspatia Rural Partnership is a constituted body representing a group of nine parish Councils in the locality: Allonby, Hayton & Mealo, Oughterside & Allerby, Westnewton, Aspatia, Plumbland, Bromfield, All Hallows and Blennerhasse & Torpenhow. We welcome the definition of Aspatia as a Key Service Centre and the strategic policies for the Aspatia Locality in S6f. The Aspatia Rural Partnership has prepared a Community Action Plan that identifies our priority issues and actions; and the policies for the Aspatia Locality in S6f will help us to meet our aims.

Many of our comments on the previous draft of the Local Plan have been accommodated in the pre-submission draft in S6f and we support direct reference to our partnership and plan here:

- Support aspirations of the Aspatia Rural Partnership Community Action Plan including enhancements and adaptations to improve multi-functional opportunities for valuable community facilities such as village halls, public houses and local shops; and
- Support production of an Aspatia Action Plan in partnership with the community to bring derelict buildings back into use and to improve the commercial attractiveness of the town centre

Our Community Action Plan identified one of the key issues for the area as, despite its attractive landscape, it generally has a poor image outside the area. We commented on the previous draft of the Local Plan that the tourism potential should be extended beyond the coast and the AONB into the wider countryside. We support the Strategic Policies in the revised Local Plan for the Aspatia Locality (S6f) to:-Promote Allonby and Aspatia as the coastal and countryside centres for outdoor recreation including walking, cycling and horse riding....; and

-Support appropriate rural and farm diversification schemes, particularly through the encouragement of small scale tourism development, or food and drink production businesses.

Our Community Action Plan also noted that Aspatia is ideally placed in terms of road and rail links to encourage economic regeneration; and that it would benefit from the relocation of its railway station to the town centre. We support the policy to Work with partners to support the improvement and integration of bus and rail services and improved parking and cycle facilities at the railway station.

We noted, however, that Blennerhasse is missing from the list of villages in the Aspatia Locality under Para 122 and the Aspatia Area Policies for Housing.

Changes : Changes Suggested
Include Blennerhasse in the list of Rural Villages in Para 122 and the Aspatia Area Policies for Housing.

Council's Response: Accepted. This omission will be corrected.

Change : Yes

Action: Amend Policy S6f to include Blennerhasse as an Infill/Rounding village.

Rep ID: 18 / 5	Company/Organisation: The Ramblers	Document: LP
Name: Mr I Brodie	Policy: S6f	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: Whilst in principle the Ramblers support the Council's policy on enhanced coast access it is considered that the Plan fails to represent Government policy consistently throughout the Plan and that incorrect wording is used with reference to the English Coastal Route.

Full Response: The Ramblers support the Council's policy in having regard to Government policy on enhanced coast access. However, the wording within the Local Plan fails to represent Government policy and is inconsistently applied throughout the Plan. The incorrect wording is found under Natural Environment under Workington (page 38); Maryport (page 42); Wigton (page 50); and Silloth (page 54). It is wrongly omitted from Aspatia (page 58). The incorrect wording is "Support the development of the Cumbrian Access project, which seeks to establish an unbroken public right of way along the coast of Britain."

Changes : The above quoted wording should be replaced in the four noted places and added to page 58: "Support the development of the English Coastal Route which seeks to establish an unbroken walking route along the coast of England, and to provide enhanced and secure access to the coastal margin." It is also our view, to add clarity, the following wording would be useful. "The Council will seek to protect and enhance the English Coastal Route from inappropriate development and, where suitable opportunities arise, as with the redevelopment of the Workington Ironworks site, to seek to enhance the route through planning gain".

Council's Response: Accept that the title of the Coastal Access route should be amended.

Change : Yes

Action: Correct the title of the England Coastal Route throughout the plan.

Rep ID: 22 / 1	Company/Organisation: Allonby Parish Council	Document: LP
Name: Mrs A Bradley	Policy: S6f	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Encouraged by commitment to the area.

Full Response: Members of Allonby Parish Council have considered this Plan and with reference to pages 92 and 93 would like to see firmer guideines regarding the number of turbines visible from the AONB and a quantitiative estimate as to allowable wind turbine density. They are encouraged by commitment to the area (pages 56 & 57).

Changes : Would like to see firmer guidelines regarding the number of turbines visible from the AONB

Council's Response: Noted. Only small scale renewable energy schemes, which preserve the special qualities of the AONB and accord with the aims and objectives of the Management Plan will be acceptable. Policy S19 assesses development on a case-by-case basis.

Change : No

Action: No action required.

Rep ID: 36 / 1	Company/Organisation: Blennerhasset and Torpenhow P	Document: LP
Name: Mrs B Kavanagh	Policy: S6f	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Generally support this policy. Omission noted from settlements list.

Full Response: Blennerhasset & Torpenhow Parish Council welcomes the definition of Aspatria as a Key Service Centre and the strategic policies for the Aspatria locality in S6f. Aspatria is an important local service centre for our parish for shopping, post office services and doctors surgeries and is well used by residents of Blennerhasset in particular. In a recent survey 86% of respondents in Blennerhasset said they go to Aspatria for both Post Office and chemist; and 82% said they go for both back up shopping and dentists surgery.

Blennerhasset and Torpenhow Parish Council commented on the previous draft of the Local Plan that the tourism potential should be extended beyond the coast and the AONB into the wider countryside.

We support the Strategic Policies in the revised Local Plan for the Aspatria Locality (S6f) to:

Promote Allonby and Aspatria as the coastal and countryside centres for outdoor recreation including walking, cycling and horse riding, and;

Support appropriate rural and farm diversification schemes, particularly through the encouragement of small scale tourism development, or food and drink production businesses.

We note however, that Blennerhasset is missing from the list of villages in the Aspatria Locality under Para 122 and the Aspatria Area Policies for housing.

Changes : Include Blennerhasset in the list of Rural villages in Para 122 and the Aspatria Area Policies for Housing.

Council's Response: Accepted. This omission will be corrected.

Change : Yes

Action: Policy S6f will be amended to include Blennerhasset as an Infill/Rounding village.

Rep ID: 37 / 48	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

Full Response: There has been no proper assessment of the significance of heritage assets in the area, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

This section fails to give a general portrait of the built heritage of Aspatria, the contribution that it makes to the character of the area, to the quality of life of its communities and to the economic well-being of the area.

There is some reference to outlying conservation areas and scattered listed buildings and to the historic landscape including WHS. But no real portrait of the historic environment in this area.

What are the key heritage assets in the area? What is the historic environment like?

The Plan should make specific references to the historic environment in the area based policies and not just the built and historic environment section.

Changes : The Plan should be expanded to include a description of the historic environment in Aspatria and an assessment be made of its character and the contribution it makes to the area.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.

Action: A summary of the historic environment has been added.

Rep ID: 37 / 49	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The map does not illustrate the historic environment properly.

Full Response: The map does not illustrate the historic environment properly.

Changes : The map should highlight some of the key heritage assets in the area.

Council's Response: Noted. The locality area diagram provides a broad/indicative overview of the area, and therefore, it is not appropriate (or possible at this scale) to include most heritage assets. The Site Allocation process will produce a Proposals Map that will clearly show heritage assets and designations.

Change : No

Action: No further change required.

Rep ID: 37 / 50	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This section is generalised and does not pick out anything that is considered to be of a priority or of particular importance.

Full Response: This section is generalised and does not pick out anything that is considered to be of a priority or of particular importance.

Changes : Specific reference to aspects of the historic environment (following an assessment being recommended for paragraphs 122 to 125) should be included here.

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Change : Partially accept.

Action: A summary of the historic environment has been added.

Rep ID: 37 / 51	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome reference to the WHS and conservation of its Outstanding Universal Value. However, we are unsure what reflect WHS status means as a strategic policy. Preference would be to refer to the aims and objectives of the management when considering development contributions.

Full Response: We welcome reference to the WHS and conservation of its Outstanding Universal Value. However, we are unsure what reflect WHS status means as a strategic policy. Preference would be to refer to the aims and objectives of the management when considering development opportunities.

Changes : Amend policy to include reference to the aims and objectives of the Management Plan. Delete word Reflect.

Council's Response: It is accepted that the term 'reflect' is unclear, therefore, the text has been amended appropriately.

Change : Accepted

Action: Changes made as suggested.

Rep ID: 37 / 52	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We support the proposal to produce an Action Plan for Aspatria.

Full Response: We support the proposal to produce an Action Plan for Aspatria.

Changes :

Council's Response: Noted

Change : N/a

Action: No further action required.

Rep ID: 58 / 11	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S6f	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects to housing growth figures and affordable house requirement

Full Response: Housing - No justification/evidence base relating to the percentage distribution of housing growth. The affordable housing requirements are not viable as evidenced by the Councils own Viability study. See further comments on affordable policy.

Changes :

Council's Response: Noted.

The spatial strategy and settlement hierarchy has been developed using a robust methodology which takes into account local need, aspiration and core services which contribute towards a sustainable community.

Allerdale Local Plan (Part 2) - will determine the level of growth appropriate to each settlement within the hierarchy, setting out explicit housing numbers per settlement.
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required.

Rep ID: 64 / 5	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Full Response: Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Changes : Wish to see the statement "support proposals which improve utility provision" included in this area based policy

Council's Response: Accept suggested change.

Change : Yes

Action: Amend policy to include suggested word changes.

Rep ID: 12 / 4	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S7	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports Policy S7.

Full Response: Encouraging the use or redevelopment of empty or unsuitable homes is a laudable aim and an important part of any strategy for sustainable development.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 8	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S7

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy recognises the importance of delivering a mix of housing types alongside the importance of necessary infrastructure. The County Council supports this policy.

Full Response: Policy S7 sets out the strategic housing principles for the authority's area. The delivery of the right amount and types of housing in sustainable locations is of importance to the County Council. Housing has an important role in supporting economic development by providing an attractive range of houses and the broader benefits of our communities being able to access affordable and suitable housing, which has important links to health and well being and educational achievement. Moreover, the County Council's responsibilities around adult social care and children's services give it a direct housing role which needs to be recognised within Planning Policy. 34. This policy recognises the importance of delivering a mix of housing types to meet needs that emerge within the Authority Area, including the needs of the aging population. In line with the earlier advice of the County Council (during the Preferred Options Consultation), the policy recognises the importance of necessary infrastructure being delivered alongside housing. The County Council is therefore supportive of this policy.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 205 / 4	Company/Organisation: Copeland Borough Council	Document: LP
	Name: Mr Chris Hoban	Policy: S7

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Full Response: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Changes :

Council's Response: Support Noted.

Change : N/A

Action: No action required.

Rep ID: 12 / 5	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S8	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports policy S8, however, is concerned about allowing flexibility as a result of viability.

Full Response: A strong policy in favour of the provision of affordable homes is commendable

Changes : Suggested Changes
 However, the paragraph which suggests that the Council will consider allowing schemes which 'fall short' of the policy requirements' in terms of affordable housing, should be removed. Experience has shown that developers will often argue that the requirement for a specified number of affordable homes will render a proposed housing scheme unviable. This policy should be specific and less flexible.

Council's Response: Comment noted. The policy approach is consistent with national policy and evidence.

Change : No

Action: No action required.

Rep ID: 16 / 5	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S8	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Justified: No Consistent:

Summary: The policy is unsound as it is not effective or justified. The Council's own viability assessment demonstrates the requirements to be unviable in the current market.

Full Response: Policy S8: Affordable Housing requires 20% affordable housing within Key Service Centres on sites of 10 (or 0.3ha) or more with the exception of Cockermouth which requires 40%. Outside of these areas housing development of 5 dwellings (or 0.15ha) or more will be required to make provision for 25% affordable housing. Such levels are contrary to the Council's own viability assessment. The Allerdale Housing Viability Study (2011) indicates under current market conditions with affordable housing set at 20% only 8% of sites contained within the SHLAA would be viable with 81% being unviable. Even if the Council took the view that all marginal sites could be brought forward with such levels of affordable housing only 1,444 dwellings would be viable. Putting aside the legitimacy of the Council's housing requirement (304 new dwellings per annum) this would mean the Council have only 4.75 years housing supply. The reality will be much worse as it is extremely unlikely all the sites identified as marginal would be viable.
 In addition persistence with such a policy will undermine the spatial strategy within the Local Plan. The viability study identifies that within areas of low market value no sites were considered viable even with 0% affordable housing. This is particularly problematic for the Council given that Workington, Maryport and Wigton, which are identified within Policy S3: Spatial Strategy and Growth to take the largest proportions of development, are considered low value market areas. In addition Cockermouth is identified as requiring 40% affordable housing but is only identified as a moderate value market area within the viability study.

Changes : We urge the Council to reconsider its policy and request a lower affordable housing requirement that can be sustained for the next five years on the basis of its own viability assessment. Relying on site-specific (or open-book) assessments of viability as the solution for unsustainable policies is not an acceptable approach. It is the Council's responsibility to demonstrate its policies are achievable and that they do not jeopardise viability in the first five years. It is not the responsibility of the applicant to demonstrate that a policy cannot be achieved. Plan policies should be achievable in the majority of cases, with open-book assessments reserved for a minority of special cases.

Council's Response: Noted. The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required.

Rep ID: 32 / 1	Company/Organisation:	Document: LP
	Name: Mr E Nicholson	Policy: S8

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Yes Justified: Consistent:

Summary: Unsustainable / undeliverable if 40% affordable housing is applied to Cockermouth housing provision.

Full Response: Unsustainable / undeliverable if 40% affordable housing is applied to Cockermouth housing provision.

Changes : Should be reduced to 20% to make the development viable.

Council's Response: Comments noted. Facilitating the delivery of affordable housing is a key aim of the Plan and the approach is considered to be appropriate, taking into account the high need for affordable housing in Cockermouth and fully consistent with the NPPF. Viability can be an important consideration in the delivery of development and therefore must be considered where it is highlighted as an issue policy provides scope to vary the requirement. Where viability is called into doubt the onus is on the developer to provide the evidence to demonstrate that this is the case.

Change : No

Action: No action required.

Rep ID: 41 / 1	Company/Organisation: Westward Parish Council	Document: LP
	Name: Ms Elizabeth Clark	Policy: S8

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The Parish Council would like some provision for affordable housing within the parish of Westward

Full Response: The local plan was fully discussed at Westward Parish Councils meeting and councillors would like some provision for affordable housing within the parish of Westward.

Changes :

Council's Response: Noted. Facilitating the delivery of affordable housing is a key aim of the Plan and the approach includes policy for delivery as part of market housing, and as an exception in rural areas. The Allerdale Local Plan (Part 2) will allocate housing sites that will deliver market and affordable homes over the plan period. Part 2 will be subject to full public consultation. Engagement in this process is key to directing the delivery.

Change : N/A

Action: No action required.

Rep ID: 43 / 8	Company/Organisation: Susco (Sustainable Cockermouth)	Document: LP
Name: Mr M Porter	Policy: S8	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO object to Policy S89 and suggest it is unsound as it does not provide more detail.

Full Response: The Council makes frequent references to 'Affordable Housing' It is good that the Council clearly recognises there is a high need in the Borough for such. However we do not feel this policy is sound enough to deal with this issue, and the Council is lacking sufficient commitment to some aspects of this issue. There is no definition of 'affordable' or any point of reference to this, or the housing and mortgage markets. We feel a clear definition is made that is applicable to reality. Eg is it, as might be appropriate, 3 times the average wage of the area (stated to be approximately £16,000pa by the planning staff at a meeting with SusCo), which is the usual maximum lending available from mortgage providers. Or is some other scale/indicator to be used, and if so, what is it. Anyone can band around terms such as 'affordable housing' but affordable to who? There is no commitment to any bare minimum percentage of affordable housing in each and every development. This has been an issue in relation to a planning application in Cockermouth only this week where the developer did not want to provide affordable housing. Developers will continue to be in a position to put forward planning applications without any or adequate affordable housing, and the Council may find itself in a position to agree applications are there are no stipulations to have a set level of such housing, if the application fulfils all the legally required aspects.
 This is a very unsound area of the plan at present and has great potential to fall apart under pressure from developers and planners, who in reality are businesses for whom profitability is the priority

Changes :

Council's Response: Comments noted. Facilitating the delivery of affordable housing is a key aim of the Plan and the approach is considered to be appropriate and fully consistent with the NPPF. A definition of affordable is provided in the Glossary and Acronyms section and in the NPPF.

Change : N/A

Action: No action required.

Rep ID: 55 / 9	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S8

Support/Object: Support

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

Summary: This approach is considered sensible and meets the needs of the communities and supports a mix of housing that meets the needs of communities whilst supporting economic development.

Full Response: The Cumbria Sub-Regional Spatial Strategy amplifies the importance of housing developments meeting the needs of all within the community, including the requirement for affordable housing. The delivery of a mix of housing sufficient to meet the needs of the housing market is recognised as an important planning consideration within the NPPF.

36. The Allerdale Strategic Housing Market Assessments identifies an annual requirement of 181 affordable homes per annum. A standard method to deliver affordable housing is for the developer to build these as a proportion of open market housing as part of their mix of housing on a development site. This approach to delivering affordable homes is increasingly important given the reducing level of central Government financial support for new affordable housing.

37. Responding to this, and in line with Government Policy, the Local Plan Policy S8 proposes that a proportion of affordable homes would be delivered on each development site with the proportion of affordable housing to be sought varying depending on local market conditions and the scheme's viability. It will be important that the level of affordable housing sought at settlements does not prejudice otherwise sustainable development and with it, deliverable levels of affordable housing. It is therefore suggested that the level of affordable housing at Cockermouth (i.e. 40% proportion), and how this may be sought from developments, should be carefully considered and monitored given the proximity of key settlements within the National Park where housing provision is generally more restricted.

38. The Policy also proposes that where there is clear need, affordable homes can be delivered in less sustainable rural locations to meet clearly identified local needs. This approach is considered sensible and should help the delivery of a mix of housing that meets the needs of communities and which supports economic development.

39. On this basis the proposed approach to the delivery of affordable housing is welcome.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 58 / 12	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S8	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: Objects to affordable housing target and policy as it is not considered deliverable.

Full Response: The plan is not sound as it is not justified when considered against the evidence and not consistent with the NPPF. The NPPF in paragraph 173 states that: Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

The viability evidence base demonstrates that unless the market conditions improve significantly then very few sites within the Borough will be viable to deliver affordable or meet SPD requirements. Given that the Authority are incorrectly seeking to priorities PDL land, which as a general rule of thumb is more cost prohibitive, it is not positively preparing the plan or meeting the policy requirement to significantly boost housing supply, including the pressing need to deliver affordable housing, which will just not take place.

Changes :

Council's Response: Noted. The Plan has been developed to take account of viability. Affordable Housing is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S8 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution. The strategy for PDL and release of Greenfield land has been revised to provide clarity and address these concerns.

An update has been made to the Viability Topic Paper to provide further support for this approach.

Change : No

Action: No action required.

Rep ID: 205 / 5	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: S8	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Full Response: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Changes :

Council's Response: Comments noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 53	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S9	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We support the need for new development of rural affordable housing to relate well and be sympathetic to its location in particular the character and form of the settlement.

Changes :

Council's Response: Noted.
Change : N/a
Action: No changes required.

Rep ID: 55 / 10	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S9	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy sets out an appropriate framework against which proposals for rural exception sites can be considered and the approach taken is welcome.

Full Response: Paragraph 55 of the NPPF highlights how housing should be located where it can enhance or maintain the vitality of rural communities with Paragraph 54 recognising the role of rural exceptions sites in supporting these communities. It also recommends that; 'Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs'.
 41. Policy S9 sets out an appropriate framework against which proposals for rural exception sites can be considered and the approach taken is welcome. Also supported are provisions within the policy that allow a small proportion of open market housing upon exceptions sites where it can be shown that the scheme will deliver significant affordable housing and viability is a key constraint.
 42. It is considered that this measure would significantly help deliver affordable housing, through cross subsidy, at a time when Government grant support for affordable housing is diminishing. This policy is therefore supported

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 205 / 6	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: S9	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Full Response: These policies are all consistent with the approach taken in the Copeland Core Strategy and should mean a complementary approach to housing is adopted in both authority areas.

Changes :

Council's Response: Comments noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 54	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S10	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the requirement for new elderly needs housing to have regard to any impact on the local environment and character of the area.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 55 / 11	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S10	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Specialist housing and house designs that can be adapted to meet residents needs over their entire lifetime are important to help maintain the independence of occupiers in their homes. For this reason this policy is supported. Additional information sug

Full Response: The NPPF highlights the importance of ensuring that the housing requirements of all, including those with special requirements, are met. Policy S10 seeks to address Elderly Needs Housing. 44. Specialist housing and house designs that can be adapted to meet residents'needs over their entire lifetime are important to help maintain the independence of occupiers in their homes. For these reasons, this Policy is supported.45. Notwithstanding this, it is noted that the Topic Paper on housing, while acknowledging the Planning for Care Report, does not quantify its, or the County Council's Extra Care Strategy's findings. This gives a conservative estimate of need for 300 extra care units in Allerdale in 2009, rising to 380 by 2019 and quantifies this requirement on the basis set out in the below table. It is suggested that the Housing Topic Paper should be updated to provide greater context in respect of specialist housing needs.

Changes : Respondent provides table of figures to enhance policy evidence.

Council's Response: Noted

Change : N/A

Action: Consideration will be given to the most appropriate document for this evidence to go.

Rep ID: 37 / 55	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S11	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We support the criterion that ensures that the development of any new sites for Gypsies and Travellers will relate to its context and character and will not have an adverse impact on historic assets.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 55 / 12	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S11	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Emphasis is placed upon updated evidence to identify key sites to meet the requirements of the GTTS community.

Full Response: Within the Government's guidance contained within Planning for Traveller Sites (March 2012) it is stated: 'Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities'.⁴⁷ It will be very important that sufficient Gypsy and Traveler sites are provided in appropriate locations. Suitable provision should help ensure that needs are met and therefore reduce the risks created by unauthorised sites.⁴⁸ The proposed Policy S11 sets out the criteria when considering the requirements for Gypsy and Traveler sites and the key criteria to be employed when selecting sites. Presently countywide evidence around Gypsy and Traveller accommodation requirements is being developed. When complete, this evidence base should assist with the identification of key sites to meet the requirements for Gypsy, Traveller and Travelling Showpeople Sites within Allerdale. It will be essential that Allerdale identify sufficient sites to meet the requirements within their authority area over the plan period. Once suitable sites are identified their delivery should be prioritised.

Changes :

Council's Response: Noted
Change : N/A
Action: No further action

Rep ID: 16 / 6	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S12	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Justified: No Consistent: No

Summary: These policies are unsound as they are not effective, justified or consistent with national policy. The policy provides over-zealous protection of employment sites from other uses and places an unnecessary burden upon developers.

Full Response: These policies are considered overly restrictive because they protect employment sites from other uses until such a time that they have been identified for release within the forthcoming Site Allocations DPD. This would result in sites remaining vacant whilst awaiting the adoption of the Site Allocations DPD, not anticipated until 2015 at the earliest, when the site could be put to beneficial use. The NPPF paragraph 22 states; 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'. The policies also identify that following any de-allocation priority will be given to a sequence of uses. The sequence identified in Development Management Policy DM3 requires residential developers to fulfil numerous criteria including providing robust evidence that there are no suitable alternatives. This policy requirement places an additional and unjust burden upon residential development and is considered contrary to paragraph 22 of the NPPF which does not stipulate a sequential preference of uses.

The policies will also work contrary to the Local Plan achieving its own specified windfall allowance. Paragraph 77 of the Local Plan, identifies a consistent windfall allowance of up to 10%, putting aside the justification for such a figure, the continued protection of unviable employment land for other uses will undermine achievement of this allowance and hence the Council's ability to meet its own objectively assessed housing need. The policies are not supported by the Local Plan evidence base. The recently published Employment Land Review concludes Allerdale has an excess of employment land with approximately 100 hectares currently allocated compared to a requirement for approximately 60 hectares to 2030.

Changes : Given the Council have already identified an over-supply of employment land and non-compliance with the NPPF it is recommended that these policies be amended and replaced with a policies that allow other uses, including housing, to be developed where there is no reasonable prospect of a site being used for the allocated employment use. Such other uses should be treated on their merits and not against a prescribed and inflexible sequence of uses having regard to market signals and the relative need for different land uses.

Council's Response: Comments noted. If appropriate the site allocation process will ensure a considered release of employment land, and consideration of alternative uses.
Change : No
Action: No further action required.

Rep ID: 19 / 6	Company/Organisation: Associated British Ports - Port of	Document: LP
	Name:	Policy: S12

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: Legally Compliant: Justified: Consistent: No

Summary: ABP objects to Policy S12 and considers it to be unsound on the basis that it is inconsistent with national policy in not specifically referring to the Port of Silloth.

Full Response: Policy S12 states that the Council will ensure that sufficient quality employment land is available to meet identified needs. Whilst ABP supports this, the pre-amble to Policy S12 refers to important employment sites clustered around the Port of Workington. It is considered that the importance of the Port of Silloth and the agglomeration effects that it has should also be identified here. As referred to above, the National Policy Statement for Ports notes that Ports can have the affect of increasing overall productivity in the local economy and encouraging new investment. They can create agglomeration effects by bringing together businesses, with varying degrees of interaction, and produce economic benefits over and above those reflected in the value of transactions among those businesses. With regard to the Port of Silloth, it plays an important role in supporting the economy of the surrounding area through the import of grain, agribulks and molasses. It therefore facilitates growth and employment creation in local and wider economy. In light of the above, ABP objects to Policy S12 and considers it to be unsound on the basis that it is inconsistent with national policy in not specifically referring to the Port of Silloth. It is therefore requested that the Port of Silloth is identified in the pre-amble to Policy S12 to reflect its importance to the local economy.

Changes : It is requested that the Port of Silloth is identified in the pre-amble to Policy S12 to reflect its importance to the local economy.

Council's Response: Accept this response.

Change : Yes

Action: The introductory text will be amended to highlight the importance of the Port of Silloth to the local economy.

Rep ID: 37 / 56	Company/Organisation: English Heritage	Document: LP
	Name: Ms E Hrycan	Policy: S12

Support/Object: Sound/Unsound: Positively Prepared: Effective: Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the requirement for new or expanding business to be of an appropriate scale and use and not to have adverse impacts on the surrounding area.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 55 / 13	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S12	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Be ensuring that there is a focus on the delivery of the best sites and necessary supporting services and infrastructure, it should be possible to prioritise those sites which are important to deliver the economic development aspirations for Allerdale. Th

Full Response: The development of Allerdale's economy is a key priority for both Cumbria County Council and Allerdale Borough Council. The Cumbria Economic Ambition highlights key steps the County Council can make to help deliver economic growth in the County. Of particular relevance to the Allerdale Area are the priorities around promoting: West Cumbria's global reputation and expertise in nuclear and clean technologies, the County's strengths in the growing advanced manufacturing sector, the world class rural landscape and tourism and opportunities to improve Cumbria's workforce skills through increasing apprenticeships, work-related training and through Education Institutions. 50. Land use planning has an important role in facilitating the delivery of appropriate employment land and supporting infrastructure.51. To meet the 51 ha requirement for employment land, we note the proposals to consider the suitability of all existing employment sites within the district to ensure the availability of the sites that meet the needs of modern business in the right locations. For sites that are not considered to meet the needs of business, there will be an opportunity to consider alternative, more appropriate, uses.52. By ensuring that there is a focus on the delivery of the best sites and necessary supporting services and infrastructure, it should be possible to prioritise those sites which are important to deliver the economic development aspirations for Allerdale. These proposals are therefore supported. 53. Away from the strategic locations, policy also gives carefully considered support for proposals to provide appropriate employment in rural locations. This proposal is also welcomed, given the rural characteristics of many parts of the district.

Changes :

Council's Response: Noted
Change : N/A
Action: No further action

Rep ID: 58 / 13	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S12	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: The approach to deferring de-allocation of sites to a DPD is not effective, justified or consistent with national policy

Full Response: The approach to deferring de-allocation of sites to a DPD is not effective, justified or consistent with national policy. NPPF is clear that reviews of land for economic development should be undertaken at the same time or combined with Strategic Housing Land Availability Assessments (paragraph 161 of NPPF). In addition, NPPF does not include a sequence to alternative uses to which there is no justification for policy approach. The approach to employment land deallocation is fundamental in terms of assessing land availability to inform the overall approach to delivery in the plan;

Changes :

Council's Response: Comment noted.
Change : No
Action: No further action required.

Rep ID: 7 / 7	Company/Organisation: Network Rail	Document: LP
Name: Ms D Clark	Policy: S13	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Believe that this policy should contain reference to potential impacts of new development upon railway safety, efficiency and the implications of development near level crossings

Full Response: The Local Plan states as follows: Port of Workington 171. In order to achieve the economic objectives of the Blueprint it is vital that there is a timely provision of infrastructure to enable and support growth. Improvements to transport infrastructure are vital to underpin the investment in nuclear decommissioning, potential new nuclear projects, as well as encouraging spin off activities and diversity of the West Cumbrian economy. Several key projects are identified such as improvements to access to the Port of Workington, the railway and the A595.

In response to the above sections we have the following comments.

(1) Level Crossings owned and operated by Network Rail within the Allerdale Council Area

Included as attachments to this response is a location map of the level crossings within the Allerdale Council area, as well as a spreadsheet containing a list of the level crossings and their locations (for convenience and accuracy this is under eastings and northings).

Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

By a proposal being directly next to a level crossing.

By the cumulative effect of developments added over time.

By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route

By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway

By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads

By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs

By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing

By any development that alters a primarily agricultural use level crossing to residential usage (e.g. from use by a farmer to proposed use by a residential development).

As a result of increased patronage over crossings, Network Rail could be forced to implement measures such as linespeed reductions, crossing upgrades and occasionally diversion. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings.

Changes : Network Rail would request that the Allerdale Council Local Plan Part 1 in going forwards includes a specific policy on level crossings.

- (1) Proposals affecting level crossings will require consultation with Network Rail and approval of plans
- (2) Developers via S106 or CIL contributions provide funding for any enhancements and mitigation measures required by Network Rail to ensure the safety, operation, performance and integrity of the railway are not impacted by developments.
- (3) Developments impacting level crossings will not proceed until full consultation and approval is obtained from Network Rail.
- (4) Network Rail requests that we are consulted at the pre-application stage by developers and councils to determine the impact upon our level crossings of proposals and that agreement is reached as to mitigation measures, including S106 / CIL funding, prior to planning permission being sort.
- (5) Proposals should be accompanied by a Transport Assessment or Traffic Impact Assessment that includes taking specific note of level crossings in the Allerdale Council area, in consultation the Network Rail Level Crossings Team for input into the compilation of the Transport or Traffic Assessment prior to submission as part of the planning application.

Council's Response: Policy S22 Criteria b has been revised to include policy in relation to the issues highlighted. This will ensure that safety of level crossing is considered through the Development Management process and Site Allocations Process (Allerdale Local Plan (Part2)). It is not considered appropriate to have a specific policy in the local plan at a strategic level.

Change : Partially accept

Action: Policy S22 has been revised to address the concerns raised in the representation.

Rep ID: 19 / 7	Company/Organisation: Associated British Ports - Port of	Document: LP
	Name:	Policy: S13

Support/Object: Object **Sound/Unsound:** Unsound **Positively Prepared:** No **Effective:** No
Legally Compliant: **Justified:** **Consistent:**

Summary: ABP considers that the Port of Silloth has a role to play in the Energy Coast Innovation Zone. It is therefore considered that Policy S13 should therefore refer to the Port of Silloth and support the role it can play in the I-Zone by, similarly to the Port of Workington, safeguarding routes to the Port to enable and encourage its growth.

Full Response: Policy S13: Energy Coast Innovation ZoneThe Energy Coast Innovation Zone is an initiative that aims to build on the Cumbrian coast's role in the renewable and low carbon energy market by providing a strategy to build on the area's existing expertise in the sector. Policy S13 seeks to support this initiative through the allocation of land in line with the initiative's objectives and supporting the development of infrastructure to support the development of renewable and low carbon energy related developments. In particular, Policy S13 identifies the Port of Workington and the Lillyhall Industrial Estate as two key sites for development which would meet the aims of the Energy Coast. With regard to the Port of Workington, Policy S13 states that land and transport routes to the Port will be safeguarded so as to not prejudice the Port's future development and its ability to assist in the Energy Coast Initiative.

ABP considers that the Port of Silloth also has a role to play in the Energy Coast Innovation Zone. In particular, the Port already handles biomass and through the Energy Coast Innovation Zone there is the opportunity to increase this. It is therefore considered that Policy S13 should therefore refer to the Port of Silloth and support the role it can play in the Energy Coast Innovation Zone by, similarly to the Port of Workington, safeguarding routes to the Port to enable and encourage its growth. It is considered that by omitting reference and support for the Port of Silloth as part of the Energy Coast Innovation Zone, Policy S13 is not doing all it can to facilitate and support the initiative. It is therefore considered that policy is unsound as it is not positively prepared and it is ineffective as it is not based on sound infrastructure planning. On this basis, ABP objects to Policy S13.

Changes : It is considered that Policy S13 should refer to the Port of Silloth and support the role it can play in the I-Zone.

Council's Response: The Council acknowledges the important contribution that the Port of Silloth makes to the local economy. However this policy relates specifically to the 'Innovation Zone' which forms a specific area of land and premises between the Port of Workington and Lillyhall Industrial Estate as part of the West Cumbria Economic Blueprint.

Change : No

Action: No action required.

Rep ID: 37 / 57	Company/Organisation: English Heritage	Document: LP
	Name: Ms E Hrycan	Policy: S13

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. No assessment has been made in the Plan of the historic harbours in Allerdale. A requirement of the NPPF is that a proper assessment of the significance of heritage assets in the area needs to have been made. This does not appear to have been brought our sufficiently in area descriptions and the overall portrait of Allerdale as being an important part of its heritage.

Changes : The Plan should be expanded to include a description of historic harbours in Allerdale and an assessment be made of their character and the contribution it makes to the area.

Council's Response: After discussion with English Heritage it was accepted that the Plan requires clarity regarding the reference to the term 'historic' ports, and therefore changes are required.

Change : No change

Action: References to 'historic' ports has been clarified accordingly.

Rep ID: 38 / 15	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: S13	

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Believes this policy relates to a potential nuclear repository in Allerdale and does not support this

Full Response: Page 72, Para 164 - "Maximise opportunity to diversify into other nuclear sectors". This council supports the view of Cumbria County Council with regard to Nuclear policy. Allerdale, due to the know faulted nature of the coal fields is unsuitable for the development of a Nuclear Depository. Further it would be inappropriate to develop such a facility in the middle of an existing, natural resource, that is, the coal field.

Changes :

Council's Response: This policy does not relate to a potential nuclear repository.

Change : No

Action: No action required.

Rep ID: 55 / 14	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S13	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy concerning Lillyhall rightly points out the importance of prioritising development that is in keeping with the economic development priorities for Allerdale and West Cumbria. Nevertheless, there remains a need to be alive to other forms of deve

Full Response: The development of Allerdale's economy is a key priority for both Cumbria County Council and Allerdale Borough Council. The Cumbria Economic Ambition highlights key steps the County Council can make to help deliver economic growth in the County. Of particular relevance to the Allerdale Area are the priorities around: promoting West Cumbria's global reputation and expertise in nuclear and clean technologies; the County's strengths in the growing advanced manufacturing sector; the world class rural landscape and tourism; and opportunities to improve Cumbria's workforce skills through increasing apprenticeships, work-related training and through Education Institutions. 55. The policy sets out the aspiration to deliver an Energy Coast Innovation Zone. The Lillyhall Estate and the Port of Workington are important elements of this Zone and building upon this opportunity should also be rightly supported. Nonetheless, it is queried whether more recognition could be given to the potential role of Derwent Howe in west Workington. This site is recognised elsewhere in the document and may benefit from further acknowledgement, if not within the policy itself, then within supporting paragraphs as a minimum. 56. The element of the policy concerning Lillyhall rightly points out the importance of prioritising development that is in keeping with the economic development priorities for Allerdale and West Cumbria. Nevertheless, there remains a need to be alive to other forms of development, such as waste management, which represents established uses of this site. On this basis care will be needed to ensure that the policy does not restrict appropriate existing uses. A minor amendment to the policy could serve to reduce such a risk.

Changes : Proposed Changes/ 57. In the final paragraph of the discussion concerning Lillyhall, after the term employment uses it is recommended that Allerdale Borough Council add (or uses of land that are not consistent with ambitions for this site).

Council's Response: Accept suggested amendment to policy.

Change : Yes

Action: Amend policy to include word changes as suggested.

Rep ID: 61 / 2	Company/Organisation: West Cumbria and North Lakes F	Document: LP
Name: Dr Ruth Balogh	Policy: S13	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: No
 Legally Compliant: Yes Justified: No Consistent: No

Summary: References to the nuclear industry in this Policy are misleading in that they are vague and ill-defined and may therefore carry the implication that they refer to nuclear power stations as they would in most other parts of the country. But there are currently no nuclear power stations in West Cumbria

Full Response: References to the nuclear industry in this Policy are misleading in that they are vague and ill-defined and may therefore carry the implication that they refer to nuclear power stations as they would in most other parts of the country. But there are currently no nuclear power stations in West Cumbria. The only nuclear power plant in this plan is an aspiration. The nuclear facilities that do exist are all concerned with nuclear waste, decommissioning, and spent fuel which is classifiable as waste. They are more accurately described as management and processing facilities for fission products brought in to the

Changes :

Council's Response: Do not accept. This policy refers to the local nuclear industry, which is inclusive of decommissioning, research and any future aspirational activity.

Change : No

Action: No action required.

Rep ID: 205 / 7	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: S13	

Support/Object: Object Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Concerned about the inclusion of research and development sector that will be encouraged at Lillyhall

Full Response: We are concerned about the inclusion of research and development as a sector that will be encouraged at Lillyhall. There are two references to this within Policy S13 (on page 74) that have been added since the Preferred Options document. It has long been established that research and development in west Cumbria will be focussed at Westlakes Science and Technology Park, with manufacturing businesses that can emerge from this being directed towards Lillyhall. Paragraph 168 talks about the need to differentiate between the key sites in west Cumbria and states that Lillyhall has a distinct role from Westlakes Science and Technology Park, but this is contradicted by the inclusion of research and development as a new function being proposed at Lillyhall. Therefore Copeland Borough Council would object to Lillyhall being promoted as a centre for research and development in west Cumbria. As suggested at the Preferred Options stage a short topic paper may help to clarify the respective roles of the strategic employment sites in Allerdale and Copeland.

Changes :

Council's Response: Noted

Change : No change

Action: No further action

Rep ID: 12 / 6	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S14	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports Policy S14.

Full Response: Resisting inappropriate and disproportionately scaled development in the open countryside is a commendable policy particularly in an area with valued landscapes.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 58	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S14	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We support the requirement for economic development in rural areas to be of an appropriate size and nature to its location and the re-use of existing buildings.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 55 / 15	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S14	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It is considered that this policy contains a framework whereby new and appropriate forms of development can be delivered, and existing enterprises expanded. On this basis the proposed policy approach is considered robust.

Full Response: Both the SRSpS and the NPPF look to ensure that there is an appropriate range and mix of employment sites to meet the requirements of the borough. Given the rural character of much of Allerdale, it is important that policy aligns with the requirement of the NPPF that Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. "Much of Allerdale is rural and there is a need for planning policy to be alive to the requirements of the rural economy. 59. By clearly setting out the forms of development that are appropriate within rural Allerdale, such as live work development, small employment spaces and extensions to existing operations, it is considered that this policy contains a framework whereby new and appropriate forms of development can be delivered, and existing enterprises expanded. On this basis, the proposed policy approach is considered robust.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 43 / 9	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: S15	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO object because Paragraphs 179 to 182 do not specifically refer to Nursery, Primary, Secondary or Sixth Form Education.

Full Response: Paragraphs 179 to 182 do not specifically refer to Nursery, Primary, Secondary or Sixth Form Education. We recognise that these phases of education are not Allerdale Borough Council's direct responsibility but they are an essential element of any community and must be considered when considering plans for development.

With reference to S15e we call upon Allerdale Borough Council to work closely with Cumbria County Council and other education providers (e.g. Academies) to develop a strategic plan for 4 to 19 education which ensures local, manageable, accessible provision for all children and young people. This strategic plan should be part of the Local Plan to ensure that growth of communities does not overwhelm educational provision.

Changes :

Council's Response: Criteria e) highlights the Council's commitment to proactively plan for the provision of schools of the right size in the right location. This criteria applies to all schools and improved provision will be applied based on joint working with educational partners and on appropriate evidence of need.

Change : No

Action: No action required.

Rep ID: 55 / 16	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S15

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Whilst this policy is supported, it is suggested that it would benefit from giving recognition to the value of ongoing skills training in the workplace and not just education institutions. This point could be recognised within criteria d) of Policy S15 or within a supporting paragraph to this policy.

Full Response: Cumbria County Council is the education authority for Cumbria. Education, for both children but also adults, is extremely important in ensuring people can fulfil their own aspirations, but also helping to ensure that workers are in a position to respond to the needs of priority employment sectors within the authority area. 61. This policy does reflect these key principles, giving a positive framework to support the delivery of new opportunities for education provision to better fulfil the authorities education aspirations. Also welcome is the commitment to work with partners to plan for the provision of schools. 62. While this policy is supported, it is suggested that it would benefit from giving recognition to the value of ongoing skills training in the workplace and not just education institutions. This point could be recognised within criteria d) of Policy S15 or within a supporting paragraph to this policy.

Changes : Proposed Changes 63. It is recommended that Allerdale Borough Council re-word paragraph criteria d of policy S15 to say (additions are in bold): Enhancing enterprise and training and skills for the local workforce by working in partnership with education facilities and employers to promote lifelong learning and skills development.

Council's Response: Accept suggestion for additional wording.
Change : Yes
Action: Amend policy to include additional wording as suggested.

Rep ID: 37 / 59	Company/Organisation: English Heritage	Document: LP
	Name: Ms E Hrycan	Policy: S16

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. Subject to the textual change, we support the requirement for new town centre development to preserve and enhance the character and distinctiveness of each town and to ensure that architectural assets, historical assets, and their settings are protected and enhanced.

Changes : Protected and enhanced should be replaced with conserved and enhanced in line with the NPPF.

Council's Response: The Plan would benefit from the changes suggested.
Change : Yes
Action: Changes made as suggested

Rep ID: 53 / 1	Company/Organisation:	Document: LP
	Name: Mr Robert Nichols	Policy: S16

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: No Consistent:

Summary: Objects to changes made to town centre boundaries.

Full Response:

- 1) My main Concern and objection to the document that directly effects me is that in appendix 4 S16 & DM9 changes to the proposed map (figure4-3 Cockermouth Town Centre) the housing area of Printers Court, Brash House and the garden of 15 Challoner street has been included in the town centre. The 7 dwellings and the garden are carefully refurbished and improved housing development that is although rural is very much part of the housing stock of Cockermouth. The planning authority despite complaining to the various departments do not seem to keep up to date maps of the area, relying on the ordnance survey mapping service instead of applications made and planning granted therefore the buildings observed by aerial photography as a big building does not equate to the contents that have been approved.
- 2) The document is based on an evidence base that is in my opinion more fiction than fact.
- 3) The comments that I made after the consultation has never been acknowledged or reply issued
- 4) Allerdale council have little interaction with the residents of the borough, residents in Cockermouth or from what I can ascertain in other areas last year they had one session in Cockermouth where they had a notice board in the entrance to a supermarket and handing out to busy shoppers a leaflet on the document. The document stated that it was all in accordance with the evidence base. This evidence base was changed following the consultation. Figures in the evidence base did not appear to agree with the findings in the report or ignored. An example schooling was in the report to have limited growth in the evidence base yet was ignored in the growth of Cockermouth. The document SHLAA that was rewritten post the consultation including land that was earmarked for growth by the cemetery. Now earmarked for housing. With regard to making comments, the council adopted a policy of all discussion had to be made by email or writing this is a disadvantage to everybody who needs help with the computer or expressing themselves. I went to the council to discuss my main interest and was told by the planning team that it had to be by email or written input. When I approached a member of the Town Council to discuss items in the document there comment was that the document had been debated by them in Allerdale therefore they could not pass comment at the Town council. This was not a planning input it was a policy input to the development team and therefore in my opinion not correct

Changes : Proper consultation with the residents that are residing in the town.

Council's Response: Concerns are noted. The revised town centre boundary for Cockermouth has been developed through several rounds of consultation and has been amended following the comments received to the Preferred Options. The approach is therefore considered to be both sound and robust. Consultation has been carried out in accordance with the relevant planning regulations and is fully documented. Full details of the consultation undertaken, and representations made during the development of the Local Plan are contained in the Consultation Statement and accompanying appendices. A response to Preferred Options representations was published alongside the Allerdale Local Plan Pre-Submission Draft and is now contained within the Consultation Statement. All interested parties including those submitting comments have been sent correspondence related to the Publication of the Local Plan.

Change : No

Action: No action required.

Support/Object:

Sound/Unsound: Sound

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

Summary: The proposed approach to distribute retail development in a hierarchical manner with levels of development commensurate to the scale of individual settlements is considered appropriate.

Full Response: Retailing is an important part of the mix of uses that local authorities should plan for, and represents a key element of sustainable and economic development. Paragraph 23 of the NPPF highlights the necessity for Local Plans to define a network and hierarchy of centres that are resilient to future economic changes. Linked to this process, NPPF Paragraph 161 states that Local Plans should consider the requirements for all retail activity, including retail and leisure development.⁶⁵ The proposed approach to distribute retail development in a hierarchical manner with levels of development commensurate to the scale of individual settlements is considered appropriate.⁶⁶ It is also welcomed that the proposed policy is open to the potential for new retail to be located away from these locations where justified by evidence or logic (e.g. village centres or local parades of shops or retail to meet specific local circumstances). The ability of policy to meet local retail needs (including in rural areas) is very important and is recognised within the NPPF. On this basis the approach proposed is welcomed.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	2 / 6	Company/Organisation:	Friends of the Lake District	Document:	LP
		Name:	Dr K Wilshaw	Policy:	S17

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: No
 Legally Compliant: No Justified: No Consistent: No

Summary: Policy S17 seems to promote development in open countryside. No further information has been provided about what Transformational activities could entail, therefore the policy could be read in a number of ways and is open to many different interpretations

Full Response: This policy raises the same concerns as policy EC6 which Friends of the Lake District commented on in 2012.

As noted in paragraph 195 - Allerdale's greatest tourism assets lie within its natural environment with the majority of visitors to the area considering the scenery and landscape to be the most important factor in the enjoyment of their trip.

Our previous comments were that this statement recognises that there is little inherent need for development to support this asset and emphasises the importance of ensuring that the natural environment is conserved as a priority for its own sake and for the contribution that it makes to the local economy through tourism. These comments still apply.

The council's preferred approach still seems to promote development in open countryside. Of particular concern is the encouragement of 'Transformational' activity in very sensitive areas including Hadrian's Wall and the Solway Coast AONB. No further information has been provided about what these 'Transformational' activities could entail. This means that the policy could be read in a number of ways and is open to many different interpretations, therefore making the document unsound.

The same sequential test for development location should be put in place for tourist development as is found in Policy S3 Spatial Strategy and Growth. The design principles for any tourist development should conform to Policy S4 Design Principles.

1. The DPD is not consistent with national policy in the following respects:

NPPF paragraph 7 highlights the importance of the environment as one of the three dimensions of sustainable development.

The NPPF states that the planning system should contribute to protecting and enhancing the environment and use resources prudently.

The NPPF also recognises the inherent linkage between socio-economic and environmental quality.

NPPF paragraph 17 outlines Core Planning Principles which include protecting the intrinsic character of the countryside, and conserving and enhancing the natural environment.

NPPF paragraph 109 states that the planning system should contribute to and enhance the local environment by protecting and enhancing valued landscapes.

NPPF paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

Changes : Suggested Changes Delete paragraph 4 relating to Transformational potential Alter paragraph 1 to read Proposals for new tourism and leisure development should be consistent with the sequential development strategy outlined by policies S3 and S4. Delete a) and b) Friends of the Lake District supports paragraphs 3, 5, 6, 7 and 8 of this policy.

Council's Response: It is important to note that the Plan should be read as a 'whole' and in conjunction with national policy as set out in the NPPF.
 This policy reflects the Council's strategy to enable and encourage rural economic activity, of which tourism is a vital source whilst ensuring that sensitive countryside locations are protected. The sequential preference within this policy ensures that development should always be directed to the larger settlements before other locations are considered and robust protections are in place to protect the most sensitive locations from inappropriate or harmful development (particularly Natura 2000 sites or the AONB).
 'Transformational' projects are highlighted as those tourist assets the Council considers to be the most attractive to visitors and the promotion of which would considerably boost the local economy. The inclusion of the asset within this list does not specifically encourage development at the attraction itself - but encourages developments which may enhance or maximise the enjoyment of the asset - such as improved accommodation or visitor centres in nearby settlements or locations as appropriate.

Change : No

Action: No action required.

Rep ID:	6 / 4	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	LP
		Name:	Mis S Hemsley-Rose	Policy:	S17

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S17.

Full Response: Our members are delighted to see that tourism is to be granted a high priority in the Local Plan as it is of great importance to the local economy. This has not always happened in the past and the tourist industry has suffered as a result. Recent research in Scotland and by the John Muir Charitable Trust has revealed that up to 44% of visitors may be deterred by the presence of large numbers of wind turbines. Therefore, it is reassuring to know that the interests of the tourism industry are to be protected in the future.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	37 / 60	Company/Organisation:	English Heritage	Document:	LP
		Name:	Ms E Hrycan	Policy:	S17

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We support the requirement for new tourism development to be of an appropriate scale and design and not have significant adverse effects on the WHS. The WHS site and the archaeological assets whether designated or undesignated are considered to be one of the most important assets in the country. Its preservation and enhancement should be the key priority and reducing the harm from tourism. (as stated in paragraph 196).

Changes : Within the NPPF, when considering the impact of development on heritage assets, the more important the asset, the greater the weight should be on it's conservation. Therefore, paragraph 2 of this policy should be amended to read:
 In sensitive coastal areas and countryside, any new tourism development should be of an appropriate design and scale in keeping with the character of the area. Development which involves substantial harm or loss to a Grade II listed asset should be exceptional. Where it affects assets of the highest significance including the WHS, should be wholly exceptional.

Council's Response: Policy S17 has been revised to ensure it contains a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The Plan should be read as whole, therefore it is considered that repetition as requested is not required.

Change : Partially accepted

Action: Policy S17 has been revised as appropriate.

Rep ID: 38 / 16	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: S17	

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Queries the relationship of this policy to the degradation of car park at Saltpans

Full Response: Page 88, para 198. "Support proposals to protect coastal amenities". Does this mean that the car park at Crosscanonby road end foreshore will be protected from further degradation? Especially as the car park at Saltpans has now been permanently closed as part of the Hadrian's Cycleway scheme for road safety reasons according to Cumbria County Council with the blessing of AONB

Changes :

Council's Response: This policy sets out the Council's strategic approach to the promotion of tourism and associated infrastructure. facilities and services. It is considered that this response relates to a specific site and issue and does not relate to the soundness of the policy or Plan. However, it is acknowledged that tourist facilities as well as businesses should be protected and therefore this has been amended within this policy.

Change : Partial

Action: Amend last paragraph of policy to protect tourism businesses and facilities.

Rep ID: 46 / 1	Company/Organisation: Natural England	Document: LP
Name: Mr Janel Baguley	Policy: S17	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: References should be corrected to the England Coast Path

Full Response: While we do not consider policy S17 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account. We would like to see some reference to the England Coast Path in this policy since Natural England is currently working on stretch 1 with the Local Planning Authority.

Changes : Some suggested wording as follows: Support the development of the England Coast Path which seeks to establish an unbroken walking route along the coast of England and to provide enhanced and secure access to the coastal margin. The council will seek to protect and enhance the English coastal route from inappropriate development and where suitable opportunities arise seek to enhance the route.

Council's Response: Accept that the title of the Coastal Access route should be amended.

Change : Yes

Action: Amend title of England Coast Route throughout Plan.

Rep ID: 55 / 18	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S17

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Welcome the approach to sustainable tourism

Full Response: Tourism and recreation are an important element of the Cumbrian economy and its value is recognised within Cumbria County Council's emerging Economic Ambition document.68. Within the policy it is set out how the visitor economy and leisure facilities should be located within the most sustainable of locations and the policy rightly identifies key schemes. Also welcome is the policy's recognition that certain forms of tourism are appropriate in rural locations. Here appropriate proposals can assist farm diversification and create employment in locations where employment opportunities may otherwise be limited.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 2 / 5	Company/Organisation: Friends of the Lake District	Document: LP
	Name: Dr K Wilshaw	Policy: S18

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: No
 Legally Compliant: No Justified: No Consistent: No

Summary: FLD object to the wording of paragraph 201 as it implies that the biodiversity and historic assets and features are contaminating the site and therefore need to be cleared.

Full Response: Paragraph 201 states 'The site has been closed to public access for over 50 years. Over that time, it has developed a unique environmental character with a wide variety of species of plants and animals, and hosts many historic assets and features. These factors, in conjunction with the nature of the site's historic use as an armament storage facility, means that there is a number of ground and decontamination works that need to be undertaken before new development can take place.'

Friends of the Lake District has concerns regarding the way that this paragraph has been worded because it implies that the biodiversity and historic assets and features are contaminating the site and therefore need to be cleared. This is of concern as both the biodiversity and the heritage of the site are of value and should not be cleared, but should be incorporated into any future use of the site.

Policy S18 e) states that the wildlife, landscape and historic assets will be safeguarded by any future development on the site. This therefore renders paragraph 201 incompatible with the Policy.

As it stands the paragraph is contrary to NPPF policies 7, 17, 109, 126, 129, 141, 158 and 165

Changes : Proposed wording. Split paragraph 201 into two separate paragraphs.
 201a

The site has been closed to public access for over 50 years. Over that time, it has developed a unique environmental character with a wide variety of species of plants and animals, and hosts many historic assets and features. These special characteristics of the site will need to be safeguarded before any development takes place.

201b

The nature of the site's historic use as an armament storage facility means that there is a number of ground and decontamination works that need to be undertaken before new development can take place.

Council's Response: Accept the principle of this response - this section will be reworded to avoid confusion.

Change : Partial

Action: Amend this section of the introductory text to avoid the implication that bio & geo assets are contributory to any ground contamination issues.

Rep ID:	2 / 9	Company/Organisation:	Friends of the Lake District	Document:	LP
		Name:	Dr K Wilshaw	Policy:	S18

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: No
 Legally Compliant: Justified: No Consistent: No

Summary: While FLD welcome changes to preferred policy approach, however, there is currently no requirement for detailed assessment of biodiversity or landscape both internal and external to the site. Furthermore, FLD believe the Council should lead the masterplan

Full Response: Policy S18 is more comprehensive than EC7 and has incorporated suggestions regarding public access, the C2C cycle route and the natural environmental assets within the site. Friends of the Lake District welcomes these changes.

However, in Friends of the Lake District's previous comments on a policy for Derwent Forest, we indicated that the council should lead on the masterplanning for the site. This would ensure that local people are given a fair chance to comment in accord with the SCI, and also to ensure that social and environmental issues are adequately picked up in the masterplan.

There is also no requirement in the policy for a detailed assessment of Derwent Forest's landscape and biodiversity both internally and with regards to the impact of any development on the setting of the Lake District National Park.

Because of this, the policy still does not accord with the following NPPF paragraphs:

NPPF paragraph 7 highlights the importance of the environment as one of the three dimensions of sustainable development. The NPPF states that the planning system should contribute to protecting and enhancing the environment and use resources prudently. The NPPF also recognises the inherent linkage between socio-economic and environmental quality.

NPPF paragraph 17 outlines Core Planning Principles which include the empowerment of local people to shape their surroundings, taking account of the character of different areas, protecting the intrinsic character of the countryside, conserving and enhancing the natural environment, and reusing brownfield land.

NPPF paragraph 109 states that the planning system should contribute to and enhance the local environment by protecting and enhancing valued landscapes.

NPPF paragraph 150 states that Local Plans are key to delivering sustainable development that reflects the views and aspirations of local communities.

NPPF paragraph 158 states that local planning authorities should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

NPPF paragraph 165 states that planning policies and decisions should be based upon up-to-date information about the natural environment.

NPPF paragraph 170 states that where appropriate, landscape character assessments should be prepared, and for areas where there are major expansion options assessments of landscape sensitivity.

Changes : Suggested Changes:
 Reword paragraph a) A comprehensive masterplan for the site including phasing will be developed by the council in consultation with the public. This is to ensure delivery of a coherent solution for the site and to avoid a piecemeal approach.

Add to paragraph e) Comprehensive assessments of the landscape character and biodiversity on the site will be included, along with an assessment of potential impacts on the setting of the Lake District National Park.

Council's Response: The Council considers this policy contains robust protections for the environment and ensures that any development must safeguard and enhance important landscape features, valuable historic assets, existing wildlife species and habitats. However, it is accepted that development on the site may affect the wider landscape character as well as the immediate setting.

Change : Partial.

Action: Amend policy to include requirement for wider landscape context to be taken into account.

Rep ID: 37 / 61	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S18	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There has been no proper assessment of the significance of heritage assets on the site, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

Full Response: There has been no proper assessment of the significance of heritage assets on the site, which is a requirement of the NPPF and therefore does not meet the objectives of sustainable development.

Reference is made to the Derwent Forest site having many historic assets and features. Given this is a site specific policy we would welcome more detailed references to the historic environment and to pin point ones of particular significance that are the key to regeneration of the site. We welcome the safeguarding of heritage assets within the assessment criteria for development proposals. Further information needs to be given on these and whether they are designated or undesignated.

Changes : The Plan should be expanded to include a description of the historic environment on the Derwent Forest site and an assessment be made of its character and the contribution it makes to the area.

Council's Response: Comments noted. Policy and wider Plan provides an appropriate policy approach to ensure that an assessment is made as part of any proposal.

Change : No

Action: No further action required.

Rep ID: 55 / 19	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S18	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Therefore, while Policy S18 is supported in principle, given the scale of the site, it is appropriate that specific reference should be made to its wider landscape context as suggested within the below text.

Full Response: This policy looks to consider the potential future uses of the former Royal Navy munitions site at Derwent Forest. The policy commits to the development of the masterplan for the site making reference to important considerations (e.g. highways and access and ecology) that should be reflected within this masterplan. Fundamentally, this approach appears to represent a suitable mechanism, which has regard to various matters (i.e. ecology) whereby future potential opportunities for this site can be realised. 70. The NPPF Core Principles include the need to take into account the roles and character of different areas, and to recognise the intrinsic beauty of the countryside and the importance of supporting thriving rural communities within it. NPPF Paragraph 109 outlines guidance in regard to conserving and enhancing the natural environment, which includes the need for the planning system to contribute to the protection and enhancement of valued landscapes. 71. Therefore, while Policy S18 is supported in principle, given the scale of the site, it is appropriate that specific reference should be made to its wider landscape context as suggested within the below text.

Changes : Reword criteria e) of Policy S18 to state: Ensure the siting, design and scale of all elements of the proposed scheme are appropriate, safeguard and enhance important landscape features, historic assets and existing wildlife species and habitats, and demonstrate how the wider landscape context has been taken into account. The proposal will seek to minimise and where appropriate mitigate adverse impacts;

Council's Response: Amendment to wording accepted.

Change : Yes

Action: Amend policy wording to include "and demonstrate how the wider landscape context has been taken into account".

Rep ID: 59 / 1	Company/Organisation: Derwent Forest Development Co	Document: LP
Name:	Policy: S18	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Queries appropriate use of word 'unique' with regards to environmental character of Derwent Forest site

Full Response: The text reads, The site has been closed to the public access over 50 years. Over that time it has developed a unique environmental character...(my emboldenment). I would question the use of the word 'unique' within this context. As you will appreciate, there are many sites of this character type in the UK and as such any possible uniqueness is attributable to the specifics of the site, not its character type. You will appreciate that character typing and the assessment of such plays an important role during the Landscape Character and Visual Assessment process within the context of any forthcoming EIA and therefore placing a 'unique' tag changes the assessment process.

Changes : Recommends review of use of word 'unique'

Council's Response: Accept comment.

Change : Yes

Action: Amend policy to remove the word 'unique'.

Rep ID: 59 / 2	Company/Organisation: Derwent Forest Development Co	Document: LP
Name:	Policy: S18	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Queries omission nodal development from Derwent Forest policy

Full Response: I note that no reference is made to the possibility of nodal development and reliance is only being placed on the development being ... predominantly 'open' in nature..

.Whilst I would acknowledge that the existing text can deliver the project as required, I believe the wording could be improved to encourage good architecture and planning by including reference to nodal development. For example, it is possible to envisage a set of circumstances where uses within the development will cluster together to provide the future development facilities. Reference to nodal development would provide for this option, all subject to the other safeguards incorporated into the policy.

Changes : Recommends inclusion of nodal development

Council's Response: Comment noted.

Change : No

Action: No further action required.

Rep ID: 59 / 3	Company/Organisation: Derwent Forest Development Co	Document: LP
	Name:	Policy: S18

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Recommends the inclusion of the word 'valuable' with relation to historic assets in Derwent Forest

Full Response: I would suggest the inclusion of the word 'valuable' in front of the words 'historic assets'. The text would read ... and will safeguard and enhance important landscape features, valuable historic assets and existing wildlife species...

This will allow appropriate cross referencing with Policy S29, otherwise there is a presumption in favour of conserving all heritage assets paragraph 266 (my emboldenment). This could place an over-emphasis on preservation and conservation of certain aspects of the existing site and affect the overall aspirations for the project (see paragraph 203 below).

Changes : Recommends inclusion of word 'valuable' before historic assets

Council's Response: Accept comment.

Change : Yes

Action: Amend policy to include the word 'valuable before historic assets.

Rep ID: 59 / 4	Company/Organisation: Derwent Forest Development Co	Document: LP
	Name:	Policy: S18

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Recommends inclusion of additional wording to Derwent Forest policy

Full Response: Given the general content and priorities of this policy and the content of paragraph 210, I would suggest that this paragraph should read, The key aspirations of the policy are to encourage economic growth and stimulate employment leading to sustainable long term development...(my emboldenment representing additions).

Changes : Recommends inclusion of wording 'economic growth and stimulate employment'

Council's Response: Accept comment.

Change : Yes

Action: Amend policy wording to reflect suggested changes.

Rep ID: 59 / 5	Company/Organisation: Derwent Forest Development Co	Document: LP
Name:	Policy: S18	

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:		Justified:	Consistent:

Summary: Recommends that residential development 'will' be supported rather than 'may'

Full Response: I would suggest that this paragraph should read, Further residential development to achieve the viability and secure the overall restoration of the site will also be supported, where it is demonstrated that the objectives of the policy are met (my emboldenments representing changes or additions). Obviously this places more certainty on the proposal to include residential development, which is a key component of the regeneration project and also provides more consistent wording, given the wording of the opening paragraph of the policy text.

Changes : Recommends that residential development 'will' be supported rather than 'may'

Council's Response: Do not accept that this change is necessary, however an amendment will be made to clarify that residential development may be supported where it is demonstrated that the objectives of the policy have been met.

Change : No

Action: Amend section to clarify that residential development may be supported where it is demonstrated that the objectives of the policy have been met.

Rep ID: 2 / 2	Company/Organisation: Friends of the Lake District	Document: LP
	Name: Dr K Wilshaw	Policy: S19

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: No
 Legally Compliant: No Justified: No Consistent: No

Summary: FLD consider that a Cumulative Impact study and capacity study is required to help the implementation of Policy S19. Additionally, text changes are required in order to ensure the study is forms part of the development management process.

Full Response: The piecemeal nature of wind energy development in the Borough means that there is no overview of the capacity of the landscape or biodiversity of the district in relation to wind turbine development. Friends of the Lake District considers that this is a gap in the Evidence Base of the local plan.

Without a Borough-wide impartial evidence-based assessment of wind energy development capacity for both landscape and for Natura 2000 sites and interest feature species, there is at the moment currently great difficulty in ascertaining whether any new wind energy development brought forward has cumulative impact.

It is going to be difficult, especially for developers of smaller wind energy developments (e.g. farm based turbines) to afford to accurately assess the cumulative impact of their development when taken in combination with all other developments across Allerdale Borough. However, this is what is being asked for in paragraph 218.

At the moment many of the smaller wind turbine applications are submitted with the barest minimum of information on the basis that the applicants indicate that they can't afford to undertake the surveys needed. It is hard to believe that a small-scale developer will be able to carry out an adequate and meaningful cumulative impact study to submit with their application.

Even commercial developers do not at the moment provide adequate cumulative impact assessments with their applications. The assessments of landscape impact are often underplayed and do not adequately recognise cumulative impact.

The existing cumulative impact of renewable energy developments on the landscape and setting of the Solway Coast AONB and the setting of the Lake District National Park needs to be identified as there is no certainty over which parts of both designated landscapes are being adversely affected by renewables development.

On ecological grounds, existing mitigation for species associated with Natura 2000 sites (e.g. that proposed for loss of pink footed geese feeding grounds because of disturbance of fields used by the birds by turbines) has been undertaken in a piecemeal fashion with no overall assessment of whether the mitigation land has been successful at protecting the Natura 2000 site birds. There is the potential that land set aside for the pink-footed geese could be affected by further turbine development because it has not been identified at a strategic level and is therefore not adequately protected for the future. The current situation is not acceptable.

Without an impartial assessment of the capacity of the Borough's landscape and ecology to be able to absorb wind energy development, it will be very difficult to adequately assess the cumulative impact of wind energy generation projects.

A study to assess capacity for wind energy generation would enable areas which have reached capacity with existing or consented wind development to be identified. This would enable more certainty in decision-making for Allerdale Borough Council. Wind energy development proposals inside areas with no more capacity because of cumulative impacts on the landscape or on Natura 2000 interest feature species could be refused on the grounds of cumulative impact, and there would be evidence and policy to support a refusal on these grounds.

Friends of the Lake District consider that a capacity study is a vital piece of evidence necessary to enable adequate planning for wind energy development. This wind energy capacity study should be based on the bird sensitivity areas in the Cumbria Biodiversity Evidence Base and the proposed Allerdale Landscape Character Assessment. Without a capacity study it cannot be demonstrated that the local plan is founded on a robust and credible evidence base.

The local plan is not consistent with national policy in the following respects:

Paragraph 7 of the NPPF highlights the importance of the environment as one of the three dimensions of sustainable development and that the planning system should contribute to protecting and enhancing the environment.

Paragraph 17 outlines Core Planning Principles which include protecting the intrinsic nature of the countryside and conserving and enhancing the natural environment.

Paragraph 109 states that the planning system should contribute to and enhance the local environment by protecting and enhancing valued landscapes.

Paragraph 115 states that Great weight should be given to conserving landscape and scenic beauty in National

Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas.

Paragraph 157 of the NPPF states that Local Plans should identify land where development would be inappropriate, for instance because of its environmental or historic significance.

Paragraph 158 states that Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area..

Paragraph 165 states Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area.

An independent evidence-based study to assess capacity for wind energy generation should be produced. This would enable areas to be identified which have reached capacity because of existing or consented wind development. This evidence would provide more certainty in decision-making for Allerdale Borough Council as wind energy developments inside areas with no more capacity because of cumulative impacts on the landscape or Natura 2000 interest feature species could be refused on the grounds of cumulative impact.

The availability of evidence to support a refusal on cumulative impact grounds would mean that there would be less chance of losing cases at appeal. The future appeal cost savings would help to cover the cost of producing the necessary evidence.

Changes : Suggested wording:
This cumulative impact study should be referenced within Policy S19 where it should be indicated that the Council will take a positive view where: Wind energy proposals do not sit within areas identified as having reached capacity because of cumulative impact on the natural environment.

Council's Response: The Cumbria Renewable Energy Capacity and Deployment Study (2011) has been used to develop Policy S19, and provides an evidence-based assessment of wind energy development capacity including consideration of protected land and constraints .The Policy ensures that a Cumulative Impact Assessment is required for each proposal for a renewable energy scheme should it be considered necessary.

Applications should be considered within the planning system according to national policy and an up-to-date local plan. The Council Is working with partners to develop a Cumulative Impact Study to provide additional evidence to inform decisions.

Change : No

Action: No action required.

Rep ID:	3 / 1	Company/Organisation:		Document:	LP
		Name:	Mrs R Prosser	Policy:	S19
Support/Object:	Support	Sound/Unsound:	Sound	Positively Prepared:	Yes
Legally Compliant:	Yes			Effective:	Yes
				Justified:	Yes
				Consistent:	Yes

Summary: Strongly support the introduction of a setback distance between wind turbines and residential properties

Full Response: Strongly support the introduction of a setback distance of 800m between wind turbines and residential properties and is to be welcomed as a means of protecting households from adverse impacts of onshore wind energy development. (paragraph 220). 800m is an absolute minimum compromise in this run away situation where Allerdale has become known for the excessive number of Wind Turbines compared to other areas.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 4 / 1	Company/Organisation:	Document: LP
Name: Mr N Prosser	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Strongly support the introduction of a setback distance between wind turbines and residential properties

Full Response: Strongly support the introduction of a setback distance of 800m between wind turbines and residential properties and is to be welcomed as a means of protecting households from adverse impacts of onshore wind energy development. (paragraph 220). 800m is an absolute minimum compromise in this run away situation where Allerdale has become known for the excessive number of Wind Turbines compared to other areas.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 5 / 1	Company/Organisation:	Document: LP
Name: Mr M Hall	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Supports the policy, but provides commentary on S19 policy material.

Full Response: Para 211 This may well be changed. Allerdale has provided more than its share of wind turbines, both locally and nationally. This is subject to an inquiry.

212 Allerdale has gone further with wind turbines than rest of Cumbria. So far as the Lake District National Park is concerned there are hydro schemes both planned and running. They should be counted more than wind turbines, because hydro power is three times as constant as wind.

213 There are other sources of renewable energy than wind, which do not damage the landscape, Undersea turbines are being developed and installed by Rolls Royce. The Solway provides very strong tidal flows.

214 With agriculture being one of the areas most important industry, it should be partnered with anaerobic digesters

216 This has to take account of the recent statement by Eric Pickles, Secretary of State for Communities and Local Government. He is promising secondary legislation to amend the consultation procedure. His proposals have to be taken into account when the plan is being considered.

217 Inappropriately sited wind farms have demonstrated that they damage the landscape. The wind farm at Bothel is visible from Surprise View above Derwent Water and appears frequently when travelling NW along the A66. The plan must prevent similar disasters. The Friends of the Lake District have protested about developments that adversely impact on the view from within the National Park. (Objection to App.No. 2/2013/0277).

218 I support the comments made by FORCE

219 This is hugely important. The proposed distance of 800m May not be sufficient. There are proposals in Scotland which could lead to a separation distance of 2500m. The reasons for this may be compelling. If this adopted in Scotland, just across the Solway. It could lead to an increased number of wind energy applications in Allerdale.

222. I fully support the comments from FORCE

Changes :

Council's Response: Comments noted.

Change : N/A

Action: No action required.

Rep ID:	6 / 5	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	LP
		Name:	Mis S Hemsley-Rose	Policy:	S19

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S19 and make several suggestions regarding changes to text.

Full Response: Force support the introduction of DPD relevant to renewable energy schemes, as there is currently no local policy on this topic, meaning proposals can only be considered against national policy. Whilst there may be significant potential for development if renewable schemes with Allerdale, there are also a high number of constraints, and a large number of already consented schemes means that particular care needs to be taken within the borough to protect its particular characteristics.

Whilst we support the policy in general, we do have some residual concerns regarding the effectiveness of this policy as detailed below;

Changes : Suggested Changes: a) FORCE feel the muddling of terms 'unacceptable adverse' and 'significant adverse' compromise the clarity of the policy.

b) Protected species require policy protection from any development, not only wind turbines, and where species are already the subject of protected status, it is not only 'significant effects' which cause concern. We therefore feel this paragraph fails the test of effectiveness and propose an alternative wording as follows; 'it should be demonstrated that the development would not result in any adverse effects (either in isolation or cumulatively) on protected species, including designated sites and migration routes'.

c) To meet the test of effectiveness, we proposed an alternative wording of this paragraph as follows 'appropriate operational requirements are addressed (including accessibility and suitability of road network, ability to connect to the grid, proximity of any relevant feedstock, etc) to the satisfaction of the local authority.'

d) Force strongly feels that the local authority should be able to take steps to protect their financial obligations in respect of these developments and would ask if consideration can be made to encouraging a more firm commitment from the developer, should a site subsequently become operational.

E) we propose the following wording 'potential benefits to the local economy and the local community are secured in line with guidance'

We would also like to see the settings of the National Landscape designations, specifically the Lake District National Park and the Solway Coast Area of Outstanding Natural Beauty included in the penultimate paragraph which requires that proposals should preserve the special qualities of the designated areas.

Council's Response: The Council has revised the policy wording to provide additional clarity with regards to the respondents suggested 'changes a) and b)'. The other suggested changes have been evaluated, however, it is considered that the revised policy represents a sound and appropriate approach. Therefore these have not been carried out.

Change : Partially Accept

Action: Changes carried out as appropriate.

Rep ID:	8 / 3	Company/Organisation:	Aspatia Rural Partnership	Document:	LP
		Name:	Cllr B Finlay	Policy:	S19

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: The Aspatia Rural Partnership support Policy S19, however, they believe that clarification is required relating to whether the minimum separation distance of 800m between wind turbines (over 25m) refers to the height of the hub or the blade.

Full Response: The Aspatia Rural Partnership is a constituted body representing a group of nine parish Councils in the locality: Allonby, Hayton & Mealo, Oughterside & Allerby, Westnewton, Aspatia, Plumbland, Bromfield, All Hallows and Blennerhasset & Torpenhow. The Aspatia Rural Partnership prepared a Community Action Plan, which highlighted the problem of a proliferation of wind farms in this area, partly because it lies between a National Park and an AONB. The Partnership is concerned about the cumulative effect of wind turbines in the area, detracting from it visual amenity and landscape quality, and affecting its tourism potential. The Aspatia Rural Partnership supports Policy S19, particularly:

Para 216 - the reference to cumulative adverse impacts; and Para 220 - the introduction of a minimum separation distance of 800m between wind turbines (over 25m) subject to clarification of whether the 25m refers to the height of the hub or the blade tip our preference would be to blade tip. We believe that the evidence to support the introduction of a separation distance is clearly set out in the Allerdale Local Plan (Part 1) Wind turbine Separation Distance Topic Paper (May 2013).

Changes : Suggested Changes
 Clarify in Para 220 whether the minimum separation distance of 800m between wind turbines (over 25m) refers to the height of the hub or the blade.

Council's Response: Accept this response.

Change : Yes

Action: The policy will be amended to clarify that minimum separation distance refers to the tip of the blade.

Rep ID:	9 / 1	Company/Organisation:		Document:	LP
		Name:	Mr J Rylands	Policy:	S19

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent Supports Policy S19 and suggests changes to text.

Full Response: S19 para 214 Virtually all the documents concerning wind turbines have mentioned economic benefits but they have never been specified. The turbines are made abroad and erected by itinerant specialist teams. Any local employment is minimal. The income produced goes to a few individuals and companies that are certainly not based in Allerdale or even in the UK in many instances. This reference should be omitted.
 Para d...appropriate measures for removal of structures and restoration of sites.

This should particularly specify removal of the concrete bases.

Para 220 800m separation is not enough and for any turbine over 25m to blade tip, this should be increased to 1000m.

Turbine colour is not mentioned. Most are white which is entirely inappropriate. Battleship grey is a colour used to blend into backgrounds and if turbines had to be this colour, they would be much less obtrusive.

Allerdale already has too many turbines, a disproportionate number of those in Cumbria. If more are to be erected, they should be in clearly designated areas and NOT dotted about randomly all over the countryside resulting in there being no views in any direction not blighted by these industrial structures.

FORCE have made detailed comments on the draft local plan which I entirely endorse.

Changes :

Council's Response: Comments noted. The specifics of proposals (such as colour) is addressed through development management.

Change : No

Action: No action required.

Rep ID: 10 / 1	Company/Organisation:	Document: LP
Name: Mr R Williams	Policy: S19	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective: Yes
 Legally Compliant: No Justified: No Consistent: Yes

Summary: Respondent supports policy S19 and the associated Topic Paper and provides further information and comments related to wind developments.

Full Response: These comments relate to Topic Paper 'Wind Turbine Separation Distance'

a) Unless my eyesight is failing badly I note that no reference is made in this document which indicates that Shadow flicker has been considered. Shadow flicker is well known to cause aggravation during the winter months when either the rising sun can affect inhabitants residing in the NW quarter, to the setting sun which can affect those residing in the NE quarter. My home is situated NNW of Wharrels Hill wind farm and during the winter period I suffer from the effects of not only shadow flicker but also reflections from the sun on the blades. I am aware that flawed Government Planning Statements refer to the document by A.D.Clarke 'A Case of Shadow Flicker' he prepared in 1993.

Please note the turbine he worked on had a tower height of 30m and a blade length of just 12.5m - hardly appropriate to reconcile this with today's monsters. These Planning Statements indicate that 'it has been proven that shadow flicker will NOT affect residents in properties greater than 10 rotor diameters away from a turbine'. This is totally untrue as Clarke stated in his paper:

.A recommendation was made that turbines should be sited AT LEAST 10 diameters distance from habitations and more if sited to the East, Southeast or West/Southwest..

My home is 833m away from the nearest turbine at Wharrels Hill and as the turbines have a diameter of 60m I should not suffer from shadow flicker as I reside almost 14 diameters away. Thus disproving completely government Planning Statements.

In addition, as your Topic Paper is supposed to be evidence based, it might have been prudent to have sought the views of residents known to reside at or near 10 rotor diameters of a turbine/s that information would be evidence based!

b) b) Once again I note that when considering noise no local evidence has been introduced in the Topic Paper. To my mind this again is a sad omission. Local public opinion is important but unfortunately not everyone affected by turbines will be aware of your documents and the Draft Local Plan. After all not everyone reads local papers so I suggest that here is a missed opportunity for local input to your Local Plan. From your plans of turbine sites it would be easy to identify those who could be affected and thus be approached for details of their experiences.

May I suggest that to be evidence based, rather than take an arbitrary distance of 800m as stated in your draft, consideration be given to seeking public opinion. This information could easily be obtained from a simple questionnaire. As a starting point a rising scale from 800m for turbines less than 50m high to 1.5/2km for the larger turbines - say 125m could be considered. Commonsense suggests introducing such a scale as the effects of even higher turbines with longer blades and more powerful generators would have a greater impact on residents or indeed even more residents.

Now is the opportunity to take a robust stand on what the residents of Allerdale want and deserve. Take the lead and see just how many other LPAs follow your example.

My final contribution. Will you please explain the size, quality and purpose of the map in Appendix 3 of the draft Local Plan?

Changes :

Council's Response: Comments noted. It is accepted that the policy would benefit from an emphasis on the potential issues for shadow flicker.
Change : Partially Accepted
Action: Shadow Flicker has been added to the examples of amenity issues.

Rep ID: 12 / 7	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports Policy S19, and provides a number of suggested changes.

Full Response: para 214 I support the emphasis given to the impact of wind turbines, both singularly and cumulatively, as a significant planning issue in relation to future development.

para 220 The introduction of a setback distance of 800m between wind turbines over 25m in height and residential properties is to be welcomed. However, some clarification is needed as to whether it is the hub or the blade tip of the wind turbine which is referred to. Additionally, as the Plan Area is subject to applications for wind turbines which are at the upper end of large scale, a setback distance of 800m may not be sufficient in all cases. A table of appropriate distance from turbines of different sizes might make a clearer and more effective contribution to this policy.

Changes : Suggested Changes

Para 211 I am writing broadly in support of Policy S19 but feel that the wording of this paragraph should include some mention of the fact that the UK national target to provide 15% of electricity and heat from renewable and low carbon sources by 2020 is controversial and currently in dispute although it remains, for the time being, the starting point for this aspect of local planning.

para 212 The letter 's' should be added to the word provide at the beginning of the third line.

para 213 The fact that Allerdale already accommodates 62% of Cumbria's installed onshore wind energy should be emphasised here in conjunction with the high quality landscapes and designations.

The ongoing investigation into the reasons for the particularly high level of development should also be mentioned. It would seem logical, as a result of this concentration of wind turbines, to exercise caution before further deployment in the Plan Area. It should also be pointed out that the designated areas (Solway Coast Area of Outstanding Natural Beauty to the west and Lake District National Park to the north east) have caused a funnelling effect in the corridor between the two which now contains the vast majority of Allerdale's wind turbines operational, consented and proposed. This must be borne in mind when further applications come forward

para 214 The realistic potential for an extra 80MW of renewable energy by 2030 should be broken down into the specific technologies and given some order of preference bearing in mind the present dominance of onshore wind. I do not accept that the onus of further renewable energy development must necessarily rely on commercial wind developments as the Plan Area already hosts 62% of the wind turbines in the County according to the Cumbria Renewable Energy Capacity and Deployment Strategy.

Unless a wind turbine manufacturer is going to locate in the Plan Area, the deployment of onshore wind turbines is going to create very few, if any, local jobs. As such, onshore wind should be specifically excluded from the exciting economic opportunity in terms of job creation to which the author of the document refers in para 214. Recent experience has clearly demonstrated that this is irrelevant to onshore wind turbines.

The Council states its aim to promote and encourage the development of renewable and low carbon energy resources at the end of page 92. I fully support this aim but, given the level of detail which underpins the rest of this policy, I do not feel that it is necessary to state here that proposals where impacts (either in isolation or cumulatively) are or can be made acceptable will be permitted. I suggest that this statement should be removed.

I would like to see the various different technologies which are covered by this policy specifically named and explained as they are in the Cumbria Renewable Energy Capacity and Deployment Strategy.

The author of the document lists air quality/emissions, noise, odour and water pollution as potentially adverse effects of renewable energy development. I would suggest that negative visual impact and shadow flicker should be added to the list.

The word significant should be removed from a)ii at the top of page 93 as any potentially adverse impact requires careful consideration and investigation before the Council should take a positive view.

Similarly, the words a significant adverse effect with reference to protected bird species; including designated sites and migration routes (page 93 point b) should be replaced by any adverse effect. Once again, any potentially adverse effect on protected species must cause the Council to demur from adopting a positive view before a thorough investigation has been carried out.

In the case of small companies and business consortiums applying for onshore wind turbines, there is a strong possibility that they will no longer exist when the turbines become redundant or planning permission expires. It is for this reason that I would suggest the setting up of a bond with an independent financial body to ensure that structures are removed and sites restored at the appropriate time. Ultimate responsibility should rest with the landowner. Reference to this should be included on page 93 point d).

The words and the setting of should be included before the Solway Coast Area of Outstanding Natural Beauty on page 93 below point e). Also in this paragraph, the words preserve the special qualities of should be changed to do not damage the special qualities of.

I would suggest that the word commercial is removed from the penultimate line of para 216 (page 94) because the Plan Area already accommodates a great many wind turbines of various sizes and capacities which should all be considered in terms of their potential cumulative impact in combination with future development.

Similarly, in para 218, wind farms should be replaced by wind turbines as even single turbines can displace bird and bat populations and impact upon migratory routes. Once again, we would suggest that the word significant be taken out of association with adverse effects because any adverse effect should cause the Council to demur from automatically taking a supportive view of a proposed development before the potential adverse effect has been fully

studied.

Presumably due to a typographical error, para 219 concludes with the repetition of a sentence for no discernible reason.

A number of inaccuracies and inconsistencies have been identified in the Cumbria Wind Energy Supplementary Planning Document (CWESPD). Therefore, the reference to it in para 221 should be changed to reflect that the document is to be amended as soon as possible. New SPDs are planned for Developer Contributions and Open Spaces, for example, and I would suggest that the policy is amended to reflect an intention to overhaul or rewrite the CWESPD at the earliest opportunity.

In para 222 (pages 94 and 95), I would again suggest that the settings of the Solway Coast AONB and the Hadrian's Wall World Heritage Site are included in the consideration of unacceptable impacts on the designated areas.

Finally, although not part of Policy S19 itself, I question the following sentence in the first paragraph on Page 15 of the Draft Plan Document the so-called Vision for the Plan Area:

The economy will be strong, diversified and well connected, with a growing and highly skilled population, with high employment, capitalising on skills and opportunities in the nuclear, energy and tourism sectors.

The nuclear industry is part of the energy sector. Therefore the validity/purpose of the final comma in the sentence requires explanation.

Council's Response: Comments and support noted. Changes have sought to address many of the changes as appropriate.

Change : Partially accepted

Action: Changes carried out as appropriate.

Rep ID:	13 / 1	Company/Organisation:		Document:	LP
		Name:	Ms K Woods	Policy:	S19

Support/Object: Object

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

Summary: Although the representor supports the inclusion of a setback distance within the policy, it is considered that this needs to be a sliding scale to ensure that it is proportionate to the scale of the development.

Full Response: I am pleased to note that there is now a proposal to have an 800m setback distance from residential properties for all wind turbines with a height of 25m or more. However I believe that there needs to be a sliding scale to ensure that the largest wind turbines are subject to a greater setback proportionate to the scale of the development.

Allerdale has been particularly lenient in its approach to controlling wind turbine development, and ill prepared in opposing developments as demonstrated by recent comments from Inspector Braithwaite. The developers are aware of Allerdale's approach, and this in turn generates more applications, and sets precedent. As a result the area has become over-populated with industrial scale turbines, with detrimental impact on local communities, wildlife and amenity. Allerdale has become one large wind farm and it is time to put tighter controls on such developments.

Changes :

Council's Response: Comments noted.

Change : No

Action: No action required.

Rep ID: 14 / 1	Company/Organisation: Kirkbampton Parish Council	Document: LP
Name: Ms A McCallum	Policy: S19	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective: Legally Compliant: Justified: Consistent:

Summary: Representor supports Policy S19.

Full Response: Kirkbampton Parish Council wishes to support that a minimum distance of 800m between wind turbines (over 25m) and residential properties is introduced, in order to protect residential amenity.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 15 / 1	Company/Organisation: Westnewton Action Group	Document: LP
Name: Mr J A Keighley	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Representation outlines the importance of a policy related to wind energy and outlines a number of changes to improve the approach.

Full Response: Due to the lack of a suitable local policy regarding renewable energy, particularly regarding wind energy - either in the form of on-shore farms or single turbines Allerdale has become a target from the wind industry who rely on the pressure exerted by their interpretation of the NPPF.

Large parts of Allerdale's landscape provide attractive setting for the Solway AONB, the Hadrian's Wall International Heritage Site and the Lake District National Park - which latter may even be extended in the near future to link up with the Yorkshire Dales NP. Not to mention also having a large number of internationally important wildlife habitats. However, this scenic setting is slowly being compromised and corrupted by being turned into an industrial wind turbine landscape. A robust policy is now essential in order to prevent erosion and abuse of our local landscape.

Changes : Suggested Changes
Section 214
Usage of the term 'adverse impact' here is frequently qualified by words such as 'unacceptably' (adverse) or 'significant' (adverse)
Adverse means adverse, it should not require such qualification, if an adverse effect is likely to occur then it is essentially 100% unacceptable.
'developers will be expected to work with local communities from an early stage and deliver benefits to the local area where the proposal is located' if possible this should be made retrospective
220
Clarification is needed here regarding wind turbine height, it needs clearly specifying that this refers to the total height of a turbine not merely its hub height!
Regarding - 'shorter distances may also be appropriate if there is support from local community' We feel that the wording here should read 'overwhelming support from the local community'.
We also believe that safety issues should be given much more serious consideration here, such as an insistence on more than mere 'fall over' distances from public areas such as footpaths, playing fields etc. and also the avoidance of siting turbines too close to roads where they may suddenly startle or/and distract a motorist coming across them on a rise or around a bend.
222
As we discussed above, the settings of these areas are just as important as the designated areas themselves, and therefore such settings should have equal status regarding unacceptable impacts, especially regarding highly visible and long lasting renewables such as wind.

Council's Response: Comments noted, and changes have been made to address many of the issues raised.

Change : Partially accept

Action: Changes carried out as appropriate.

Rep ID: 26 / 1	Company/Organisation: Sebergham Parish Council	Document: LP
Name: Ms	Gauntlett	Policy: S19

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome the introduction of the 800m set-back distance relating to wind turbines, and the other planning constraints and requirements to protect the environment and wildlife in the Borough.

Full Response:

1. We have no reason to doubt that the content is legal and soundly based, and Allerdale BC has reacted positively to the outcome of the first consultation. The content appears to the PC to be justified and reasonable.
2. The PC welcomes the changes to the Draft made following the first consultation in 2012 and is content that the issues we raised have been adequately addressed.
3. In particular, we welcome the inclusion in S19 (Renewable Energy and Low Carbon Technologies) of an 800m set back distance and other planning policies, requirements and controls to contain the development of wind turbines and mitigate the damage they inflict on the environment, ecology, landscape and health and well being of residents and visitors alike. We urge that no diminution of these requirements is introduced into the final Plan.
4. The PC urges the Council to react as speedily as possible in submitting the Draft Local Plan to the Planning Inspectorate on completion of the consultation period.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 27 / 1	Company/Organisation:	Document: LP
Name: Mr	A & C Rule	Policy: S19

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The introduction of an 800m set-back distance is proportionate and in response to the wishes of the vast majority of local people who, whilst many support 'green energy', are increasingly concerned at the potential for significant adverse impacts on their lives and wellbeing.

Full Response: The introduction of an 800m set-back distance is proportionate and in response to the wishes of the vast majority of local people who, whilst many support 'green energy', are increasingly concerned at the potential for significant adverse impacts on their lives and wellbeing.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 29 / 2	Company/Organisation:	Document: LP
Name: Mr A Graham	Policy: S19	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: I am fully support of the policy to introduce a separation distance of 800 metres between wind turbines and residential properties.

Full Response: I am fully supportive of the policy to introduce a separation distance of 800 meters between wind turbines and residential properties. However, I do feel that this could have been extended to a distance of 1km for wind turbines greater than 50 metres in height. This would still be less than half of the 2.5km distance being proposed by the Scottish Government.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 31 / 1	Company/Organisation:	Document: LP
Name: Mrs S Graham	Policy: S19	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: I am fully supportive of the policy to introduce a separation distance of 800 metres between wind turbines and residential properties.

Full Response: I am fully supportive of the policy to introduce a separation distance of 800 meters between wind turbines and residential properties. However, I do feel that this could have been extended to a distance of 1km for wind turbines greater than 50 metres in height. This would still be less than half of the 2.5km distance being proposed by the Scottish Government.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 34 / 1	Company/Organisation:	Document: LP
Name: Mrs P Bibby	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: I support making the minimum distance between wind turbines and dwellings 800m. In view of health and safety issues I feel that this is a reasonable recommendation.

Full Response: I support making the minimum distance between wind turbines and dwellings 800m. In view of health and safety issues I feel that this is a reasonable recommendation.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 36 / 4	Company/Organisation: Blennerhasset and Torpenhow P	Document: LP
Name: Mrs B Kavanagh	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Support this policy, particularly paras 216 and 220

Full Response: Blennerhasset & Torpenhow Parish Council commented on the previous draft of the Local Plan regarding the high number of applications for wind turbines in the area and the need to take cumulative effect into account. Blennerhasset and Torpenhow Parish Council supports Policy S19, particularly: Para 219 - the reference to cumulative adverse impacts; and Para 220 - the introduction of a minimum separation distance of 800m between wind turbines (over 25m). We believe that the evidence to support the introduction of a separation distance is clearly set out in the Allerdale Local Plan (Part 1) Wind turbine Separation Distance Topic Paper (May 2013).

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 62	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S19	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Subject to the amendments, we support the requirement for any renewable energy projects to consider their impact on the historic environment. Reference should be made to the wording in the NPPF regarding conserving and enhancing the historic environment rather than significant impact.

Full Response: Subject to the amendments, we support the requirement for any renewable energy projects to consider their impact on the historic environment. Reference should be made to the wording in the NPPF regarding conserving and enhancing the historic environment rather than significant impact.

Changes : Amendments should refer to the NPPF wording, rather than significant impact it should read conserve and enhance the historic environment. When referring to the WHS, it is suggested that it should be amended to read provided that they do not affect its Outstanding Universal Value and accord with the aims and objectives of the Management Plan.

Council's Response: Comment noted, however, the Council consider that the published approach is the most appropriate.

Change : No

Action: No action required.

Rep ID: 38 / 17	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S19

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Queries definition of small scale in relation to renewable energy and does not believe any should be acceptable in AONB
Full Response: Page 93. Renewable Energy. "In AONB only small scale renewable energy schemes will be acceptable". What constitutes "small scale" and why would you consider any such schemes in the AONB, these industrial schemes do stand out, are neither natural or beautiful and are totally out of character within AONB.

Changes :

Council's Response: Comments noted. The scale of development would be defined during the development management process and would be related to the technology and context.
Change : No
Action: No further action

Rep ID: 39 / 1	Company/Organisation:	Document: LP
Name: Mr B	Taylor	Policy: S19

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Strongly supports the proposal for a minimum separation of 800 metres
Full Response: With reference to the draft Allerdale plan, I would like to register my strong support for the proposal to require a MINIMUM separation of 800 metres between any proposed Wind Turbine Development and the nearest habitation/building of community involvement (eg church or school)

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 40 / 1	Company/Organisation:	Document: LP
Name: Mr A Brown	Policy: S19	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: No Effective:
 Legally Compliant: No Justified: Consistent: No

Summary: Does not believe this policy reflects current national policy or local circumstances.

Full Response: The current Allerdale Local Plan, adopted in 1999 is silent on the subject of renewable energy.

Allerdale has not produced or adopted any Supplementary Planning Documents or policy to fill in the detail relating to local conditions as compared with National Policy. Other Authorities have done so, Milton Keynes for example. Allerdale has used only the National and Regional guidelines when considering renewable energy schemes and these National Policies ignore local circumstances and are skewed in favour or approval. The result has been a free for all approach particularly for wind turbines, and a proliferation of onshore wind turbines throughout the Borough, including rural areas. The same effect has not been seen in the other districts in Cumbria, and has not happened for example in Eden District which has an equal if not greater wind resource than Allerdale. It may be that by embracing the branding of Britain's Energy Coast Allerdale has seemed to attract and encourage green energy that are not nuclear based and this means overwhelmingly wind turbines thanks to current subsidy regimes. Other technologies should not be ignored! Allerdale hosts 62% of the Cumbria onshore wind turbine development, and when weighted to its share of area within Cumbria, has 3 times the mean deployment of turbines when compared with the county as a whole. When the comparison is narrowed to areas within the five districts in Cumbria which are not protected by the Lake District National Park designations, Allerdale has a massive 41 times the mean deployment of turbines when compared with the districts adjoining. The conclusion must be that Allerdale is not playing on a level playing field in relation to the National Planning Policy Framework and has allowed wind turbine development totally out of proportion with the rest of the county, leading to severe criticism of a policy by default. This saturation is the subject of scrutiny within Allerdale Borough Council. The policies proposed in the proposed plan in S19 therefore appear to be more of the same, and I believe that this skewed free for all policy should be terminated. Areas suitable for wind turbines within the Borough should be identified and agreed after detailed consultation as part of the new plan. There should be no free for all policy. Wind turbines should only be permitted within the areas designated as suitable and all other areas of Rural Allerdale should not be forced to host any more turbines. In any event no turbine should be nearer than 1200m from any dwelling to protect the dwelling from noise, low frequency noise, and shadow flicker. There are several examples of these problems within Allerdale. The rural landscape of Allerdale is already saturated with turbines, both in groups, and as individual machines damaging the amenity of the local landscape, tourism, the amenity of local people and their dwellings and no more turbines should be permitted outside designated areas. They do not create jobs locally. Account should be taken, in the new local plan, of the latest political pronouncements made by the Government to ensure that the views of local people carry weight in the planning process, even to the point of veto to stop turbine development where they are opposed by the local population. Turbines are already seriously divisive within the local communities. There is clearly a serious disconnect in a planning regime where professional officers are constantly recommending turbines both individual and in groups for approval - following national policy so they say - and those recommendations for approval are being refused by the Allerdale Development panel in increasing numbers, and in defiance of the professional officers recommendations.

Changes : Areas suitable for wind turbine within the Borough should be identified and agreed after detailed consultation as part of the new plan. There should be no "free for all" policy.

Council's Response: Comments noted. The Policy closely follows national policy and will ensure that there is a proactive and robust approach to the development of renewable energy proposals.

Change : No

Action: No further action

Rep ID: 42 / 1	Company/Organisation:	Document: LP
Name: Mr Charles Woodhouse	Policy: S19	

Support/Object: Support	Sound/Unsound: Sound	Positively Prepared:	Effective:
Legally Compliant: Yes		Justified:	Consistent:

Summary: Respondent supports Policy S19, but suggests some revisions.

Full Response: I support the need for a development plan document in relation to renewable energy (S 19). This document is long overdue. Its delay has resulted in many turbine developments (eg High Pow, Silloth, Bothel, Tallentire and shortly West Newton) which now blight and scar Allerdale and distress host communities which, had this document existed, might not have been allowed. I agree broadly with the suggested amendments and improvements submitted by Force on 1 June 2013 and by Marion Fitzgerald on 12 June 2013. I will not therefore repeat all the detailed points and suggested corrections they have helpfully made but wish to make some additional suggestions. There are many key criteria to be incorporated in the final plan. I will try to summarise some of these.

- 1 Onshore wind developments must no longer be sited on sensitive, beautiful, quiet rural landscape areas, whether or not technically protected. The recent, opportunistic rush by developers to funnel so many large turbines on the hitherto unspoilt Allerdale plain adjoining, between and intervisible with the Lake District National Park and the Solway AONB and Hadrian's Wall WHS must now stop before it becomes even more a landscape of (and dominated by) turbines and thus wrecked beyond recognition.
- 2 The views of the local host community must be taken into account in each case and given appropriate weight and never again be overridden and disregarded.
- 3 The amenity of existing residents must be maintained and respected at an acceptable level. Thus no large (ie non domestic, own farm, below 15m) wind turbine should be constructed in close proximity of a residential property. A minimum separation distance of 800m (proposed in para 220) is an overdue starting point and to be welcomed but for turbines over 50m, unless it can be demonstrated in each case through independent on site testing that there would be no unacceptable impact due to noise, amplitude modulation, low frequency sound or vibration on residential amenity, the minimum distance should be 1.5km with an upwards sliding scale for turbines over 80m.
- 4 Wind farm developments, whether individually or cumulatively, should not have a negative impact upon the local economy, particularly tourism, Cumbria's largest industry and creator of employment.
- 5 When turbines become obsolete and inoperative (likely to be well before their permitted 25 years) effective and enforceable provisions and remedies must be in force to ensure farmers and developers remove all infrastructure above and below ground. A bond or sinking fund must be required as a condition of any consent and provision must be required to provide for all abandonment costs. We must not leave our grandchildren with the inevitable and entirely predictable clean-up costs.
- 6 On necessary wildlife protection, red squirrels should be included in the list. Parts of the Allerdale plain at the back of Skiddaw for example still enjoy red squirrels one of the very few pockets of this endangered species left in England.
- 7 Turbine developments should not take place in locations adversely affecting heritage assets, in particular churches but also including gardens and parkland whether or not listed nationally specific site assessments must be required in each case.

Changes : Please incorporate the suggestions of Force and Marion Fitzgerald referred to above. In addition I suggest:
 In 211 line one, insert currently after Strategy In line three after 2020.
 Insert This figure is in dispute and may change.

In 213 line four, after energy. rewrite as follows However it also has a large number of high quality landscapes and designations. These include the sensitive rural landscape adjoining and highly visible to and from the Lake District National Park and the Solway AONB. This must stop being turned any further into a landscape of and dominated by turbines. Therefore the level resource that is realistically achievable is significantly reduced to avoid further destruction of these landscapes and designations. In 214 line five, delete after technologies the words and commercial wind developments. In line nine delete exciting after presents an and after economic opportunity insert (to be demonstrated in each case)

In S19 delete sentence beginning Proposals where impacts.. In para a) i) insert after noise, vibration, amplitude impact (including all impacts causing symptoms such as sleep disorders, discomfort and mental health and physiologic problems), flicker and shadow flicker .In para b) insert after bird species and on red squirrels. Insert as additional para at the end of this box after located - The impact on tourism, a key earner and supporter of family incomes, must always be considered and the views of the host communities in each and every case must be given appropriate weight.

In para 218 line seven after bat species insert or red squirrels. In para 220 please take account of my comments on minimum setback distances in box 6 above and note that following the recent High Court judgement in the Milton Keynes it is lawful for an LPA to provide for these to preserve and protect residential safety and amenity. It is also the duty and responsibility of the LPA to do so and failure here could and may lead to liability claims and litigation. In each case there must be certainty established on an independent and evidenced based assessment beyond reasonable doubt before turbine developments near residential dwellings are allowed. This is an area where no one knows for certain what distances are safe as technology, science and medical knowledge and experience develops. (See for example the Scottish Government's requirements and the recent debates in parliament.)What is certain is that ill health in many forms is caused by turbine noise and vibration and that out of date, inadequate onshore energy industry figures cannot be relied on.

Council's Response: Comments noted. The Council has considered all responses to S19 (including those from FORCE) and have made changes to the policy to improve the clarity and its application. Policy S19 'Renewable Energy and Low Carbon Technologies' sets a positive framework for the development of renewable energy across the Plan Area reflecting both national planning policy and local evidence. It sets a robust framework to ensure that unacceptable impacts and inappropriate renewable energy developments do not take place. It is considered that the issues raised in the representation are adequately covered by the policy as developed.

Change : Partially accept.

Action: Changes have been made in relation to the FORCE representation referred.

Rep ID: 43 / 10	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: S19	

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: SUSCO believe that this policy should be linked to housing.

Full Response: SusCo would like to put forward that this commitment should be linked to the Housing Policy. It would like the Council to require all housing has solar roofing panels, and if this is not deemed viable for some reason (by the Council not developers) that a compulsory minimum percentage of housing include solar roofing panels. In addition a requirement that all housing is built to maximise energy and water efficiency.

Changes :

Council's Response: Comment noted. Policy DM12 Sustainable Construction supports energy saving/generation and ensures that housing is built to maximise water efficiency

Change : No

Action: No further action

Rep ID: 44 / 1	Company/Organisation:	Document: LP
Name: Ms Susan Ross	Policy: S19	

Support/Object: **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: Support this policy in general but have concerns about 800m set back distance

Full Response: I support this policy in general. However, I would like to comment concerning para 220. Many applications in Allerdale are for turbines of upto, and even above, 90m. This generation of turbines have such high visual impact on residents that in some cases a separation distance of 800m would not be sufficient, and should be greater, considering site specific factors of topography, orientation of views and land cover. In many parts of Allerdale the predominant tree is Ash, and if growing close to a property, might be expected to offer some form of cover, but the spread of Ash dieback disease would negate this.

Changes : Setback distance therefore should be more than 800m in those cases where residents amenity and property value could be compromised.

Council's Response: Comment noted.

Change : No

Action: No further action.

Rep ID: 45 / 1	Company/Organisation:	Document: LP
Name: Mr David Colborn	Policy: S19	

Support/Object: **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: The policy on renewable energy schemes finally provides more protection for the residents of the Borough.

Full Response: The policy on renewable energy schemes finally provides more protection for the residents of the Borough. Additionally I fully endorse the comments that have been submitted by FORCE in relation to this policy and also the suggested amendments to the policy.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 46 / 2	Company/Organisation: Natural England	Document: LP
Name: Mr Janet Baguley	Policy: S19	

Support/Object: **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: The last sentence of chapter 219 is duplicated

Full Response: The last sentence of chapter 219 is duplicated: 'Where mitigation is proposed, measures should be clearly defined and where appropriate secured by planning obligations. Where mitigation is proposed , measures should be clearly defined and where appropriate secured by planning obligations.'

Changes : Remove duplication

Council's Response: Accept this correction.

Change : Yes

Action: Remove duplication from policy.

Rep ID: 47 / 1	Company/Organisation:	Document: LP
Name: Mrs Susan Wasilewski	Policy: S19	

Support/Object: **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: Support policy in general but have concerns about 800m setback distance

Full Response: I would suggest that all bird species need consideration re. siting of wind turbines, not only protected general.

While I wholeheartedly agree with the need for a separation distance between wind turbines and dwellings as outlined in paragraph 220, I feel a blanket 800m for any wind turbine over 25m is unrealistic. The bigger the wind turbine the noisier it becomes, therefore there is a need for a greater separation distance when this circumstance arises.

Changes :

Council's Response: Comments and support is noted. Policy ensures the impacts of development on species such as birds is appropriately considered.

Change : No

Action: No further action required.

Rep ID: 48 / 1	Company/Organisation:	Document: LP
Name: Mr Eric Wasilewski	Policy: S19	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Support policy in general but have concerns about 800m setback distance

Full Response: I would suggest that all bird species need consideration re. siting of wind turbines, not only protected general.
 While I wholeheartedly agree with the need for a separation distance between wind turbines and dwellings as outlined in paragraph 220, I feel a blanket 800m for any wind turbine over 25m is unrealistic. The bigger the wind turbine the noisier it becomes, therefore there is a need for a greater separation distance when this circumstance arises.

Changes :

Council's Response: Comments and support is noted. Policy ensures the impacts of development on species such as birds is appropriately considered.
Change : No
Action: No further action required.

Rep ID: 49 / 1	Company/Organisation:	Document: LP
Name: Mr Paul Tyson	Policy: S19	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Support policy but have suggestion for clarifications to be made.

Full Response: A development plan relating to the erection of wind turbines is long overdue and greatly welcomed. The lack of a policy specific to this area has already has damaged Allerdale tremendously already and the sooner this plan is put in place the better. 4. What also has to be considered is the spate of applications in the last year many of which are opportunistic and rushed in before this policy comes in to place. I think there needs to be greater clarity in the choice of wording in relation to "unacceptably adverse" and "significant adverse". If the impact of an application has an effect then that should be enough. Variations of how adverse the effect can cause confusion. Set back distances are put in place for good reasons many of which are health related. If an agreed 800 meter separation distance is proposed this should apply to all parties, interested or otherwise. Also this separation distance should not be "expected" but should be insisted upon. I think there should be a requirement that any turbine application to be for a specific model. Too many times people in opposition to a proposed wind turbine cannot get accurate information on possible noise levels because the applicants either included indicative or generalised test results or give general data for a manufacture or range of manufacturers products. This should not be acceptable.

Changes : Needs to be greater clarity in the choice of wording relating to "unacceptably adverse" and "significantly adverse". Setback distances should be required not "expected".

Council's Response: Comments noted. Greater clarity has been provided in relation to "unacceptably adverse" and "significantly adverse". The approach to setback distance is considered to be appropriate.
Change : Partially accept
Action: Greater clarity has been provided in relation to "unacceptably adverse" and "significantly adverse".

Rep ID: 52 / 1	Company/Organisation:	Document: LP
Name: Mr David Crone	Policy: S19	

Support/Object: Object Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Object ue to proposed 800m separation distance being inadequate in terms of noise and overbearance.

Full Response: Below are extracts from our objection to the Carwath planning application, which demonstrates that the proposed 800m separation distance is woefully inadequate, both in terms of noise and overbearance. 'Noise.. it is said that there is 'no reason to suspect higher than usual levels of aerodynamic modulation' (blade swish), but 'it is true to say that the cause of such a feature in the noise is not clearly understood'. That the ETSU guidance is clearly inadequate in this respect is borne out by our own experience of the Wharrels Hill wind farm. When the wind is blowing strongly (contradicting the statement in para. 9.3.5 that 'noise is not a problem when wind speeds are high') from the SW we can sense the low frequency background noise of the turbines and hear the 'swish' of the blades (an impact which has been dismissed in the official guidance as being insignificant except when close to turbines - but we live 1.2 km away) superimposed on it, often in the daytime above the traffic noise of the busy A595. When this occurs at night, which is not infrequently, the bedroom windows have to be closed to reduce (but not eliminate) sleep disturbance. This type of noise from the Carwath turbines can reasonably be expected to be greater. A 'Barrister's Opinion', given in the case of the proposed Matlock Moor wind farm, says that 'The scale of the increases in actual noise levels, whether they have been minimised, and what they mean in terms of the actual effect on the living conditions of nearby occupiers, are relevant questions under the requirements of the EIA Regulations, as material planning conderations under s70(2) of the Town and Country Planning Act 1990. The Government's policy in PPS22 is that authorities 'should ensure that renewable energy developments have been located and designed in such a way to minimise increases in ambient niuse levels'. This planning application fails to deal adequately with the above issues. In the case of the Gorsedd Bran wind farm appeal in Wales, which was dismissed, the Inspector commented that '...I have no doubt that these turbines could operate within or at levels suggested in ETSU 97...however they are for guidance and are not absolute values. The problem is that those noise levels do not mean that the turbines cannot be heard'. Overbearance. There is a well recognised phenomenon referred to variously as overbearance, dominance, 'looming', caused by turbines being too close to dwellings. In the GorseddBran appeal referred to above, the Inspector said ' In my view they are too close when the height, size of swept area, and relative elevation of the turbines is such that they appear unacceptably overbearing when viewed from a dwelling or its immediate surroundings'. He supported overbearance as a reason for refusal of the planning application. Overbearance is not referred to in the applicant's Residential Assessment. The assessment of the visual effects uses undefined words such as Minor, Moderate, Major to describe the visual impact, and in some cases says that this will be reduced by the screening of trees and buildings. But this ignores the 'netting effect', which occurs when the whole of a turbine cannot be seen, making it appear closer than it actually is. Referring to the Gorsedd Bran Inspector's definition referred to above, some of the subjectivity surrounding the assessment of overbearance can be reduced by measuring and combining the vertical and horizontal angles subtended at the eye of the observer by the rotor blades (the 'overbearing angle', OA)We live 1.2km away from the Wharrels Hill wind farm, and find it overbearing (with an OA of 9.5 degrees). The Gorsedd Bran turbines, some 1.5 km from residences, would have had an OA of about 12 deg. At Cherwell, Dover, proposed turbines up to 800m away (OA 15 deg assuming level ground) were described as 'looming', with an adverse efect up to 1km distant (OA 12 deg). Locally, we are aware that the resident nearest to the Siddick wind farm found the nearest turbine oppressive (OA 19 deg). Three of the homes at Rosley, and the school, located between 650m and 1050m from the nearest turbine, have OAs ranging from 13 deg to 19 deg. These are described in the Residential Assessment as experiencing a mainly Minor/Moderate visual impact. By contrast, Intack Head, with an offset distance of 1.8km, is described as experiencing a Moderate-Major visual impact, but has an OA of just over 5 deg. Applying the OA of 9.5 deg which we find overbearing at Bothel to this case would give an offset distance of about 1.3km. The 800m offset distance proposed in the draft Local Plan is demonstrably woefully inadequate. We understand that the Scottish Government is considering consulting on a distance of 2.5km.'The topic paper does not deal adequately with the issue of overbearance/dominance, and we would like to suggest that the above methodology is used to reduce the amount of subjective judgement which is applied to this issue when considering planning applications and appeals. The resulting separation distances, based on overbearance, would have the added benefit of reducing 'amplified modulated' noise, from which we suffer at Bothel. We hope that our response in this format is acceptable to you; but if you would prefer us to complete an official representation form, please let us know.

Changes :

Council's Response: Comments noted. The approach to setback distance is considered to be appropriate.
Change : No
Action: No further action required.

Rep ID: 54 / 1	Company/Organisation:	Document: LP
Name: Mr Dennis Dickins	Policy: S19	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Currently there is no local policy on renewable energy schemes, especially on-shore wind turbines, therefore this document and its proposals, indicate that a positive approach is being made to ensure that a correct balance is achieved with wind turbines a

Full Response: Currently there is no local policy on renewable energy schemes, especially on-shore wind turbines, therefore this document and its proposals, indicate that a positive approach is being made to ensure that a correct balance is achieved with wind turbines and their impact on the surrounding environment.

Consideration is also being given to the impact of wind turbines on tourism, including impacts on wildlife, habitats, visual impact, historical sites, noise pollution and distance from residential housing.

This framework of proposals is long overdue, but never the less, most welcome.

Changes : However, although these measures are to be welcomed, I trust that the 800m minimum distance from housing is based on some recognised parameter that is based on national guidelines, since this could be open to challenge? Also, I am assuming that the 25m height is to blade tip?
 Certainly the impact of wind turbines on the visual environment is considerable in my area. It is also apparent that inappropriately located smaller height wind turbines can have just as detrimental effect on the visual landscape as larger constructions. I would like to see a specific reference about a visual impact assessment for small wind turbines, since if 25m to blade tip is going to be a guideline used in the local plan, it should have the proviso wind turbines less than 25m blade height can still have a detrimental impact upon the landscape if sited in a prominent location, therefore, smaller (in height) wind turbines may have to be sited so that they are screened from creating an adverse visual impact. N.B.: I have noted a single wind turbine by a farm steading (Crossrigg, G.R. NY 14923 44870) on a back road to Westnewton, off the A596, which is, in my opinion, is a well sited, small wind turbine of an ideal height so as not to cause any detrimental visual impact to the surrounding environment.
 Likewise, noise assessments, though site specific and based on ambient levels, should also be supported by guidelines used by Environmental Health. Again, I know that the residents in the houses at the edge of the village of Bothel, closest to the Wharrels Hill turbine development, suffer from intrusive noise pollution under certain weather conditions, usually at night. Therefore there should be scope for noise level measurements to take account of the envisaged '25 year life' span of wind turbines, even if this may require a 12 month continuous monitoring period in all weather conditions (if this is not already being undertaken).
 I would like to see referenced or included in the final LP, that conflicts with other industries, the most notable being tourism, should be highlighted as conflict of economic interest. Tourism as an industry, is more beneficial to the local population than wind turbines, which are in direct conflict with the landscape in most instances. As a nation, the increasing population, especially within the conurbations, are resulting in increasing numbers of people wanting to access the countryside. It is not only the honey pot areas of the Lake District and the Solway AONB that are experiencing more visitors, but the peripheral areas of countryside, which in effect includes most of rural Cumbria. The countryside is still very attractive in these areas and the views can be stunning, although increasingly marred by the visual impact of wind turbines. In our area, which is outside the National Park, there are an increased number of towed caravans, camper vehicles, motorbikes and cyclists visiting the countryside

Council's Response: Comments and support noted. Clarity has been provided in relation to blade height as suggested.

Change : No

Action: Text has been added to provide clarity '(over 25m to blade tip)'

Rep ID: 55 / 20	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S19

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This approach enables the careful consideration of the impact of proposals individually, and having regard to cumulative effects and is supported which suggestions for amendments.

Full Response: Allerdale has been subject to increasing pressure to accommodate wind energy development over recent years. Inappropriately sited development can create negative effects. It is therefore important that individual schemes are subject to careful consideration.⁷⁴ This policy highlights a range of considerations that regard should be given to during the consideration of renewable energy schemes (which includes windfarms) The approach proposed enables the careful consideration of the impact of proposals individually, and having regard to cumulative effects, and it is supported. However, within the non exhaustive list of the amenity effects that should be considered, either within the policy or in supporting paragraphs, it is suggested that recognition should be given to shadow flicker, this is recognised within the Cumbria Wind Energy SPD.⁷⁵ The County Council is currently working with partners, including Allerdale BC, in the development of a study which will consider the cumulative landscape and visual impacts of vertical infrastructure (e.g. wind turbines, pylons, telecoms, masts etc.) development upon the county. This study may assist the future consideration of such proposals.

Changes : Revise criteria a) i) to Policy S19 to state: Do not have an unacceptably adverse impact on the amenity of local residents (such as air quality/emissions, noise, odour, water pollutions, shadow flicker);

Council's Response: Comments noted and wording change accepted.

Change : Yes

Action: Wording changed as suggested.

Rep ID: 57 / 1	Company/Organisation:	Document: LP
	Name: Ms Sheila Pearson	Policy: S19

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: I wish to provide support for the Policy, especially the emphasis given to the impact of wind turbines, both singularly and cumulatively, as a significant planning issue in relation to future development.

Full Response: I wish to provide support for the Policy, especially the emphasis given to the impact of wind turbines, both singularly and cumulatively, as a significant planning issue in relation to future development.

1. No more wind turbines. Enough is enough. Never mind set back distances. Never mind health issues. No more wind turbines in Allerdale.

2. Set aside enough monies now to provide for decommissioning. Allerdale is the best place in the world to live. Over the centuries eclectic groups of people have settled here, including the Romans and the Vikings. The resulting population is the finest anywhere. They are honest, truthful, steadfast, careful and rarely cantankerous. They are also happy and loving and family orientated. Allerdale beware! There is a gross imbalance in the allocation of decisions, unfairly biased towards the Government's Green Policy. There is a danger that whole sectors of society dismiss the other sectors. In other words, you, the planners, are seen by the people of Allerdale to be dismissive of their ideas. This is just not fair to you or the people

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 60 / 7	Company/Organisation: REG Windpower	Document: LP
Name: Mr Matt Olley	Policy: S19	

Support/Object: Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Considers the policy to be consistent with national policy in part but has significant concerns with criteria

Full Response: Policy S19 is prefaced by information from the UK Renewable Energy Strategy and the findings of the The Cumbria Renewable Energy Capacity and Deployment Study (2011). The latter confirms that in Allerdale there is capacity realistically to expand capacity by a further 80MW over the plan period, with the emphasis on micro-renewable energy and commercial wind developments. The first part of draft Policy S19 is consistent with this evidence base and paragraph 98 of the Framework, in that it seeks to positively encourage renewable energy and low carbon developments where impacts area (or can be made) acceptable. This statement on its own is sound. However, the policy then goes on to include criteria which are not wholly consistent with the provisions of the Framework. This is particularly the case where noise (criterion a (i)) and heritage assets, (criterion a (iv)) are concerned. The final part of the policy which refers to landscape, visual and environmental considerations is also unsatisfactory. Noise Impacts (Criterion a(i)) With regard to noise, criterion a (i) states the Council will take a positive view where proposals do not have an unacceptably adverse impact on the amenity of local residents. The supporting text at paragraph 220 then goes on to state:

-In order to address community concerns and in the interests of residential amenity and safety, a minimum separation distance of BOOM between wind turbines (over 25m) and residential properties will be expected
 -This minimum separation distance is wholly arbitrary and without justification: there are a number of schemes elsewhere in the UK where turbines are located less than the specified 800 metres and which still enable a satisfactory residential noise environment to be retained. The National Planning Policy Framework confirms at Footnote 17 that, in assessing the likely impacts of potential wind energy developments, the decision maker should follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure (EN-3) (read in conjunction with the over-arching National Policy Statement for Energy Infrastructure (EN-1)). The relevant test for noise impact is confirmed within NPS EN-3 and the Companion Guide to Planning Policy Statement 22. These state that proposals should be accompanied by a noise assessment which comply with ETSU-R-97, taking account of the latest industry good practice. Where a wind farm is shown to comply with ETSU-R-97, the decision maker may give little or no weight to potential adverse noise impacts from the operation of turbines. Criterion a(i) and therefore Policy S19 is fundamentally unsound as it is not consistent with national policy. REG suggest that the only remedy available is deletion of the text within paragraph 220. Heritage Assets (Criterion a(iv)) Criterion a (iv) states the Council will take a positive view where proposals, 'do not have an unacceptably adverse impact on heritage assets and their settings.

-The Framework sets out tests for assessing harm to heritage assets at paragraphs 132, 133 and 134. Paragraph 132 makes it clear that the primary consideration is the impact of a proposal on the significance of a designated heritage asset. Where substantial harm or loss is caused to this significance, permission should typically be refused unless it can be demonstrated that this substantial harm or loss is necessary to achieve substantial public benefits which outweigh the harm or loss of the asset or a range of exception criteria apply. Where less than substantial harm would occur, the benefits of the proposal should be weighed in the balance against that harm. The focus in national policy is therefore clearly on consideration of harm to the significance of the asset. Whilst the setting of a heritage asset can contribute to the significance of an asset it is only one factor. Criterion (iv), and by extension, S19 is therefore unsound on the basis of its focus upon setting.

Changes : To make the policy sound, REG consider the last part of the criterion should be deleted, so it reads: I do not have unacceptably adverse impact on heritage assets.
 - Landscape, Visual and Environmental Impacts the final part of Policy S19 states:
 - Renewable energy proposals are expected to provide supporting evidence including landscape, visual and environmental assessments and to demonstrate that any negative impacts can be satisfactorily mitigated...
 - This statement contradicts the first paragraph of Policy S19 and also paragraph 98 of the Framework, which confirm renewable energy and low carbon development proposals will be approved where impacts (or can be made) acceptable. In referring to a requirement for the satisfactory mitigation of any negative impacts, it sets an unachievable bar for commercial scale wind energy proposals to pass. Such developments will always give rise to significant landscape and visual impacts that some perceive to be negative and which cannot be mitigated: such impacts go with the territory and as much is accepted in NPS EN-3. The reasons for a higher test is not justified in the policy and it will only serve to provide uncertainty for developers. The policy is therefore unsound of it being unjustified and inconsistent with national policy. The final paragraph of Policy S19 should therefore be amended to state:
 - Renewable energy proposals are expected to provide supporting evidence including landscape, visual and environmental assessments and to demonstrate that residual impacts are acceptable...

Council's Response: Policy has been amended to ensure that the policy follows the NPPF and is clear and consistent.

Change : Partially accept

Action: Amend policy accordingly.

Rep ID: 64 / 6	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S19	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggest amendments to policy

Full Response: Development on land that has a peat layer greater than 50cm deep where water is currently used or is planned to be used for drinking water supply is not acceptable. In general once a peat system has been disturbed, this tends to precipitate a chain reaction of events that leads to loss of carbon, degradation of habitat, negative impacts on raw water quality and alterations to the hydrological functions and services of the upper catchments of river systems.

Changes : We would suggest the following additional text: 'The Council will take a positive view where: a) Proposals (either in isolation or cummulative): v) do not involve land which is used for water catchment purposes in the borough and is critical to the delivery of a water supply. Renewable energy infrastructure, such as wind turbines will not be acceptable on land which is used for water catchment purposes which contains deep peat.'

Council's Response: It is considered that Policy S19 provides sufficient material to ensure than biodiversity and geodiversity appropriately considered in assessing renewable energy proposals. However, it is accepted that the Plan could provide further emphasis to the issues highlighted. Accordingly Policy S2 (bullet 9) has been amended to ensure that soils, water sources and water quality are protection.

Change : Partially accept

Action: Policy S2 (bullet 9) has been amended.

Rep ID: 65 / 1	Company/Organisation:	Document: LP
Name: Ms Karen Dawson	Policy: S19	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Yes Justified: Consistent:

Summary: Considers the 800m setback distance is not effective

Full Response: The 800m separation distance between wind turbines and residential properties quoted in policy ref S19/220 is inadequate to protect residential amenity. Medium/Large turbines would have an overwhelming and oppressive visual impact on the surrounding area. Their continual presence, and unremitting movement whenever the wind was blowing, would have the potential to make life in some nearby properties intolerable.

Noise & health There is increasing worldwide evidence that low frequency noise from such large wind turbines can seriously affect people's health at distances up to several km. Symptoms include sleep deprivation, stress, heart disease, hypertension, depression, and anxiety. Groups reported to be particularly at risk include children and noise-sensitive individuals of any age.

Changes : The "800m separation distance between wind turbines and residential properties quoted is inadequate to protect residential amenity and we would suggest this is increased to 1500 or preferably 2000m for any medium to large turbines.

Council's Response: Comments noted. The approach to setback distance is considered to be appropriate.

Change : No

Action: No Further action required.

Rep ID: 37 / 63	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S20	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. NSIP will have an impact on the historic environment, which needs to be included within this policy as a separate criterion. This policy would benefit from including a specific reference to the historic environment.

Changes : Additional criteria should read:
 To minimise the harm to historic assets and to ensure that their significance is conserve and enhanced.

Council's Response: This additional criteria would not be appropriate in Policy S20. Nationally Significant Infrastructure Projects are submitted to the Planning Inspectorate Major Infrastructure Unit and determined by the Secretary of State.

Change : No

Action: No action required.

Rep ID: 55 / 21	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S20	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Whilst the thrust of this policy is considered broadly appropriate; amendments to address somewhat minor inaccuracies within the supporting paragraphs would enhance this element of the Plan.

Full Response: West Cumbria is anticipated to become a location for more nationally significant infrastructure and the County Council is fully engaged in processes around the development of such proposals. Allerdale has proposed a policy that sets out many considerations relevant to this process such as: the need for community consultation, the importance of maximising socio-economic benefit associated with a development and the potential for the Borough Council to undertake an impact report in this respect. Supporting text also highlights the value of working with partners. 78. While the thrust of the policy is considered broadly appropriate; amendments to address somewhat minor inaccuracies within the supporting paragraphs, would enhance this element of the Local Plan. 79. Policy would benefit from making explicit reference to the fact that Allerdale Borough Council would provide feedback to the consideration of NSIP schemes. 80. It is suggested that there needs to be recognition that consideration of the impacts of a developments construction and decommissioning and not just its operation will need to be undertaken when considering schemes. 81. It is noted how Criteria d) to the policy refers to the construction phase, but the principles of sustainable transport would also be applicable to the operation and potentially decommissioning phases of the project. 82. It is noted how Paragraph 226 states that 'the local plan does not have policy status for NSIP decision making by the Secretary of State'. This is not strictly true. The advice in the overarching NPS states that 'other matters which the IPC (now PINS) may consider important and relevant to its decision making may include development plan documents or other documents in the LDF. In the event of a conflict the NPS prevails.' Paragraph 226 also seems to contradict the positive statement made in paragraph 229.

Changes : In regard to Policy S20 it is suggested that a further objective in the policy along the following lines:

That the Council comments on the emerging proposals to minimise adverse impacts and maximise the benefits of the project.

In criteria b), amend the end of the first sentence to read, '.... of the construction, operation or decommissioning of the proposed development'.

In criteria d), add the word 'of' after 'maximisation' and after workers add 'during construction, operation and decommissioning'.

Council's Response: Support noted. Accept changes to wording.

Change : Yes

Action: Amend wording as suggested.

Rep ID: 62 / 1	Company/Organisation: National Grid	Document: LP
Name:	Policy: S20	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Support the approach taken in this policy

Full Response: National Grid has identified the following policy that will have an influence over the implementation of the above proposals: Policy S20: Nationally Significant Infrastructure. National Grid advocates the approach taken in this policy to engaging with the decision making process. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf: 1) National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy. 2) A sense of place - design guidelines for development near high voltage overhead lines.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 205 / 8	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: S20	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We note the inclusion of a policy relating to Nationally Significant Infrastructure Projects (NSIPs). The clauses within the policy seem logical, however it should be recognised that where the NSIP relates to a new nuclear power station at Moorside most of the impacts, requirements and associated/ancillary developments will take place in Copeland.

Full Response: We note the inclusion of a policy relating to Nationally Significant Infrastructure Projects (NSIPs). The clauses within the policy seem logical, however it should be recognised that where the NSIP relates to a new nuclear power station at Moorside most of the impacts, requirements and associated/ancillary developments will take place in Copeland.

Changes :

Council's Response: The Council recognises that Copeland will be the host authority for the new nuclear power station at Moorside and therefore will be subject to the majority of development impacts. Allerdale will continue to work in partnership with Copeland as appropriate.

Change : No

Action: No action required.

Rep ID: 16 / 8	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M	Good	Policy: S21

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: No Consistent:

Summary: This policy is unsound as it is unjustified. The Council's own evidence on viability indicates viability issues across the district under current market conditions.

Full Response: The Council will be aware that paragraph 174 of the NPPF requires the cumulative impact of obligations and standards upon development viability to be considered during plan making. The Council's own viability study indicates issues with viability across the district with some low value market areas being unviable. It is noted the Council intend to produce an SPD on developer contributions to set out the formulae and charges applied to development. Such charge setting must take account of the viability evidence as well as the cumulative impact of policies.

Changes :

Council's Response: Noted. The Plan has been developed to take account of viability.

Change : No

Action: No action required.

Rep ID: 33 / 7	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N	Winter	Policy: S21

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: S21 Physical Infrastructure. Public transport should be a main heading rather than a bracketed after thought under transport improvements. This suggests a very low priority which is not consistent with other statements.

Full Response: S21 Physical Infrastructure. Public transport should be a main heading rather than a bracketed after thought under transport improvements. This suggests a very low priority which is not consistent with other statements.

Changes : Adopt these points, suitably worded to ensure effective delivery

Council's Response: The suggested infrastructure, facilities and services list in this policy is not exhaustive or ranked by priority. It is simply to illustrate the types of contribution developers may be expected to offer.

Change : No

Action: No action required.

Rep ID: 37 / 64	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S21	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We fully endorse the inclusion of heritage assets on the list of infrastructure that can be considered for developer contributions.

Changes :

Council's Response: Noted

Change : N/A

Action: No action required.

Rep ID: 43 / 11	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: S21	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO feel that the second paragraph in this box is insufficiently solid and binding in crucial areas. It only refers to initial running costs of services and facilities. There must be an ongoing plan for adoption, maintenance and ongoing running costs.

Full Response: It is felt the second paragraph in this box is insufficiently solid and binding in crucial areas. It only refers to initial running costs of services and facilities. There must be an ongoing plan for adoption, maintenance and ongoing running costs. As elsewhere the Council ignores the ongoing issues of aspects of various forms of development in the Local Plan this makes it unsound. Without a confirmed commitment to the future, the future can be ignored by those requesting to be involved in developments as it becomes 'not my problem' The Council needs to ensure it does not pick up costs in the future, by including binding on going commitments, particularly when it's income is being reduced over the years.

Changes :

Council's Response: Accept comment.

Change : Yes

Action: Amend this policy to include ongoing maintenance costs as well as initial running costs.

Rep ID: 55 / 22	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S21

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The County Council welcome opportunities to engage in the development of these planning tools should they progress such as providing some of the evidence required to underpin the Infrastructure Delivery Plan.

Full Response: Planning obligations (these are generally financial contributions to provide off site services or infrastructure required to mitigate the negative effects of development) have an important role in ensuring the suitability and sustainability of new development.⁸⁵ The County Council is presently progressing an important policy around planning obligations and it is welcomed that the proposed Local Plan contains a policy that recognises the potential to seek planning obligations for infrastructure that the County Council has responsibility for. ⁸⁶ Policy also recognises the potential to introduce a Community Infrastructure Levy and makes a commitment to prepare a Supplementary Planning Document on Planning Obligations. The County Council will welcome opportunities to engage in the development of these planning tools should they progress such as providing some of the evidence required to underpin the Infrastructure Delivery Plan.

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 56 / 1	Company/Organisation: Ramblers	Document: LP
	Name: Mrs Pauline Goodridge	Policy: S21

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Support development contributions for extensions to pedestrian (and cycle) routes and the pedestrian network

Full Response: Support development contributions for extensions to pedestrian (and cycle) routes and the pedestrian network

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 58 / 14	Company/Organisation: Story Homes	Document: LP
Name:		Policy: S21

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: The approach to producing an SPD and developer contributions is not acceptable and does not accord with the NPPF. Consideration of developer contribution issues are fundamental to demonstrating the overall viability and deliverability of the plan and, as such, must be set within the DPD and open to scrutiny.

Full Response: The approach to producing an SPD and developer contributions is not acceptable and does not accord with the NPPF. Consideration of developer contribution issues are fundamental to demonstrating the overall viability and deliverability of the plan and, as such, must be set within the DPD and open to scrutiny. In regard to the emerging Local Plan, the establishment of developer contribution requirements to deliver infrastructure is fundamental to assessing viability and delivery of the plan with the Council's own Viability Study indicating issues with viability across the District. This policy is therefore unsound as it is unjustified

Changes :

Council's Response: Noted. The SPD will be produced accordingly with the NPPF and with an appropriate level of consultation.

Change : No

Action: No action required.

Rep ID: 205 / 9	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban		Policy: S21

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The approach towards developer contributions and the Community Infrastructure Levy (CIL) outlined in Policy S21 mirrors that of the Copeland Core Strategy. This is welcomed because it is important that such matters are considered strategically at a larger

Full Response: The approach towards developer contributions and the Community Infrastructure Levy (CIL) outlined in Policy S21 mirrors that of the Copeland Core Strategy. This is welcomed because it is important that such matters are considered strategically at a larger than district level. Close working by the two authorities when considering any CIL charging and/or production of a Supplementary Planning Document would probably be beneficial when taking this matter forward.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 7 / 9	Company/Organisation: Network Rail	Document: LP
Name: Ms D Clark	Policy: S22	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Believe that this policy should contain reference to potential impacts of new development upon railway safety, efficiency and the implications of development near level crossings

Full Response: S22 Transport Principles states that all new development should, (b) Ensure they can be accessed safely and that they do not compromise the safety of any transport route, including railway lines. The Local Plan also states that, e) Make provision for pedestrians and cyclists to be given the highest priority within town centres and new developments, also, g) Protect and, where appropriate, enhance all designated public rights of way.

Allerdale Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.

The Local Plan both seeks to protect the railway whilst at the same time making provision for pedestrians and cyclists within new developments as well as protecting public rights of way. These policies may indeed clash where a level crossing is concerned, and where a development might lead to a material increase in the type or volume of traffic, especially if the level crossing itself is a public right of way or a bridle path. The Local Plan also states that it will, Support improvements to the West Cumbria Coastal Railway service. Improvements to train services, including increased frequency of services, reduced timescale of journey, may be impacted by developments that impact upon a level crossing leading to, for example, increased barrier down time and blocking back across a crossing effectively cancelling out improvements to services

In the first instance Network Rail would seek closure of a level crossing, and replacement with a suitable footbridge/road bridge or diversionary route, where closure is not possible improvements would be required to facilitate the safety and continued performance of the railway line. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by third party commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway infrastructure improvements including those to level crossings. A sum of £1500-£2000 per dwelling (in the case of a residential development) would be requested by Network Rail to facilitate mitigation measures on level crossings. Where several proposals may provide a cumulative impact upon a level crossing the council would be requested by Network Rail to receive a sum of £1500-£2000 per dwelling for each development which could then be pooled to fund level crossing mitigation measures. The sum set down by Network Rail is in line with respective sums obtained for works to mitigate highways issues as a result of a development or developments.

Network Rail would request that the Allerdale Council Local Plan Part 1 in going forwards includes a specific policy on level crossings.

- (1) Proposals affecting level crossings will require consultation with Network Rail and approval of plans;
- (2) Developers via S106 or CIL contributions provide funding for any enhancements and mitigation measures required by Network Rail to ensure the safety, operation, performance and integrity of the railway are not impacted by developments.
- (3) Developments impacting level crossings will not proceed until full consultation and approval is obtained from Network Rail.
- (4) Network Rail requests that we are consulted at the pre-application stage by developers and councils to determine the impact upon our level crossings of proposals and that agreement is reached as to mitigation measures, including S106 / CIL funding, prior to planning permission being sort.
- (5) Proposals should be accompanied by a Transport Assessment or Traffic Impact Assessment that includes taking specific note of level crossings in the Allerdale Council area, in consultation the Network Rail Level Crossings Team for input into the compilation of the Transport or Traffic Assessment prior to submission as part of the planning application.

Changes : Network Rail would request that the Allerdale Council Local Plan Part 1 in going forwards includes a specific policy on level crossings.

- (1) Proposals affecting level crossings will require consultation with Network Rail and approval of plans;
- (2) Developers via S106 or CIL contributions provide funding for any enhancements and mitigation; measures required by Network Rail to ensure the safety, operation, performance and integrity of the railway are not impacted by developments.
- (3) Developments impacting level crossings will not proceed until full consultation and approval is obtained from Network Rail.
- (4) Network Rail requests that we are consulted at the pre-application stage by developers and councils to determine the impact upon our level crossings of proposals and that agreement is reached as to mitigation measures, including S106 / CIL funding, prior to planning permission being sort.
- (5) Proposals should be accompanied by a Transport Assessment or Traffic Impact Assessment that includes taking specific note of level crossings in the Allerdale Council area, in consultation the Network Rail Level Crossings Team for input into the compilation of the Transport or Traffic Assessment prior to submission as part of the planning application.

Council's Response: Policy S22 Criteria b has been revised to include policy in relation to the issues highlighted. This will ensure that safety of level crossing is considered through the Development Management process and Site Allocations Process (Allerdale Local Plan (Part2)). It is not considered appropriate to have a specific policy in the local plan at a strategic level.

Change : Partially accept

Action: Policy S22 has been revised to address the concerns raised in the representation.

Rep ID: 38 / 18	Company/Organisation: Crosscanonby Parish Council	Document: LP
	Name: Mrs C Freeland	Policy: S22

Support/Object: Object **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: States that improved bus services are required to support sustainable communities.

Full Response: Page 101 - Sustainable Communities Infrastructure. This requires not only bus and rail integration but improved bus services from villages, including evenings, to allow villagers the use of Maryport as a Key Service Centre.

Changes :

Council's Response: Comments noted.

Change : No

Action: No action required.

Rep ID: 43 / 12	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
	Name: Mr M Porter	Policy: S22

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: SUSCO believe that transport policy requires clarification and further emphasis.

Full Response: Please see end document for details in relation to links between the proposed plan and other policy documentation. Although the document was written in particular reference to the proposed Strawberry How development in Cockermouth, the concerns can be applied across the board. In reference to specific points in the Local Plan:- Under Transport Principles Point C the reference to 'reliable time' is inappropriate. I could reliably take an hour to travel from Cockermouth to Keswick, every time I went, but this would not be deemed acceptable given it is a trunk road and I could cycle it in less than an hour! This section needs to relate to acceptable time limits and for those to be defined in some format e.g. average mph for varying areas (e.g. central urban outer urban rural etc.) and types of road. It was felt points E and G were critical to the consideration of transport issues, as is in 236 the issue of the principle of reducing the adverse impacts of travel, given the Borough has many small towns and rural settlements where potential traffic increases could be very damaging to those communities. We also support the principle of 237 of encouraging people who have cars to use them less often. Our concern though, arises from the Local Plan's lack of any viability study in relation to public transport being provided to assist with this and the previously stated aims of the plan to get people to use more public transport. If for some reason public transport providers do not deem to financially viable to increase provision, then this undermines the plan. The Council needs to ensure that any future developments include such and have evidence and commitments that public transport is a viable option for developments of any kind.

Changes :

Council's Response: Comments noted.

Change : No

Action: No action required.

Rep ID: 55 / 23	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S22	

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:		Justified:	Consistent:

Summary: Overall it is considered that the Allerdale Local Plan (Part 1) has been satisfactorily amended to reflect the Highway and Transportation concerns raised during previous consultation with respect to the Local Plan. Nevertheless, to enhance this aspect of

Full Response: Overall it is considered that the Allerdale Local Plan (Part 1) has been satisfactorily amended to reflect the Highway and Transportation concerns raised during previous consultation with respect to the Local Plan. Nevertheless, to enhance this aspect of the policy a number of further changes are suggested. These are discussed below: Policy S22 point e) it is recommended that the importance of providing adequate linkages for pedestrians, cyclists and public transport should be further emphasised within the policy. Policy S22 point f) in addition to the National Guidance, the local Highway Authority has and will be issuing its own guidance on Transport Assessments and Travel Plans relevant to Cumbria and applicable to any development which could impact on the local highway network. Policy S22 Point g) in addition to protecting and enhancing existing PRoW, opportunities for the creation of new PRoW routes should also be included. Paragraph 237 The emphasis should be on the promotion of alternative modes of travel and encouraging communities to be pro-active in developing alternative transport solutions. There is a range of ways that people can travel in addition to scheduled buses, trains, walking and cycling. Scheduled bus services in the main are provided commercially without direct support from CCC. CCC also supports a range of other passenger transport options, including Rural Wheels, Village and Community Wheels, voluntary car schemes and community bus schemes. Most of these schemes will rely on volunteers from the community. In receiving financial contributions from new developments, these can provide assistance to procure scheduled bus services, but other transport schemes rely on volunteer involvement. Paragraph 242 significant emphasis is given to the detrimental impact associated with providing too many car parking spaces. However no mention is given to the issues created when there are too few, such as road safety issues as a result of indiscriminate parking, detrimental impact of streetscape, loss of green/garden spaces, etc. It is therefore recommended that recognition of the negative affects of too few spaces be recognised within the text supporting this policy.

Changes : To enhance the policy, the following recommendations are proposed: Within Policy S22 criteria e) it is recommended that the policy be amended to state the following: Make provision for pedestrians and cyclists to be given the highest priority within town centres and new developments as well as ensuring adequate links for pedestrians and cyclists between new developments, town centres and public transport nodes and interchanges where appropriate.

Within Policy S22 criteria f), it is recommended that the policy be amended to state the following: Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national and local guidance.

Within Policy S22 criteria g), it is recommended that the policy be amended to state the following: Protect and, where appropriate, enhance all designated public rights of way or create new public rights of way routes. 89. Within Paragraph. 237 it is suggested that the 2nd sentence be reworded as follows: Opportunities for sustainable transport choices are more limited in rural areas and it is important to promote sustainable travel options and encourage community-led ownership of transport schemes where existing public transport is limited or unavailable, in order to facilitate modal shift, moving people and journeys from private cars onto public transport. Travel Plans produced for new developments will be a key tool in achieving this. 90. Paragraph 242 It is therefore suggested that the following sentence be inserted before the last: However, providing too few parking spaces can result in indiscriminate parking occurring to the detriment of road safety and have a negative impact of the overall streetscape including the loss of gardens and other green spaces.

Council's Response: Accept changes to policy wording as suggested.

Change : Yes

Action: Amend policy wording as suggested.

Rep ID: 58 / 15	Company/Organisation: Story Homes	Document: LP
Name:		Policy: S22

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It is consider this policy contains terms which are ambiguous and require clarification.

Full Response: The policy refers to new development being located in areas which help reduce journey times. It is considered the reference to 'reduce' is unclear against what you would be comparing to ascertain it is a reduction. It is considered that this should be amended to refer to new development being located in areas which do not have significant/adverse impacts on journey times. This would align it with the wording in the National Planning Policy Framework. Criterion C uses the wording 'reliable time'. This is considered to be ambiguous and makes no qualification as to what would be considered reliable. This needs to be qualified in the policy. In regard to evidence base documentation relating to highway matters, I append to this letter a letter from I-Transport who raise specific comments in relation to the Cockermouth LDF Transport Study Modelling Results (January 2012). These comments need to be considered in relation to that Modelling Study and any reliance upon it in regard to supporting the Pre-Submission Plan.

Changes :

Council's Response: Comments are noted. A key objective of spatial planning is to ensure that jobs, housing, shopping, leisure facilities and services are accessible by sustainable transport methods. Reducing journey times and lengths is key to achieving this aim. The wording of the policy has been developed in partnership with community and stakeholder and the therefore Council consider the word to be appropriate.

Change : No

Action: No action required.

Rep ID: 7 / 8	Company/Organisation: Network Rail	Document: LP
Name: Ms D Clark	Policy: S23	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary:	Believe that this policy should contain reference to potential impacts of new development upon railway safety, efficiency and the implications of development near level crossings
Full Response:	<p>The Local Plan states as follows:S23 Supporting and Safeguarding Strategic Infrastructure d) Seek improvements to the West Cumbrian Coastal Railway service and encourage greater movement of freight via railway;In response to the above sections we have the following comments.</p> <p>(1) Level Crossings owned and operated by Network Rail within the Allerdale Council Area</p> <p>Included as attachments to this response is a location map of the level crossings within the Allerdale Council area, as well as a spreadsheet containing a list of the level crossings and their locations (for convenience and accuracy this is under eastings and northings).</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <p>By a proposal being directly next to a level crossing</p> <p>By the cumulative effect of developments added over time;</p> <p>By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route</p> <p>By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway</p> <p>By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads</p> <p>By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</p> <p>By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing</p> <p>By any development that alters a primarily agricultural use level crossing to residential usage (e.g. from use by a farmer to proposed use by a residential development.</p> <p>As a result of increased patronage over crossings, Network Rail could be forced to implement measures such as linespeed reductions, crossing upgrades and occasionally diversion. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings.</p>
Changes :	<p>Network Rail would request that the Allerdale Council Local Plan Part 1 in going forwards includes a specific policy on level crossings.</p> <p>(1) Proposals affecting level crossings will require consultation with Network Rail and approval of plans</p> <p>(2) Developers via S106 or CIL contributions provide funding for any enhancements and mitigation measures required by Network Rail to ensure the safety, operation, performance and integrity of the railway are not impacted by developments.</p> <p>(3) Developments impacting level crossings will not proceed until full consultation and approval is obtained from Network Rail.</p> <p>(4) Network Rail requests that we are consulted at the pre-application stage by developers and councils to determine the impact upon our level crossings of proposals and that agreement is reached as to mitigation measures, including S106 / CIL funding, prior to planning permission being sort.</p> <p>(5) Proposals should be accompanied by a Transport Assessment or Traffic Impact Assessment that includes taking specific note of level crossings in the Allerdale Council area, in consultation the Network Rail Level Crossings Team for input into the compilation of the Transport or Traffic Assessment prior to submission as part of the planning application.</p>
Council's Response:	Policy S22 Criteria b has been revised to include policy in relation to the issues highlighted. This will ensure that safety of level crossing is considered through the Development Management process and Site Allocations Process (Allerdale Local Plan (Part2)). It is not considered appropriate to have a specific policy in the local plan at a strategic level.
Change :	Partially accept
Action:	Policy S22 has been revised to address the concerns raised in the representation.

Rep ID: 19 / 8	Company/Organisation: Associated British Ports - Port of	Document: LP
	Name:	Policy: S23

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: ABP supports this policy and considers that it represents sound infrastructure planning and is therefore an effective policy.

Full Response: Policy S23 seeks to safeguard strategic infrastructure in Allerdale and support its development and improvement. It identifies the Port of Silloth as Strategic Infrastructure and aims to protect and enhance the Port. ABP supports this policy and considers that it represents sound infrastructure planning and is therefore an effective policy. As identified above, the Port of Silloth is a vital piece of infrastructure in Allerdale and the wider area. In particular, it is an importance piece of infrastructure for a number of businesses and industries in the area, including Carr's Flour Mill, Prime Molasses and the agricultural industry; all who depend on the Port for import and export of goods. The protection of the Port and support for its continued operation and growth would therefore ensure that this vital resource is protected for these businesses and industries, allowing them to grow and flourish.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 24	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S23	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy sets out a framework to support and safeguard the strategic infrastructure for the Borough. Nevertheless, the policy would benefit in specifying the individual areas of infrastructure, and clearly state that, together with economic development they will contribute to the creation of sustainable communities.

Full Response: The County Council has endeavoured to provide the most up to information around Council managed services and infrastructure relevant to the plan. 92. It is considered that this policy sets out a framework to support and safeguard the strategic infrastructure for the Borough. Nevertheless, the policy would benefit in specifying the individual areas of infrastructure, and clearly state that, together with economic development they will contribute to the creation of sustainable communities. 93. Apart from this policy, it is considered that the evidence around education contained in the supporting Strategy for Infrastructure would benefit from being updated, as it does not reflect the most up to date position further information has been provided to the Borough Council with respect to this. 94. There is also a requirement to update Table 7 within the Strategy for Infrastructure to recognise the need for additional schools places and the importance of developer contributions in delivering these as per the information provided by the County Council to assist with the preparation of this evidence. We do note that the need for additional school places is identified elsewhere within the Strategy. 95. Recognition should be given to the potential of developer contributions in assisting with the delivery of specialist housing accommodation given the reducing availability of Government money to fund such accommodation. 96. With respect to highways paragraph 3.3 of the Strategy for Infrastructure does not paint an accurate picture as assessment of the highway network did not give consideration to the capacity of junctions as suggested within the text. 97. With respect to Paragraph 3.5 of the Strategy for Infrastructure it should be noted that while figure 3.3 illustrates the distribution of bus routes and stops, there is a wide variation in service frequencies which will need detailed consideration. 98. When Allerdale Borough Council identifies its preferred development sites at the subsequent site allocation stage of the Local Plan (Part 2), a more in depth understanding of the main infrastructure issues and requirements will be needed moving forward. Cumbria County Council will continue to assist Allerdale Borough Council in the preparation of this important area of work.

Changes : In criteria g) of policy S23, after improvement it is suggested that Allerdale Borough Council add (transport, health, education and utilities) and after economic growth add and sustainable communities
 100. Paragraph 3.3 of the Strategy for Infrastructure should be revised to state: According to the assessment none of the highway links in Allerdale have experienced stress above 0.90 (or 90% capacity). While this suggests that there is sufficient capacity in the highway network, it should be noted consideration was not given to the capacity of junctions and non highway routes. Therefore the assessment is unlikely to highlight localised highway issues that may exist.
 101. Paragraph 5.14 of the Strategy for Infrastructure should be revised to state: There are no critical shortages in elderly care provision, although the transition from residential care to more extra care housing will result in short term capacity issues. It is anticipated that some extra care housing schemes on appropriate sites may be delivered supported directly by CCC themselves with potentially funded potential funding through a range of means including capital budget, developer contributions, government funding, any contributions the Borough Council may seek to provide and the remained remainder by private developers .
 102. Table 7 of the Strategy for Infrastructure should be revised to include Primary and Secondary Education. 103. Table 7 of the Strategy for Infrastructure should be revised to include Elderly Needs Housing. 104. The information in tables 3-9, 3-10, 3-13 and 3-14 does not reflect the latest information. It is recommended that this should be suitably updated. 105. Table 3-20 Provision of Elderly Care figs and Table 3-21 Capacity level of Elderly Care Establishments reflect 2010 data and also include non elderly care establishments this data would benefit from an update from Cumbria County Council. Also, if information detailed in paragraphs 3.41, 3.42 and 3.43 is similarly based on 2010 data then these areas would benefit from further updated information from Cumbria County Council.

Council's Response: Comments noted and changes accepted as requested.

Change : Yes

Action: Changes made as suggested.

Rep ID: 64 / 7	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S23	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggest amendments to policy

Full Response: We welcome the existing level of support for the development of strategic infrastructure which is much needed to support the Council's growth aspirations; however we suggest the following additional wording which will reflect the strategic importance of the water supply proposals and assist in the delivery of necessary works.

Changes : We suggest the following additional wording which will reflect the strategic importance of the water supply proposals and assist in the delivery of necessary works: 'The Council will: i) Support proposals to secure future drinking water supplies for West Cumbria. Justification: To support the anticipated works that will be necessary to safeguard and deliver a reliable water supply to accommodate both existing and potential new customers as part of the Council's housing growth plans.'

Council's Response: Accept suggestion for additional wording.

Change : Yes

Action: Amend policy to include suggested word additions.

Rep ID: 2 / 3	Company/Organisation: Friends of the Lake District	Document: LP
Name: Dr K Wilshaw	Policy: S24	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Friends of the Lake District supports Policy S24 on Green Infrastructure as it seeks to promote the resilience of ecosystem services in the district which will create a more sustainable environment.

Full Response: Friends of the Lake District supports the proposed policy on Green Infrastructure as it seeks to promote the resilience of ecosystem services in the district which will create a more sustainable environment.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 25	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S24	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The National Planning Policy framework acknowledges the importance of Green Infrastructure during the development of sustainable communities. Policy S24 details the approach to the delivery of Green Infrastructure and is considered to be robust.

Full Response: The National Planning Policy framework acknowledges the importance of Green Infrastructure during the development of sustainable communities. Policy S24 details the approach to the delivery of Green Infrastructure and is considered to be robust.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 56 / 2	Company/Organisation: Ramblers	Document: LP
Name: Mrs Pauline Goodridge	Policy: S24	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Helps pedestrian links between settlements

Full Response: Helps pedestrian links between settlements

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 64 / 8	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S24	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggest amendments to policy

Full Response: United Utilities supports the principles within this policy, however seeks additional text within the following bullet point: Promote improvements in air, water and soil quality and more sustainable drainage and flood mitigation solutions. The use of SuDS will be required as part of new housing developments unless the applicant can demonstrate that they are not practicable. Applicants must demonstrate how surface water run-off will be addressed without having any detrimental impact on existing sewer infrastructure. Justification: SuDS can not only reduce the risk of surface water flooding, but also contribute to water quality improvements and biodiversity enhancements.

Changes : Seek additional text within the following bullet point: Promote improvements in air, water and soil quality and more sustainable drainage and flood mitigation solutions. The use of SuDS will be required as part of new housing developments unless the applicant can demonstrate that they are not practicable. Applicants must demonstrate how surface water run-off will be addressed without having any detrimental impact on existing sewer infrastructure. Justification: SuDS can not only reduce the risk of surface water flooding, but also contribute to water quality improvements and biodiversity enhancements.

Council's Response: It is the Council's intention is that this policy summarises the key ways in which Green Infrastructure can provide benefit and contribute to sustainable communities. The Council sets out the detailed requirements for SuDS in policy S24 (Green Infrastructure).

Change : No

Action: No action required.

Rep ID: 16 / 9	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S25	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: No Consistent:

Summary: This policy is unsound as it is unjustified. The Council's own evidence on viability indicates viability issues across the district under current market conditions.

Full Response: The Council will be aware that paragraph 174 of the NPPF requires the cumulative impact of obligations and standards upon development viability to be considered during plan making. As discussed previously against Policies S8 and S21 the Council's own viability assessment indicates substantial viability issues across the district. The impact of the affordable housing requirement alone will render much development unviable. The cumulative impact of this policy in combination with others could seriously jeopardise delivery of the housing need within Allerdale. The Council will also be aware that such a policy requiring contributions towards open space is contrary to CIL which is meant to be the only tool for collecting cumulative impact on types of infrastructure. It is also worth re-iterating reliance on site-specific (or open-book) assessments of viability as the default remedy for unsustainable policies and undeliverable plans is no longer an acceptable approach. It is incumbent on the Council to demonstrate that its policies are achievable and that they do not jeopardise viability in the first five years. It is not the responsibility of the applicant to demonstrate that a policy cannot be achieved. Plan policies should be achievable in the majority of cases, with open-book assessments reserved for a minority of special cases.

Changes : It is recommended that the policy be re-written taking account of the Council's own viability study. If the Council wishes to provide for open space sports and recreation space then the CIL provides the most appropriate mechanism for raising the funds for doing so. Requiring that all major developments make a contribution could be contrary to the CIL Regulations.

Council's Response: Noted. The Plan has been developed to take account of viability. Open space is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S25 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

The Council is confident that policies are achievable and that they do not jeopardise viability across the Plan Period and especially in the first five years. Planning obligations (including S106) remain an appropriate mechanism to deliver open space. Policy states that It is the Council's intention to introduce a Community Infrastructure Levy (CIL) where it is satisfied that it can be done without compromising development viability.

Change : No

Action: No action required.

Rep ID: 30 / 1	Company/Organisation:	Document: LP
Name: Mr C Lasper	Policy: S25	

Support/Object: Object Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Objects to the policy as it does not specifically outline special protections already in place on specific areas of public open space, specifically The Green at Limetree Crescent and the War Memorial Gardens

Full Response: For the immediacy of your reference I enclose a photocopy of your letter to me of 20th December 2011. The above might be part of the consultation to which your third paragraph refers BUT:
 Amongst the few maps included in the above there is none referable to the Green (i.e. at Limetree Crescent); in the text of the above I have found nothing other than the S25 Policy that appears to have any reference to the Green. However, 'open space' is undefined and the S25 Policy would be inconsistent with the Green's status as a registered green (VG 138 of 1st October 2009 and see Regulation 4(1) of 2007/456; about ¾ of an acre); the exclusive public right to indulge there in 'lawful sports and pastimes' (ie, of any and all kinds as members of the public see fit) puts the Green outside the planning control principles contemplated by S25 (Development proposal that will result ..., outweigh the loss)
 In any case, the public statement of this area's planning principles ought to make it plain to any and all that any development of the Green is not solely, hardly even primarily, a matter for the planning authority. Consequently, I object to the above Plan. Your Council's Guidance Note is largely unintelligible: for instance, I have no view (an shall not occupy my time framing any) either on 'legal compliance' or on 'consistency with national policy'. My case is that the above Plan's apparent treatment of the Green as an 'open space' within S25 (a) conflicts with the public right (above) established under section 10 of the Commons Registration Act 1965, and (b) is inexpedient in failing to give the public notice of the Green's special legal status (as above). The Plan ought to refer, specifically, to the Green and to record its registered green status and the public right to indulge there in any and all lawful sports and pastimes.
 As an entirely separate matter, I refer you to the War Memorial Gardens (in Cockermouth), i.e. open space that lies on the north bank of the Derwent and to the west of the footpath that runs north from the Harris Bridge. The Garden's freehold is held by Cockermouth Town Council under section 10 of the Open Spaces Act 1906 I am sure that Mrs Brown will be willing to confirm this to you as she did in her letter to me of 29th June 2012 and, consequently, upon exclusive, trust for the public (i.e for their enjoyment as an open space within the meaning of that Act). S25 is inconsistent with that trust and I object to the above Plan accordingly. The Plan ought to refer, specifically, to the War Memorial Gardens and to record the trust for public enjoyment under section 10.

Changes : Considers that specific protections already in place should be explicitly reference within the Plan

Council's Response: It is considered this response relates mainly to a specific site and not the soundness of the policy or Plan. Legal protections in already in place to protect specific areas of land will not be affected by the policies within this Plan. This policy sets out the Council's strategic approach to the provision and improvement of public open space and does not deal specifically with individual sites which will be identified through the evidence base. The Allerdale Local Plan (Part 2): Site Allocations process will further identify and protect areas of public open space of value.

Change : No

Action: No action required.

Rep ID: 37 / 65	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S25	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. This policy makes specific reference to designated parks and gardens. Any aspects such as these needs to have a proper assessment and be identified in the spatial descriptions and area portraits. This will be in accordance with the NPPF. However, it is a little generic and there has been no assessment of any within the district and area descriptions earlier on in the Plan. The policy would benefit from referencing designated parks and gardens as part of the green infrastructure. However, anything specific should be addressed through the historic environment policy.

Changes : The Plan should be expanded to include a description of historic parks and gardens and an assessment be made of their character and the contribution it makes to the area.

Council's Response: Comments noted, however, the Local Plan evidence base is considered to be the best location for this detail.

Change : No

Action: No action required.

Rep ID: 43 / 13	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: S25	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO support the commitment to protect the provision of informal sport and recreation facilities and open spaces, but are concerned about the loss of locally important sites to development.

Full Response: We support the commitment to protect the provision of informal sport and recreation facilities and open spaces. We feel these are the most vulnerable areas in terms of developers wanting to build of land that is important to the community, yet may appear as insignificant to themselves, or to others who live in the particular area. This is of particular concern with open land on the outer edges of settlements, where it is easy to see current boundaries creeping outwards bit by bit each seeming small but creating a big overall impact over time.

Changes :

Council's Response: This policy adopts an evidenced base approach in which the Open Space, Sports and Recreation Strategy will inform the application of policy. Areas of valuable open space, sports and recreation space will be identified and protected. Allerdale Local Plan (Part 2): Site Allocations will identify, designate and protect land used for open space, sport and recreational purposes.

Change : N/A

Action: No action required.

Rep ID: 56 / 3	Company/Organisation: Ramblers	Document: LP
Name: Mrs Pauline Goodridge	Policy: S25	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Supports promotion of opportunities to enjoy outdoor recreational activities and the countryside

Full Response: Promote opportunities to enjoy outdoor recreational activities and the countryside

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 58 / 16	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S25	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It is not considered this policy is justified given viability issues.

Full Response: The same points arise in relation to this policy approach being unjustified given the viability issues across the District under current market conditions.

Changes :

Council's Response: Noted. The Plan has been developed to take account of viability. Open space is an important aspect of future development that can have a major impact on quality of life, however, the Council is mindful of viability and therefore Policy S25 has been designed to ensure that where viability is a constraint there is flexibility to negotiate an appropriate solution.

The Council is confident that policies are achievable and that they do not jeopardise viability across the Plan Period and especially in the first five years.

Change : No

Action: No action required.

Rep ID: 20 / 1	Company/Organisation: The Theatres Trust	Document: LP
Name: Ms R Freeman	Policy: S26	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We support the document because Policy S26 (Community and Rural Services) will protect existing cultural facilities to reflect Objective SO5c.

Full Response: We support the document because Policy S26 (Community and Rural Services) will protect existing cultural facilities to reflect Objective SO5c. We have not indicated whether we consider the document to be sound or legally compliant as the Inspector is the best judge for these items.

Your town centre theatres are important because they don't just touch the people who work there and the people who attend events, they affect all those who provide their services - the restaurants, local pubs, programme printers, caterers, costumiers and taxis etc. Theatres are a vital part of the community and provide a beacon of vitality for your evening economy and, unless they are supported, your town centres will just be places for supermarkets, coffee shops, bookmakers, banks and takeaways.

Changes : We are pleased that this new policy (S26) itemises theatres as an example of a community facility, but suggest that a more succinct description for the term could be community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. This would obviate the need to provide examples, although we are happy for the word 'theatre' to be retained in this section.

Council's Response: Support noted.

Change : Partial

Action: No action required.

Rep ID: 37 / 66	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S26	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We support reference to the historic environment when considering new community facilities. The wording should be amended to conserve and enhance heritage assets. (NPPF)

Changes : Respect and enhance should be replaced with conserve and enhance.

Council's Response: Accepted.

Change : Yes

Action: Change made as suggested

Rep ID: 55 / 26	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S26	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Policy is supported

Full Response: Paragraph 25 of the NPPF makes clear the importance of plans promoting the retention and development of local services and community facilities.108. The approach set out within this policy, whereby there is a commitment to protect and encourage the delivery of new rural services is considered appropriate.109. Moreover, the clear policy about when loss of an existing community facility would be considered appropriate is also considered acceptable.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 6 / 7	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S Hemsley-Rose	Policy: S27	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S27.

Full Response: Friends of Rural Cumbria's Environment welcome the protection for historic assets 'and their settings.' Our members appreciate that, in relation to any proposed development, these assets 'and their settings will be conserved and enhanced in a manner appropriate to their intrinsic historic value and significance, their importance to local character, distinctiveness and sense of place, and to other social, cultural, economic or environmental benefits/values.'We note the content of paragraph 268 which affords protection to areas outside designated sites 'where there is evidence of their value or significance to the local community, and a lack of sufficient public benefit to outweigh any loss to them.' This accords well with ambition to promote the tourist economy outlined elsewhere in the Plan and with the present Government's Localism Policy.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 67	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S27	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Although reference to the term 'historic environment' is mentioned here. There is no assessment of the contribution it makes to the character of the Borough. A requirement of the NPPF.

Full Response: Although reference to the term 'historic environment' is mentioned here. There is no assessment of the contribution it makes to the character of the Borough. A requirement of the NPPF.

Changes : The Plan should be expanded to include a description of the historic environment in Allerdale and an assessment be made of their character and the contribution it makes to the area.

Council's Response: The Plan would benefit from the changes suggested, and the spatial portrait, area based introductions as well as Policy S27 introduction have been updated as appropriate, and as discussed with English Heritage.

Change : Partially Accepted

Action: Introduction to Policy S27 revised as appropriate.

Rep ID: 37 / 68	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S27	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We welcome a list of the assets in the area. However, it appears to be incorrect (which is due to a lack of evidence base on the historic environment),

Full Response: We welcome a list of the assets in the area. However, it appears to be incorrect (which is due to a lack of evidence base on the historic environment), notable:

Allerdale does not have any registered battlefields.

Allerdale only has one WHS not more than one as indicated here. When referring to assets in the list the number and type should be inserted given this a very specific policy. Also, a better description of them would be useful in this section to show what and how it contributes to the character and special qualities of Allerdale. The Plan does not go far enough.

Changes : This paragraph should be amended to accurately detail the historic assets in Allerdale. This will help inform any assessments to be made of their character and the contribution it makes to the area.

Council's Response: The changes to the introduction are broadly accepted.

Change : Accepted

Action: The introduction has been updated accordingly.

Rep ID: 37 / 69	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S27	

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:		Justified:	Consistent:

Summary: This policy provides little guidance on development that affects archaeological assets. Reference should be made to the NPPF, when rewording this policy.

Full Response: We consider this policy to be unsound for the following reasons. Although this helps to meet the requirements of the NPPF it does not go far enough. Specific references to Allerdale would be preferable here. This would benefit from the inclusion of undesignated rather than valuable. We consider all heritage assets to have some value. This provides little guidance on development that affects archaeological assets. Reference should be made to the NPPF, when rewording this policy.

This would benefit from an amendment, which would set out explicitly the intervention for development proposals, setting out the different assets in the area as outlined in NPPF paragraph 132.

Delete this paragraph given the amendment suggested for point e) above. The paragraph would benefit from the inclusion of references to specific intentions/projects or important heritage assets in the Borough rather than just conservation areas. For example Conservation Area Appraisals and Management Plans Heritage at Risk Projects Conservation Areas at Risk World Heritage Site Parks and Gardens.

We welcome the intention to identify local heritage assets.

Changes : Include references to the Plan area in this paragraph. Insert undesignated in the text. This should be amended to read: Development, which would result in harm to the significance of a Scheduled Monument or other nationally important archaeological site, will not be permitted. The preservation of other archaeological sites will be an important consideration. When development affecting such sites is acceptable in principle, the Council will seek to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development. This should be amended to read: When considering the impact of any development proposal on a designated heritage asset, the presumption will be given to its conservation of their significance and their settings to be preserved or enhanced. The loss of any significance should be minimised, and will be permitted only where any harm is justified by the public benefits of the proposal. The total or substantial demolition of a listed building will be permitted only in exceptional circumstances. In all circumstances, any loss or impact will be fully recorded. Delete paragraph and incorporate as above Include references to the Plan area in this paragraph.

Council's Response: It is accepted that changes are required to provide greater clarity, compatibility with the NPPF and an improved emphasis archaeological assets.

Change : Partially accepted.

Action: Policy has been substantially revised according to comments received.

Rep ID: 55 / 27	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S27	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is essentially considered robust, however it may benefit from revisions to enhance its effectiveness.

Full Response: The proposed policy is essentially robust and represents a framework to consider the impact of development upon important assets. Notwithstanding this, it is considered that this policy would benefit from revisions to enhance its effectiveness. 111. Archaeological remains are identified as heritage assets under NPPF's definition. On this basis they should be treated in the same way as heritage assets are treated in paragraph e) of the policy. 112. Criteria e) and f) in Policy S27 refer to historic assets. It is unclear what historic assets are as the term is undefined. It is therefore suggested that the term heritage assets should be used instead, as this is defined in NPPF.

Changes : It is recommended that Allerdale Borough Council amend Criteria d) to Policy S27 to state:
 Developments involving or affecting any archaeological remains must identify/ demonstrate:
 i) The significance of the archaeological remains
 ii) The impact of the proposal on the significance of the archaeological remains
 iii) The impact on the setting of the archaeological remains Strategic Policies Built and Historic Environment
 iv) How the significance and/or setting of the remains could be better revealed
 v) Opportunities for mitigating climate change without damaging significance
 vi) The public benefits of the proposal
 114. Within Criteria e) and f) of Policy S27 it is suggested that Allerdale Borough Council replace the term historic assets with heritage asset.

Council's Response: Accepted.

Change : Yes

Action: Change made as suggested

Rep ID: 6 / 8	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S Hemsley-Rose	Policy: S28	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S28.

Full Response: It is reassuring to see confirmation of the high level of protection for the World Heritage Site and its Buffer Zone together with the key views both into and out from the WHS. Friends of Rural Cumbria's Environment agree that any proposed developments outside the Buffer Zone which are likely to affect the setting of the WHS should trigger a full Environmental Impact Assessment. If the effects are deemed to be adverse, the proposal should be refused. (paragraph 275).

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 70	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S28	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Although we welcome the commitment of the Council to protecting the WHS. The Plan as a whole needs to reinforce the WHS and the positive impacts of having one in the Borough.

Full Response: Although we welcome the commitment of the Council to protecting the WHS. The Plan as a whole needs to reinforce the WHS and the positive impacts of having one in the Borough, Both in this section and in the portrait of the Borough and individual areas, a better description of the WHS should be made. It includes not only the Wall, turrets and mile castles but also the westernmost fort on the Wall (At Bowness) and also a series of frontier defences beyond the western end of the Wall down the coast past Maryport. These latter remains are unique to this Borough and the importance of these should be brought out in the Plan. The extra detail of this archaeology and significance should be enhanced considering it is so strategically importance. The policy should be amended slightly in line with the NPPF to include reference to the significance of archaeological remains and their settings.

Changes : A better description of the WHS and what is unique to the area. The importance of it and an assessment of the contribution it makes to Allerdale need to be made here and throughout the Plan. Any references in the Plan to the WHS should be amended to read
 Frontiers of the Roman Empire (Hadrian's Wall): World Heritage Site, which is now the official name. Reference should be made to the fact that Allerdale is a partner in the WHS Management Plan Committee. Any reference to the Wall as in Hadrian's Wall should always be a capital letter.

Council's Response: References and corrections in relation to the terminology are accepted.

Change : Partially accepted.

Action: Terminology in relation the Hadrian's Wall have been amended as suggested, both within Policy S28 and throughout the Plan.

Rep ID: 37 / 71	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S28	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The buffer zone is not a designation, so reference to it should be amended appropriately.

Full Response: The buffer zone is not a designation, so reference to it should be amended appropriately.

Changes : Delete buffer zone.

Council's Response: Noted, however, it is considered that reference to the buffer zone is required.

Change : Partially Accepted

Action: Text has been amended to improve clarity.

Rep ID: 55 / 28	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S28

Support/Object: Support **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: Hadrian's Wall is of importance to the heritage and economy of Allerdale and beyond and the proposed policy, which seeks to protect the Heritage Site from inappropriate forms of development is supported

Full Response: Hadrian's Wall is of importance to the heritage and economy of Allerdale and beyond and the proposed policy, which seeks to protect the Heritage Site from inappropriate forms of development is supported.

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 38 / 19	Company/Organisation: Crosscanonby Parish Council	Document: LP
	Name: Mrs C Freeland	Policy: S29

Support/Object: Object **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: States this policy has implications for specific site at Birkby Lodge.

Full Response: Page 121, Para 286 "Surface water drainage issues have implications for waste water capacity". This is relevant to the proposed development at land adjacent to Birkby Lodge.

Changes :

Council's Response: The Council considers that response relates to a site specific issue and not the soundness of the policy or Plan.
Change : No
Action: No action required.

Rep ID: 43 / 14	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
	Name: Mr M Porter	Policy: S29

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: SUSCO feel the Council should require that developers deliver SUDs rather than seek. Furthermore, more information is required about long term management of SUDs.

Full Response: The group feel the Council should insist that developers obtain rather than seek approval, and clarify that schemes must have this or will not be approved. It also omits to require the financial commitment to the long term, along with the management plan. It must identify who is financially responsible in the long term not just who will manage it and how.

Changes :

Council's Response: Policy S29 states that (in relation to SuDS) developers will be required to submit a management plan outlining how the system will be maintained and managed in the long term to the SuDS Approval Body (SAB). However, it is accepted that that this needs further clarification throughout the Plan. Policy S21 (Developer Contributions) has been amended to ensure that the Planning Obligations also relate to the initial and ongoing running costs of infrastructure delivered as part of development.

Change : No
Action: No action required.

Rep ID: 50 / 1	Company/Organisation: Environment Agency	Document: LP
	Name: Mr Jeremy Pickup	Policy: S29

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Error made with regards to drainage hierarchy. Amendments required.

Full Response: Paragraph 283 refers to a hierarchy of foul drainage options. This requires a separate heading and should be separated from S29 Flood Risk and Surface Water Drainage.

Changes : A separate policy or heading should be created for foul water drainage

Council's Response: Accept error as highlighted and changes suggested.

Change : Yes

Action: Amend policy as suggested.

Rep ID: 50 / 2	Company/Organisation: Environment Agency	Document: LP
	Name: Mr Jeremy Pickup	Policy: S29

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Errors made with regards to Environment Agency title.

Full Response: There are a number of references (e.g. paragraphs 279, 286 & 316) throughout the document to the 'Environmental Agency' and these should be changed to the Environment Agency.

Changes : Replace Environmental with Environment where appropriate

Council's Response: Accept changes as suggested.

Change : Yes

Action: Correct errors as suggested.

Rep ID: 55 / 29	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S29	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy gives recognition of matters around flooding and drainage, and although these are considered robust in principle, they would benefit from some appropriate amendments to bolster their effectiveness and meaning.

Full Response: In recent years flooding has arisen as a serious issue in the County. County Council Policy seeks to ensure that new development is built away from those areas at greatest risk of flooding. The County Council will soon have a statutory responsibility to manage surface water drainage and with this, it will be important that policy is compatible with the County's responsibilities relating to this area. 117. The proposed policies do give recognition of matters around flooding and drainage, and although these are considered robust in principle, they would benefit from some appropriate amendments to bolster their effectiveness and meaning.

Changes : At the end of the first paragraph to Policy S29 following (SRFA) it is suggested that Allerdale Borough Council add Lead Local Flood Authority (LLFA) Local Flood Risk Management Strategy. 119. Within Criteria a) to Policy S29 following SRFA it is suggested that Allerdale Borough Council add LLFA Local Flood Risk Management Strategy 120. Within Paragraph 229 following Environment Agency add County LLFA 121. Within Paragraph 285 after County Council it is suggested that Allerdale Borough Council delete this and add as Lead Local Flood Authority will approve the use of SUDs (schedule 3 to made law April 2014) via. Also delete the following the assessment of ground suitability for, (as the approval of plans would require approval of appropriate solutions). As the number of properties that Suds approval is required for is not set, it is also suggested that the words that serve more than one property in new developments be removed and replace them

Council's Response: Accept suggested changes to policy wording.

Change : Yes

Action: Amend policy wording to reflect suggested changes.

Rep ID: 64 / 9	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S29	

Support/Object: Object Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Has concerned about errors in supporting text

Full Response: We wish to highlight our concerns over the supporting text as set out below. Supporting text, paragraph 283 (Page 120): United Utilities has serious concerns surrounding the context of the drainage options as currently set out within the hierarchy. Whilst the hierarchy as set out within the document would reflect a process for dealing with foul sewage, it should not be applied to surface water, particularly due to the implications this has on the capacity of the waste water infrastructure. We therefore suggest the following alternative: A hierarchy of drainage options for disposing of surface water must be considered and discounted in the following order: - Continue and/or mimic the site's current natural discharge process; - Attenuate flows into green engineering solutions such as ponds; swales or other open water features for gradual release to a watercourse and/or porous sub soils; - Attenuate by storing in tanks or sealed systems for gradual release to a watercourse; - Direct discharge to a surface water only sewer; - Controlled discharge into the combined sewerage network, only if it can be demonstrated that there are no other viable options. - Connection to the public sewer - Package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption) - Septic Tank - If none of the above are feasible, a cesspool. If new development is shown to increase storm sewer overflows it will be necessary to phase the development to allow the existing infrastructure to be improved. Culverting of waterways should be avoided.5. Should paragraph 283 relate to the disposal of foul sewage, we would suggest the text needs to be made clearer that it relates to foul sewage and not surface water, as set out below: A hierarchy of options for dealing with foul sewage must be considered and discounted in the following order: Connection to the public sewer Package sewage treatment plan (which can be offered to the Sewerage Undertaker for adoption) Septic Tank If none of the above are feasible, a cesspool.

Changes : Should paragraph 283 relate to the disposal of foul sewage, we would suggest the text needs to be made clearer that it relates to foul sewage and not surface water, as set out below: A hierarchy of options for dealing with foul sewage must be considered and discounted in the following order: Connection to the public sewer Package sewage treatment plan (which can be offered to the Sewerage Undertaker for adoption) Septic Tank If none of the above are feasible, a cesspool.

Council's Response: Accept suggested changes to policy.
Change : Yes
Action: Amend policy to reflect suggested changes.

Rep ID: 8 / 4	Company/Organisation: Aspatria Rural Partnership	Document: LP
Name: Cllr B Finlay	Policy: S30	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: The Aspatria Rural Partnership support Policy S30.

Full Response: The Aspatria Rural Partnership is a constituted body representing a group of nine parish Councils in the locality: Allonby, Hayton & Mealo, Oughterside & Allerby, Westnewton, Aspatria, Plumbland, Bromfield, All Hallows and Blennerhasset & Torpenhow.

The Aspatria Rural Partnership prepared a Community Action Plan, which identified empty properties as being of particular concern to local residents. We commented on the previous draft of the Local Plan that we would like to see a policy that encourages the development of brownfield sites in the town before green field sites on the edges are considered.

We support the policy S30 Reuse of Land, which states: Proposals for development on greenfield sites may be required to carry out a sequential test to demonstrate that there are no available previously developed sites, which are not of high environmental value, within the settlement that could suitably accommodate the scheme.

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 12 / 8	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S30	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports Policy S30.

Full Response: This eminently sensible policy, encouraging the reuse of 'previously developed land and vacant sites within the Plan Area' in preference to the development of greenfield sites which are likely to be of higher environmental value, is worthy of support.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 16 / 10	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S30	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Justified: No Consistent: No

Summary: The approach set out in the policies is unsound as the preference for the reuse of land and sequential test is unjustified, ineffective and not consistent with national policy.

Full Response: The NPPF provides no justification for the prioritisation of brownfield sites over and above greenfield sites. The Council also have not provided any compelling evidence upon why it should depart from the NPPF. If a site is in a sustainable location for housing, or indeed other forms of development, and is required to achieve the housing requirement then there is no reason to delay granting permission. In addition the sequential test requirement of the policies against which developers must demonstrate a lack of suitable and available previously developed sites within the settlement is unjustified under the NPPF and places an additional burden upon the developer. Paragraph 111 of the NPPF does allow local authorities to set a target for the development of brownfield land providing this can be justified. It is, however, important to note that the achievement of such a target should not delay other suitable sites coming forward but rather be a target for the whole of the plan period not for a single year. The HBF are concerned that the policy could prove contrary to the delivery of the annual targets set out in the housing trajectory. This could cause problems for the Council if certain key brownfield sites fail to come forward at the pace expected. The Council will be aware that paragraph 49 of the NPPF cautions that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

Changes : It is therefore recommended that the Council remove the second paragraph from policy S30 and delete policy DM16.

Council's Response: Whilst the NPPF does not require targets for previously developed land, it does encourage the effective reuse of brownfield land. In order to maximise the reuse of land, wherever possible, we consider the sequential approach for development over a certain size threshold to be an appropriate approach. The Council has clarified however that the sequential test will apply only to windfall development on greenfield sites.

Change : Partial

Action: Clarify policy to state that sequential test for previously developed land will apply only to windfall developments on greenfield sites.

Rep ID: 36 / 2	Company/Organisation: Blennerhasset and Torpenhow P	Document: LP
Name: Mrs B	Kavanagh	Policy: S30

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Support this policy which encourages the development of brownfield sites in the town before green field sites on the edges are considered.

Full Response: Blennerhasset & Torpenhow Parish Council commented on the previous draft of the Local Plan that we would like to see a policy that encourages the development of brownfield sites in the town before green field sites on the edges are considered. We support the policy S30 Reuse of Land, which states: "Proposals for development on greenfield sites may be required to carry out a sequential test to demonstrate that there are no available previously developed sites, which are not of high environmental value, within the settlement that could suitably accommodate the scheme."

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 37 / 72	Company/Organisation: English Heritage	Document: LP
Name: Ms E	Hrycan	Policy: S30

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: In line with the requirements of the NPPF to achieve sustainable development, this policy would benefit from including reference to the re-use and adaptation of existing buildings as the most important objective in the reuse of land policy. Where this is

Full Response: In line with the requirements of the NPPF to achieve sustainable development, this policy would benefit from including reference to the re-use and adaptation of existing buildings as the most important objective in the reuse of land policy. Where this is not possible, the reuse of the materials on the site should be promoted.

Changes : Insert:the Council will encourage the reuse and adaptation of existing buildings.Where this is not possible, the effective reuse of materials and previously developed and vacant sites within the Plan area will be promoted.

Council's Response: It is accepted that further policy material is required to provide greater emphasis to this issue, however, it is felt that Strategic Objectives, SO1g would be the most appropriate location for this material.

Change : Partially Accepted.
Action: Strategic Objectives, SO1g has been updated accordingly.

Rep ID: 55 / 30	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S30	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Policy S30 sets out principles around previously developed and contaminated land. It highlights how the use of previously developed land which is not of high environmental value, would be prioritised over green field land. Given the importance of delivering regeneration and sustainable patterns of development but also the environmental benefits, the proposed policy is considered appropriate and to be reflective of County Council policy in this regard.

Full Response: The Cumbria Sub Regional Spatial Strategy highlights that development sites should be selected in a sequential way. The reuse of buildings and previously developed land (PDL) should be prioritised over greenfield land given the likely reduction in environmental impacts, the fact that such land, is often in more accessible locations and the regeneration benefits the development of PDL can bring. However, it is noteworthy that the more recent NPPF sets out that Local Planning Authorities should have greater discretion when considering the role of PDL and should it be used before greenfield land. 123. Policy S30 sets out principles around previously developed and contaminated land. It highlights how the use of previously developed land which is not of high environmental value, would be prioritised over green field land. Given the importance of delivering regeneration and sustainable patterns of development but also the environmental benefits, the proposed policy is considered appropriate and to be reflective of County Council policy in this regard.

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 58 / 17	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S30	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: There is no justification for this approach which is not consistent with National Planning Policy. Whilst the NPPF does allow authorities to set a target for development of brownfield land providing this can be justified there is no such justification or

Full Response: There is no justification for this approach which is not consistent with National Planning Policy. Whilst the NPPF does allow authorities to set a target for development of brownfield land providing this can be justified there is no such justification or PDL target set out within the plan. In addition, the authorities own evidence base acknowledges the need for greenfield sites to enable meeting its housing requirements. It is also acknowledged that there is a shortage of previously developed land in sites within localities. This policy puts an additional burden on housing developers and is not consistent with National Planning Policy, the policy therefore needs to be substantially amended. The inclusion of a reference in the policy to there being a presumption in presumption in favour of previously developed land does not accord with the NPPF and should be removed. Paragraph 15 of the NPPF sets out that there is a presumption in favour of sustainable development. It does not state that this needs to be PDL or a sequential approach be included regarding greenfield release. The requirement for a sequential test to be carried out for greenfield release needs to be removed also.

Changes :

Council's Response: Whilst the NPPF does not require targets for previously developed land, it does encourage the effective reuse of brownfield land. In order to maximise the reuse of land, wherever possible, we consider the sequential approach for development over a certain size threshold to be an appropriate approach. The Council has clarified however that the sequential test will apply only to windfall development on greenfield sites.
Change : Partial
Action: Clarify policy to state that sequential test for previously developed land will apply only to windfall developments on greenfield sites.

Rep ID: 37 / 73	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S31	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We support the requirements outline in this policy.
 Full Response: We support the requirements outlined in this policy.

Changes :

Council's Response: Noted.
 Change : N/A
 Action: No further action required.

Rep ID: 46 / 3	Company/Organisation: Natural England	Document: LP
Name: Mr Janet Baguley	Policy: S31	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Suggested additional text to improve policy
 Full Response: While we do not consider policy S31 to be unsound, we have suggested changes below that would improve the DPD, and which we ask the local planning authority to take into account

Changes : We would welcome an additional bullet point to reflect that development may be acceptable if negative impacts on the natural environment are avoided.

Council's Response: Noted. The Plan should be read as a whole, therefore, it is considered that the change suggested is not required.
 Change : N/A
 Action: No further action required.

Rep ID: 55 / 31	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S31	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The proposed policy approach to the consideration of conversion proposals and replacement dwellings is appropriate and reflects the guidance set out within the NPPF,
 Full Response: The proposed policy approach to the consideration of conversion proposals and replacement dwellings is appropriate and reflects the guidance set out within the NPPF, which seeks greater flexibility to encourage the appropriate conversion of rural buildings to alternative uses. 125. The priority for business or services uses over residential uses (which can then be considered appropriate where alternative uses cannot be secured) is welcome, given the benefits (recognised in the NPPF) that modest employment proposals can bring to the rural economy.

Changes :

Council's Response: Support noted.
 Change : N/A
 Action: No action required.

Rep ID:	1 / 1	Company/Organisation:	The Coal Authority	Document:	LP
		Name:	Mr A Northcote	Policy:	S32

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: The Coal Authority supports of S32

Full Response: Support - The Coal Authority welcomes and supports policy S30 which sets out a positive planning framework for addressing unstable land which is a locally distinctive issue in Allerdale, arising from mining legacy. This policy is in line with the requirements of paragraph 109, 120, 121 and 166 of the NPPF.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	6 / 9	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	LP
		Name:	Mrs S Hemsley-Rose	Policy:	S32

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S32.

Full Response: Our members feel that this policy is especially relevant to onshore wind development as there are already instances within the Plan Area where residential amenity has been compromised by noise, shadow flicker and the overbearing nature of some wind turbines/wind farms. For this reason, we are pleased to note point b) (page 127) which states that proposals will not be supported where they will 'result in a detrimental effect on the local area in terms of visual amenity, distinctive character or environmental quality.' Also, point e) which confirms that developments with a 'significant adverse environmental impact in relation to landscape' will be resisted. The protection of the amenity of existing and future residents in Allerdale is outlined in paragraph 298. This should be one of the first priorities of any Local Authority. We are pleased to see the reference to disruption of 'tranquillity' which some types of development can cause either by themselves or cumulatively in the rural environment. (paragraph 298)

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required

Rep ID:	37 / 74	Company/Organisation:	English Heritage	Document:	LP
		Name:	Ms E Hrycan	Policy:	S32

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We fully support the intentions behind this policy.

Full Response: We fully support the intentions behind this policy.

Changes :

Council's Response: Noted.

Change : N/A

Action: No further action required.

Rep ID: 38 / 20	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S32

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: States this policy has implications for specific site at Birkby Lodge.

Full Response: Page 127, S32, Para c "cause pollution to water environment". This is relevant to the proposed development at land adjacent to Birkby Lodge.

Changes :

Council's Response: Do not consider that this response relates to the soundness of the policy or the Plan. Site specific issues will be dealt with when land is brought forward as part of the Allerdale Local Plan (Part 2): Site Allocations process or as part of individual planning applications.

Change : No

Action: No action required.

Rep ID: 50 / 5	Company/Organisation: Environment Agency	Document: LP
Name: Mr Jeremy Pickup		Policy: S32

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Welcome reference to Water Framework Directive within policy.

Full Response: We are pleased to see that the Water Framework Directive is acknowledged in Policy S32: Safeguarding Amenity and Policy S36: Air, Water & Soil Quality and that proposals will not be supported where they would cause significant adverse environmental impact to the water environment or cause deterioration of the Water Framework Directive Classification Status.

Changes : There are several ways in which new developments can achieve WFD:-
 Remove culverts to open up watercourses where possible to enhance the natural environment;
 Promote sustainable water use within new building design;
 Promote Sustainable Drainage Systems (SUDS) for all developments;
 Control of diffuse pollution sources;
 Prohibit direct discharges of pollutants into water bodies & groundwater;
 Eliminate pollution of surface waters;
 Avoid inappropriate development in sensitive areas for example, floodplains and groundwater source protection zones which will prevent and reduce the impact of accidental pollution incidents, for example as a result of floods;
 Consider land use and water supply issues and ensure adequate local wastewater treatment capacity;
 Ensure wastewater treatment capacity is adequate for storm water flows;
 Promote good agricultural practice and use best practice to reduce risk of point source or diffuse pollution;
 Carefully plan all storage and handling arrangements for livestock slurries and manures, animal feedstuffs, silage effluent, agricultural fuel oil, dirty water, fertilisers, veterinary medicines, chemicals and pesticides;
 Promote sustainable water use in terms of abstraction and irrigation;
 Manage contaminated run-off from roads, drives and car parks are large runoff-producing areas in the urban environment.

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 50 / 6	Company/Organisation: Environment Agency	Document: LP
	Name: Mr Jeremy Pickup	Policy: S32

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Welcome reference to Water Framework Directive within policy.

Full Response: We are pleased to see that the Water Framework Directive is acknowledged in Policy S32: Safeguarding Amenity and Policy S36: Air, Water & Soil Quality and that proposals will not be supported where they would cause significant adverse environmental impact to the water environment or cause deterioration of the Water Framework Directive Classification Status.

Changes : There are several ways in which new developments can achieve WFD:-
 Remove culverts to open up watercourses where possible to enhance the natural environment;
 Promote sustainable water use within new building design;
 Promote Sustainable Drainage Systems (SUDS) for all developments;
 Control of diffuse pollution sources;
 Prohibit direct discharges of pollutants into water bodies & groundwater;
 Eliminate pollution of surface waters;
 Avoid inappropriate development in sensitive areas for example, floodplains and groundwater source protection zones which will prevent and reduce the impact of accidental pollution incidents, for example as a result of floods;
 Consider land use and water supply issues and ensure adequate local wastewater treatment capacity;
 Ensure wastewater treatment capacity is adequate for storm water flows;
 Promote good agricultural practice and use best practice to reduce risk of point source or diffuse pollution;
 Carefully plan all storage and handling arrangements for livestock slurries and manures, animal feedstuffs, silage effluent, agricultural fuel oil, dirty water, fertilisers, veterinary medicines, chemicals and pesticides;
 Promote sustainable water use in terms of abstraction and irrigation;
 Manage contaminated run-off from roads, drives and car parks are large runoff-producing areas in the urban environment.

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 32	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S32

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It will be important that new development maintains the quality of the environment and amenity, and it is considered the Policy S32 presents a framework whereby the foremost amenity considerations can be assessed during the determination of planning applications.

Full Response: It will be important that new development maintains the quality of the environment and amenity, and it is considered the Policy S32 presents a framework whereby the foremost amenity considerations can be assessed during the determination of planning applications.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 64 / 10	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S32	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggest amendments to policy

Full Response: Policy S32: Safeguarding Amenity (Page 127) It is preferable to locate the development of sensitive uses such as housing or schools an acceptable distance away from existing operational businesses to ensure no future amenity issues.

Changes : Suggest the following additional text: 'Proposals will not be supported where they would:g) Involve sensitive new developments (such as housing, schools, hospitals) being adversely affected by existing sources of pollution. Sensitive uses should be located an acceptable distance away from existing operational sources of pollution. Justification: Sensitive uses should be located away from sources of odour such as wastewater treatment works. It will be necessary to consult with the Council and United Utilities for proposals near to wastewater treatment works. Any planning application should be supported by an odour impact assessment.'

Council's Response: It is considered that the second paragraph of this policy already provides appropriate protection for sensitive uses from potentially polluting development.

Change : No

Action: No action required.

Rep ID: 2 / 8	Company/Organisation: Friends of the Lake District	Document: LP
Name: Dr K Wilshaw	Policy: S33	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FLD are strongly supportive of Policy S33 and welcome the commitment to provide further guidance on landscape character.

Full Response: Friends of the Lake District are strongly supportive of Policy S33 and its associated paragraphs. We support the council's commitment to provide further guidance on landscape character at district level. This landscape character work should be undertaken as quickly as possible as there will be a landscape policy vacuum once the landscape designations and policy in the current local plan are superseded by the adoption of the new local plan.

Friends of the Lake district would welcome the opportunity to input into the proposed landscape character guidance.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	2 / 10	Company/Organisation:	Friends of the Lake District	Document:	LP
		Name:	Dr K Wilshaw	Policy:	S33

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FLD support Allerdale Borough Council's proposal to produce further guidance on landscape character to inform decision making.

Full Response: Friends of the Lake District support Allerdale Borough Council's proposal to produce further guidance on landscape character to inform decision making as laid out in paragraph 306.

Production of Allerdale-specific guidance will aid decision making in the Borough and should be written to ensure that landscape is protected from inappropriate design. Once the guidance is completed, reference should be made to it in the Local Validation Checklist to ensure that developers are aware of its existence and have used it to inform their developments.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	6 / 10	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	LP
		Name:	Mis S Hemsley-Rose	Policy:	S33

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S33.

Full Response: Friends of Rural Cumbria's Environment support the Council's concern for the large areas of unspoilt countryside which make up much of the Plan Area and the also the Council's awareness that these 'are both highly scarce and vulnerable and require protection from development pressure.'

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 16 / 12	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M	Good	Policy: S33

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: No Consistent:

Summary: The policy is considered unjustified as it places an unnecessary burden upon development.

Full Response: This policy requires landscape character assessments to be undertaken for all major developments. Such a blanket requirement is an unnecessary burden upon developers. It is recommended that this policy be amended to relate only to areas of high landscape value.

Changes :

Council's Response: Do not accept. The Council considers it appropriate that all major development should provide a landscape assessment given the inherent scale of such proposals. However, it is accepted that the type of landscape assessment should be proportionate to the scale and nature of the development and this has been clarified in the policy.

Change : No

Action: Clarify that the requirements for landscape assessments for major developments should be proportionate to the scale and expected impact of the development.

Rep ID: 37 / 75	Company/Organisation: English Heritage	Document: LP
Name: Ms E	Hrycan	Policy: S33

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the recognition of the need to protect and enhance the character and local distinctiveness of the landscape in the plan area.

Changes :

Council's Response: Noted.

Change : N/a

Action: No further action required.

Rep ID: 55 / 33	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S33	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Whilst the ethos of Policy S33 is supported, given the high quality of much of Cumbria's landscape, and its importance as an economic driver, it is felt that the policy should be more robustly worded and provide clearer detail around the wording of policy

Full Response: The NPPF Core Principles include the need for local planning authorities to take into account the roles and character of different areas, and to recognise the intrinsic beauty of the countryside and the importance of supporting thriving rural communities within it.128. NPPF Paragraph 109 outlines guidance in regard to conserving and enhancing the natural environment, which includes the need for the planning system to contribute to the protection and enhancement of valued landscapes. 129. Whilst the ethos of Policy S33 is supported, given the high quality of much of Cumbria's landscape, and its importance as an economic driver, it is felt that the policy should be more robustly worded and provide clearer detail around the wording of policy.

Changes : The third paragraph to Policy S33 should be reworded to state:
 The Cumbria Landscape Character Assessment Toolkit (or successor documents) will be used to inform the detailed assessment of individual proposals. Development and land use change should be compatible with the distinctive characteristics and features of Cumbria's landscape types and sub types. Proposals will be assessed in relation to: 1. locally distinctive natural or built features, 2. visual intrusion or impact, 3. scale in relation to the landscape and features,4. the character of the built environment, 5. public access and community value of the landscape,6. historic patterns and attributes,7. biodiversity features, ecological networks and semi-natural habitats,and 8. openness, remoteness and tranquillity.

Council's Response: Accept suggestions for word changes.

Change : Yes

Action: Amend policy to take on board wording changes as suggested.

Rep ID: 2 / 4	Company/Organisation: Friends of the Lake District	Document: LP
Name: Dr K Wilshaw	Policy: S34	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FLD supports Policy S34

Full Response: This policy recognises the value of the Solway Coast AONB. FLD welcomes the reference to the Solway Coast Landscape and Seascape Character Assessment and the statement that proposals will need to have regard to this document.

FLD is pleased to see that it is recognised that developments adjoining the AONB may also impact on the AONB and that they too will need to comply with the policy to ensure that environmental harm is minimised.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 6 / 11	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S	Hemsley-Rose	Policy: S34

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S34, however, they propose a change related to including a trigger for EIA.

Full Response: As in the case of Policy S28 which relates to Hadrian's Wall World Heritage Site, our members are reassured to see confirmation of the high level of protection afforded to the Solway Coast AONB.

Changes :

Changes Suggested

However, we consider that any proposed developments in the AONB or 'adjoining area,' which are likely to affect the AONB and/or its setting, should trigger a full Environmental Impact Assessment. If the effects are deemed to be adverse, the proposal should be refused. Friends of Rural Cumbria's Environment feel that Policies S28 and S34 should be entirely consistent with each other.

Council's Response: The Council does not consider this approach to be appropriate. Requirements for EIA are set out in national regulations.

Change : No

Action: No action required.

Rep ID: 37 / 76	Company/Organisation: English Heritage	Document: LP
Name: Ms E	Hrycan	Policy: S34

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the recognition of the need to protect and enhance the character and local distinctiveness of the Solway Coast AONB.

Changes :

Council's Response: Noted.

Change : N/a

Action: No further action required.

Rep ID: 38 / 21	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S34

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Believes this policy should have protection for Crosscanonby car park and should prevent wind turbine development

Full Response: Page 132, Para 310. "Promote AONB as an area to be enjoyed by visitors". Again, requirement for protection of car park at Crosscanonby and prevention of erection of wind turbines.

Changes :

Council's Response: It is considered that the site specific nature of this response does not relate to the soundness of the policy or Plan. However, if this site is considered a valuable tourism facility it will be protected under Policy S17 (Tourism, Coastal and Countryside Recreation).
 It is not considered appropriate for Plan to rule out any specific types of development within Policy, however any issues relating to the development of wind turbines will be dealt with as part of Policy S19 (Renewable Energy and Low Carbon Technologies).

Change : No

Action: No changes required.

Rep ID: 55 / 34	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry		Policy: S34

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is considered appropriate.

Full Response: This policy sets out the manner in which development within the Solway Coast AONB can be considered. The area of landscape is of high quality and it should be appropriately protected from inappropriate forms of development. The proposed policy respects these principles and is considered appropriate.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 6 / 12	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S	Hemsley-Rose	Policy: S35

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy S35

Full Response: Friends of Rural Cumbria's Environment fully support the following statement: 'Nationally and internationally protected sites and species will be afforded the highest level of protection. A high priority is also given to the protection of locally identified biodiversity or ecologically valuable assets.' (Page 134)

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 38 / 22	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S35

Support/Object: Object Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Believes this policy should reference the protection of amenities at Crosscanonby car park that is mentioned in the Shoreline Management Plan.

Full Response: The Shoreline Management Plan actually allows for amenities ie Crosscanonby car park and Salt Pans to be protected rather than "managed retreat". Crosscanonby Car Park requires relatively inexpensive measures ie Gabion baskets, is sanctioned by the SMP and would protect much used car park and is especially relevant now the Salt Pans car park is permanently closed. Page 20 and Page 88 and Page 132 also refer.

Changes :

Council's Response: It is considered that the site specific nature of this response does not relate to the soundness of the policy or Plan.

Change : No

Action: No action required.

Rep ID: 50 / 3	Company/Organisation: Environment Agency	Document: LP
Name: Mr Jeremy Pickup		Policy: S35

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Support policy with suggestions for changes.

Full Response: The last sentence in paragraph 316 states 'It should be noted that development which falls within 5m of some watercourses may need approval by the Environmental Agency to ensure the protection of riverside habitats.' We suggest this is changed to: It should be noted that development which falls within 8 metres of a watercourse designated as a 'Main River' requires the approval of the Environment Agency.

Changes : The last sentence in paragraph 316 states 'It should be noted that development which falls within 5m of some watercourses may need approval by the Environmental Agency to ensure the protection of riverside habitats.' We suggest this is changed to: It should be noted that development which falls within 8 metres of a watercourse designated as a 'Main River' requires the approval of the Environment Agency.

Council's Response: Accept response.

Change : Yes

Action: Correct error in policy and amend as suggested.

Rep ID: 55 / 35	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry		Policy: S35

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is considered robust.

Full Response: Policy S35 related to the protection and enhancement of biodiversity and geodiversity and in line with the NPPF seeks to secure environmental improvements through development. 133. The County Council provided detailed comments around biodiversity and geodiversity during the consideration of the Preferred Options Core Strategy. It is welcome that the advice provided at this point is broadly reflected within this policy which is considered robust.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID:	37 / 77	Company/Organisation:	English Heritage	Document:	LP
		Name:	Ms E Hrycan	Policy:	S37

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Reference is made to the coastline being Allerdale's most important assets including outstanding scenery, seascapes and historic harbours. This needs to be included in the spatial portrait and area descriptions. Throughout the document there is little reference or proposals for the historic harbours.

Full Response: Reference is made to the coastline being Allerdale's most important assets including outstanding scenery, seascapes and historic harbours. This needs to be included in the spatial portrait and area descriptions. Throughout the document there is little reference or proposals for the historic harbours.

Changes : The Plan needs to be expanded to explicitly detail these heritage assets in the Borough and to make an assessment of their contribution to the area.

Council's Response: 'Historic' has been used in this context to refer to the existing longterm use of the site, rather than the historic environment of the site. The Council will clarify the policy text.

Change : No

Action: The text has been amended to clarify the meaning of 'historic' in this context.

Rep ID:	8 / 5	Company/Organisation:	Aspatia Rural Partnership	Document:	LP
		Name:	Cllr B Finlay	Policy:	DM1

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: The Aspatia Rural Partnership support policy DM1.

Full Response: The Aspatia Rural Partnership is a constituted body representing a group of nine parish Councils in the locality: Allonby, Hayton & Mealo, Oughterside & Allerby, Westnewton, Aspatia, Plumbland, Bromfield, All Hallows and Blennerhasset & Torpenhow.

The Aspatia Rural Partnership prepared a Community Action Plan, which identified empty properties as being of particular concern to local residents. We commented on the previous draft of the Local Plan that we would like to see the occupation of empty properties before new houses are built.

We support the policy DM1 Housing Renewal and Empty Properties.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 12 / 9	Company/Organisation:	Document: LP
	Name: Ms M Fitzgerald	Policy: DM1

Support/Object: Support **Sound/Unsound:** Sound **Positively Prepared:** Yes **Effective:** Yes
Legally Compliant: Yes **Justified:** Yes **Consistent:** Yes

Summary: Respondent supports Policy DM1.

Full Response: Bringing empty properties back into use (paragraph 330) is a sensible and logical step for this Council to take.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 36 / 3	Company/Organisation: Blennerhasset and Torpenhow P	Document: LP
	Name: Mrs B Kavanagh	Policy: DM1

Support/Object: Support **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: Blennerhasset & Torpenhow Parish Council commented on the previous draft of the Local Plan that we would like to see the occupation of empty properties before new houses are built. We support policy DM1 Housing Renewal and Empty Properties.

Full Response: Blennerhasset & Torpenhow Parish Council commented on the previous draft of the Local Plan that we would like to see the occupation of empty properties before new houses are built. We support policy DM1 Housing Renewal and Empty Properties.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 36	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM1	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It is considered that this policy appropriately recognises the aspiration to deliver housing market and contains policy to facilitate the achievement of this. However recognition should be given to the importance of access.

Full Response: Weak housing markets are a feature within parts of Allerdale Borough. When considering principles around housing, the NPPF is clear that housing delivery has a central role in the attainment of balanced and sustainable communities. The SRSpS (paragraph 4.20) also emphasises the importance of housing market renewal in West Cumbria. 135. It is considered that this policy appropriately recognises the aspiration to deliver housing market renewal and contains policy to facilitate the achievement of this. This includes encouragement to improve existing housing stock, the delivery of new housing that would improve the social mix of the area and environmental improvements. 136. It is considered that this policy should be able to effectively dovetail with other areas of policy that support the delivery of housing market renewal, such as the prioritising of PDL and the principles of accessibility and design highlighted elsewhere. 137. Nevertheless, alongside design and access consideration, recognition should be given the importance of access.

Changes : Policy DM1 criteria c) should be amended to include access as shown below. Environmental improvements, enhancement of public realm, access and open space.

Council's Response: Accept this response.

Change : Yes

Action: Amend policy wording as suggested.

Rep ID: 55 / 37	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM2	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is considered broadly acceptable and provides a mechanism whereby proposals for rural workers accommodation can be adequately considered.

Full Response: While giving recognition to the importance of meeting the housing and economic needs of rural communities, both the NPPF and the Cumbria Sub Regional Spatial Strategy are clear that it should be the exception for new housing to be located within open countryside locations, with such housing only being acceptable where there exists a demonstrable need for it. 140. Reflecting these principles, Policy DM2 sets out the circumstances when rural workers accommodation would be acceptable in open countryside locations. This policy is considered to be broadly acceptable and provides a mechanism whereby proposals for rural workers accommodation can be adequately considered.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 16 / 7	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M	Good	Policy: DM3

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Justified: No Consistent: No

Summary: These policies are unsound as they are not effective, justified or consistent with national policy. The policy provides over-zealous protection of employment sites from other uses and places an unnecessary burden upon developers.

Full Response: These policies are considered overly restrictive because they protect employment sites from other uses until such a time that they have been identified for release within the forthcoming Site Allocations DPD. This would result in sites remaining vacant whilst awaiting the adoption of the Site Allocations DPD, not anticipated until 2015 at the earliest, when the site could be put to beneficial use. The NPPF paragraph 22 states; 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'.

The policies also identify that following any de-allocation priority will be given to a sequence of uses. The sequence identified in Development Management Policy DM3 requires residential developers to fulfil numerous criteria including providing robust evidence that there are no suitable alternatives. This policy requirement places an additional and unjust burden upon residential development and is considered contrary to paragraph 22 of the NPPF which does not stipulate a sequential preference of uses.

The policies will also work contrary to the Local Plan achieving its own specified windfall allowance. Paragraph 77 of the Local Plan, identifies a consistent windfall allowance of up to 10%, putting aside the justification for such a figure, the continued protection of unviable employment land for other uses will undermine achievement of this allowance and hence the Council's ability to meet its own objectively assessed housing need.

The policies are not supported by the Local Plan evidence base. The recently published Employment Land Review concludes Allerdale has an excess of employment land with approximately 100 hectares currently allocated compared to a requirement for approximately 60 hectares to 2030.

Changes : Given the Council have already identified an over-supply of employment land and non-compliance with the NPPF it is recommended that these policies be amended and replaced with a policies that allow other uses, including housing, to be developed where there is no reasonable prospect of a site being used for the allocated employment use. Such other uses should be treated on their merits and not against a prescribed and inflexible sequence of uses having regard to market signals and the relative need for different land uses.

Council's Response: Comments are noted. Policy DM3 seeks to ensure that there is a sufficient supply of employment land to meet the areas economic development requirements over the plan period. The policy states that the Council will consider that there may be scope for de-allocation, however, this should be undertaken in a consistent manner during the Site Allocation process. Therefore, the DM3 is considered to be an appropriate policy approach.

Change : No

Action: No further action

Rep ID: 55 / 38	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry		Policy: DM3

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: It is considered that this policy approach is appropriate.

Full Response: Paragraph 22 of the NPPF states that; 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'. 142. The proposed approach whereby the future role of existing sites would be carefully considered, and if necessary de-allocated, aligns with the approach of the NPPF. Also welcome are proposals in the Local Plan to consider whether the site could be suitably upgraded to meet the requirements of businesses prior to its release. On this basis we are satisfied that the proposed policy approach is appropriate.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 55 / 39	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM4	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is considered appropriate and highlights relevant considerations to be applied when considering the expansion and intensification of sites.

Full Response: This is a criteria based policy that highlights the considerations that will be assessed when evaluating the expansion and intensification of existing employment sites. 144. It is considered that this policy is appropriate and highlights relevant considerations to be applied when considering the expansion and intensification of sites. In particular we welcome the recognition given to the importance of effective measures to address increased traffic such as encouraging modal shift which does reflect our earlier advice.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 6 / 13	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S Hemsley-Rose	Policy: DM5	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy DM5.

Full Response: Our members are pleased to note that wind turbines are not included in this policy because, unless they are genuinely small scale, they do not meet any of the criteria for permissible development in terms of integration into the rural landscape and acceptable impact. This applies particularly in cases where larger wind turbines are proposed which will export all the electricity produced to the National Grid as opposed to first supplying the premises where they are located.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 78	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: DM5	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the inclusion of this policy in the plan.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 55 / 40	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: DM5

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Whilst the main thrust of this policy is appropriate, it is considered it would benefit from giving recognition to the importance of such schemes not creating unacceptable traffic impacts.

Full Response: Paragraph 28 of the NPPF highlights the importance of farm diversification in the creation of a strong rural economy. 146. While the main thrust of this policy is appropriate, it is considered it would benefit from giving recognition to the importance of such schemes not creating unacceptable traffic impacts.

Changes : Policy DM5 should include an additional point:-
 f) Effective measures have been agreed to address increased traffic movements

Council's Response: Accept this response.

Change : Yes

Action: Accept amendments to policy.

Rep ID: 37 / 79	Company/Organisation: English Heritage	Document: LP
	Name: Ms E Hrycan	Policy: DM6

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives.

Full Response: The NPPF requires that plan policie should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. We welcome the inclusion of this policy in the plan.

Changes :

Council's Response: Noted

Change : N/A

Action: No further action

Rep ID: 43 / 15	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: DM8	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO feel the Council should require impact assessments as a matter of course.

Full Response: It is felt to be insufficient to say an impact assessment may be required for certain proposals. This should not be left as a grey debatable area, and should be a compulsory requirement for such developments. It should also be a requirement that the relevant community is consulted, as it is the community that will be impacted in many ways as a result. In addition the Council may find there are benefits from feedback from local knowledge, particularly those who hold a long term historic knowledge of the local area to improve it's decision making.

Changes :

Council's Response: The imposition of a local impact threshold should be proportionate to the town centre to which it relates and therefore a 'blanket' approach would not be appropriate. Additionally small-scale proposals are unlikely to have significant adverse impacts on town centres and therefore the requirement for an AI in this instance could be construed as overly onerous. These policies do not negate the requirement for planning application to be submitted (where the proposal is not deemed not permitted change/development) where public consultation will be carried out in accordance with national policy and regulations.

Change : No

Action: No action required.

Rep ID: 55 / 41	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM8	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Consider the proposed thresholds to be appropriate.

Full Response: The NPPF states that the impact of town centre uses in non town centre locations should be tested. This policy's requirement to undertake a sequential assessment for town centre locations outside of designated town centre locations is welcome and it aligns with the NPPF's advice. The thresholds beyond which impact assessments of town centre uses in non town centre locations, and which are below those expressed within the NPPF, are also considered appropriate.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 53 / 2	Company/Organisation:	Document: LP
	Name: Mr Robert Nichols	Policy: DM9

Support/Object: Object **Sound/Unsound:** Unsound **Positively Prepared:** **Effective:**
Legally Compliant: No **Justified:** No **Consistent:**

Summary: Objects to changes made to town centre boundaries.

Full Response: 1) My main Concern and objection to the document that directly effects me is that in appendix 4 S16 & DM9 changes to the proposed map (figure4-3 Cockermouth Town Centre) the housing area of Printers Court, Brash House and the garden of 15 Challoner street has been included in the town centre. The 7 dwellings and the garden are carefully refurbished and improved housing development that is although rural is very much part of the housing stock of Cockermouth. The planning authority despite complaining to the various departments do not seem to keep up to date maps of the area, relying on the ordnance survey mapping service instead of applications made and planning granted therefore the buildings observed by aerial photography as a big building does not equate to the contents that have been approved.

2) The document is based on an evidence base that is in my opinion more fiction than fact.

3) The comments that I made after the consultation has never been acknowledged or reply issued

4) Allerdale council have little interaction with the residents of the borough, residents in Cockermouth or from what I can ascertain in other areas last year they had one session in Cockermouth where they had a notice board in the entrance to a supermarket and handing out to busy shoppers a leaflet on the document. The document stated that it was all in accordance with the evidence base. This evidence base was changed following the consultation. Figures in the evidence base did not appear to agree with the findings in the report or ignored. An example schooling was in the report to have limited growth in the evidence base yet was ignored in the growth of Cockermouth. The document SHLAA that was rewritten post the consultation including land that was earmarked for growth by the cemetery. Now earmarked for housing. With regard to making comments, the council adopted a policy of all discussion had to be made by email or writing this is a disadvantage to everybody who needs help with the computer or expressing themselves. I went to the council to discuss my main interest and was told by the planning team that it had to be by email or written input. When I approached a member of the Town Council to discuss items in the document there comment was that the document had been debated by them in Allerdale therefore they could not pass comment at the Town council. This was not a planning input it was a policy input to the development team and therefore in my opinion not correct

Changes : Proper consultation with the residents that are residing in the town.

Council's Response: Concerns are noted. The revised town centre boundary for Cockermouth has been developed through several rounds of consultation and has been amended following the comments received to the Preferred Options. The approach is therefore considered to be both sound and robust. Consultation has been carried out in accordance with the relevant planning regulations and is fully documented. Full details of the consultation undertaken, and representations made during the development of the Local Plan are contained in the Consultation Statement and accompanying appendices. A response to Preferred Options representations was published alongside the Allerdale Local Plan Pre-Submission Draft and is now contained within the Consultation Statement. All interested parties including those submitting comments have been sent correspondence related to the Publication of the Local Plan.

Change : No

Action: No action required.

Rep ID:	37 / 80	Company/Organisation:	English Heritage	Document:	LP
		Name:	Ms E Hrycan	Policy:	DM10

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy would benefit with reference to local character and context and not just conservation areas and listed buildings. The term designated and undesignated heritage assets and/or historic environment should be included which would ensure that it covers everything.

Full Response: This policy would benefit with reference to local character and context and not just conservation areas and listed buildings. The term designated and undesignated heritage assets and/or historic environment should be included which would ensure that it covers everything.

Changes : Insert local character and context. Refer to designated and undesignated assets and the historic environment as a whole.

Council's Response: The Plan would benefit from the changes suggested.

Change : Yes

Action: The policy and accompanying text have been amended refer to the local character and context as appropriate. Additionally, references to heritage assets has been corrected.

Rep ID:	6 / 14	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	LP
		Name:	Mis S Hemsley-Rose	Policy:	DM12

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: FORCE support Policy DM12.

Full Response: Friends of Rural Cumbria's Environment support the incorporation of low carbon/renewable energy sources in new construction through the addition of solar panels and consideration of the orientation of buildings etc.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 16 / 13	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: DM12	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent: No

Summary: The policy is unsound as it has not been adequately assessed for its impact on the viability of housing delivery and hence on the implementation of the plan, as required by the NPPF

Full Response: The Government's national standards for construction are set out within the Building Regulations. As part of these regulations developers are required to achieve a 44% reduction in carbon emissions from the 2010 baseline from 2014 onwards, rising to 100% from 2016.

The Code for Sustainable Homes is a voluntary set of national standards devised by the house building industry. Since it is voluntary the Council should not attempt to make such standards mandatory.

In addition the Council's own viability study indicates significant viability issues within the current market. This policy would place additional and unnecessary burdens upon the development industry will have the effect of seriously compromising the Councils ability to deliver its strategy.

Changes : The HBF recommend the policy be deleted.

Council's Response: Do not accept. This policy does not require, but encourages the achievement of Code 4. This is with the exception of water conservation, for which development will still be required to achieve Code 4 as this has been identified as a local priority.

Change : No

Action: No action required.

Rep ID: 58 / 18	Company/Organisation: Story Homes	Document: LP
Name:	Policy: DM12	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The policy approach to require Code Level 4 is not justified and the Council's own Viability Study indicates significant viability issues within the current market. In addition, it is noted that the policy refers to the Code for Sustainable Homes in full,

Full Response: The policy approach to require Code Level 4 is not justified and the Council's own Viability Study indicates significant viability issues within the current market. In addition, it is noted that the policy refers to the Code for Sustainable Homes in full, however the Viability Assessment is only considered in relation to impact on compliance with building regulations. Therefore there are inconsistencies in the way in which the code has been assessed and is applied in the emerging plan policy and in the Viability Assessment. There is no justification to support this policy approach and the whole policy should be deleted.

Changes :

Council's Response: Do not agree. This policy does not require, but encourages the achievement of Code 4. This is with the exception of water conservation, for which development will still be required to achieve Code 4 as this has been identified as a local priority.

Change : No

Action: No changes required.

Rep ID: 12 / 10	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: DM13	
Support/Object: Support	Sound/Unsound: Sound	Positively Prepared: Yes Effective: Yes
Legally Compliant: Yes	Justified: Yes	Consistent: Yes

Summary: Respondent supports Policy DM13.

Full Response: It is reassuring to note that care will be taken to avoid unnecessary and unsightly development. There is reference in paragraph 375 to the adverse impact of the tall vertical structures which characterise this type of development and how it can combine negatively with other development such as wind turbines. As Allerdale is already host to 62% of onshore wind turbines in Cumbria, the cumulative impact of tall, vertical structures must be an important consideration in respect of future proposals.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 21 / 1	Company/Organisation: Mobile Operators Association	Document: LP
Name:	Policy: DM13	
Support/Object: Support	Sound/Unsound:	Positively Prepared: Effective:
Legally Compliant:	Justified:	Consistent:

Summary: We support the inclusion of a telecommunications policy within the emerging local plan however there are some concerns regarding the wording.

Full Response: Paragraph 42 of the National Planning Policy Framework (NPPF) confirms that; advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services. Paragraph 43 confirms that in preparing local plans, local planning authorities should support the expansion of telecommunications networks, but should also aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified.

While we support the inclusion of a telecommunications policy within the emerging local plan, we have the following concerns about the draft wording of Policy DM 13: Telecommunications Development

g) Where the proposal is on or near an education facility, the relevant body has been consulted on the proposal

The MOA's concern relates to the suggestion that the Operators should undertake pre application consultation with educational facilities which are located 'near' a proposed telecommunications site. Paragraph 59 of the Code of Best Practice on Mobile Phone Network Development states that; there are no hard and fast rules for determining whether a base station is near a school or college for the purposes of pre-application consultation. The institutions concerned need to be considered on a case-by-case basis in the light of local circumstances. We consider that the Council's suggested consultation with educational facilities is excessive and that the advice provided in the Code of Best Practice on Mobile Phone Network Development is more effective and results in a more meaningful consultation exercise. On that basis, we request that paragraph g is deleted. In summary, while we support the inclusion of Policy DM13 relating to telecommunications developments, we consider that the section discussed above is overly restrictive and therefore request that it be removed from the policy.

Changes : Request that paragraph g of policy is deleted.

Council's Response: The Council maintains that consultation with the relevant body prior to submission of an application is an appropriate requirement. It is intended that quality pre-application engagement will ensure that proposals can proceed without complication and delay.

Change : No

Action: No action required.

Rep ID: 37 / 81	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: DM13	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. Welcome the inclusion of this policy and reference to heritage assets.

Full Response: The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. Welcome the inclusion of this policy and reference to heritage assets.

Changes :

Council's Response: Noted
Change : No Change
Action: No further action

Rep ID: 55 / 42	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM13	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy is supported.

Full Response: Telecommunications are of very important in breaking down the issues of isolation faced by Cumbria. This policy grants support for appropriately sited telecommunications development and is supported.

Changes :

Council's Response: Support noted.
Change : N/A
Action: No action required.

Rep ID: 16 / 14	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: DM14	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:

Legally Compliant: Justified: No Consistent: No

Summary: This policy is considered unsound as it is not justified or consistent with national policy with regards to the requirement for 30 dwellings per hectare.

Full Response: The policy requires as a starting point new housing development to be at a density of 30 dwellings per hectare and any variance from this will require justification on behalf of the developer. It is also questionable whether such a requirement creates good design, the developers design and access statement should be used to judge such issues. The Council will be aware that the NPPF no longer requires such a minimum density and therefore the policy would create an unwarranted additional burden upon developers.

Changes : The density element of the policy be deleted.

Council's Response: The reference within this policy to density represented a starting point for discussion, based upon a previously accepted standard. However it is accepted that using a specific figure of 30 dwellings per hectare does not reflect the principal of assessing appropriate density case by case.

Change : Partial

Action: This policy has been amended to state. "... A key objective of the Council is to ensure effective and efficient use of land. Therefore the density of development will be determined appropriate to its context and nature on a case by case basis and in full discussion with the Council".

Rep ID: 37 / 82	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: DM14	

Support/Object: Sound/Unsound: Positively Prepared: Effective:

Legally Compliant: Justified: Consistent:

Summary: We welcome the inclusion of this policy in the Plan. The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. As the plan is read as a whole, we support this policy.

Full Response: We welcome the inclusion of this policy in the Plan. The NPPF requires that plan policies should contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The historic environment should be considered in the delivering a number of other planning objectives. As the plan is read as a whole, we support this policy.

Changes : Whilst we welcome that development should take advantage of historic assets. Preference should be to include reference to NPPF wording of conserve/preserve and enhance.

Council's Response: Noted

Change : No Change

Action: No further action

Rep ID: 58 / 19	Company/Organisation: Story Homes	Document: LP
Name:	Policy: DM14	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: NPPF does not require minimum densities for developments and there is no justification for such an approach within the plan or evidence base. The emerging plan includes policies relating to good design and approach to good design and design and access statements should be the tool to determine the appropriate level of density.

Full Response: NPPF does not require minimum densities for developments and there is no justification for such an approach within the plan or evidence base. The emerging plan includes policies relating to good design and approach to good design and design and access statements should be the tool to determine the appropriate level of density. This element of the policy should be deleted. Whilst fundamental issues are raised with the current plan approach Story Homes remain committed to working with the Authority to ensure a robust and workable plan is delivered expediently. As already discussed its considered that a meeting with the HBF representative and Story Homes representatives as soon as possible would be advantageous to discuss a way forward and how the Authority are considering addressing the substantive issues raised.

Changes :

Council's Response: The reference within this policy to density represented a starting point for discussion, based upon a previously accepted standard. However it is accepted that using a specific figure of 30 dwellings per hectare does not reflect the principal of assessing appropriate density case by case.

Change : Partial

Action: This policy has been amended to state: "... A key objective of the Council is to ensure effective and efficient use of land. Therefore the density of development will be determined appropriate to its context and nature on a case by case basis and in full discussion with the Council".

Rep ID: 12 / 11	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: DM16	

Support/Object: Support Sound/Unsound: Sound Positively Prepared: Yes Effective: Yes
 Legally Compliant: Yes Justified: Yes Consistent: Yes

Summary: Respondent supports Policy DM16.

Full Response: This is to be applauded alongside policy S30 which seeks to encourage the reuse of previously developed land in preference to greenfield sites which are likely to be of greater environmental value.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 16 / 11	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: DM16	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective: No
 Legally Compliant: Justified: No Consistent: No

Summary: The approach set out in the policies is unsound as the preference for the reuse of land and sequential test is unjustified, ineffective and not consistent with national policy.

Full Response: The NPPF provides no justification for the prioritisation of brownfield sites over and above greenfield sites. The Council also have not provided any compelling evidence upon why it should depart from the NPPF. If a site is in a sustainable location for housing, or indeed other forms of development, and is required to achieve the housing requirement then there is no reason to delay granting permission. In addition the sequential test requirement of the policies against which developers must demonstrate a lack of suitable and available previously developed sites within the settlement is unjustified under the NPPF and places an additional burden upon the developer.

Paragraph 111 of the NPPF does allow local authorities to set a target for the development of brownfield land providing this can be justified. It is, however, important to note that the achievement of such a target should not delay other suitable sites coming forward but rather be a target for the whole of the plan period not for a single year.

The HBF are concerned that the policy could prove contrary to the delivery of the annual targets set out in the housing trajectory. This could cause problems for the Council if certain key brownfield sites fail to come forward at the pace expected. The Council will be aware that paragraph 49 of the NPPF cautions that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

Changes : It is therefore recommended that the Council remove the second paragraph from policy S30 and delete policy DM16.

Council's Response: Whilst the NPPF does not require targets for previously developed land, it does encourage the effective reuse of brownfield land. In order to maximise the reuse of land, wherever possible, we consider the sequential approach for development over a certain size threshold to be an appropriate approach. The Council has clarified however that the sequential test will apply only to windfall development on greenfield sites.

Change : No

Action: Clarification that the sequential test for previously developed land will only apply for windfall development on greenfield sites.

Rep ID: 55 / 43	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: DM16	

Support/Object: Support Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: This policy helpfully sets out the scales of development after which schemes must demonstrate the site is sequentially appropriate.

Full Response: This policy helpfully sets out the scales of development after which schemes must demonstrate the site is sequentially appropriate. These are: 151. By aiding the prioritisation of PDL this policy should help to secure the development is located in the most appropriate and sequentially acceptable locations.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 38 / 23	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: DM17

Support/Object: Object **Sound/Unsound:** Sound **Positively Prepared:** **Effective:**
Legally Compliant: Yes **Justified:** **Consistent:**

Summary: Reports specific incident of hedgerow poisoning in Crosscanonby.

Full Response: DM17, Para 388. "Hedgerows are valuable environmental resource." Previously reported poisoning of hedgerows on Crosscanonby Road continues in spite of instruction to contrary.

Changes :

Council's Response: It is considered that this response relates to a site specific issue and does not reflect upon the soundness of the policy or Plan. This issue will be taken forward as a customer query.

Change : No

Action: No action required.

Rep ID: 43 / 16	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: DM17

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: SUSCO feel the Policy requires more detail.

Full Response: The group agrees with this principle but has concerns that again there is no definition and measure who decides what is important to preserve and by what measure.

It is supported that a tree and hedgerow assessment is included in all planning applications.

Changes :

Council's Response: Support noted.

Change : N/A

Action: No action required.

Rep ID: 37 / 83	Company/Organisation: English Heritage	Document: LP
Name: Ms E	Hrycan	Policy: Appendix

Support/Object: **Sound/Unsound:** **Positively Prepared:** **Effective:**
Legally Compliant: **Justified:** **Consistent:**

Summary: Preference would be for a plan and table to illustrate/outline the historic environment in Allerdale.

Full Response: Preference would be for a plan and table to illustrate/outline the historic environment in Allerdale.

Changes :

Council's Response: Noted. The Site Allocation process will produce a Proposals Map that will clearly show heritage assets and designations.

Change : No

Action: No action required.

Rep ID: 37 / 84	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Appendix	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We will support this indicator subject to the inclusions/amendments being incorporated.

Full Response: We will support this indicator subject to the inclusions/amendments being incorporated.

Changes : Number of buildings at risk should be amended to read designated heritage assets at risk
 Target or objective for this should be year on year reduction
 The target/objective for the number of development consents against English Heritage advice would be none

Council's Response: Amendments accepted.

Change : Accepted.

Action: Changes have been addressed.

Rep ID: 43 / 18	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M Porter	Policy: Appendix	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO raise various issues with the Strategy for Infrastructure.

Full Response: Doc. 3 Strategy For Infrastructure April 2013 Section 3 : Baseline Assessment

Roads Network stress is defined as any part of the network where the ratio of flow to capacity is above 0.90 (or 90% capacity) 3.1 Network Stress data based on survey work in and around Cockermouth: although none of the highway links experience stress above 90% it is noted that consideration should be given to junction capacities and non-highway routes therefore localised issues exist. There are also assessments on Educational Provision, Health Care Prov. Water and WWTW capacities. Other points of reference include: Measuring levels of accessibility to infrastructure items Criticality of infrastructure items 4.3 Population and Household growth data.
 4.15 The central strategic policy is: S2: Sustainable Development Principles, which contains a number of relevant elements, such as: 4. Ensure that development will not harm highway safety 5. Does not result in undue traffic congestion Doc. 4 Planning Statement in prep. for Planning App. re:Fitz Road June 2010.
 Page 9 is very relevant: I've included the main section in full. Consideration of proposals/submissions made under the SHLAA process is also relevant. The following major sites, including this one, were considered in the Assessment. It should be noted that some sites proposed have been amalgamated into single sites where boundaries are contiguous and that some other, smaller sites on the east of the town were also rejected on highway grounds. Site Comments in the Assessment Land south east of Lorton Road = Major Highway constraints Land east of the Cemetery and Strawberry How = Major highway constraints Land west of Simonscales Lane = Major Highway constraints Land adjacent to the Fitz Smell issues from sewage works, development in open countryside. divorced from settlement, landscape impacts. Clearly the above sites east of the town centre together with some other smaller sites have highway issues and on current evidence these are insurmountable without major, probably public sector, investment; this could include a new junction to the A66 Trunk Road. It is interesting to note that the sites east of the town have not been discarded on grounds of landscape impact or as being divorced from the settlement even though they clearly encroach upon open countryside and most significantly the boundary of the Lake District National Park. A very interesting paragraph to end with Some of these points can be referenced to CCC : The Cockermouth LDF Transport Study Modelling Results. 2012.and to expand our info.base.

Changes :

Council's Response: Comments noted.

Change : No

Action: No action required.

Rep ID: 50 / 4	Company/Organisation: Environment Agency	Document: LP
	Name: Mr Jeremy Pickup	Policy: Appendix

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggestion for changes to Monitoring and Implementation: to include reference to exemptions test.

Full Response: Appendix 6 Monitoring and implementation S29 Flood Risk and Surface Water Drainage; notes (page 200); suggest reference to the Exception Test is added to application of the Sequential Test. Suggest change to: Detail proposals accepted in zones 3 & 2 subject to mitigation measures following application of the Sequential Test and passing the Exception Test (where required).

Changes : Appendix 6 - Monitoring and implementation S29 Flood Risk and Surface Water Drainage; notes (page 200); suggest reference to the Exception Test is added to application of the Sequential Test. Suggest change to: Detail proposals accepted in zones 3 & 2 subject to mitigation measures following application of the Sequential Test and passing the Exception Test (where required).

Council's Response: Suggestion accepted.

Change : Yes

Action: Appendix 6 (S29) amended to include number of applications approved in Flood Zones 2 & 3 post successful exception tests.

Rep ID: 64 / 12	Company/Organisation: United Utilities	Document: LP
	Name: Ms Jenny Hope	Policy: Appendix

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Suggested additions

Full Response: We wish to highlight some additional text and minor amendments (to appendix 7):

Changes : '2. Upgrade wastewater treatment works at Cockermouth with associated upgrades to the sewerage network. In addition, rationalisation and/or local improvements of the smaller works in the Borough will be undertaken where feasible and necessary to meet the housing and economic growth requirements.
 3. United Utilities will develop a project to secure drinking water supplies to West Cumbria following changes to the abstraction regime at Ennerdale.'

Council's Response: Changes accepted.

Change : Accepted.

Action: Changes made as suggested.

Rep ID: 37 / 85	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S3	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA conclusion that the increase in employment and localised wealth will contribute to creating a community with a strong sense of local history. The Local Plan policy does not make reference to the impact of employment and development

Full Response: We disagree with the SA conclusion that the increase in employment and localised wealth will contribute to creating a community with a strong sense of local history. The Local Plan policy does not make reference to the impact of employment and development on the historic environment and reflection of character and appearance of the local areas. Therefore, any proposals would not reflect this.

Changes :

Council's Response: The conclusion in the SA was not that the policy will create a strong sense of local history, but rather it has the potential to benefit other aspects of the SA Objective including creating vibrant, active and open minded communities. On further consideration of the point raised by EH the appraisal has been updated to include both potential beneficial and adverse effects.

Change : Partially accepted.

Action: The appraisal has been updated to include both potential beneficial and adverse effects.

Rep ID: 37 / 86	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6a	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA which states that this policy will protect and preserve conservation areas in Workington. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand the impact on local character in respect to sympathetic development when detail on local character in the Plan has not been included.

Full Response: We disagree with the SA which states that this policy will protect and preserve conservation areas in Workington. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand the impact on local character in respect to sympathetic development when detail on local character in the Plan has not been included.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Since this point has been raised by EH assessment table has been revised.

Change : Partially accept.

Action: Since this point has been raised by EH we have added the following caveat to the assessment table: 'However an assessment of the historic environment in the area must be conducted in order to understand the impact of new development on the local character.'

Rep ID: 37 / 87	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6b	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA which states that this policy will have no significant effect on the built environment in Maryport. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand the impact on the built environment, when an assessment of the historic assets in the Plan has not been included.

Full Response: We disagree with the SA which states that this policy will have no significant effect on the built environment in Maryport. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand the impact on the built environment, when an assessment of the historic assets in the Plan has not been included.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Since this point has been raised by EH assessment table has been revised.

Change : Partially Accepted

Action: The following caveat has been added to the assessment table: 'It is essential that an assessment of the historic environment in Maryport is conducted in order to ascertain the impact new development will have on the character of the area.'

Rep ID: 37 / 88	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6c	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA that states that this policy will be beneficial to the areas of cultural and heritage importance within Cockermouth. There has been no proper description or assessment been made of the historic environment in the town and therefore

Full Response: We disagree with the SA that states that this policy will be beneficial to the areas of cultural and heritage importance within Cockermouth. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to establish what is important, when this has not been included in the Plan.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

Since this point has been raised by EH assessment table has been revised.

Change : Partially accept.

Action: The following caveat has been added: It is essential that an assessment of the historic environment in Cockermouth is conducted in order to ascertain the impact new development will have on the character of the area.

Rep ID: 37 / 89	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6d	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA that this policy will be beneficial to the historic environment and landscape features in Wigton. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to

Full Response: We disagree with the SA that this policy will be beneficial to the historic environment and landscape features in Wigton. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to determine what the historic environment is, when this has not been included in the Plan.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

The SA remains as written.

Change : No

Action: No action required.

Rep ID: 37 / 90	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6e	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA which states that this policy will have a positive effect on the historic environment of Silloth. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand any significance and what should be conserved and enhanced.

Full Response: We disagree with the SA which states that this policy will have a positive effect on the historic environment of Silloth. There has been no proper description or assessment been made of the historic environment in the town and therefore it is difficult to understand any significance and what should be conserved and enhanced.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan. S6e positively impacts aspects of landscape quality and the built environment. This does not mean that we expect it to have a positive impact on the historical assets of the area, however, they are one of several features. It is also anticipated that sympathetic developments in conservation areas will encourage people to maintain listed buildings which is considered to be a positive impact.

The SA remains as written.

Change : Partially accept.

Action: No action required.

Rep ID: 37 / 91	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S6f	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy has any positive impacts on the historic environment nor helps retain individual character and design in the local environment in Aspatria. There has been no proper description or assessment been made of the histo

Full Response: We disagree with the SA, that this policy has any positive impacts on the historic environment nor helps retain individual character and design in the local environment in Aspatria. There has been no proper description or assessment been made of the historic environment in the town or locality and therefore it is difficult to understand what its character is.

Changes :

Council's Response: The introduction to the area based policy provides a focused summary of the main issues and features of the area. It is accepted that further emphasis of the historic environment would help set the context for the policy and rest of the Plan.

The SA remains as written.

Change : Partially accept.

Action: No action required.

Rep ID: 37 / 92	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S13	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA that this policy will be 'potentially beneficial' to the Borough's historic ports nor will it benefit the historic environment. No identification or assessment has been made of the historic harbours in Allerdale.

Full Response: We disagree with the SA that this policy will be 'potentially beneficial' to the Borough's historic ports nor will it benefit the historic environment. No identification or assessment has been made of the historic harbours in Allerdale nor an assessment been made of their character or contribution.

Changes :

Council's Response: After discussion with English Heritage it was accepted that the Plan requires clarity regarding the reference to the term 'historic' ports, and therefore changes have been made to the policy.

Change : No change

Action: References to 'historic' ports has been clarified accordingly.

Rep ID: 37 / 93	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S17	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy will ensure that development is appropriate to the area. The policy fails to relate to the requirements of the NPPF when considering the impact of development on heritage assets and applying different weights dependent on designation and on conserving their significance.

Full Response: We disagree with the SA, that this policy will ensure that development is appropriate to the area. The policy fails to relate to the requirements of the NPPF when considering the impact of development on heritage assets and applying different weights dependent on designation and on conserving their significance.

Changes :

Council's Response: Policy S17 has been revised to ensure it contains a positive strategy for the conservation, enhancement and enjoyment of the historic environment. The Plan should be read as whole, therefore it is considered that repetition as requested is not required. The council will take new developments on a case by case basis and will assess the surrounding area when making planning decisions. This policy states that developments should be appropriate for the area, therefore, the SA considers S17 to be beneficial.

Change : No

Action: No action required.

Rep ID: 37 / 94	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S18	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy will have no significant effect on the built environment. The Plan does not identify what the built environment is on the site, nor does it make any assessment of historic assets and the contribution they make to the site.

Full Response: We disagree with the SA, that this policy will have no significant effect on the built environment. The Plan does not identify what the built environment is on the site, nor does it make any assessment of historic assets and the contribution they make to the site.

Changes :

Council's Response: Following comments regarding S18 the policy has been revised. A central aim of the policy is to ensure that a full assessment is made of the historic environment to inform any development proposal. The Plan should be read as a whole.

The assessment (SA) has been revised as appropriate.

Change : No

Action: No change required.

Rep ID: 37 / 95	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S20	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy will not have any significant impact on the built environment. The NPPF requires that plan policies should contain a positive strategy for the historic environment. Therefore, reference to the historic environment

Full Response: We disagree with the SA, that this policy will not have any significant impact on the built environment. The NPPF requires that plan policies should contain a positive strategy for the historic environment. Therefore, reference to the historic environment needs to be included in the policy on NSIPs.

Changes :

Council's Response: The Plan should be read as whole. This additional criteria would not be appropriate in Policy S20. Nationally Significant Infrastructure Projects are submitted to the Planning Inspectorate Major Infrastructure Unit and determined by the Secretary of State. The SA does not Policy S20 will not have any significant impact on the built environment.

Change : No

Action: No change required.

Rep ID: 37 / 96	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S25	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy will be 'potentially beneficial' to the Borough's open spaces nor will it benefit the historic environment. No identification or assessment has been made of the historic parks and gardens nor assessment been made of the historic parks and gardens nor assessment been made of their character or contribution.

Full Response: We disagree with the SA, that this policy will be 'potentially beneficial' to the Borough's open spaces nor will it benefit the historic environment. No identification or assessment has been made of the historic parks and gardens nor assessment been made of their character or contribution.

Changes :

Council's Response: It is considered that this policy has no significant effect on the historic landscape. However, the assessment (SA) has been revised and it makes clear, there are potential beneficial effects to the rest of the built environment.

Change : No

Action: No action required.

Rep ID: 37 / 97	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S27	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the SA, that this policy will be beneficial to the historic environment of Allerdale. There has been no proper, accurate description or assessment been made of the historic environment in the Borough and therefore it is difficult to establish what is important, when this has not been included in the Plan.

Full Response: We disagree with the SA, that this policy will be beneficial to the historic environment of Allerdale. There has been no proper, accurate description or assessment been made of the historic environment in the Borough and therefore it is difficult to establish what is important, when this has not been included in the Plan. The Plan also provides little guidance on development that affects archaeological assets nor does it apply policy that relates to specific aspects of the historic environment in Allerdale.

Changes :

Council's Response: The policy has been revised according to EH comment on S27, to address concerns. Furthermore, the spatial portrait, area based introductions as well as Policy S27 introduction have been updated as appropriate to provide context. This has been discussed with English Heritage.

Due to the high level of the SA it is considered that the importance of the historic environment in the area of development will be assessed at the time of planning application.

Change : No

Action: No changes required

Rep ID: 37 / 98	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S28	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: The SA policy reference should match that of the Local Plan, and therefore should read S28 not S29. We disagree with the SA that this policy will be majorly beneficial to the historic environment of Allerdale. There has been no proper, accurate description or assessment been made of the historic environment in the Borough and therefore it is difficult to establish what is important, when this has not been included in the Plan.

Full Response: The SA policy reference should match that of the Local Plan, and therefore should read S28 not S29. We disagree with the SA that this policy will be majorly beneficial to the historic environment of Allerdale. There has been no proper, accurate description or assessment been made of the historic environment in the Borough and therefore it is difficult to establish what is important, when this has not been included in the Plan. The Plan provides little guidance on development that affects archaeological assets nor applies a policy to specific aspects of the historic environment in Allerdale. The Plan therefore does not provide a robust policy for the assessment of development that would affect the historic environment.

Changes :

Council's Response: Error in title corrected. Furthermore, the spatial portrait, area based introductions as well as Policy S27 introduction have been updated as appropriate to provide context. This has been discussed with English Heritage.

Limitation of development near the WHS is considered to be a major benefit even without an assessment of the surrounding historic environment. It is still assumed that this assessment will take place during the planning decision making.

Change : Partially Accept

Action: Error corrected.

Rep ID: 37 / 99	Company/Organisation: English Heritage	Document: SA
Name: Ms E Hrycan	Policy: S37	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: We disagree with the assessment that this policy would be minor beneficial in meeting SA Obj. EN3. There has been no assessment made of Allerdale's most important assets including outstanding scenery, seascapes and historic harbours within the Plan.

Full Response: We disagree with the assessment that this policy would be minor beneficial in meeting SA Obj. EN3. There has been no assessment made of Allerdale's most important assets including outstanding scenery, seascapes and historic harbours within the Plan. Therefore, the policy does not help new development to be appropriate to coastal and countryside character.

Changes :

Council's Response: After discussion with English Heritage it was accepted that the Plan requires clarity regarding the reference to the term 'historic' ports, and therefore changes have been made to the policy.

Change : No

Action: No change required.

Rep ID: 46 / 5	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: The criteria of selecting sites within 15km of the borough is perfectly acceptable as a guideline but should not be used as a definitive way of identifying which European sites should be considered in the Habitats Regulations Assessment.

Full Response: 3.4 Summary of Qualifying Features
 A general comment to make is in relation to the criteria used to select the European sites being assessed. The criteria of selecting sites within 15km of the borough is perfectly acceptable as a guideline but should not be used as a definitive way of identifying which European sites should be considered in the Habitats Regulations Assessment. The criteria used to identify European sites should be related to the potential impact pathways in the context of proposed growth outlined in the plan, for example, the impacts of a new major housing development could have impacts much further than 15km away. As a general guide, and subject to case-by-case analysis, the following are likely to be relevant: a) all sites within the plan area; b) all sites downstream of the plan area in the case of river or estuary sites; c) all peatland and other wetland sites with significant hydrological links to land within the plan area, irrespective of distance from the plan area; d) all sites which have significant ecological links with land in the plan area, for example, land used by bats or migratory birds, which also use a SAC or SPA respectively, at different times of the year; e) all sites within 5km of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area; f) all sites within about 20km of the plan area that comprise major (regional or national) visitor attractions such as promoted National Nature Reserves, coastal sites and sites in major tourist or visitor destinations such as AONBs and National Parks; g) all sites that are used for, or could be affected by, water abstraction irrespective of distance from the plan area; h) all sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving land in the plan area, irrespective of distance from the plan area. Notwithstanding the above, Natural England considers that there have been no omissions as a result of the chosen methodology, however further justification would be useful to ensure all potential impacts pathways have been considered. This point is further highlighted in relation to 6.15.3 (Drigg Coast SAC)

Changes :

Council's Response: Accepted. Changes required to improve clarity of the HRA.

Change : Partially Accept

Action: HRA updated accordingly.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 6	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Questions terminology used in the HRA.

Full Response: Terminology. The terminology used in the report to describe the HRA process is often inaccurate, and there appears to be some confusion between the different stages of the process. For example the use of the term 'significant adverse effects' in relation to the screening stage. There are two separate stages in the HRA process and there should be clear disparity between the two; those of likely significant effect (LSE) and adverse effects on integrity, the latter being considered at Appropriate Assessment (AA) stage (for example 4.6.6 Tourism, Coastal and Countryside Recreation, paragraph 8).

Changes :

Council's Response: Accepted. Changes required to improve clarity of the HRA.

Change : Partially accepted

Action: HRA updated accordingly.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 7	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Discounting impacts on Drigg SAC because it lies outside the 15km assessment area is not a justified reason with respects to the Habitats Regulations.

Full Response: 6.15.3 Drigg Coast SAC Local Plan Policies identified as having potential adverse effects either alone or in combination. Discounting impacts on Drigg SAC because it lies outside the 15km assessment area is not a justified reason with respects to the Habitats Regulations. The Local Planning Authority (LPA) is correct to include it in the assessment because they have correctly identified that there may be impact as a result of coastal defence. The justification to discount the potential effects is that the Shoreline Management Plan limits coastal defence schemes in Allerdale not that the site is outside the 15km boundary.

Changes :

Council's Response: Wording confirmed as suitable during meeting between Allerdale BC and Natural England (19.08.13)

Change : No

Action: No changes required.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 8	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Suggests expansion of the evidence base and changes to the terminology in the policy

Full Response: 11.1.1 Wind Farms and other renewable developments along Solway Firth. It would have been beneficial if the LPA had carried out further assessment in relation to the impact of renewable energy proposals on the Solway Firth. However, provided the Local Plan does not lend support to renewable energy in this particular location then this may not be an issue of soundness. Natural England recommends that the LPA carry out further work to help inform future planning applications as this is likely to be an issue in the future.

Changes : It should lose the 'significant' to avoid confusion with Likely Significant Effect stage. Any adverse effect is significant. These changes should also be carried through to the associated text of the policy. The Policy (S19) should also be altered to ensure the correct terminology is used, i.e. in the policy they refer to 'Do not have a significant adverse effect on nature conservation features, biodiversity and geodiversity, including Natura 2000 sites, habitats and species'.

Council's Response: It is accepted that changes suggested would improve the clarity of Policy S19 and therefore provide a better alignment with the HRA.

Change : Partially accepted

Action: Revise S19 with text provided by Natural England.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 9	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: Natural England would prefer to see protecting Natura 2000 sites in policy itself, not just in the associated text.

Full Response: 11.1.4 Shoreline Management Plan. The report states that 'it is considered that text now included within the Allerdale Local Plan provides adequate protection for Natura 2000 sites from adverse effects resulting from coastal development' Natural England would prefer to see protecting Natura 2000 sites in policy itself, not just in the associated text.

Changes : Natural England would prefer to see protecting Natura 2000 sites in policy itself, not just in the associated text.

Council's Response: It is accepted that the HRA would benefit by referencing Policy S37 and paragraph 329.

Change : Partially accepted

Action: It is accepted that the HRA would benefit by referencing Policy S37 and paragraph 329.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 10	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Sound/Unsound: Sound Positively Prepared: Effective:
 Legally Compliant: Yes Justified: Consistent:

Summary: the Screening Table is lacking sufficient justification in determining no likely significant effect at times.

Full Response: Appendix C Natura 2000 Screening Table. It is our opinion that the Screening Table is lacking sufficient justification in determining no likely significant effect at times. For example increased recreational pressure has been identified as a possible impact on River Eden SAC but the final column of the screening table determines that there will be no risk of significant effect on the site. There is no justification provided for this determination.

Changes :

Council's Response: It is accepted that the HRA should be updated to reflect the comment received.

Change : Partially Accepted

Action: Changes made as detailed in other representations

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 11	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Questions the uncertainty regarding the River Ehen SAC - Local Plan Policies identified as having potential adverse effects either alone or in combination

Full Response: 6.7.3 River Ehen SAC - Local Plan Policies identified as having potential adverse effects either alone or in combination. The report states that 'The Local Plan is therefore not anticipated to have any likely Adverse Effect on the Integrity of the River Ehen SAC, so this site has not been taken forward to more detailed assessment. Hydrological changes as a result of further abstraction from Ennerdale are not permitted by the Environment Agency so any further development and/or housing would need to find an alternative water supply source. The Environment Agency and United Utilities are presently in the process of investigating alternative sources.' Natural England are aware of the consultation draft Water Resource Management Plan (currently out for consultation) that looks at three options of new water supply, one of which is the preferred, and based on the results of the consultation United Utilities will be committing to one of the options in the very near future. The preferred option will require a large amount of infrastructure and could take more than 12 years to complete. The above results in uncertainty with respect to abstraction requirements for future development proposed through the Local Plan, particularly with respect to the southern part of Allerdale as this area currently uses water supply from Ennerdale (as outlined in the Habitats Regulations Assessment, section 6.7.3). Additional work will be required to ensure future development can rely on an alternative water supply as further abstraction from Ennerdale is not an option. The HRA outlines that drawdown of water from Ennerdale at the head of the River Ehen is mainly to supply Whitehaven's water supply (in Copeland) so Allerdale development policies are not likely to have a significant impact on this lake. However it goes on to state that the southern part of Allerdale does use water supply from Ennerdale. Further clarification is required to understand the level of proposed development in the southern part of Allerdale and how the Local Planning Authority intends to address water supply constraints. A possible solution is to ensure policy wording is explicit with regard to infrastructure requirements, i.e. The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development or suitable arrangements having been put in place for the improvement of the water supply infrastructure necessary by the development. Where there is a need for extra capacity this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment is not adversely affected. Such a caveat to the policy wording provides a clear steer that new infrastructure should be in place prior to development and as a result development proposal which advance ahead of the required infrastructure cannot draw support from the plan. It is not sufficient to conclude no adverse effect simply on the grounds that abstraction licenses will not be granted by the Environment Agency, the HRA needs further explanation on this issue and the local plan should be explicit due to the level of uncertainty regarding water supply. The above issue should also be considered in the context of the Duty to Cooperate. Natural England advises that the Local Planning Authority ensure partnership working between the Environment Agency, United Utilities and Natural England to ensure this issue is adequately covered at Site Allocations stage in order to provide certainty on the timescales for delivering infrastructure and further clarity on whether phasing of development will be required. This will ensure the plan is effective in that proposed growth is deliverable over the plan period.

Changes : A possible solution is to ensure policy wording is explicit with regard to infrastructure requirements, i.e. The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development or suitable arrangements having been put in place for the improvement of the water supply infrastructure necessary by the development. Where there is a need for extra capacity this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment is not adversely affected.

Council's Response: It is accepted that the Plan could be improved by using the text provided. Additionally the HRA should refer to this text.

Change : Accepted

Action: Change the HRA accordingly and revise S3 with the text provided.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 12	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Natural England request that all reference to mussels throughout the Local Plan and the HRA be corrected.

Full Response: Natural England request that all reference to mussels throughout the Local Plan and the HRA be amended to 'freshwater mussels Margaritifera margaritifera' in order to avoid unwelcome attention to the animal

Changes : All reference to mussels throughout the Local Plan and the HRA be amended to 'freshwater mussels Margaritifera margaritifera' in order to avoid unwelcome attention to the animal

Council's Response: Correction is fully accepted.

Change : Accepted

Action: Change made to the HRA as suggested.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 13	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Questions the HRA regarding Naddle Forest SAC - Local Plan Policies identified as having potential adverse effects either alone or in combination

Full Response: 6.9.3 Naddle Forest SAC - Local Plan Policies identified as having potential adverse effects either alone or in combination. We are of the opinion that the justification for no likely significant effect of additional air pollution on Naddle Forest SAC is insufficient. The plan states that 'In-combination effects of increased vehicular pollution in this location would be subject to regional/national policies. This site has been screened out of the Allerdale BC Local Plan HRA assessment.' The Regional Spatial Strategy for the north west has been revoked so regional policies are no longer in existence and it is not clear what is meant by 'national policies', i.e. Natural England does not consider that the NPPF provides measures to mitigate air pollution at a local level. Any issues relating to local and/or regional air pollution impacts should be addressed at the local level and with cooperation between Local Planning Authorities to consider in-combination effects.

Changes :

Council's Response: It is accepted that the HRA should be updated to reflect the comment received.

Change : Accepted

Action: It was agreed that in order to address this issue the HRA should be changed to state 'In-combination effects of increased vehicular pollution in this location would be subject to local and national policy. This site has been screened out of the Allerdale BC Local Plan HRA assessment'

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 14	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Hold the opinion that the consideration of in-combination effects has not been fully addressed in the report

Full Response: 8. In-combination. We are of the opinion that the consideration of in-combination effects has not been fully addressed in the report. We recognise that Chapter 8 identifies a list of plans and projects that could have in-combination effects and are taken forward to Appropriate Assessment. However, on reviewing the Appropriate Assessment section it is not clear how they have been assessed as the plans/projects are not referred to again by name. The in-combination assessment needs further clarity by including it in the screening process to ascertain those effects that result in a likely significant effect alone (and therefore progress to the Appropriate Assessment stage) and those which do not result in a likely significant effect but need to be considered in-combination. It is necessary to ensure cross boundary impacts have been adequately addressed and this will require cooperation with neighbouring authorities.

Changes :

Council's Response: It is accepted that the HRA should be updated to reflect the comments received.

Change : Accepted.

Action: HRA has been updated accordingly and now includes an assessment of the in-combination effects.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 15	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant: No	Justified:	Consistent:

Summary: Considers that deferring further screening to the Site Allocations DPD is not appropriate in this case as the Local Plan does highlight areas for growth

Full Response: 10.0 Appropriate Assessment of Potential Significant Effects on Natura 2000 sites. 10.1.1 Solway Firth Marine Site Water Quality and Sedimentation. See comments under 11.1.3.
 10.1.2 Land Take. It is our view that deferring further screening to the Site Allocations DPD is not appropriate in this case as the Local Plan does highlight areas for growth. The report states that The extent of development proposed within the Local Plan over the next 15 years is considered to be unlikely to exert sufficient impact on coastal areas as most development will be centred on Key Service Centres located outside the sensitive bird areas, apart from Silloth. However the displacement of SPA birds should be a consideration when assessing planning applications in more rural areas.

We recognise that growth centred on Key Service Centres is unlikely to have an adverse effect on any European site but the report does not assess the impacts of growth in Silloth where the HRA highlights this exception. Further justification is required with respect to the comment that 'the displacement of SPA birds should be a consideration when assessing planning applications in more rural areas'. It is important that the plan itself demonstrates that it will not result in an adverse effect on any European site and the Council, as competent authority, should provide clear reasoning in relation to SPA impacts as a result of development in Silloth. If impacts as a result of development in Silloth are uncertain then this issue needs to be explored further and will also require further consideration at site allocations stage. It is not appropriate to defer this issue to the project stage, particularly as the Local Plan lends support to growth in this area.

Changes :

Council's Response: It is accepted that changes are required.

Change : Accepted

Action: A table of committed development will be inserted into Policy S3 to indicate the level of allocations 'outstanding' for Silloth and other KSCs. Furthermore, the HRA has been revised to state 'However the displacement of SPA birds should be a consideration in the site allocations process and planning applications.'

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 16	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: It is our opinion that the conclusion of no adverse effect on integrity is insufficient.

Full Response: 10.1.4 Port Development. It is our opinion that the conclusion of no adverse effect on integrity is insufficient. The report states that: In conclusion it is considered that although increased operation of the port at Silloth could potentially result in some minor adverse effects on qualifying features these are unlikely to cause any Adverse Effect on the Integrity of the Solway Firth Marine sites." However, there is no clear explanation as to why it has been determined that the adverse effects will only be minor and will not result in any adverse effect on integrity. The report states that Allerdale Local Plan includes provision for port development at both Workington and Silloth Docks. Movement of vessels at Silloth will be within the Solway Firth Marine Site and any updating and/or maintenance of facilities that would be required would be subject to Habitats Regulations Assessment." However, there is no policy wording to this effect in the Local Plan (Policy S3, S13, S20, S22). The report states that In terms of mitigation for any adverse effects the port could potentially take a considerable amount of freight transport off the trunk roads leading through the Lake District National Park and along the A595 to Carlisle, with the potential for a corresponding reduction in traffic noise, disturbance and vehicle emissions." However there is no explanation of how this mitigation would be achieved. Where there is the potential for harm, or where it cannot be certain that harm will not occur, avoidance and mitigation measures must be implemented to ensure that there will not be an adverse effect.

Changes :

Council's Response: It is accepted that more clarity is required.

Change : Partially accepted

Action: The Policy S6 Silloth has been updated to provide addition clarity as requested and agreed.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 17	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Questions consistency of approach with regards to River Derwent and Bassenthwaite Lake SAC Water Quality

Full Response: 10.3.1 River Derwent and Bassenthwaite Lake SAC Water Quality. See comments under 11.1.3.
 10.3.2 Hydrology. See comments for 6.7.3. There seems to be an inconsistency of approach here, the water source issue for River Ehen SAC was screened out at the Likely Significant Effect stage but the same issue for River Derwent and Bassenthwaite Lake SAC was taken to the Appropriate Assessment stage..

Changes :

Council's Response: Accepted.

Change : Accepted

Action: The HRA has been updated to refer to the updates to S2 and S3

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 18	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Suggests that it is not always clear from the Screening Table how the proposed mitigation will be achieved,

Full Response: Appendix D Allerdale Local Plan Policies Screening Tables. It is not always clear from the Screening Table how the proposed mitigation will be achieved, this is a crucial element of the HRA. For example: S13 Energy Coast Innovation Zone we would like to see protection for designated sites in the policy itself rather than the supporting text. It is not sufficient for the Habitats Regulation Assessment of a plan to conclude no significant effects, merely because it contains a policy protecting internationally designated sites. Any policy introduced to remove uncertainty should be targeted and specifically deal with the issue that is causing the uncertainty. S17 Tourism, Coastal and Countryside Recreation it is not clear how the proposed mitigation of 'carefully managing recreation on Natura 2000 sites' will be implemented. S24 Green Infrastructure it is not clear how the proposed mitigation to ensure that plans to enhance natural assets to encourage visitors does not adversely affect Natura 2000 sites and to encourage use of less sensitive sites will be achieved.

Changes :

Council's Response: The comments were withdrawn during meeting between Allerdale BC and Natural England (19.08.13)

Change : No

Action: No action required.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 46 / 19	Company/Organisation: Natural England	Document: HRA
Name: Mr Janet Baguley	Policy:	

Support/Object: Object Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: No Justified: Consistent:

Summary: Does not believe that it is acceptable to suggest that 'there are still issues remaining unresolved and unmitigated'.

Full Response: 11. Conclusions: The report states that 'there are still issues remaining unresolved and unmitigated'. This is not acceptable, if any issues remain then they should be subject to further assessment in order to meet the requirements of the Habitats Regulations. It then goes on to say that: This is in part due to inadequate baseline information, if this is the case then the Local Planning Authority has a responsibility to try and improve the baseline information. 11.1.2 Water supply/Abstraction. See previous comments under 6.7.3.
 11.1.3 Water quality: The report states: It is considered that insufficient data is available to address this complex issue, and that the competent authorities will need to study this issue in more depth to ensure that adequate treatment of additional wastewater loads will be possible in the timescales allowed for development targets. As per our comments above under chapter 11 it is not acceptable to have outstanding uncertainties at this stage. If any issues remain then they should be subject to further assessment in order to meet the requirements of the Habitats Regulations. More information is needed to clarify how the LPA intend to deal with this issue and how they will work with the necessary bodies under the duty to cooperate? The report goes on to say it is considered that the policies in the Local Plan cannot in themselves result in Adverse Effect on the Integrity of a Natura 2000 site because of the stringent controls exercised by the Environment Agency but it does not address the possibility that development could be blocked if there is a lack of adequate treatment facilities available

Changes :

Council's Response: Issues broadly accepted.

Change : Accepted

Action: The HRA has been revised accordingly.

All changes to the Local Plan and HRA have formally been agreed by Natural England, and therefore the objection has been formally withdrawn. Letter dated 3 October 2013 has been submitted to the examination as a Core Document.

Rep ID: 2 / 12	Company/Organisation: Friends of the Lake District	Document: Topic Papers
	Name: Dr K Wilshaw	Policy:

Support/Object: Object

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

Summary: FLD consider that Policy S19 does not provide sufficient support for community renewable schemes. Furthermore, the setback distance is unjustified and needs to be based on a full renewable energy capacity study.

Full Response: Paragraph 48 of the Allerdale Wind Turbine Separation Distance Topic Paper (AWTSDTP) states that there is a perceived lack of local benefit from production. It would be worthwhile for Allerdale Borough Council to investigate ways of fostering community-based renewable schemes, including wind.

Community owned and managed schemes mean that communities decide on and then benefit from renewable energy schemes rather than the current situation where multinational companies impose their schemes on the local community who then see the profits from the schemes going out of the area and into the pockets of shareholders who have no local connections or accountability.

Whilst it may be too late to add policies related to community renewable schemes into the Local Plan, there could be an opportunity to create an additional topic paper or SPD to address the issue of community renewables.

With regard to turbine separation distance, it appears that there is little consistency in the examples given in the paper (Sections 5.4 and 5.5). This is true for both example adopted policies from Scotland and Wales (distances vary from 500m-3km) and also from the Planning Appeal decisions (turbines found acceptable at 400m but unacceptable at 1km distant from dwellings). This inconsistency makes it very hard to be able to pin down a specific distance necessary between turbines and dwellings. Settling on any one figure could be considered to be an arbitrary decision.

Appendix 3 comprises a map showing areas which would fall outside of a nominal 800m separation distance from properties. The separation distance means that the vast majority of Allerdale would be sterilized for turbine development. Many of the areas left which fall outside of the separation distance fall within the Solway Coast AONB, within a couple of kilometres of the Lake District National Park boundary or within/adjacent to Natura 2000 sites. This therefore appears to demonstrate that by forcing turbine development away from properties, it moves it into areas where the presence of turbines would be unacceptable for other reasons.

In FLD's submission regarding the Renewable Energy Policy in the Local Plan (S19), we suggested that a renewables capacity study should be carried out to identify areas where capacity for hosting wind energy has been reached. It may be that separation distance should also be brought into this study, however there needs to be quantitative reasons for choosing a particular separation distance, and these have not been brought forward in the Topic Paper which makes it difficult to justify any particular distance.

Changes :

Council's Response: The Policy provides appropriate support for renewable energy schemes, including community based schemes. The Council considers that the Wind Turbine Separation Distance Topic Paper provides appropriate explanation of the approach that has been taken.

Change : No

Action: No action required.

Rep ID:	6 / 6	Company/Organisation:	Friends of Rural Cumbria's Envir	Document:	Topic Papers
		Name:	Mis S Hemsley-Rose	Policy:	

Support/Object: Support **Sound/Unsound:** Sound **Positively Prepared:** Yes **Effective:** Yes
Legally Compliant: Yes **Justified:** Yes **Consistent:** Yes

Summary: FORCE support Poicy S19 and the associated topic paper, but would like to see the table of p15 clarified.

Full Response: This topic paper sets out the evidence base for the inclusion of an 800m separation distance between wind turbines and residential properties in the Local Development Framework. Friends of Rural Cumbria's Environment support the document but consider that there is a slight problem with the description of recent events in Milton Keynes on pages 15 and 16. Perhaps the best way to solve the problem would be to enter Milton Keynes twice in the table on Page 15. It is somewhat misleading to suggest that no setback distance applies in Milton Keynes ('quashed' no status') when, in fact, a setback distance had already been included in the Local Plan. The ONLY part of the judgement not in favour of Milton Keynes Council was that the proposed setback in the Supplementary Planning Document was in conflict with the setback distance already enshrined in the Local Plan. The judgment therefore confirms that Local Authorities CAN introduce setback distances between wind turbines and private residences.

Changes :

Council's Response: Comments noted.

Change : No

Action: No action required.

Rep ID: 7 / 1	Company/Organisation: Network Rail	Document: Topic Papers
Name: Ms D Clark	Policy:	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Network Rail would requests that as part of the final version of the Wind Turbine Separation Distance Topic Paper that a policy is added with regards to the separation distances of wind turbines from the railway and Network Rail land.

Full Response: Network Rail is the not for dividend owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

With regards to the proposal Network Rail has the following comments to make, which are from a desktop study of the document only.

The Policy states:

2.4 Policy conclusions

Currently, there is no mention of separation distances in government or planning policy. Government is clear that planning authorities must proactively promote and support renewable energy to ensure that key legal targets are achieved. The policy paper focuses on the potential impact of wind turbines and wind farms on residential areas.

Network Rail would request that as part of the final version of the Allerdale Wind Turbine Separation Distances Topic Paper that a policy is added with regards to the separation distances of wind turbines from the railway and Network Rail land.

Network Rail would wish to see wind turbines sited so that the lateral distance from the railway boundary to the foot of the mast is greater than the height of the mast + length of the propeller blade + 3m. To protect railway infrastructure in the event of failure, all wind turbines must be located at least a minimum stand off distance from the railway equal to the turbine's own height (to blade tip) + 3m from the railway boundary. This should include any change in location of any wind turbine made as a result of micro-siting.

Wind turbulence may be a factor to be considered and the applicant would need to ensure design/position of wind turbine does not present a potential problem for neighbours (railway included). Should the wind turbine(s) collapse for any reason then the developer should ensure that any fail safe distance will include the wind-turbines potential for topple in the direction of the railway boundary and the use of recovery equipment (e.g. cranes, emergency vehicles, lighting equipment).

We would like to stress that Network Rail is a supporter of sustainable methods of producing energy, but we would welcome the consideration of the details as above and their inclusion within the final version of the policy.

Changes : Request that separation distances from railway is included in this topic paper

Council's Response: The topic paper outlines the basis of the separation distance designed to ensure amenity of residential properties. Separation distances from railways and other transport infrastructure are and will be considered during the development management process.

Change : No

Action: No further action.

Rep ID: 7 / 2	Company/Organisation: Network Rail	Document: Topic Papers
Name: Ms D Clark	Policy:	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Concerned that increased patronage over level crossings could result in linespeed reductions with severe consequences for timetabling of trains and health and safety.

Full Response: Network Rail is the not for dividend owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

With regards to the proposal Network Rail has the following comments to make, which are from a desktop study of the document only. The policy states: S22 Transport Principles New development should be located in areas which help to reduce journey times and have safe and convenient access to public transport, open space, Key and Local Service Centres and utilities. Where possible, new development should actively seek to improve travel choice and reduce the need to travel using private motor vehicles. Exceptions to this policy will be considered for suitable development in rural areas that meets the requirements of other local plan policies and can demonstrate that provisions for sustainable access have been incorporated into the development. The Council will support rural transport schemes and shall work with partners to enhance services whenever possible. All new development in the Plan Area will: a) Be required to improve accessibility and movement in the local area reflecting the Local Transport Plan; b) Ensure they can be accessed safely and that they do not compromise the safety of any transport route, including railway lines; e) Make provision for pedestrians and cyclists to be given the highest priority within town centres and new developments; f) Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national guidance; g) Protect and, where appropriate, enhance all designated public rights of way.

(1) Level Crossings

The following level crossings are in the Allerdale Council area (with a map attached of their geographical location):

****Respondent includes table and map of level crossings within the Borough****

Councils (and now increasingly neighbourhood areas) are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

By a proposal being directly next to a level crossing

By the cumulative effect of developments added over time in the vicinity of a level crossing

By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route

By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway

By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads

By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing

By any proposal that may cause blocking back across the level crossing

By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes

The policy states:

All new development in the Plan Area will: b) Ensure they can be accessed safely and that they do not compromise the safety of any transport route, including railway lines; e) Make provision for pedestrians and cyclists to be given the highest priority within town centres and new developments; f) Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national guidance; g) Protect and, where appropriate, enhance all designated public rights of way.

As a result of increased patronage over crossings (either by pedestrians, cyclists or increased usage as a right of way), Network Rail could be forced to implement measures such as linespeed reductions. As a result of increased volume and type of users e.g. blocking back across a crossing preventing lowering of barriers there could be severe consequences for the timetabling of trains and this would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings, which may have limited clearance (a small window of opportunity for someone using the crossing to see or hear an approaching train or trains) as well as potential increased vandalism and trespass issues.

By integrating the Network Rail level crossing policy into the Allerdale Cumulative Viability Assessment the areas of concern for the council (safety and security of the transport network) can be addressed where a future development

may include within its boundary a level crossing or impact upon a level crossing outside its red line boundary, and this in turn may affect the areas of concern leading to a potential reduction in the safety of road users, pedestrians or cyclists.

In this regard, we request that the potential impacts from development affecting Network Rail's level crossings are specifically addressed through the Allerdale Cumulative Viability Assessment. There have been instances whereby Network Rail has not been consulted as a statutory undertaker where a proposal has impacted on a level crossing.

As such, we strongly believe that the importance of Level Crossing safety warrants a specific Policy included in the Allerdale Cumulative Viability Assessment which will help to elevate the importance of Level Crossings within the development management and planning process. We request that the policy confirms that:

1. Allerdale Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway;
2. As a first principle, Network Rail would seek to close Level Crossings where possible.
3. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; (this fits in with f) Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national guidance). Travel Plans and Transport Assessments should not wholly focus on highways but include railway level crossings as part of their sphere of consideration.
4. Where cycling or walking routes are proposed over the railway, increasing usage at a level crossing Network Rail would object to these proposals.
5. The developer would be required to fund all qualitative improvements required to the level crossing identified as a direct result of the development proposed, including funding for any replacement footbridges as a result of the council and the developer seeking access for pedestrians and cyclists over the railway. Where closure was not possible the developer would be expected to fund all enhancements to the level crossing as deemed necessary by Network Rail.

Whilst the Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010 is a statutory obligation for the council, by including the Network Rail Level Crossings Policy into the Allerdale Cumulative Viability Assessment, this would ensure that developers (who would consult the policy as part of the preparation of their planning application submission) would also be aware of the statutory obligation and consider the potential impact of their proposal upon the relevant level crossing(s). This would result in earlier consultation with Network Rail, where safety and access issues can be addressed

<http://www.networkrail.co.uk/level-crossings>

<http://www.rail-life.co.uk/>

include above links to the Network Rail website which shows the different types of level crossing (which are not always indicated by barriers, warning lights) and which can frequently be crossings over the railway used for minimal agricultural purposes (e.g. taking cows over into different fields).

On the Rail Life website please view the See Track / Think Train TV advert which you may have seen on television recently and which demonstrates the issues that can arise crossing a level crossing with limited clearance and normally agricultural uses.

Early awareness of the issues above through policy inclusion will allow the council and developers to factor in costs associated with the impact on a level crossing at an early stage.

Network Rail welcomes dialogue with Allerdale Council and other local authority partners along with the communities to work together to reduce risks at level crossings. Road improvements can be an opportunity to divert public rights of way over or under the railway, particularly footpath level crossings.

I would highlight that Network Rail has been consulting with the Highlands Council in Scotland, in order to change their planning assessments / development plans. From now on, if a developer proposes, e.g. new housing near a level crossing, they will have to assess, as part of their planning application, any increase in traffic through the crossing that might increase the potential for accidents. If there is an impact, the developer has to pay for safety improvements, such as extra signage, a change from half to full barriers, or even have the crossing closed completely. Should they not do this, then the Highlands Council can refuse the application. Our level crossings team would help the developer by assessing the safety impact of their proposals and make their recommendations. The planning change is particularly important in the Highland area, where many crossings cannot safely accommodate even minor increases in use, and some of which will be affected by major development proposals. As well as looking at long-term increases in traffic numbers and type of user, we have also considered the construction vehicles used during developments, which may be unsuitable for some crossings.

Highlands Council is Scotland's biggest local authority geographically, and we have around 200 crossings there in their area.

(2) Developer Contributions.

Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including

improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network. The National Planning Policy Framework states that councils should: work with transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development or transport investment necessary to support strategies for the growth of other major generators of travel demand in their areas. Also, encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network. To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that the Allerdale Cumulative Viability Assessment include provisions for rail. The policy should include the following:

A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Allerdale Cumulative Viability Assessment.

A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Improvements to rail transport contribute to the public good and railway developments should not be expected to support other public projects. Our infrastructure projects and station developments and improvements support regeneration, increase the attractiveness of settlements and benefit communities.

Changes : Request that the potential impacts from development affecting Network Rail's level crossings are specifically addressed through the Allerdale Cumulative Viability Assessment Topic Paper

Council's Response: Noted.

Change : No

Action: No change required.

Rep ID: 7 / 3	Company/Organisation: Network Rail	Document: Topic Papers
Name: Ms D Clark	Policy:	

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:	Justified:	Consistent:	

Summary: Concerned that increased patronage over level crossings could result in linespeed reductions with severe consequences for timetabling of trains and health and safety.

Full Response: Network Rail is the not for dividend owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

With regards to the proposal Network Rail has the following comments to make, which are from a desktop study of the document only.

The Spatial Strategy states:

3. The aim of establishing a settlement hierarchy is to promote sustainable communities where new development is located close to services and facilities with good public transport links. By locating housing, jobs and services close together, the need for travel will be reduced and the ongoing prosperity of existing settlements will be supported.

1) Level Crossings

The following level crossings are in the Allerdale Council area (with a map attached of their geographical location):

****Respondent inserts table and map of level crossings within the Borough.****

Councils (and now increasingly neighbourhood areas) are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

By a proposal being directly next to a level crossing

By the cumulative effect of developments added over time in the vicinity of a level crossing

By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route

By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway

By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads

By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs

By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing

By any proposal that may cause blocking back across the level crossing

By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes

As a result of increased patronage over crossings (either by pedestrians, cyclists or increased usage as a right of way), Network Rail could be forced to implement measures such as linespeed reductions. As a result of increased volume and type of users e.g. blocking back across a crossing preventing lowering of barriers there could be severe consequences for the timetabling of trains and this would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings, which may have limited clearance (a small window of opportunity for someone using the crossing to see or hear an approaching train or trains) as well as potential increased vandalism and trespass issues.

By integrating the Network Rail level crossing policy into the Allerdale Spatial Strategy Topic Paper the areas of concern for the council (safety and security of the transport network) can be addressed where a future development may include within its boundary a level crossing or impact upon a level crossing outside its red line boundary, and this in turn may affect the areas of concern leading to a potential reduction in the safety of road users, pedestrians or cyclists.

In this regard, we request that the potential impacts from development effecting Network Rail's level crossings are specifically addressed through the Allerdale Spatial Strategy Topic Paper. There have been instances whereby Network Rail has not been consulted as a statutory undertaker where a proposal has impacted on a level crossing.

As such, we strongly believe that the importance of Level Crossing safety warrants a specific Policy included in the Allerdale Spatial Strategy Topic Paper which will help to elevate the importance of Level Crossings within the development management and planning process. We request that the policy confirms that:

1. Allerdale Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway;

2. As a first principle, Network Rail would seek to close Level Crossings where possible.

3. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; (this fits in with f) Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national guidance). Travel Plans and Transport Assessments should not wholly focus on highways but include railway level crossings as part of their sphere of consideration.

4. Where cycling or walking routes are proposed over the railway, increasing usage at a level crossing Network Rail would object to these proposals.

5. The developer would be required to fund all qualitative improvements required to the level crossing identified as a direct result of the development proposed, including funding for any replacement footbridges as a result of the council and the developer seeking access for pedestrians and cyclists over the railway. Where closure was not possible the developer would be expected to fund all enhancements to the level crossing as deemed necessary by Network Rail.

Whilst the Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010 is a statutory obligation for the council, by including the Network Rail Level Crossings Policy into the Allerdale Spatial Strategy Topic Paper, this would ensure that developers (who would consult the policy as part of the preparation of their planning application submission) would also be aware of the statutory obligation and consider the potential impact of their proposal upon the relevant level crossing(s). This would result in earlier consultation with Network Rail, where safety and access issues can be addressed.

<http://www.networkrail.co.uk/level-crossings/>

<http://www.rail-life.co.uk/>

include above links to the Network Rail website which shows the different types of level crossing (which are not always indicated by barriers, warning lights) and which can frequently be crossings over the railway used for minimal agricultural purposes (e.g. taking cows over into different fields).

On the Rail Life website please view the See Track / Think Train TV advert which you may have seen on television recently and which demonstrates the issues that can arise crossing a level crossing with limited clearance and normally agricultural uses.

Early awareness of the issues above through policy inclusion will allow the council and developers to factor in costs associated with the impact on a level crossing at an early stage.

Network Rail welcomes dialogue with Allerdale Council and other local authority partners along with the communities to work together to reduce risks at level crossings. Road improvements can be an opportunity to divert public rights of way over or under the railway, particularly footpath level crossings.

(2) Developer Contributions Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network.

The National Planning Policy Framework states that councils should, work with...transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development or transport investment necessary to support strategies for the growth of other major generators of travel demand in their areas. Also, encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that the Allerdale Spatial Strategy Topic Paper include provisions for rail. The policy should include the following:

A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Allerdale Spatial Strategy Topic Paper.

A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Improvements to rail transport contribute to the public good and railway developments should not be expected to support other public projects. Our infrastructure projects and station developments and improvements support regeneration, increase the attractiveness of settlements and benefit communities.

Changes : Request that the potential impacts from development affecting Network Rail's level crossings are specifically addressed through the Allerdale Spatial Strategy Topic Paper

Council's Response: Noted.

Change : No

Action: No action required.

Rep ID: 7 / 4	Company/Organisation: Network Rail	Document: Topic Papers
Name: Ms D Clark	Policy:	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Concerned that increased patronage over level crossings could result in linespeed reductions with severe consequences for timetabling of trains and health and safety.

Full Response: Network Rail is the not for dividend owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

With regards to the proposal Network Rail has the following comments to make, which are from a desktop study of the document only.

The policy states:

7.2 Spatial Strategy and Growth 49. The spatial strategy of the local plan seeks to ensure that the majority of development is located in the existing urban centres that provide the best range of services, employment opportunities and access to public transport. This is considered to be the most sustainable approach as it makes the most use of existing physical, utility and social infrastructure and also reduces the need to travel. Using the proposed distribution of housing growth set out in the Local Plan, the bulk of housing development would be located within the main towns of Aspatria, Cockermouth, Maryport, Silloth, Wigton and Workington.

1) Level Crossings

The following level crossings are in the Allerdale Council area (with a map attached of their geographical location):
 Respondent inserts table and map of level crossings within the Borough

Councils (and now increasingly neighbourhood areas) are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

By a proposal being directly next to a level crossing

By the cumulative effect of developments added over time in the vicinity of a level crossing

By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route

By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway

By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads

By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs

By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing

By any proposal that may cause blocking back across the level crossing

By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes

As a result of increased patronage over crossings (either by pedestrians, cyclists or increased usage as a right of way), Network Rail could be forced to implement measures such as linespeed reductions. As a result of increased volume and type of users e.g. blocking back across a crossing preventing lowering of barriers there could be severe consequences for the timetabling of trains and this would also effectively frustrate any future train service improvements. In addition, safety issues can arise as increased numbers of pedestrians and vehicles use the crossings, which may have limited clearance (a small window of opportunity for someone using the crossing to see or hear an approaching train or trains) as well as potential increased vandalism and trespass issues.

By integrating the Network Rail level crossing policy into the Allerdale Housing Growth Topic Paper the areas of concern for the council (safety and security of the transport network) can be addressed where a future development may include within its boundary a level crossing or impact upon a level crossing outside its red line boundary, and this in turn may affect the areas of concern leading to a potential reduction in the safety of road users, pedestrians or cyclists

In this regard, we request that the potential impacts from development effecting Network Rail's level crossings are specifically addressed through the Allerdale Housing Growth Topic Paper. There have been instances whereby Network Rail has not been consulted as a statutory undertaker where a proposal has impacted on a level crossing.

As such, we strongly believe that the importance of Level Crossing safety warrants a specific Policy included in the Allerdale Housing Growth Topic Paper which will help to elevate the importance of Level Crossings within the development management and planning process. We request that the policy confirms that:

1. Allerdale Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway;
2. As a first principle, Network Rail would seek to close Level Crossings where possible.
3. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; (this fits in with f) Where necessary be accompanied by Transport Assessments/Travel Plans in accordance with national guidance).
Travel Plans and Transport Assessments should not wholly focus on highways but include railway level crossings as part of their sphere of consideration.
4. Where cycling or walking routes are proposed over the railway, increasing usage at a level crossing Network Rail would object to these proposals.
5. The developer would be required to fund all qualitative improvements required to the level crossing identified as a direct result of the development proposed, including funding for any replacement footbridges as a result of the council and the developer seeking access for pedestrians and cyclists over the railway. Where closure was not possible the developer would be expected to fund all enhancements to the level crossing as deemed necessary by Network Rail.

Whilst the Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010 is a statutory obligation for the council, by including the Network Rail Level Crossings Policy into the Allerdale Housing Growth Topic Paper, this would ensure that developers (who would consult the policy as part of the preparation of their planning application submission) would also be aware of the statutory obligation and consider the potential impact of their proposal upon the relevant level crossing(s). This would result in earlier consultation with Network Rail, where safety and access issues can be addressed

<http://www.networkrail.co.uk/level-crossings/>

<http://www.rail-life.co.uk/>

include above links to the Network Rail website which shows the different types of level crossing (which are not always indicated by barriers, warning lights) and which can frequently be crossings over the railway used for minimal agricultural purposes (e.g. taking cows over into different fields).

On the Rail Life website please view the See Track / Think Train TV advert which you may have seen on television recently and which demonstrates the issues that can arise crossing a level crossing with limited clearance and normally agricultural uses.

Early awareness of this issue through policy will allow the council and developers to factor in costs associated with the impact on a level crossing at an early stage.

Network Rail welcomes dialogue with Allerdale Council and other local authority partners along with the communities to work together to reduce risks at level crossings. Road improvements can be an opportunity to divert public rights of way over or under the railway, particularly footpath level crossings.

(2) Developer Contributions

Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network.

The National Planning Policy Framework states that councils should, work with transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development or transport investment necessary to support strategies for the growth of other major generators of travel demand in their areas. Also, encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in

support of a planning application that this quantifies in detail the likely impacts on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that the Allerdale Housing Growth Topic Paper include provisions for rail. The policy should include the following:

A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Allerdale Housing Growth Topic Paper.

A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.

A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Improvements to rail transport contribute to the public good and railway developments should not be expected to support other public projects. Our infrastructure projects and station developments and improvements support regeneration, increase the attractiveness of settlements and benefit communities.

Changes : Request that the potential impacts from development affecting Network Rail's level crossings are specifically addressed through the Allerdale Housing Growth Topic Paper

Council's Response: Noted
Change : No.
Action: No action required

Rep ID: 202 / 1	Company/Organisation: Lake District National Park Autho	Document: Topic Papers
	Name: Mr Chris Warren	Policy:

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:		Justified:	Consistent:

Summary: Generally not identified any obvious implications for the LDNP resulting from the approach set out in the Topic Papers and do not consider there to be any cross boundary issues which need further investigation

Full Response: We have reviewed the following Topic Papers: 1. Spatial Strategy 2. Housing Growth, and 3. Wind Turbine Separation Distance. Generally we have not identified any obvious implications for the Lake District National Park resulting from the 'scope' and 'approach' set out in the Topic Papers. We do not consider there to be any strategic cross-boundary issues at this stage which need further investigation by the two authorities. We do recognise that any growth in Cockermouth beyond this new plan's period will require us to work together closely to explore how to most appropriately accommodate development, but this is not of concern at this time as through the Local Plan you are able to accommodate the identified necessary growth without significant implications for the Lake District National Park. With regards to the Wind Turbine Separation Distance Topic Paper, one matter of detail I would like to draw attention to is regarding the effects on protected landscapes, referred to in Appendix 2 Para. 206 - the Solway Coast AONB and Hadrian's Wall WHS are cited but the Lake District National Park is not; for completeness I believe this should be included.

Changes :

Council's Response: Noted
Change : N/a
Action: No action required.

Rep ID: 203 / 1	Company/Organisation: Carlisle City Council	Document: Topic Papers
Name: Jilly Hale	Policy:	

Support/Object: Support

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

Summary: Have no objection to Allerdale's proposed level of growth, or to the spatial and economic strategy as set out. It is considered that the strategy contained in the Allerdale Plan and the draft strategy in the Carlisle District Local Plan (Preferred Option)

Full Response: Following our meeting today, and previous meetings on 1st October 2012, and 14th June 2012, I am writing to you in support of the approach taken so far between the authorities towards the 'duty to cooperate' set out in the Localism Act 2011.

Cumbrian authorities have a particularly well established culture of joint working. Specific examples of this are jointly commissioned studies, the most recent being the 2013 Gypsy and Traveller Accommodation Needs Assessment, and the Cumbria Renewable Energy Capacity and Deployment Study 2011. In addition the Solway Coast AONB is jointly managed by an AONB Partnership between Allerdale, Carlisle, Natural England, the Environment Agency and various other community representatives.

-When working with Allerdale Borough Council on the duty to cooperate, we have sought to identify common strategic issues, and explore whether specific planning policies were needed to address these issues, as follows:
 -Hadrian's Wall WHS crosses Northumberland, Carlisle District, Allerdale and Copeland. Potential for common policy with text agreed by Judith Nelson (English Heritage); outcome joint policy agreed,
 -Policy S28; Solway Coast AONB partnership working already in place through AONB unit. However, potential to have common policy, (this also applies to North Pennines AONB); outcome joint policy agreed,
 -Policy S34; strategic housing sites discussion around whether each district could meet its housing need. Whilst this is unlikely to be an issue, we discussed Wigton as a KSC in the north of Allerdale, and issues arising from this. An issue that was identified was capacity of secondary school in Wigton, and any large housing allocations to west of Carlisle may generate children who choose to go to Wigton School rather than secondary schools in Carlisle (quality and standard issue together with parental choice); outcome agreed that Carlisle is likely to allocate sufficient sites through its forthcoming Preferred Options Local Plan to meet its own needs. Carlisle is unlikely to allocate sites in the first five years of its plan period as it can demonstrate a five year supply + 20%;
 -Carlisle is a sub regional centre for retail discussion around hinterland for retail and potential impacts on Wigton. Wigton considered to meet specific local needs through small independent shops; outcome agreed that Wigton caters for a strong local market through independent and local retailers, and this is unlikely to be compromised by the strategy in the Carlisle Local Plan;
 - University The University of Cumbria has facilities within the Energus building at Lillyhall, in Workington, West Cumbria, offering a flexible learning space for all University of Cumbria students. When University responded to Carlisle Issues and Options, they referred to a draft masterplan, and the need to tie in with our Local Plan.
 -Travellers Allerdale and Carlisle both agreed that updated evidence is required as the county wide 2008 GTAA is becoming out of date; outcome - County wide study currently being undertaken and at first draft stage;
 -Thurstonfield/Kirkbampton straddle boundary of districts. Issues may not be strategic, but may be local issues with waste water treatment work capacity; renewables Allerdale considers that high percentage of wind turbines have been permitted and in operation within district. By comparison, Carlisle has seen little wind turbine development, possibly as our windiest areas are constrained by RAF Spadeadam requirements, and Eskdalemuir seismic testing station. Also AONB constraints;
 - potential for Duty to Cooperate to be referenced in spatial portrait and map; outcome - key diagram to show cross boundary strategic green infrastructure (Solway Coast AONB); heritage (Hadrian's Wall World Heritage Site); transport corridors (road and rail).

Changes :

Council's Response: Support noted.

Change : N/a

Action: No action required.

Rep ID: 37 / 1	Company/Organisation: English Heritage	Document: Evidence Base
Name: Ms E Hrycan	Policy:	

Support/Object: Sound/Unsound: Unsound Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: Do not consider the evidence base contains any reference to the historic environment

Full Response: A requirement of the NPPF (Paragraph 169) is that a sound local plan will be based on a strong up-to-date evidence base about the historic environment. This should be used to assess the significance of the heritage assets in the area and the contribution they make to the Borough. The published evidence base available on the Council's website does not include any that relate to the historic environment. This lack of evidence is reflected throughout the Plan.

Changes :

Council's Response: The full historic environment evidence base has been consolidated and is now published online. Furthermore, the evidence base has been emphasised throughout the Plan.

Change : Partially accepted

Action: The full historic environment evidence base has been consolidated and is now published online. Furthermore, the evidence base has been emphasised throughout the Plan.

Rep ID: 43 / 17	Company/Organisation: Susco (Sustainable Cockermouth	Document: Evidence Base
Name: Mr M Porter	Policy:	

Support/Object: Sound/Unsound: Positively Prepared: Effective:
 Legally Compliant: Justified: Consistent:

Summary: SUSCO arise various issues with the Cockermouth transport study.

Full Response: Transport Group: Additional referencing information in relation to the DPD May 2013 :Doc 1. Cumbria Strategic Partnership Meeting. Focus On Transport Making Cumbria a Better Place Transport on the Right Track.

One of the key future principles agreed: Ensure transport impacts of new housing are accounted for.

Doc. 2. Moving Cumbria Forward: 2011-2026 Transport Plan Strategy

Focus on 'Localism'

Key points: Encouraging behaviour change from car to alternative forms of movement .. to lower carbon footprint and to :Reduce the need to travel.Strategy supports:1. Encourage/support a reduction in car journeys. What have we been told in consultation: 2. Local congestion pinch points and journey times identified as problems for business and local people 3. Reducing vehicle journeys 4. Traffic in estates, through villages, along rural roads and traffic speeds. What the strategy wants to deliver: 6. Effective connections between people and places 7. Sustainable, prosperous communities. 8. A reduction in vehicle journeys. 9. A reduction in congestion at hot spots Key Statements:5. New developments will be located where more people can get there on foot, by cycle and by bus or train 6. Getting to jobs, schools, shops, health care will be improved 7. Reducing the need to travel. Therefore enabling new developments to be in localities that reduce journeys by car.

New housing areas will need to produce travel plans and reflect local priorities. Initial planning ideas up to 2015, with yearly reviews built in.

Changes :

Council's Response: Noted.

Change : N/a

Action: No action required.

Rep ID: 53 / 3	Company/Organisation:	Document: Evidence Base
Name: Mr Robert Nichols		Policy:

Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared:	Effective:
Legally Compliant: No	Justified:	No	Consistent:

Summary: Considers that the evidence base is not based upon fact

Full Response:

- 1) My main Concern and objection to the document that directly effects me is that in appendix 4 S16 & DM9 changes to the proposed map (figure4-3 Cockermouth Town Centre) the housing area of Printers Court, Brash House and the garden of 15 Challoner street has been included in the town centre. The 7 dwellings and the garden are carefully refurbished and improved housing development that is although rural is very much part of the housing stock of Cockermouth. The planning authority despite complaining to the various departments do not seem to keep up to date maps of the area, relying on the ordnance survey mapping service instead of applications made and planning granted therefore the buildings observed by aerial photography as a big building does not equate to the contents that have been approved.
- 2) The document is based on an evidence base that is in my opinion more fiction than fact.
- 3) The comments that I made after the consultation has never been acknowledged or reply issued
- 4) Allerdale council have little interaction with the residents of the borough, residents in Cockermouth or from what I can ascertain in other areas last year they had one session in Cockermouth where they had a notice board in the entrance to a supermarket and handing out to busy shoppers a leaflet on the document.

The document stated that it was all in accordance with the evidence base. This evidence base was changed following the consultation. Figures in the evidence base did not appear to agree with the findings in the report or ignored.

An example schooling was in the report to have limited growth in the evidence base yet was ignored in the growth of Cockermouth. The document SHLAA that was rewritten post the consultation including land that was earmarked for growth by the cemetery. Now earmarked for housing. With regard to making comments, the council adopted a policy of all discussion had to be made by email or writing this is a disadvantage to everybody who needs help with the computer or expressing themselves. I went to the council to discuss my main interest and was told by the planning team that it had to be by email or written input. When I approached a member of the Town Council to discuss items in the document there comment was that the document had been debated by them in Allerdale therefore they could not pass comment at the Town council. This was not a planning input it was a policy input to the development team and therefore in my opinion not correct

Changes : Proper consultation with the residents that are residing in the town.

Council's Response: Concerns are noted. The revised town centre boundary for Cockermouth has been developed through several rounds of consultation and has been amended following the comments received to the Preferred Options. The approach is therefore considered to be both sound and robust. Consultation has been carried out in accordance with the relevant planning regulations and is fully documented. Full details of the consultation undertaken, and representations made during the development of the Local Plan are contained in the Consultation Statement and accompanying appendices. A response to Preferred Options representations was published alongside the Allerdale Local Plan Pre-Submission Draft and is now contained within the Consultation Statement. All interested parties including those submitting comments have be sent correspondence related to the Publication of the Local Plan.

Change : No

Action: No action required.

Rep ID: 55 / 44	Company/Organisation: Cumbria County Council	Document: Evidence Base
	Name: Mr Michael Barry	Policy:

Support/Object:	Sound/Unsound:	Positively Prepared:	Effective:
Legally Compliant:		Justified:	Consistent:

Summary: It is considered that the evidence in the supporting Strategy for Infrastructure would benefit from being updated.

Full Response: It is considered that the evidence around education contained in the supporting Strategy for Infrastructure would benefit from being updated, as it does not reflect the most up to date position further information has been provided to the Borough Council with respect to this. 94. There is also a requirement to update Table 7 within the Strategy for Infrastructure to recognise the need for additional schools places and the importance of developer contributions in delivering these as per the information provided by the County Council to assist with the preparation of this evidence. We do note that the need for additional school places is identified elsewhere within the Strategy. 95. Recognition should be given to the potential of developer contributions in assisting with the delivery of specialist housing accommodation given the reducing availability of Government money to fund such accommodation. 96. With respect to highways paragraph 3.3 of the Strategy for Infrastructure does not paint an accurate picture as assessment of the highway network did not give consideration to the capacity of junctions as suggested within the text. 97. With respect to Paragraph 3.5 of the Strategy for Infrastructure it should be noted that while figure 3.3 illustrates the distribution of bus routes and stops, there is a wide variation in service frequencies which will need detailed consideration. 98. When Allerdale Borough Council identifies its preferred development sites at the subsequent site allocation stage of the Local Plan (Part 2), a more in depth understanding of the main infrastructure issues and requirements will be needed moving forward. Cumbria County Council will continue to assist Allerdale Borough Council in the preparation of this important area of work.

Changes :

Council's Response: The Strategy for Infrastructure is a live document and Can be revised as required.

Change : Accepted.

Action: The Strategy for Infrastructure has been updated accordingly.

Our Ref: POC/CSDM/052013

This matter is being dealt with by: Planning Policy Team
Direct Line: 01900 702610 Fax: 01900 702848

Email: localplan@allerdale.gov.uk



03 May 2012

Mr Anthony Northcote
Planning Advisor
Planning and Local Authority Liaison
The Coal Authority
200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG
planningconsultation@coal.gov.uk

Dear Mr Northcote,

Allerdale Local Plan (Part 1) – Pre-Submission Draft Consultation

Public Consultation on the proposed Allerdale Local Plan (Part 1) Pre-Submission Draft commences on **Friday 3rd May 2013** for a six week period. This document forms part of the replacement Allerdale Local Plan, and covers the whole of Allerdale that lies outside the Lake District National Park.

Following consideration of the comments received in response to the Preferred Options consultation undertaken in June and July 2012, it is the intention of the Local Authority to submit the following documents to the Government for Public Examination:

- The Allerdale Local Plan (Part 1) Pre-Submission Draft. The Plan sets out the spatial planning and policy framework for the Borough of Allerdale (excluding the Lake District National Park) up to 2028. It includes a long term vision and strategic objectives, a spatial strategy, strategic policies, development management policies and a monitoring and implementation framework to deliver the strategy. It also contains changes to the Proposals Map.
- Sustainability Appraisal
- The Habitats Regulations Assessment

We are now seeking your representations on the Pre-Submission Draft during a formal consultation period between **3rd May 2013** and **18th June 2013**.



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**Allerdale Borough Council
Allerdale House
Workington
Cumbria CA14 3YJ
Tel: 01900 702702
Fax: 01900 702507**

The Allerdale Local Plan (Part 1) Pre-Submission Draft will be available on the Council's website from **Friday 3rd May 2013** at www.allerdale.gov.uk/localplan

The Pre-Submission documents can be viewed at the Council's offices at Allerdale House, Workington between 9:00 am and 5:00 pm Monday to Thursday and 9:00 am and 4:30 pm on Fridays.

Copies are also available for inspection at the following locations during their normal opening hours:

- Aspatria Library: Local Link, The Brandraw, Aspatria, CA7 3EZ (016973 20515)
- Cockermouth Customer Services Centre: Fairfield Car Park, Cockermouth, CA13 9RT (01900 702870)
- Cockermouth Library: Main Street, Cockermouth, CA13 9LU (01900 325990)
- Maryport Customer Services Centre: Senhouse Street, Maryport, CA15 6BH
- Maryport Library: Lawson Street, Maryport CA15 6ND (01900 812384)
- Silloth Library: Solway community school, Liddell Street, Silloth CA7 4DD (016973 32195)
- Wigton Library: High Street, Wigton (016973 66150)
- Wigton Local Link: Community Office, Market Hall, Wigton CA7 9AA (01900 702890)
- Workington Library: Vulcans Lane, Workington, CA14 2ND (01900 706170)

Alternative formats may be available upon request.

Comments should be made using the official representation form which can be downloaded from our website: www.allerdale.gov.uk/localplan. A Guidance Note has been prepared to help you make your comment and this is also available on our website.

Hard copies of the form are available at council offices and libraries, and can be requested by telephoning 01900 702610 or by emailing localplan@allerdale.gov.uk

Completed forms should be returned by email or post to:

Email: localplan@allerdale.gov.uk

Post: Planning Policy
Development Services
Allerdale Borough Council
Allerdale House
WORKINGTON
CA14 3YJ

Please note that this is a statutory period of consultation and all comments must be received by **4pm on Tuesday 18th June 2013** to make sure that they are considered.

The representations received during this formal period of consultation will be passed to the Planning Inspectorate for use in the Examination in Public, and as such these will be published for public scrutiny.

If you have any queries regarding the Pre Submission consultation or would like to be kept informed as to the progress of the Plan, please do not hesitate to contact a member of the Planning Policy team on 01900 702610 or by email: localplan@allerdale.gov.uk

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Kerrigan', with a stylized flourish at the end.

Kevin Kerrigan
Head of Development Services



Allerdale Local Plan

Core Strategy and Development Management Documents Preferred Options Stage Consultation

Core Strategy and Development Management DPD Documents
Representation Form and Notes

Please return to Allerdale Borough Council by Tuesday 31st July 2012

By post: Planning Policy Department, Planning Services, Allerdale Borough Council, Allerdale House, Workington, Cumbria, CA14 3YJ.

By email: localplan@allerdale.gov.uk

For assistance on how to complete this form please refer to the guide on pages 7 & 8

Further advice and guidance can be obtained by contacting the planning policy department directly or by visiting the Allerdale Borough Council Website:

Tel: 01900 702610

Website: www.allerdale.gov.uk/localplan

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Consultee ID:

(For official use only)

Part A: Personal details

*if an agent is appointed, please fill in your title, name and organisation but the full contact details of the agent must be completed.

	Personal details	Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (if applicable)		
Department (if applicable)		
Organisation (if applicable)		
Address(1)		
Address(2)		
Address(3)		
Address(4)		
Postcode		
Tel Number		
Email		

Consultee ID:

(For official use only)

Part B: Please use a separate sheet for each comment that you wish to make

1. To which DPD document does this representation relate?

Core Strategy		Development Management	
---------------	--	------------------------	--

2. To which part of the document does this representation relate?

Policy:		Paragraph:		Table:		Map:	
Site:				Other:			

3. Do you consider the DPD is:

(i) Legally compliant	Yes:			No:	
(ii) Sound	Yes:			No:	
If you have entered No to 3 (ii), please continue to Q5. In all other circumstances, please go to Question 4.					

4. Do you consider the DPD is unsound because it is not:

(1) Justified	
(2) Effective	
(3) Consistent with national policy	

- 5. Please give details of why you consider the DPD is not legally compliant or is unsound.**

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

<div style="text-align: right; padding-right: 20px;">(Continue on a separate sheet/ expand box if necessary)</div>
--

- 6. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound.**

It will be helpful if you are able to put forward your suggested revised wording of any proposal or text.

<div style="text-align: right; padding-right: 20px;">(Continue on a separate sheet/ expand box if necessary)</div>
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Signature:		Date:	
------------	--	-------	--

Part C: About Yourself

This section will add an extra layer of information to the consultation. **Any information/details provided in this section will remain confidential.**

Q1. What is your gender?

Male		Female	
------	--	--------	--

Q2. Which of the following age groups apply to you?

0-15		16-24		25-34		35-44	
45-54		55-64		65-74		75+	

The Race Relations (Amendment) Act 2000 requires all public authorities to promote racial quality and prevent racial discrimination. Allerdale Borough Council is committed to: eliminating unlawful racial discrimination, promoting equality and opportunity and promoting good relations between people of different racial groups.

For this reason we would ask you to complete this question.

Q3. What is your ethnic origin?

White	British	Irish	Other
Black or Black British	Caribbean	African	
Mixed	White & Caribbean	White & African	White & Asian
Asian or Asian British	Indian	Pakistani	Bangladeshi
Chinese or other ethnic group	Chinese	Other	
Gypsies and Travellers	Irish	Other	
Any other ethnic group			

Part D: Guide to making comments on the Allerdale Core Strategy and Development Management Preferred Options Documents

If you have a comment to make about the documents, it is important that we hear from you.

To those not familiar with the planning system the representations form can appear complicated and technical in places, so we have prepared this guide to provide an additional explanation of the layout and terms used.

If you are not able to use the form but would like to comment, you can write to the council at the following address, setting out your comments in a letter or email:

Please send letters to: **Planning Policy Department
Planning Services
Allerdale Borough Council
Allerdale House
Workington
Cumbria, CA14 3YJ**

Please send e-mails to: **localplan@allerdale.gov.uk**

Part A - Personal details

Please fill out as many parts of this section of the form as you can. We need this information to ensure that we can keep you informed about the next stages in the preparation of the plans.

Part B – Your representations

1: To which DPD does this representation relate?

It is important that you indicate which document you are commenting on, so that we can assign your response to the correct database.

2: To which part of the document does your representation relate?

It is important that both we can fully take into consideration your comments on the Allerdale Local Plan. For this reason it would be very helpful to us if you could, as a minimum, provide details of the part of the document you are commenting on, such as the page or paragraph number for example.

3. Do you consider the DPD is:

(i) Legally compliant?

The form asks if you consider the plan to be legally compliant. This is essentially asking whether or not the plan has been prepared in line with the plan making regulations set out by government. If the plan has not been prepared in line with the regulations, then the

council will have to withdraw the plan and carry out some additional work to ensure the regulations have been met.

(ii) sound?

The form also asks whether you consider the document to be 'sound' on three key points.

The first point asks whether or not the policies and site allocations in the plan are **justified**, in other words, does the Council's interpretation of the evidence justify the proposals set out in the plan.

The second point asks about the **effectiveness** of the plan – here you may wish to consider whether the policies in the plan can actually be delivered and are able to respond to change.

The third point refers to **consistency with national policy**. The National Planning Policy Framework (NPPF) is the document that sets out the national planning policy framework. This document can be obtained from the Department of Communities and Local Government website: www.communities.gov.uk/

5. Please give details of why you consider the DPD is not legally compliant or is unsound

6. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound.

Making your comments in relation to questions 5 and 6:

It is important that the Council fully understand your comments, particularly where you think changes need to be made to make the plan 'sound'.

If you feel that the plan has not been prepared in line with regulations, or is not sound, then you can use the first box to explain why and the second box to set out what you think needs to be changed to make the plan 'sound' or meet the planning regulations. You can also use this part of the form if you want to support the plan.

Part C – Equality and diversity monitoring

It will help us to analyse responses to consultations if you tell us about yourself. This section will remain confidential.

Appendix 3

List of contacts consulted about the Pre submission draft and associated documents.

	Hard Copy	Email	Letter
4NW		✓	
Above Derwent Parish Council			✓
Action With Communities in Cumbria		✓	
Adlington		✓	
Age UK		✓	
Age UK West Cumbria		✓	
Aggregate Industries		✓	
Aikton Parish Council			✓
Airport Operators Association		✓	
Allerdale Disability Association		✓	
Allhallows Parish Council		✓	
Allonby Parish Council	✓		
Alpha Design		✓	
AMEC Environment & Infrastructure UK Limited		✓	
Ancient Monuments Society		✓	
Arlecdon & Frizington Parish Council		✓	
Aspatia Town Council			✓
Associated British Ports		✓	
AWAZ Cumbria		✓	
Bassenthwaite Parish Council			✓
Bewaldeth & Snittlegarth Parish Council			✓
Big Tree Planning Ltd		✓	
Blennerhasset & Torpenhow Parish Council			✓
Blindbothel Parish Council		✓	
Blindcrake Parish Council			✓
Boltons Parish Council		✓	
Borrowdale Parish Council		✓	

Bothel & Threapland Parish Council			✓
Bowness on Solway Parish Council	✓		
Bridekirk Parish Council		✓	
Briery Homes		✓	
Broadway Malayan		✓	
Brigham Parish Council			✓
Britain's Energy Coast		✓	
Britain's Energy Coast		✓	
British Cycling Federation		✓	
British Geological Survey		✓	
British Telecom		✓	
British Toilet Association		✓	
Bromfield Parish Council		✓	
Broughton Moor Parish Council	✓		
Broughton Parish Council			✓
Burgh-by-Sands Parish Council		✓	
Business, Innovation and Skills Department		✓	
Buttermere Parish Council		✓	
Caldbeck Parish Council	✓		
Camerton Parish Council			✓
CAMRA		✓	
Capita Symonds		✓	
Carlisle City Council		✓	
Castle Sowerby Parish Council		✓	
CBI North West		✓	
Chemical Business Association		✓	
Chesterton Humberts		✓	
Church of England		✓	

Churches Together in England		✓	
Churches Trust for Cumbria		✓	
Citizens Advice Bureau		✓	
Civil Aviation Authority		✓	
Cockermouth & District Chamber of Trade		✓	
Cockermouth Civic Trust		✓	
Cockermouth Town Council			✓
Colliers CRE		✓	
Copeland Borough Council		✓	
Copeland Borough Council		✓	
Council for British Archaeology (North Area)		✓	
Country Guardian		✓	
Country Land & Business Association (North Office)		✓	
Crosscanonby Parish Council	✓		
Cumbria Association of Local Councils		✓	
Cumbria Biodiversity Partnership		✓	
Cumbria CC		✓	
Cumbria CC Adult and Local Services		✓	
Cumbria Chamber of Commerce		✓	
Cumbria Community Transport		✓	
Cumbria Constabulary		✓	
Cumbria County Council		✓	
Cumbria Disability Network		✓	
Cumbria Federation of Women's Institutes		✓	
Cumbria Fire & Rescue Service		✓	
Cumbria Housing Group		✓	
Cumbria Local Access Forum		✓	
Cumbria Local Enterprise Partnership		✓	
Cumbria Neighbourhood Watch Association		✓	
Cumbria Primary Care Trust		✓	
Cumbria RIGS		✓	

Cumbria Rural Enterprise Agency		✓	
Cumbria Rural Forum		✓	
Cumbria Rural Housing Trust		✓	
Cumbria Strategic Partnership		✓	
Cumbria Tourism		✓	
Cumbria Wildlife Trust		✓	
Cumbria Young Farmers		✓	
Cumbria Youth Alliance		✓	
Dalston Parish Council		✓	
David L Walker Surveyors		✓	
Day Cummins Ltd		✓	
De Pol Associates		✓	
Deaf Vision		✓	
Dean Parish Council	✓		
Dearham Parish Council			✓
Defence Infrastructure Organisation		✓	
Department for Environment, Food and Rural Affairs		✓	
Department for Culture, Media and Sport		✓	
Department of Communities and Local Government		✓	
Department of Education		✓	
Department of Energy & Climate Change		✓	
Department of Environment, Food & Rural Affairs		✓	
Department of Health		✓	
Department of Transport		✓	
Department of Works and Pensions		✓	
Derwent Forest Development Consortium		✓	
Design Council		✓	
Distington Parish Council		✓	
DPP			✓
Drivers Jonas Deloitte		✓	
Dumfries & Galloway		✓	
Dundraw Parish Council			✓
Eden District Council		✓	

Eden, Homes and Communities		✓	
Electricity North West Ltd		✓	
Embleton & District Parish Council			✓
Employers' Forum on Disability		✓	
English Heritage			✓
Environment Agency	✓	✓	
Equality & Human Rights Commission		✓	
Equality and Human Rights Commission		✓	
Eric Telford Planning Associated		✓	
Fairhurst		✓	
Fields in Trust		✓	
Forestry Commission	✓		
Freight Transport Association		✓	
Friends of Deer Park		✓	
Friends of Rural Cumbria's Environment		✓	
Friends of the Earth West Cumbria		✓	
Friends of the Lake District		✓	
Friends, Families and Travellers		✓	
Gilcrux Parish Council			✓
Gingerbread North West		✓	
GL Hearn		✓	
Gladedale Estates		✓	
Gladman Homes			✓
Great Clifton Parish Council			✓
Great Clifton Residents Group		✓	
Green Design Group		✓	
Greysouthen Parish Council	✓		
GVA		✓	
GVA Grimley		✓	
Gypsy Roma Traveller Achievement Service Leeds		✓	
Hall Aitken		✓	
Harvest Housing		✓	
Hayton & Mealo Parish Council			✓
Health & Safety Executive		✓	

Highways Agency		✓	
Holme Abbey Parish Council		✓	
Holme East Waver PC	✓		
Holme Low Parish Council			✓
Holme St Cuthbert Parish Council	✓		
Home Group		✓	
Homes and Communities Agency		✓	
House Builders Federation			✓
Impact Housing Association		✓	
Inspira		✓	
Institute of Directors		✓	
Invest in Cumbria		✓	
Invest in Cumbria		✓	
Ireby Parish Council		✓	
JMP Consultants Ltd		✓	
Jones Day		✓	
Jones Lang Lasalle		✓	
Keswick Town Council		✓	
Kirkbampton Parish Council		✓	
Kirkbride Parish Council	✓		
Lake District National Park Authority		✓	
Lakeland Building Design		✓	
Lakes College West Cumbria		✓	
Lamplugh Parish Council		✓	
Lancaster University		✓	
Lattimer Group		✓	
Little Clifton Parish Council		✓	
Lorton Parish Council		✓	
Lowca Parish Council		✓	
Loweswater Parish Council			✓
LS (Jersey)		✓	

Maryport Town Council		✓	
Miller Homes Ltd		✓	
Mind in West Cumbria		✓	
Ministry of Defence		✓	
Ministry of Defence		✓	
Ministry of Justice		✓	
Mobile Operators Association		✓	
Morrisons		✓	
N.J. Hodgson & Co		✓	
National Childminding Association (North West Office)		✓	
National Farmers Union		✓	
National Grid		✓	
NATS		✓	
Natural England		✓	
Network Rail Town Planning Team (LNW)		✓	
NHS North West		✓	
NHS Trust		✓	
North Cumbria University Hospitals NHS Trust		✓	
North West Allerdale Trust		✓	
North West Ambulance Service NHS Trust		✓	
Northern Gas Networks Ltd		✓	
Northern Housing Consortium Limited		✓	
Nuclear Decommissioning Authority		✓	
Nugeneration		✓	
Orton Parish Council			✓
Oughterside & Allerby Parish Council			✓
Outreach Cumbria (GLBT Health Project)		✓	
Papcastle Parish Council	✓		
Paul Butler Associates		✓	
Peacock & Smith		✓	
Persimmon Homes		✓	
PFK Planning		✓	
Planning Inspectorate	✓	✓	✓
Plumbland Parish Council		✓	
Port of Workington		✓	
RAC Motorinn Services		✓	

RAC Motoring Services		✓	
Ramblers		✓	
Ramblers Association (Lake District)		✓	
REG Windpower		✓	
Renewable UK		✓	
representing National Offender Management Service (NOMS)		✓	
Rights of Women		✓	
Road Haulage Association		✓	
Rockcliffe Parish Council		✓	
Royal Mail Group Ltd		✓	
RSPB		✓	
RWE npower renewables		✓	
Sainsburys Supermarkets		✓	
Sanderson Weatherall		✓	
Savills		✓	
Seaton Parish Council		✓	
Sebergham Parish Council		✓	
Silloth Town Council		✓	
Skills Funding Agency		✓	
Smiths Gore		✓	
Smiths Gore		✓	
Solway Coast AONB		✓	
Solway Firth Partnership		✓	
South Lakeland District Council		✓	
Sport England		✓	
St Johns Castlerigg Parish Council		✓	
Stagecoach Cumbria and North Lancashire		✓	
Stewart Ross Associates		✓	
Story Homes		✓	
Sustrans		✓	
Taylor & Hardy		✓	
Taylor Wimpey North West		✓	
Tesco Plc		✓	
The Coal Authority		✓	

The Co-operative Group Ltd		✓	
The Crown Estate		✓	
The Disabled Persons Transport Advisory Committee		✓	
The Garden History Society		✓	
The Gender Trust		✓	
The Georgian Group		✓	
The Green Party		✓	
The Gypsy Council		✓	
The Home Office		✓	
The Marine Management Organisation		✓	
The Market Hall		✓	
The National Trust		✓	
The Office for Disability Issues		✓	
The Runnymede Trust		✓	
The Senhouse Museum Trust		✓	
The Society for the Protection of Ancient Buildings		✓	
The Theatres Trust		✓	
The Traveller Law Reform Project		✓	
The Twentieth Century Society		✓	
The Victorian Society		✓	
The Woodland Trust		✓	
Thomas Armstrong Construction Ltd		✓	
Thursby Parish Council	✓		
UK Resilience		✓	
Underskiddaw Parish Council			✓
United Utilities	✓		
University of Cumbria		✓	
Ward Hadaway		✓	
Waverton Parish Council		✓	
West Cumbria CVS		✓	
West Cumbria Development Agency		✓	
Westfield Housing Association		✓	
Westnewton Action Group		✓	
Westnewton Parish Council		✓	
Westward Parish Council		☐	✓
Wigton Parish Council			✓
Winscales Parish Council	✓		
Wm Morrison Supermarkets PLC		✓	
Woodside Parish Council		✓	
Workington Civic Trust		✓	
Workington Town Council			✓
Young Cumbria		✓	
Youth Outreach		✓	
Youthtastic		✓	

List of individuals consulted on pre-submission draft

			Hard copy	Email	Letter
Ms	Sarah	Hemsley		✓	
Mr	David	Williarms		✓	
Mrs	Anne	Singleton		✓	
Mr	Douglas	Newham		✓	
Mrs	Felicity	Crowley			✓
Mr	Joe	Sandwith			✓
Mr	R	Nichols			✓
Miss	F	Watson			✓
Mr	John F	Hyncica			✓
Mr	Alan	Rule		✓	
Mr	Malcolm	Jennings		✓	
Mr	David	Colborn		✓	
Mr	John	Robinson		✓	
Mrs	Margaret	Robinson			✓
Mrs	Fiona	Weakley			✓
Miss	D	Lewthwaite		✓	
Dr	Ian	Francis		✓	
Dr	Simon	Dumbill			✓
Mrs	Jeannette	Smith		✓	
Mr	Anthony	Macey			✓
Mrs	Susie	Davies			✓
Mrs	Sylvia	Walsh		✓	
Mrs	Sheila	Pearson		✓	
Mr	Chris	Taylor		✓	
Dr	Ian	Lowles			✓
Dr	Mark	Greaves			✓
Mrs	Margaret	Guy		✓	
Mr and Mrs	D and GJ	Crone			✓
	N D	Sideaway			✓
Mr	Neil	Bassett			✓
Mr	Steve	Atkinson		✓	
Ms	Margaret	Armstrong		✓	
Ms	Susan	Allison		✓	
Mrs	A M J	Jones		✓	
Mr	Stephen	Murray			✓
Ms	Judith	Johnstone		✓	
Mrs	A	Logan		✓	
Mr	Clive	Narrainen			✓
Mr	J K	Rylands		✓	
Mr	Adrian	Brown		✓	
	J & K	Howis		✓	
	Mary	Walsh			✓
Mrs	Ruth	Guthrie		✓	
Mr	John	Guthrie		✓	
Mrs	Judith	Cockton		✓	
Mr	Robert	Van Den Bossche		✓	
Mrs	Sheena	Van Den Bossche		✓	
Mr	John	Sutton			✓
Mrs	Maureen	Sutton			✓
Mr	Stewart	Gimber		✓	
Mr	Nicholas	Cockton		✓	

Mr	William	Patterson	✓	
Mr	Ron	Williams		✓
Mr	John	Havelock	✓	
Mr	J Alan	Keighley	✓	
Mr &				
Mrs	J & E	Bell	✓	
Mr	David	Copeland		✓
Mr	William Peter	Boyes		✓
Mrs	Pauline	Boyes	✓	
Mrs	Donna	Holliday	✓	
Mr	Mark	Holliday	✓	
Mr	Charles	Sanderson	✓	
Mrs	Florence	Sanderson		✓
Mr	Richard	Chapman	✓	
Mrs	Anne	Chapman		✓
Mrs	Gillian	Linder		✓
Ms	Janet	Farebrother	✓	
Mr	George	Mattinson		✓
Mr	Andrew	Hunter	✓	
Mrs	Joan	Pouchner	✓	
Mr	Anthony	Pouchner	✓	
Ms	Sue	Miller		✓
Mrs	Dorothy	Miller		✓
Mrs	Susan	McCallum		✓
Mr	Bill	McCallum		✓
Miss	Lesley	McCallum		✓
Mr	Mark	Eastwood		✓
Mrs	Caroline	Eastwood		✓
Mrs	Myra	Kirkpatrick	✓	
Mr	Clive	Kirkpatrick	✓	
Mr	Melvyn	McEuwan		✓
Mrs	Gillian	McEuwan		✓
Mr	Ben	Greaves	✓	
Mrs	Deborah	Redmond	✓	
Mr	Anthony	Allaker	✓	
Mrs	Helen	Allaker	✓	
Mrs	Jennifer	Walton		✓
Mr	Mark	Walton		✓
Ms	Carla	Allport		✓
Mr	Peter	Allport		✓
Mrs	Caroline	Brews	✓	
Mr	Philip	Brews	✓	
Mrs	Gwendoline	Dodd	✓	
Miss	Hannah	Dodd	✓	
Ms	Pamela	Watson		✓
Mrs	Dorothy	McGrath		✓
Mr	David	McGrath		✓
Mr	James	McGrath		✓
Mr	Paul	Holliday		✓
Mr	Ron	Hardy		✓
Mr	Roy	Lucas	✓	
Mrs	Barbara	Lucas	✓	
Mrs	Margaret	Travell	✓	
Mr	Geoff	Travell		✓
Mrs	Sharon	Woollard	✓	
Mr	Colin	Woollard		✓
Mr	Francis	Wheeler		✓

Mrs	June	Wheeler		✓
Mrs	Joan	Wilson		✓
Mr	Richard	Wilson	✓	
Mrs	Sandra	Boardman	✓	
Mr	Allan	Boardman	✓	
Mrs	Eileen	Fennell		✓
Mr	John	Fennell		✓
Mrs	Jennifer	Bernard		✓
Dr	Robert	Bernard		✓
Mrs	Carol	Thompson		✓
Mr	William	Thompson		✓
Mr	Victor	Thompson		✓
Mrs	Jean	Thompson		✓
Mrs	Elizabeth	Cooper		✓
Mr	Ronald	Goulding		✓
Mr	Simon	Rickerby		✓
Mr	Denis	Cooper		✓
Mr	Elliott	Cooper		✓
Mrs	Clair	Cooper-Rickerby		✓
Mrs	Mary	Goulding		✓
Miss	Tracy	Erlston		✓
Mr	Adrian	Windridge		✓
Mrs	Jacqueline	Windridge		✓
Mr	Robert	Allison		✓
Mrs	Katie	Allison		✓
Mrs	Daphne	Beck		✓
Mrs	Maureen	Zanineth		✓
Mrs	Helen	MacDonald		✓
Miss	Alison	Church		✓
Mr	Sean	Knapp		✓
Mr	Jeffrey	Nicholson		✓
Mr	Andrew	Butler		✓
Mrs	Sandra	Butler		✓
Mr	Albert	Zaninetti		✓
Mrs	Lisa	Varey		✓
Mrs	Doreen	Hardy		✓
Miss	Kathryn	Hardy		✓
Mrs	Nicola	Bell		✓
Mr	Mark	Gascoigne		✓
Mr	Derek	Jackson		✓
Mrs	Maureen	Jackson		✓
Mr	Michael	Caley		✓
Mrs	Nicola	Caley		✓
Mr	David	Bell		✓
Mrs	Valerie	Conelly		✓
Mrs	Dorothy	Hillar		✓
Mrs	Susan	Batty		✓
Mrs	Christine	Blake		✓
Mr	Allan	Sykes		✓
Mrs	Brenda	Sykes		✓
Mrs	Joyce	Caley		✓
Mr	Dacre	Caley		✓
Mrs	Pearl	Coates		✓
Mr	Stephen	Coates		✓
Mr	Alan	Littlefair		✓
Miss	Laura	Hughes		✓
Mr	Thomas	Windridge		✓

Mr	Clive	Marshall	✓	
Ms	Pauline	Bibby	✓	
Ms	Sue	Ross	✓	
Mrs	S	Steel	✓	
Mrs	Janet	North	✓	
Mr	Richard	Lewington		✓
Mrs	Patricia	Lewington		✓
Ms	Allyson	Turner	✓	
Ms	Joan	Lancaster	✓	
Mr	Mark	Holt	✓	
	Nicky	Luckett	✓	
Mrs	J	Kirkbride	✓	
Mr	Graham	Stanton	✓	
Ms	Vera	Stanton	✓	
Mr &	Susan and			
Mrs	Arthur	Allison	✓	
Mr	Richard	Watson	✓	
Mr &	Deborah and			
Mrs	Steve	Kitching	✓	
Mrs	Pat	Stephenson	✓	
Mr	Robin	Mcnamara	✓	
Ms	Sheila	Murphy	✓	
	Aine	Kelly	✓	
Mr	Joe	Crowther	✓	
Miss	Jenny	Bate	✓	
Ms	Elizabeth Joy	Hall	✓	
Mr	CJ	Bate	✓	
	Graham and			
Mr & Ms	Gillian	McFarlane and Conyers	✓	
Mrs	Samantha	Russell	✓	
Mr	Ian	Russell	✓	
Mrs	Kathleen	Chambers		✓
Mr	Ian	Inglis		✓
Mr	Malcolm	Mullett		✓
Ms	Barbara	Burton		✓
Ms	Viv	Lewis	✓	
Mr and	Mave and			
Mrs	Tony	Tyas	✓	
Mr	Charles	Woodhouse	✓	
	S	Walsh	✓	
Mr	John	Maynard Hall	✓	
Ms	Lilli	Green	✓	
Ms	Jenny	Alexander	✓	
Ms	Mary	Snape	✓	
Mr	Alan	Waugh	✓	
Mrs	Wendy	Thomas	✓	
Mr	John	Thomas	✓	
Ms	Dianne	Standen	✓	
Mr and				
Mrs	John and Ann	Day	✓	
Mr	William	Irving	✓	
Mr &	Geoffrey &			
Mrs	Ella	Cole		✓
Mrs	Kim	Terry		✓
	CJ	Payne	✓	
Mr	James	Garrett	✓	
Mr	Ian	Brodie	✓	
Dr	Ruth	Balogh	✓	

Ms
Ms

Mercia
Jane

Haughan
Sheppard



Planning and Compulsory Purchase Act 2004

**The Town and Country Planning (Local Planning) (England) Regulations
2012**

Regulation 19 Consultation- Allerdale Local Plan (Part 1)

Allerdale Borough Council has published the pre-submission draft of the Allerdale Local Plan containing the Core Strategy, Development Management Policies and changes to the Proposal Map. The consultation period will run from 3 May to 4pm 18 June 2013.

The Core Strategy sets out the overall strategy for future development including housing, employment, retail, and leisure. The Development Management policies provide more detailed guidance for determining planning applications. The documents cover the whole of Allerdale that lies outside the National Park.

The documents will be available to view between 9:00am to 5:00 pm Monday to Thursday and 9:00 am to 4:30 pm on Fridays at the Council's offices at Allerdale House, Workington.

Copies will also be available to view at the following venues during their normal opening hours;

Aspatria Library: The Brandshaw, Aspatria

Cockermouth Library: Main Street, Cockermouth

Maryport Library: Lawson Street, Maryport

Silloth Library: Solway Community School, Liddell Street, Silloth

Wigton Library: High Street, Wigton

Workington Library: Vulcans Lane, Workington

Customer Service Centre, Fairfield Car Park, Cockermouth

Town Hall, Senhouse Street, Maryport

Local Links, Market Hall, Wigton

The documents and comments form are also available on the Council's website www.allerdale.gov.uk/localplan

The documents can be made available in alternative formats on request.

Representations should be made in writing, using the comments forms and sent by either email or letter to:

Planning Policy, Development Services, Allerdale Borough Council, Allerdale House, Workington CA14 3YJ or localplan@allerdale.gov.uk by no later than 4pm Tuesday 18 June 2013.

Representations may be accompanied by a request to be notified at a postal address/email address of any of the following;

Submission of the Local Plan for public examination by an independent Planning Inspector;

Publication of the Inspectors' recommendations; and

The adoption of the Local Plan.

Mr K Kerrigan
Head of Development Services
3 May 2013

Allerdale Borough Council

Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England)
Regulations 2012

Regulation 19 Consultation - Allerdale Local Plan (Part 1)

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Maryport Library: Lawson Street, Maryport

Silloth Library: Solway Community School, Liddell Street, Silloth

Wigton Library: High Street, Wigton

Workington Library: Vulcans Lane, Workington

Customer Service Centre, Fairfield Car Park, Cockermouth

Town Hall, Serhouse Street, Maryport

Local Links, Market Hall, Wigton

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Planning Policy, Development Services, Allerdale Borough Council,
Allerdale House, Workington CA14 3YJ or localplan@allerdale.gov.uk by no later than 4pm Tuesday 18 June 2013.

Representations may be accompanied by a request to be notified at a postal address/email address of any of the following:

Submission of the Local Plan for public examination by an independent Planning Inspector;

Publication of the Inspectors' recommendations; and

The adoption of the Local Plan

Head of Development Services

Date: 3 May 2013

TS 3 May 2013

MO 89925

13 x 2

Cost: £478.10

For the attention of: Shona Reid

Please approve by: 2pm Today

Ad produced by: David

Contact tel: 01228 221726

Fax: 01228 601729

Please Note:

Advert's or quotes will **NOT** be placed in publications unless we get final approval.

Allerdale Borough Council

**Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England)
Regulations 2012 Regulation 19 Consultation -
Allerdale Local Plan (Part 1)**

Allerdale Borough Council has published the pre-submission draft of the Allerdale Local Plan containing the Core Strategy, Development Management Policies and changes to the Proposal Map. The consultation period will run from 3 May to 4pm 18 June 2013.

The Core Strategy sets out the overall strategy for future development including housing, employment, retail, and leisure. The Development Management policies provide more detailed guidance for determining planning applications. The documents cover the whole of Allerdale that lies outside the National Park.

The documents will be available to view between 9:00am to 5:00pm Monday to Thursday and 9:00am to 4:30pm on Fridays at the Council's offices at Allerdale House, Workington.

Copies will also be available to view at the following venues during their normal opening hours.

Aspatria Library: The Brandshaw, Aspatria

Cockermouth Library: Main Street, Cockermouth

Maryport Library: Lawson Street, Maryport

Silloth Library: Solway Community School, Liddell Street, Silloth

Wigton Library: High Street, Wigton

Workington Library: Vulcans Lane, Workington

Customer Service Centre, Fairfield Car Park, Cockermouth

Town Hall, Senhouse Street, Maryport

Local Links, Market Hall, Wigton

The documents and comments form are also available on the Council's website www.allerdale.gov.uk/localplan

The documents can be made available in alternative formats on request. Representations should be made in writing, using the comments forms and sent by either email or letter to:

Planning Policy, Development Services, Allerdale Borough Council,
Allerdale House, Workington CA14 3YJ or localplan@allerdale.gov.uk
by no later than 4pm Tuesday 18 June 2013.

Representations may be accompanied by a request to be notified at a postal address/email address of any of the following;

Submission of the Local Plan for public examination by an Independent Planning Inspector;

Publication of the Inspectors' recommendations; and

The adoption of the Local Plan

Head of Development Services

Date: 3 May 2013

CN 3 May 2013

MO 89922

13 x 2

Cost: £542.37

For the attention of: Shona Reid

Please approve by: 2pm Today

Ad produced by: David

Contact tel: 01228 221726

Fax: 01228 601729

Please Note:

Advertisers or quotes will **NOT** be placed in publications unless we get final approval.

Pre Submission - Deposit Copies & Topic Paper Updates

List of locations where copies of the Preferred Options documents were available for inspection

Allderdale Borough Council Allderdale House New Bridge Road WORKINGTON CA14 3YJ
Allderdale Borough Council Fairfield Car Park COCKERMOUTH CA13 9RT
Workington Library Vulcans Lane WORKINGTON CA14 2ND
Maryport Library Lawson Street MARYPORT CA15 6ND
Cockermouth Library Main Street COCKERMOUTH CA13 9LU
Wigton Library High Street WIGTON CA7 9NJ
Aspatria Library Local Link Centre The Brandraw ASPATRIA CA7 3EZ
Silloth Library Liddle Street SILLOTH CA7 4DD



Allerdale Borough Council
Allerdale House
Workington
Cumbria CA14 3YJ
Tel: 01900 702702
Fax: 01900 702507
Email: enquiries@allerdale.gov.uk

Have your say about the new Local Plan

Residents are being asked to give their views on a document which will determine planning strategy for the next 15 years.

Allerdale Borough Council has launched its consultation on the next stage of the new Local Plan. This 'pre-submission draft' will form part of the final Plan, covering the area the Council administers planning for, but excluding the area inside the National Park Boundaries.

The Local Plan will set out a 15-year strategy to meet the needs of local communities for housing, employment, retail and leisure, while balancing the need to protect the natural and built environment.

The Council now needs members of the public to give their opinions about the content of the document. All the comments received will be submitted with the Plan to the Secretary of State for Communities and Local Government for public examination.

Councillor Mark Fryer, Executive member with responsibility for planning policy, said: "This Local Plan has been developed through a series of consultations over recent years, and extensive evidence gathering by the Council. Putting the document together is a lengthy process - it is hugely important that we get it right as it forms the basis for planning decisions over the next 15 years.

"We have to get the balance right in this document. It must give us scope for the right developments, of the correct scale, to be made in the best locations, so the towns and villages of Allerdale can flourish. However, it must also protect the rural and built environments, ensuring they are attractive places to live, work and visit."

Further information on the Local Plan and how to submit comments can be found at www.allerdale.gov.uk/localplan. Copies of the Local Plan can also be viewed from 3 May at libraries in Aspatria, Cockermouth, Maryport, Silloth, Wigton and Workington, as well as at Council offices in Wigton, Cockermouth, Maryport and Workington.

All comments must be submitted in writing, preferably, using the comments form, or alternatively by email or letter. Comments can be submitted either by email at localplan@allerdale.gov.uk or by post to Planning Policy, Development Services, Allerdale House, New Bridge Road, Workington, CA14 3YJ.

The deadline for comments is 4pm Tuesday 18 June 2013.

Our Ref: POC/CSDM/052013/2

This matter is being dealt with by: Planning Policy Team

Direct Line: 01900 702610 Fax: 01900 702848

Email: localplan@allerdale.gov.uk

Judith Nelson
North West Planner
English Heritage
Canada House
3 Chepstow Street
Manchester M1 5FW



30 May 2013

Dear Madam,

Allerdale Local Plan (Part 1) – Pre-Submission Draft Consultation

Further to my letter dated 3 May 2013 regarding the public consultation on the proposed Allerdale Local Plan (Part 1) Pre-submission Draft, I am writing to advise that the consultation period has been extended until **4pm Friday 12 July 2013**.

Topic papers, which provide background detail and explanation, on a number of policy areas have been added to the Council website at www.allerdale.gov.uk/localplan alongside the Allerdale Local Plan (Part 1) Pre-submission Draft, Sustainability Appraisal and Habitats Regulations Assessment. The topic papers published by the Council are

Wind Turbine Separation Distance
Spatial Strategy
Housing Growth
Cumulative Viability Assessment

Copies of the Allerdale Local Plan (Part 1) along with the Sustainability Appraisal and Habitats Regulations Assessment are available to view at the Council Offices at Allerdale House, Workington between 9:00 am and 5pm Monday to Thursday and 9:00 am to 4:30 pm on Fridays

Copies are also available for inspection at the following locations during their normal opening hours:

- Aspatia Library: Local Link, The Brandraw, Aspatia, CA7 3EZ (016973 20515)
- Cockermouth Customer Services Centre: Fairfield Car Park, Cockermouth, CA13 9RT (01900 702870)
- Cockermouth Library: Main Street, Cockermouth, CA13 9LU (01900 325990)



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**Allerdale Borough Council
Allerdale House
Workington
Cumbria CA14 3YJ
Tel: 01900 702702
Fax: 01900 702507**

- Maryport Customer Services Centre: Senhouse Street, Maryport, CA15 6BH
- Maryport Library: Lawson Street, Maryport CA15 6ND (01900 812384)
- Silloth Library: Solway community school, Liddell Street, Silloth CA7 4DD (016973 32195)
- Wigton Library: High Street, Wigton (016973 66150)
- Wigton Local Link: Community Office, Market Hall, Wigton CA7 9AA (01900 702890)
- Workington Library: Vulcans Lane, Workington, CA14 2ND (01900 706170)

Alternative formats may be available upon request

Comments should be made using the official representation form which can be downloaded from our website: www.allerdale.gov.uk/localplan. A guidance note has been prepared to help you make your comment and this is also available on our website.

Hard copies of the representations form are available at the council offices and libraries, and can be requested by telephoning 01900 702610 or by emailing localplan@allerdale.gov.uk

Completed forms should be returned by email or post to:

Email: localplan@allerdale.gov.uk

Post: Planning Policy
Development Services
Allerdale Borough Council
Allerdale House
WORKINGTON
CA14 3YJ

Please note that this is a statutory period of consultation and all comments must be received by **4pm Friday 12 July 2013 (extended from 18th June 2013)** to make sure they are considered. If you have already submitted comments since the start of this consultation these have been logged and you do not need to re-submit them.

The representations received during this formal period of consultation will be passed to the Planning Inspectorate for use in the Examination in Public, and as such these will be published for public scrutiny.

If you have any queries regarding the Pre Submission consultation or would like to be kept informed as to the progress of the Plan, please do not hesitate to contact a member of the Planning Policy team on 01900 702610 or by email: localplan@allerdale.gov.uk

Yours faithfully



Kevin Kerrigan
Head of Development Services

Our Ref: POC/CSDM/052013/2

This matter is being dealt with by: Planning Policy Team
Direct Line: 01900 702610 Fax: 01900 702848

Email: localplan@allerdale.gov.uk



31 May 2013

Dear Sir or Madam,

Allerdale Local Plan (Part 1) – Pre-Submission Draft Consultation

I am writing to advise that the consultation period on the proposed Allerdale Local Plan (Part 1) Pre-submission Draft has been extended until **4pm Friday 12 July 2013**.

Topic papers, which provide background detail and explanation, on a number of policy areas have been added to the Council website at www.allerdale.gov.uk/localplan alongside the Allerdale Local Plan (Part 1) Pre-submission Draft, Sustainability Appraisal and Habitats Regulations Assessment. The topic papers published by the Council are

Wind Turbine Separation Distance
Spatial Strategy
Housing Growth
Cumulative Viability Assessment

Could you please ensure that the copies of the Allerdale Local Plan (Part 1) and associated documents remain on deposit until the revised date of 12 July 2013.

The Allerdale Local Plan (Part 1) along with the Sustainability Appraisal and Habitats Regulations Assessment are will also remain on deposit at the Council Offices at Allerdale House, Workington between 9:00 am and 5pm Monday to Thursday and 9:00 am to 4:30 pm on Fridays

Copies are available for inspection at the following locations during their normal opening hours:

- Aspatria Library: Local Link, The Brandraw, Aspatria, CA7 3EZ (016973 20515)
- Cockermouth Customer Services Centre: Fairfield Car Park, Cockermouth, CA13 9RT (01900 702870)
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- Maryport Customer Services Centre: Senhouse Street, Maryport, CA15 6BH



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- Workington Library: Vulcans Lane, Workington, CA14 2ND (01900 706170)

Alternative formats may be available upon request

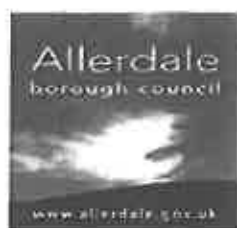
Please note that this is a statutory period of consultation and all comments must be received by **4pm Friday 12 July 2013 (extended from 18th June 2013)** to make sure they are considered. If representors have already submitted comments since the start of this consultation these have been logged and they do not need to re-submit them.

If you have any queries regarding the Pre Submission consultation or require further forms or guidance notes, please do not hesitate to contact a member of the Planning Policy team on 01900 702610 or by email: localplan@allerdale.gov.uk

Yours faithfully



Kevin Kerrigan
Head of Development Services



Allerdale Borough Council
Allerdale House
Workington
Cumbria CA14 3YJ
Tel: 01900 702702
Fax: 01900 702507
Email: enquiries@allerdale.gov.uk

Local Plan consultation exercise extended

Residents are being given more time to share their views on a document which will determine planning strategy for the next 15 years.

Allerdale Borough Council is consulting the public on the next stage of the new Local Plan. This 'pre-submission draft' will form part of the final Plan, covering the area the Council administers planning for, but excluding the area inside the National Park Boundaries.

The consultation period has been extended to **4pm on Friday 12 July 2013** to give people more time to look at new information which has been made available on the subjects of housing, renewable energy and viability.

The Local Plan will set out a 15-year strategy to meet the needs of local communities for housing, employment, retail and leisure, while balancing the need to protect the natural and built environment. All the comments received will be submitted with the Plan to the Secretary of State for Communities and Local Government for public examination.

Further information on the Local Plan and how to submit comments can be found at www.allerdale.gov.uk/localplan. Copies of the Local Plan can also be viewed from 3 May at libraries in Aspatria, Cockermouth, Maryport, Silloth, Wigton and Workington, as well as at Council offices in Wigton, Cockermouth, Maryport and Workington. All comments must be submitted in writing, preferably, using the comments form, or alternatively by email or letter. Comments can be submitted either by email at localplan@allerdale.gov.uk or by post to Planning Policy, Development Services, Allerdale House, New Bridge Road, Workington, CA14 3YJ.