

# Appendices Volume 1: Pre-Submission Draft



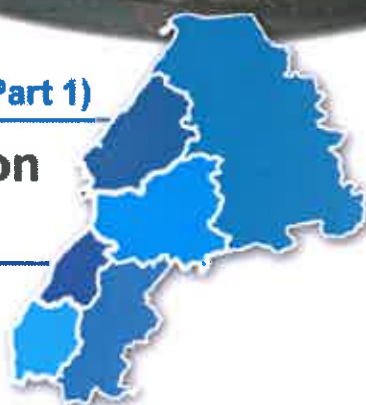
**Allerdale Borough Council**



**Allerdale Local Plan (Part 1)**

**Pre - Submission  
Draft**

**May 2013**



# Pre-submission Responses

Rep ID:	1 / 2	Company/Organisation:	The Coal Authority	Document:	LP
		Name:	Mr A Northcote	Policy:	General

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

**Summary:** Objection - The Plan does not make reference to the Cumbria Minerals and Waste Development Framework, which leaves the reader potentially being unaware that these DPDs are relevant to the taking forward of non-mineral development proposals.

**Full Response:** Objection - The Allerdale Local Plan does not make any reference to any part of the Cumbria Minerals and Waste Development Framework, which leaves the reader potentially being unaware that these DPDs are relevant to the taking forward of non-mineral development proposals.

The Cumbria Minerals and Waste Core Strategy, which forms part of the overall Cumbria MWDF, was adopted in April 2009. In line with the former MPS1, now the NPPF, this incorporated a commitment to defining Minerals Safeguarding Areas (MSAs) for the surface coal resource areas within the County (Core Strategy Policy 14). As such, the surface coal resource area within Allerdale Borough was then defined as an MSA and a Mineral Consultation Area through the subsequent Policy DC9 of the Generic Development Control Policies DPD within the Cumbria MWDF. This Policy DC9 requires implementation by the District Council in order to ensure that minerals are not needlessly sterilised by non-mineral surface development.

The NPPF in paragraphs 143 and 144 sets out an obligation on both MPAs and LPAs to ensure that mineral resources are not needlessly sterilised and to promote the prior extraction of mineral resources where appropriate if sterilisation is to occur.

**Changes :** Change Requested - The Allerdale Local Plan should provide an appropriate cross reference to the Cumbria Minerals and Waste Development Framework.

**Council's Response:** It is considered that the Plan includes policy material to ensure that the development is consistent with the Minerals and Waste Development Framework. However, it is accepted that a more explicit, direct reference would both improve clarity of the Plan and clear guidance for users.

**Change :** Yes

**Action:** The Links table proceeding Policy S2 has been updated to provide a cross reference to the Cumbria Mineral and Waste Development Framework.

<b>Rep ID:</b>	2 / 1	<b>Company/Organisation:</b>	Friends of the Lake District	<b>Document:</b>	LP
		<b>Name:</b>	Dr K Wilshaw	<b>Policy:</b>	General

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

**Summary:** FLD would encourage the inclusion of a policy addressing electricity infrastructure,

**Full Response:** Friends of the Lake District previously made representations regarding the lack of a policy addressing electricity infrastructure. No policy has been put forward so our previous comments stand and are reproduced below.

FLD would encourage the inclusion of a policy addressing electricity infrastructure, Policy EM17 in the adopted Local Plan addresses this. Such infrastructure is potentially highly intrusive. The issue remains of relevance, and should therefore be addressed in the revised Plan.

In terms of the tests of legal compliance and soundness therefore, FLD would highlight the following conflicts:

1. The DPD has not had regard to extant Regional Spatial Strategy policy, most notably EM1.
2. The DPD has 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.

**Changes :** Suggested Changes Include a policy on electricity infrastructure. Where new development required new grid connections, these should be undergrounded wherever possible. It should be noted that the Solway Coast AONB has an amenity allowance for undergrounding within the AONB boundaries.

**Council's Response:** It is considered that the Plan includes policy material to address the future development of electricity infrastructure, both in terms of accessing the impacts and protecting amenity, landscape and biodiversity.

**Change :** Not accepted

**Action:** No further action

Rep ID: 11 / 1	Company/Organisation:	Document: LP
Name: Mr R Oxlade	Policy: General	
Support/Object:	Sound/Unsound:	Positively Prepared:
Legally Compliant:		Effective:
		Justified:
		Consistent:

**Summary:** Respondent makes comments on the main issues facing Allerdale, however, these do not relate to the soundness of legal compliance of the plan.

**Full Response:** Firstly some background information on myself and my partner Angela, we both moved to Cumbria around four years ago to escape the rat race that is the south East and now live in Stainburn, both have experience of what it is like to live in an area that keeps building and creating more congestion and reducing the quality of life, Cumbria met our requirements in being rural and sparsely populated away from the maddening crowds. Allerdale needs to keep focus on what makes this area attractive to people like myself, the excessive number of wind farms has had a major impact and building large housing estates on Greenfield sites would make things even worse. It is also important to align the demand for housing with the potential for employment; it took me three years to find suitable employment before I could make the move to Cumbria and even though I work for the major employer in the area I had to accept a reduced income.

You talk of the need for more housing, building more housing estates is I believe just a short term view of the government to address the issues with unemployment in the construction industry; you cannot just keep building houses to keep people employed just like an economy cannot be based upon continual expansion, it needs to reach equilibrium. Another point is that before building new property you must fully utilise the existing housing stock, whilst there are many properties for sale the demand must be low, there are new housing estates in both Flimby and Dearham with vacant new property for sale so if people cannot shift existing property then where is the demand for new homes coming from?

I regularly pass the old Alcan works in Workington and it's such a negative for the area, if you cannot utilise the site for industry then build new homes here rather than encroaching into the countryside using Greenfield sites.

One of the big challenges for the Allerdale district is rejuvenation which requires investment from companies willing to start their businesses in the area which would provide opportunities for local people to get a decent wage. The issue facing any business in this area is Logistics, if you are going to start a business that requires material and a final product to be shipped then you want to be near a major motorway, and more central in the UK, not tucked away in the far north western corner. So make better use of the Workington docks where large loads can easily be shipped between Liverpool, Swansea, Cardiff, Bristol, Plymouth and Southampton as examples without reliance on heavy road haulage and the wear and tear this causes to the roads and offer incentives to attract new businesses.

Another issue in Cumbria is a skills shortage, although a nationwide problem it is very evident in Cumbria and is potentially one reason why new businesses are not attracted to the area. Local colleges have difficulty in recruiting people able to deliver courses, mainly because the bigger employer down the road offers a higher salary and good pension scheme but even they have issues with recruiting the right people and I know people who have to travel to Newcastle for certain courses. There is a need to recruit people from outside the area to teach in local colleges and training centres by offering relocation packages and incentives, living within easy reach of the lakes is one, and the fact that within three hours you can be in Manchester, Glasgow, Newcastle or Edinburgh should address the worry about retail.

#### Changes :

**Council's Response:** Noted

**Change :** No Change

**Action:** No further action



Rep ID: 12 / 1	Company/Organisation:		Document: LP
	Name: Ms M Fitzgerald	Policy: General	
Support/Object: Support	Sound/Unsound: Sound	Positively Prepared: Yes	Effective: Yes
Legally Compliant: Yes		Justified: Yes	Consistent: Yes

**Summary:** The respondent is concerned about the use of the West Cumbria Economic Blueprint as part of the economic strategy adopted by the Allerdale Local Plan, both in terms of content of the Blueprint and process of its production.

**Full Response:** I have continuing concerns about this document's heavy reliance on the 'Economic Blueprint' which was prepared by Britain's Energy Coast. The Blueprint was published in 2012 and the first draft of Allerdale's Draft Development Framework was delayed in anticipation that the Blueprint would be in a sufficiently advanced state to fully inform the Local Plan. In the event, this was not the case and the earlier draft of the plan was put out for public consultation before the Blueprint had been printed and distributed.

Britain's Energy Coast is a title adopted by the local nuclear industry and its partners, including Allerdale and Copeland Borough Councils as well as a large number of established local businesses.

The appropriateness of consultation with influential 'partners' and 'stakeholders' as an integral part of the process of preparing the Development Framework is not disputed.

Britain's Energy Coast, however, appears to have had a disproportionate influence on elements of the Framework which threatens the objectivity and integrity of the document as a whole and the autonomy of the Local Authority in its preparation.

References to Britain's Energy Coast recur throughout the document. Britain's Energy Coast is indeed the only 'partner mentioned in the Strategic Objectives (Page 18), where SO3b confirms the Council's full commitment to the economic aims of the West Cumbria Economic Blueprint and Implementation Plan.

Further references to Britain's Energy Coast include:

Page 22 - S2 Sustainable Development Principles  
Page 30 - S3 Spatial Strategy and Growth  
Page 36 - S6a Workington  
Page 72 - S12 (Economy) Land and Premises  
Page 73 - S13 Energy Coast Innovation Zone. This whole of the above Chapter is devoted to Britain's Energy Coast: a Masterplan for West Cumbria (2007) and the Economic Blueprint. The reference in paragraph 164 'to other nuclear and energy sectors' requires clarification. 'Nuclear' is part of the 'energy sector' and an explanation as to which other forms of energy the Council and its 'partners' are referring to is lacking from this paragraph.  
Page 79 - S14 Rural Economy  
Page 80 - S15 Education and Skills  
Page 84 - S16 Town Centres and Retail  
Page 88 - S17 Tourism, Coastal and Countryside Recreation  
Page 89 - S18 Derwent Forest  
Page 92 - S19 Renewable Energy and Low Carbon Technology  
Page 97 - S20 Nationally Significant Infrastructure Projects  
Page 105 - S23 Supporting and Safeguarding Strategic Infrastructure  
Page 148 - DM3 Protection of Employment Sites

#### Changes :

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 25 / 1	Company/Organisation: Aspatna Town Council	Document: LP
Name: Mrs H Ostle	Policy: General	

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

**Summary:** There is no mention of North Allerdale in the Local Plan and therefore there is no cross boundary. In addition there is no reference to the new Localism Act, ie Parish and Town Councils

**Full Response:** There is no mention of North Allerdale in the Local Plan and therefore there is no cross boundary. In addition there is no reference to the new Localism Act, ie Parish and Town Councils. Aspatna Town Council believe that the plan should cover ALL of Allerdale.

**Changes :**

**Council's Response:** Comments noted. It is considered that the Plan includes a clear strategy for the sustainable development of the whole of the Allerdale Local Plan Area, including the north of the area. Locality area based policies (S6) have been prepared access the Plan Area. The Plan has been prepared over a number of years in consultation and cooperation with a wide range of stakeholders, including Parish councils. A topic paper has been produced to detail the compliance with the Localism Act and the Duty to Cooperate.

**Change :** No change

**Action:** No further action

Rep ID: 56 / 4	Company/Organisation: Ramblers	Document: LP
Name: Mrs Pauline Goodridge	Policy: General	

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

**Summary:** Sections 6 & 7 does not comply with Government policy on coastal access (i.e. England Coastal Route)

**Full Response:** Sections 6 & 7 does not comply with Government policy on coastal access (i.e. England Coastal Route)

**Changes :**

**Council's Response:** References to the England Coastal Route have been corrected throughout the document

**Change :** Partially accept

**Action:** Correction of terminology relating the England Coastal Route.

Rep ID: 205 / 10	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: General	

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

**Summary:** Highlights typographical errors throughout Plan

**Full Response:** There are a few occasions when Westlakes Science and Technology Park has not been given its full title. It may seem pedantic but for clarity, and to avoid confusion, please can you use the term Westlakes Science and Technology Park in the following paragraphs: 167 (page 75), 168 (page 75), 181 (page 81), (together with any further references I may have missed), Also, paragraph 167 (page 74) should also say 'Moorside', not Moorfield.

**Changes :** Correct typographical errors

**Council's Response:** Noted. Typographical errors have been corrected accordingly.

**Change :** Yes

**Action:** Correct typographical errors

Rep ID: 37 / 2	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Introduction	

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

**Summary:** There has been no proper, accurate assessment of heritage assets within the Borough

**Full Response:** There has been no proper, accurate assessment of the significance of heritage assets in the area and the contribution they make to the Borough (NPPF, Paragraph 169). This paragraph needs to expand on the portrait of the built heritage within the Borough to illustrate this. The list of heritage assets is inaccurate. There is some concern over the accuracy of the figures quoted for heritage assets. Listed buildings: 1181 (not 1500) Scheduled Monuments 140 (not 80) Although reference has been made to the number of listed buildings scheduled monuments and conservation areas. It does not go far enough to show the character of the area and the contribution it makes to all aspects of life and why it is special. Further into the document, reference is made to a variety of heritage assets (both designated and non-designated) and this should be brought out here to be consistent. They have been highlighted so are obviously considered an important part of the character of the Borough for example historic harbours, market towns. It should be noted that any reference 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.

**Changes :** The Plan needs to be expanded to explicitly detail the heritage assets in the Borough and to make an assessment of their contribution to the area. Listed buildings: 1181 Scheduled monuments: 140 The Plan needs to be expanded to explicitly detail the heritage assets and the contribution they make to the area. The Plan needs to make sure that reference to specific heritage assets that are mentioned elsewhere in the Plan are emphasised here. Throughout the Plan references to the WHS should read Frontiers of the Roman Empire (Hadrian's Wall): World Heritage Site.

**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 :** Yes

**Action:** Changes made to the Spatial Portrait, S6 introductions and S27 as suggested.

Rep ID: 58 / 2	Company/Organisation: Story Homes	Document: LP
Name:	Policy: Introduction	

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

**Summary:** Does not consider that the plan complies with the Duty to Cooperate

**Full Response:** No evidence is identified as to how cross-boundary impacts have been materially addressed in the emerging plan or neighbouring plans whilst evidence identifies that there are cross-boundary issues that need to be reconciled. The Statement of Compliance with the Duty to Co-operate May 2013 does not set out what active policy measures are included within the plan. The key element of interest to Story Homes is in relation to the approach on housing delivery and co-operation in regards to addressing neighbouring authorities undersupply, or Allerdale's undersupply, both historic and planned given the housing requirement within the plan will not meet the Authorities objectively assessed needs for both market and affordable housing (paragraph 47 of the NPPF). The plan is therefore not sound and does not comply with the Duty to Cooperate in the Localism Act 2011

**Changes :**

**Council's Response:** Comments are noted. A 'Duty to Cooperate' Statement of Compliance has been produced to clearly demonstrate how the Plan and the LA meets the DTC. The Statement document has been updated to provide greater clarity and evidence.

**Change :** N/a

**Action:** The Statement document has been updated to provide greater clarity and evidence.

Rep ID: 19 / 1	Company/Organisation: Associated British Ports - Port of	Document: LP
	Name:	Policy: Vision

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

**Summary:** ABP supports the vision for Silloth within the Local Plan as it is considered it appropriately supports the Port of Silloth

**Full Response:** Vision

The Local Plan Vision sets out the roles that the Council proposes the individual settlements in Allerdale will perform by 2028 and Strategic Objectives setting out how this vision will be achieved. In relation to Silloth and the Port of Silloth, the Vision states that the role of the port will be maintained and enhanced. The Strategic Objectives state that the long-term sustainability of the ports at Workington and Silloth will be delivered through support for appropriate port-related activities and lobbying for improved road and rail links (Strategic Objective SO3j) and the role of both ports as alternative means of accessing the area for business and visitors will be promoted.

ABP supports the vision for Silloth and the above mentioned Strategic Objectives. As referred to above, the Port of Silloth plays a vital role in the economy of Allerdale and the wider region. It also one of the main employers in Silloth and supports numerous business in Silloth and the wider area, including Carr's Flour Mill, Prime Molasses and the agricultural industry. It is therefore considered vital that the role that the Port plays in the local economy and employment is supported in the Local Plan.

In addition, it should be recognised that the Port of Silloth is a vital piece of transport infrastructure for many businesses and industries in the area, including the agricultural sector. More specifically, it provides a sustainable and cost effective means of importing and exporting goods for these businesses and industries and connects them to the wider UK. It also provides a sustainable option for distributing freight around the country, reducing the amount of freight transported by road. It is, however, vital to the service that the Port plays that the road infrastructure connecting the Port to wider area is improved and maintained in order to ensure ease of access to the Port for the above-mentioned businesses and industries.

**Changes :** Greater emphasis should be given to the importance of Silloth as a vital piece of transport infrastructure.

**Council's Response:** Noted

**Change :** No

**Action:** No action required.

Rep ID: 37 / 3	Company/Organisation: English Heritage	Document: LP
	Name: Ms E Hrycan	Policy: Vision

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

**Summary:** The Plan should refer to the historic environment in this paragraph. Refer to NPPF wording possibly conserve and enhance.

**Full Response:** The Plan should refer to the historic environment in this paragraph. Refer to NPPF wording possibly conserve and enhance .

**Changes :** Replace protected and enhanced with conserve and enhanced, which would tie in with the NPPF.

**Council's Response:** Change accepted.

**Change :** Accepted.

**Action:** The vision has been updated accordingly.

Rep ID: 37 / 4	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** The vision does not refer to the historic environment and any particular character or heritage assets in Workington.

**Full Response:** The vision does not refer to the historic environment and any particular character or heritage assets in Workington.

**Changes :** The Plan needs to expand this section to ensure that there is a description of the historic environment of Workington and an assessment of its character and heritage assets

**Council's Response:** The vision has been developed through various rounds of public consultation and therefore, reflects the issues and aspirations raised. It is not accepted that the vision need emphasis the historic environment on a blanket basis.

**Change :** No

**Action:** No change required.

Rep ID: 37 / 5	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** Briefly summarises the main historic character of the area and its distinctiveness. We support the recognition of the importance of the Roman and Georgian heritage in future tourism promotion.

**Full Response:** Briefly summarises the main historic character of the area and its distinctiveness. We support the recognition of the importance of the Roman and Georgian heritage in future tourism promotion.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No changes required.

Rep ID: 37 / 6	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** Support this policy subject to changes

**Full Response:** Subject to the change suggested below, we support this paragraph. We welcome reference to the historic environment. The vision would benefit from expanding on elements of the built environment for example -what is the significant character of Cockermouth (i.e. why is it high quality?) or are any heritage assets?

**Changes :** The Plan should be expanded to include an assessment of the significant character for Cockermouth.

**Council's Response:** The vision has been developed through various rounds of public consultation and therefore, reflects the issues and aspirations raised. It is not accepted that the vision need emphasis the history environment on a blanket basis.

**Change :** No

**Action:** No changes required.

Rep ID: 37 / 7	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** Support this policy subject to changes

**Full Response:** Subject to the change suggested below, we support this paragraph. We welcome the positive proposal to enhance the historic fabric of Wigton. However, the vision would benefit from emphasising what the historic environment is and why it is important in the identity of Wigton similarly to a particular emphasis on the character made in the paragraph on Maryport.

**Changes :** The Plan should be expanded to include a description of the historic environment in Wigton and an assessment be made of it's character.

**Council's Response:** The vision has been developed through various rounds of public consultation and therefore, reflects the issues and aspirations raised. It is not accepted that the vision need emphasis the historic environment on a blanket basis.

**Change :** No

**Action:** No change required.

Rep ID: 37 / 8	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** Support this policy subject to changes

**Full Response:** Subject to the change suggested below, we support this paragraph. We welcome the reference to the historic environment in the document's vision of enhancing the tourism sector in Silloth. However, the vision would benefit from providing more emphasis on the historic environment. However, there is no detail as to what this is.

**Changes :** The Plan should be expanded to include an assessment of the significant character for Silloth.

**Council's Response:** The vision has been developed through various rounds of public consultation and therefore, reflects the issues and aspirations raised. It is not accepted that the vision need emphasis the historic environment on a blanket basis.

**Change :** No

**Action:** No change required.

Rep ID: 37 / 9	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Vision	

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

**Summary:** The vision does not refer to the historic environment and any particular character or heritage assets in Aspatria. It is recommended that this be incorporated.

**Full Response:** The vision does not refer to the historic environment and any particular character or heritage assets in Aspatria. It is recommended that this be incorporated.

**Changes :** The Plan needs to **expand** this section to ensure that there is a description of the historic environment of Aspatria and an assessment of it's character and heritage assets.

**Council's Response:** The vision has been developed through various rounds of public consultation and therefore, reflects the issues and aspirations raised. It is not accepted that the vision need emphasis the historic environment on a blanket basis.

**Change :** No

**Action:** No change required.

<b>Rep ID:</b> 38 / 1	<b>Company/Organisation:</b> Crosscanonby Parish Council	<b>Document:</b> LP
<b>Name:</b> Mrs C Freeland	<b>Policy:</b> Vision	
<b>Support/Object:</b> Object	<b>Sound/Unsound:</b> Sound	<b>Positively Prepared:</b>
<b>Legally Compliant:</b> Yes	<b>Justified:</b>	<b>Effective:</b>
		<b>Consistent:</b>

**Summary:** Questions validity of statement in Vision

**Full Response:** Page 16 Rural Areas "whilst the quality of the local environment assets has been protected and enhanced"  
Currently no evidence of this happening.

**Changes :**

**Council's Response:** Comments noted.  
**Change :** N/a  
**Action:** No changes suggested.

<b>Rep ID:</b> 60 / 1	<b>Company/Organisation:</b> REG Windpower	<b>Document:</b> LP
<b>Name:</b> Mr Matt Olley	<b>Policy:</b> Vision	
<b>Support/Object:</b>	<b>Sound/Unsound:</b> Unsound	<b>Positively Prepared:</b> No
<b>Legally Compliant:</b>	<b>Justified:</b>	<b>Effective:</b>
		<b>Consistent:</b>

**Summary:** Considers that vision should directly support renewable energy.

**Full Response:** The approach advocated in national policy and summarised above is generally reflected in the Vision; however, the following additions/amendments are requested in order to make the vision more precise and proactive in relation to renewable energy developments. These amendments were requested by REG at the preferred options stage: By 2028 Allerdale 's communities will be sustainable, prosperous, safe, healthy and vibrant. The economy will be strong, diversified and well connected, with a growing and highly skilled population, with high employment, building on skills and opportunities in the nuclear, renewable energy and tourism sectors. It will be a place that is adaptable to the challenges of climate change, where renewable energy generation is supported, has a diverse and extensive.... It is considered that the benefits of renewable energy should be recognised at the outset of the Core Strategy. Whilst obvious benefits include national security through sustainable energy supply, there are significant economic benefits generated by renewable energy schemes both local and nationally as are identified in the report prepared by BIGGAR Economics on behalf of DECC and RenewableUK (see further below). Bearing in mind these benefits and the provisions of the NPPF, REG consider that without the above amendments, the vision is not positively prepared and is therefore unsound.

**Changes :**

**Council's Response:** Noted. The vision supports economic development, and stresses the importance of the energy sector. It is considered that this includes the renewable energy sector, therefore a specific reference is not required.  
**Change :** No  
**Action:** No action required.

Rep ID: 205 / 1	Company/Organisation: Copeland Borough Council	Document: LP
	Name: Mr Chris Hoban	Policy: Vision

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

**Summary:** The Vision appears to be a reasonable reflection of Allerdale's aspirations for the future. It is broadly consistent with the Vision in the Copeland Core Strategy. Questions reference to Workington as West Cumbria's principal centre.

**Full Response:** The Vision appears to be a reasonable reflection of Allerdale's aspirations for the future. It is broadly consistent with the Vision in the Copeland Core Strategy. Our only area of concern is on page 15, where we would question Workington's position as West Cumbria's principal residential, educational, leisure, cultural and commercial centre. This is a change from the Preferred Options draft which stated that Workington will have retained and enhanced its role as Allerdale's principal residential, which reflected the significant and complementary role that Whitehaven also plays in this part of west Cumbria.

**Changes :**

**Council's Response:** The Council maintains the position that Workington is West Cumbria's principal centre, and this is supported by appropriate evidence.

**Change :** N/A

**Action:** No action required.

Rep ID: 19 / 2	Company/Organisation: Associated British Ports - Port of	Document: LP
	Name:	Policy: Objectives

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

**Summary:** It is considered that this objective should also identify the Port of Silloth as essential infrastructure and support its continued operation.

**Full Response:** Strategic Objectives  
 Notwithstanding the above, Strategic Objective SO3b states that the timely improvement and delivery of essential infrastructure, such as the Port of Workington to support economic growth will be supported. For the reasons outlined above, namely the role that the Port of Silloth plays in the local economy and the support it provides for local business and industries, it is considered that Strategic Objective SO3b should also identify the Port of Silloth as essential infrastructure and support its continued operation. Due to the omission of reference to the Port of Silloth as essential infrastructure in Strategy Objective SO3b, ABP objects to this objective and considers it to be unsound. As referred to above, the Port is a vital piece of infrastructure for many business and industries in the area, providing them with easy access to wider markets and providing a sustainable and cost effective solution for the import and export of goods. By not acknowledging that the Port of Silloth is essential infrastructure in Allerdale, it is considered that the Local Plan is not based on sound infrastructure planning and is therefore in-effective. Furthermore, the National Policy Statement for Ports (January 2012) highlights the essential role that ports play in the UK economy. In particular, it states that at a regional and local level, the economic benefits of ports can include regeneration and employment opportunities, as well as additional benefits resulting from the associated agglomeration of businesses. Therefore by not identifying the Port of Silloth as essential infrastructure in Allerdale and by not providing a similar level of support as provided for the Port of Workington, it is considered that the Local Plan would also be inconsistent with national policy and unsound. ABP therefore requests that Strategic Objective SO3b also provides support for the Port of Silloth, and proposes the following wording amendments:  
 Encourage the development of business clusters, maximise the economic opportunities identified in the West Cumbria Economic Blueprint and Implementation Plan and ensure the timely improvement and delivery of essential infrastructure, such as the Port of Workington and the Port of Silloth, to support economic growth.

**Changes :** ABP proposes the following word amendments: "Encourage the development of business clusters, maximise the economic opportunities identified in the West Cumbria Economic Blueprint and Implementation Plan and ensure the timely improvement and delivery of essential infrastructure, such as the Port of Workington and the Port of Silloth, to support economic growth."

**Council's Response:** The Plan provides clear policy supporting the Port of Silloth, and this support has been emphasised following representations to the Pre-Submission Draft. However, it is not considered appropriate to emphasise the Port of Silloth in this particular objective as this relates to the West Cumbria Economic Blueprint.

**Change :** No change

**Action:** No further action



Rep ID: 33 / 1	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N	Winter	Policy: Objectives

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

**Summary:** S02d. Affordable homes should have a higher priority for access to convenient passenger transport services over higher value homes.

**Full Response:** S02d Affordable homes should have a higher priority for access to convenient passenger transport services over higher value homes.

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

**Council's Response:** Noted. SO4a seeks to locate all types of development in locations that are accessible by a variety of modes of transport, and in particular public transport. Therefore, it is considered that this approach in combination with the Policies in the Plan are sufficient to meet the objective outlined.

**Change :** No change

**Action:** No further action

Rep ID: 33 / 2	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N	Winter	Policy: Objectives

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

**Summary:** S04a. Walking distances to bus stops should ideally not exceed 400m. New development roads should be designed so buses may serve the area in a timely and efficient way. Bus routes will ideally be traffic calming free or subject to bus friendly traffic calming that does not cause passengers to fall, or damage the bus and has the least adverse impact on time to complete the route.

**Full Response:** S04a Walking distances to bus stops should ideally not exceed 400m. New development roads should be designed so buses may serve the area in a timely and efficient way. Bus routes will ideally be traffic calming free or subject to bus friendly traffic calming that does not cause passengers to fall, or damage the bus and has the least adverse impact on time to complete the route.

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

**Council's Response:** Noted. SO4a seeks to locate all types of development in locations that are accessible by a variety of modes of transport, and in particular public transport. This is considered to be the best approach. The distance of transport options (including bus stops) to residential development is likely to be an important component in the site allocations methodology.

**Change :** No change

**Action:** No further action

Rep ID: 33 / 3	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N Winter	Policy: Objectives	

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

**Summary:** S04b. Road infrastructure should include sufficient road space for a full size bus if required and bus shelters capable of accommodating all intending passengers.

**Full Response:** S04b Road infrastructure should include sufficient road space for a full size bus if required and bus shelters capable of accommodating all intending passengers.

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

**Council's Response:** Noted, however, this change is not considered to be necessary as it would be dealt with through the development management process.

**Change :** No change

**Action:** No further action

Rep ID: 33 / 4	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N Winter	Policy: Objectives	

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

**Summary:** S04c. Consult bus operators on new developments at an early stage before key decisions are made, in order passenger transport considerations are taken fully into account.

**Full Response:** S04c Consult bus operators on new developments at an early stage before key decisions are made, in order passenger transport considerations are taken fully into account.

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

**Council's Response:** It is considered the SO as it stands provides the undertaking to ensure that partnership working occurs.

**Change :** No change

**Action:** No further action

Rep ID: 37 / 10	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** Do not support strategic objectives which do not refer to the historic environment.

**Full Response:** We do not support these strategic objectives. The strategic objectives do not refer to the historic environment. This needs to be positively cross referenced. An additional objective should be introduced.

**Changes :** Insert: Encourage the re-use and adaptation of existing buildings including those in the historic environment.

**Council's Response:** The Plan encourages the re-use and efficient use of the existing building stock regardless of historic context, therefore, this particular emphasis is not required.

**Change :** No change

**Action:** No further action

Rep ID: 37 / 11	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** Do not support strategic objectives which do not promote the WHS

**Full Response:** We do not support these strategic objectives. The role of the historic environment in the economy particularly with reference to tourism should be emphasised. This section should promote the WHS as it would be provide economic, educational, and tourist opportunities. There is no mention of this heritage asset at all.

**Changes :** Objectives need to include reference to the historic environment particularly with regards the tourism objective. The WHS should be emphasised.

**Council's Response:** The objective has been amended to reflect the issue raised.

**Change :** Yes

**Action:** Objective revised as appropriate

Rep ID: 37 / 12	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** The promotion of heritage in the tourism objective should be included.

**Full Response:** The promotion of heritage in the tourism objective should be included.

**Changes :** Replace SO3h with the following: Promote the principles of sustainable tourism, through realising the potential of the district's heritage assets in tourism including the WHS, Roman Maryport and the Derwent Forest.

**Council's Response:** It is accepted that Objective SO3h should be updated to include reference to the World Heritage Site.

**Change :** Partially Accepted

**Action:** Objective revised as appropriate

Rep ID: 37 / 13	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** We welcome a specific section on strategic built and historic environment principles.

**Full Response:** We welcome a specific section on strategic built and historic environment principles.

**Changes :**

**Council's Response:** Noted

**Change :** No change

**Action:** No further change

Rep ID: 37 / 14	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** The Plan should refer to the need for new development to relate well to existing development and to develop locally distinctive and high quality areas. This would closely reflect the requirements of the NPPF.

**Full Response:** The Plan should refer to the need for new development to relate well to existing development and to develop locally distinctive and high quality areas. This would closely reflect the requirements of the NPPF.

**Changes :** Divide and amend SO5a to read: Ensure that all new development meets high standard of quality of design, energy efficiency, safety, security and accessibility in addition New development should have due regard to existing development, enhances public realm and develops locally distinctive and high quality places.

**Council's Response:** Noted, however, it is unclear what this would add to the objective.

**Change :** No change

**Action:** No further action

Rep ID: 37 / 15	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** The Plan should introduce the need for new development to relate well to existing development and to develop locally distinctive and high quality areas.

**Full Response:** The Plan should introduce the need for new development to relate well to existing development and to develop locally distinctive and high quality areas.

**Changes :** SO5b should be amended to read:  
 Conserve and enhance the historic environment including both non-designated and designated assets in particular heritage at risk, conservation areas and the WHS. Where possible every opportunity should be made to sustain and enhance their significance and to recognise their importance in the Borough.

**Council's Response:** The objective has been amended to reflect some of the issues raised.

**Change :** Partially Accepted

**Action:** Objective revised as appropriate

Rep ID: 37 / 16	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: Objectives	

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

**Summary:** The Plan should refer to the historic environment and how it could be protected and enhanced including historic landscapes.

**Full Response:** The Plan should refer to the historic environment and how it could be protected and enhanced including historic landscapes.

**Changes :** Insert historic environment into objective SO6a.

**Council's Response:** Accepted. The objective has been amended to reflect the issue raised.

**Change :** Yes

**Action:** SO6a has been revised as appropriate

Rep ID: 38 / 2	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: Objectives	

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

**Summary:** Queries the definition of small in relation to development to be allowed within Local Service Centres

**Full Response:** Page 17 SO1c - "Small scale development in Local Service Centres". What is the definition of small?

**Changes :**

**Council's Response:** Comment noted. The Allerdale Local Plan (Part 2) Site Allocations will define the level of growth expected at this level of the settlement hierarchy by revising settlement boundaries to permit levels of growth that are both appropriate and sustainable. This exercise will take into account various factors such as context, character, constraints and level of affordable need. Part 1 of the Plan provides the policy context for this process. Part 2 and the settlement boundary review will be subject to full public consultation.

**Change :** No change

**Action:** No further action

Rep ID: 38 / 3	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: Objectives	

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

**Summary:** Queries compatibility of Strategic Objective in relation to specific development project

**Full Response:** These principles conflict with the passing of plans to build on the Deer Park at Maryport which is extremely versatile agricultural land in that it has the dual function of giving a pleasant aspect to the entrance to the town centre as well as being an important part of Roman Maryport which will be lost forever when it becomes a housing estate.

**Changes :**

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 38 / 4	Company/Organisation: Crosscanonby Parsh Council	Document: LP
Name: Mrs C	Freeland	Policy: Objectives

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

**Summary:** Queries compatibility of Strategic Objective in relation to specific development project

**Full Response:** These principles conflict with the passing of plans to build on the Deer Park at Maryport which is extremely versatile agricultural land in that it has the dual function of giving a pleasant aspect to the entrance to the town centre as well as being an important part of Roman Maryport which will be lost forever when it becomes a housing estate.

**Changes :**

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 38 / 5	Company/Organisation: Crosscanonby Parsh Council	Document: LP
Name: Mrs C	Freeland	Policy: Objectives

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

**Summary:** Queries whether this objective will prevent the development of wind turbines within the AONB

**Full Response:** Page 19 SO6a - "Protect and enhance the natural landscape particularly within the Solway Coast AONB" - will this ensure that there is no wind turbine developments within the AONB?

**Changes :**

**Council's Response:** Noted. Policy S19 Renewable Energy and S34 Solway Coast AONB provide details related to the scale of development that is considered to be appropriate in the AONB. Development (including renewable energy), must accord with the aims and objectives of the Management Plan.

**Change :** No change

**Action:** No further action

Rep ID: 38 / 6	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: Objectives

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

**Summary:** Queries whether strategic objective will support and protect car parks at Crosscanonby

**Full Response:** Page 20 SO6c "Promote opportunities to improve access to the countryside and coast" - Will this mean support and protection for car parks on foreshore at Crosscanonby?

**Changes :**

**Council's Response:** The Plan provides a strategic vision and policy material to direct for the future development of the Allerdale Local Plan Area. Therefore, specific proposals such as that mentioned will be assessed through development management using the strategy set out in this document. Policy S37 provides some guidance for shoreline management and coastal development, and any proposals will be informed by Shoreline Management Plan and the specifics of the development.

**Change :** N/a

**Action:** No changes required

Rep ID: 55 / 1	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: Objectives

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

**Summary:** It is considered that reference 'essential' improvements is ill-defined and could be subject to different interpretations (this word would also conflict with the term, 'required' stated elsewhere in SO4b).

**Full Response:** It is considered the aspiration of this Objective to support rail and transport improvements to support key schemes is clear. However it is considered that reference 'essential' improvements is ill-defined and could be subject to different interpretations (this word would also conflict with the term, 'required' stated elsewhere in SO4b).  
 2. Improved transport in itself should be a priority, especially when consideration is given to the relative isolation and rurality of the district which in itself can be considered a constraint to the sustainable development of the Borough.  
 3. It is recommended that the word essential be deleted as it is not clearly defined and therefore would be subject to differing interpretations.

**Changes :** Objective SO4a should be revised to state: "Support essential road and rail infrastructure improvements required to deliver economic growth and key economic projects."

**Council's Response:** The Plan would benefit from the changes suggested.

**Change :** Yes

**Action:** Changes made as suggested.

Rep ID: 60 / 2	Company/Organisation: REG Windpower	Document: LP
	Name: Mr Matt Olley	Policy: Objectives

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

**Summary:** Believe policy is consistent with NPPF

**Full Response:** Draft Policies SO1e and SO1f concern renewable energy generation and are therefore interrelated. Policy SO1e aims to support and encourage construction methods that seek to, in effect, to use renewable energy sources. Policy SO1f seeks to promote renewable and low carbon energy production in the Borough. Both policies are considered to be sound on the grounds that they comply with the pro-renewable energy sentiment of the NPPF.

**Changes :**

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 60 / 4	Company/Organisation: REG Windpower	Document: LP
Name: Mr Matt Olley	Policy: Objectives	

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

**Summary:** Based on this, the current list of economic objectives with the emerging local plan are considered unsound, as there is no reference to the benefits of renewable energy per Se. Therefore, the economic objectives are not justified as they are not based on

**Full Response:** A significant material consideration for the national economy is the security of energy supply. The overarching National Policy Statement on Energy Infrastructure confirms that if the UK is unable to meet its own energy requirements in the future, its economy will not operate efficiently and its expansion will be constrained. A report examining the economic benefits of onshore wind farms was published in May 2012 by BiGGAR Economics on behalf of the Department of Energy and Climate Change and RenewableUK. Some of the notable conclusions of the report include:

- 98% of expenditure on the designing and planning of wind farms up to the point of securing permission is retained in the UK;
- 45% of expenditure on the construction of the wind farms (manufacture and construction on site) is retained in the UK;
- 90% of expenditure on the operation and maintenance of wind farms is retained in the UK;
- It is estimated that in 2011 the onshore wind industry supported 8600 jobs in the UK and generated £548 million in GVA across the UK.
- Based on the scenarios for the future deployment of onshore wind in the UK as set out in the UK Renewable Energy Strategy (2011) and the National Renewable Energy Action Plan (2010) it is estimated that the contribution of the onshore wind sector to the UK economy could increase (by 2020) to 8,700 jobs and £580 million GVA (under lowest deployment scenario) to 17,900 jobs and £1,183 million GVA (under the highest deployment scenario). In addition, there is and could be a range of wider economic impacts.
- Spending by persons employed in the industry presently contributed a further £85million in GVA to the UK economy in 2011 and supported a further 2,400 jobs. This could increase to between £90 million / 2,500 jobs (lowest deployment) and £192million / 5,400 jobs (highest deployment).
- Further GVA and jobs up to £27million / 800 jobs could be created through the effects of employee expenditure during the construction phase of wind farms.
- Persons employed in the onshore wind industry contributed £94.3million in taxes to the exchequer in 2011. This could grow by up to £218million (under highest deployment and job creation scenario) by 2020.
- The onshore wind industry paid £12million in business rates from the operation of wind farms in 2011. This could increase to £52million by 2020 (under the highest deployment scenario)
- While the majority of wind turbine manufacturers are based overseas it is instructive to note that many of the components can and are being manufactured in the UK. Based on this, the current list of economic objectives with the emerging local plan are considered unsound, as there is no reference to the benefits of renewable energy per Se. Therefore, the economic objectives are not justified as they are not based on the available evidence, and they are not consistent with national policy which supports renewable energy development.

**Changes :** Request objective S03a is amended to read:  
 Diversify the urban and rural economic base of Allerdale to enable a prosperous mixed, low carbon economy. The creative knowledge based industries, specialist engineering and tourism sectors will be supported, and renewable and low carbon energy generation promoted.

**Council's Response:** SO3a already supports the development of the energy sector. This considered to be the appropriate strategy, and distinct emphasis of renewable energy is not considered necessary at this juncture.

**Change :** No change

**Action:** No further action



Rep ID: 61 / 1	Company/Organisation: West Cumbria and North Lakes F	Document: LP
Name: Dr Ruth Balogh	Policy: Objectives	

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

**Summary:** Concerned about confusion between renewable energy and low carbon energy production.

**Full Response:** There is potential for confusion if renewable and low carbon energy production are taken together in the same strategic objective.

This is because West Cumbria is a special case, nationally, with regard to nuclear power which is, within this Plan, identified as a low carbon energy production source. West Cumbria in fact has no nuclear power stations, it only has the aspiration for one. The existing nuclear industry here is concerned with waste management, processing and decommissioning. There is a danger that vague references in this Plan to 'the nuclear industry' might be understood as they would in most other parts of the country where nuclear plants are located - to refer to nuclear power generation and not to the whole spectrum of activities, including those that deal with fission products (ie nuclear waste)

**Changes :**

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 64 / 11	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: Objectives	

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

**Summary:** Suggest amendments to policy

**Full Response:** We wish to highlight some additional text and minor amendments (to appendix 7):

**Changes :** We wish to highlight some additional text and minor amendments: 'There are a number of settlements identified within the hierarchy that have been identified as having constraints in relation to then disposal/treatment of surface and waste water. These capacity issues are not considered to be critical and can be dealt with either by developer contributions via Policy S21 and/or by phasing sites so that constraints can be relieved in utility company asset management plans. The requirement to phase residential development sites as a result of drainage capacity issues will be addressed in the Site Allocations Development Plan Document. As a result of proposed changes to the abstraction at Ennerdale an alternative means of supplying West Cumbria with drinking water will need to be developed by United Utilities. The Draft Water Resources Management Plan 2013 identifies 3 potential options to 6 achieve this. United Utilities will work closely with the Council in developing the preferred solution.'

**Council's Response:** The Plan would benefit from the changes suggested.

**Change :** Yes

**Action:** Changes made as suggested.

Rep ID: 204 / 1	Company/Organisation: British Energy Coast	Document: LP
Name: Mr Tim Hirst	Policy: Objectives	

Support/Object: Support

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

**Summary:** The document appears to be thorough and comprehensive, and notably addresses issues that will help support and promote the local economy.

**Full Response:** The document appears to be thorough and comprehensive, and notably addresses issues that will help support and promote the local economy. Britain's Energy Coast is pleased to see that there is ample reference to and close alignment with the West Cumbria Economic Blueprint and our latest iteration of the Blueprint Implementation Plan (25.04.13). In particular the Local Plan's Strategic Objectives - detailed on page 18, and elaborated upon elsewhere in the ensuing sections of the document - link with and support the six Themes that have emerged from the Implementation Plan, namely: Innovation & Technology - S03c Business Support - S03a Access to Markets - S04d Education Skills & Training - S03c, S03g Infrastructure - S03b, S03f, S03j, S04a, S04b Sites & Premises - S03d You may aware that we are planning to make provision in the Sites & Premises Theme within the Blueprint Implementation Plan for the compilation of a West Cumbria Property Strategy and Prospectus (to compliment the NDA West Cumbria Property Options currently being developed) and further Strategic Spatial Assessments for the key West Cumbrian centres.

I understand that there are already existing Masterplans for Allerdale's designated main employment sites: namely, Lillyhall, the Port of Workington, and Derwerit Howe. I also believe that Allerdale have an existing Masterplan for Workington town centre that went beyond the boundaries of the successful re-development of the main shopping area. Britain's Energy Coast would, therefore, be very pleased to work with Allerdale to understand where the additional resource that it will have at its disposal could and should be applied to help Allerdale realise the Objectives contained in the Local Plan.

**Changes :**

**Council's Response:** Support noted.

**Change :** N/a

**Action:** No action required.

Rep ID: 205 / 2	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: Objectives	

Support/Object:

Sound/Unsound:

Positively Prepared:

Effective:

Legally Compliant:

Justified:

Consistent:

**Summary:** The Objectives are broadly consistent with those in the Copeland Core Strategy

**Full Response:** The Objectives are broadly consistent with those in the Copeland Core Strategy. As with the Preferred Options we would still seek clarification regarding Objective SO3c and the specific roles of Lillyhall and Westlakes Science and Technology Park when discussing nuclear research, which are still not clear to us.

**Changes :** Seek clarification regarding SO3c and the specific roles of Lillyhall and Westlakes Science Park

**Council's Response:** Noted

**Change :** No change

**Action:** No further action

Rep ID: 55 / 2	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S1

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

**Summary:** Consider this policy reflects national guidance and is sound.

**Full Response:** The Presumption In Favour of Sustainable Development is a planning principle expressed within the National Planning Policy Framework. 6. The policy reflects the guidance of the NPPF and is considered sound. The only question that would be raised with respect to this policy is whether it is strictly necessary given this policy represents guidance already contained within the NPPF.

**Changes :**

**Council's Response:** The model policy wording aims to help the Council meet the expectation of the NPPF by having clear policies on guiding how the presumption in favour of sustainable development will be applied locally. The Planning Inspectorate advises that this model policy will be an appropriate way of meeting this expectation.

**Change :** No

**Action:** No action required.

Rep ID: 63 / 1	Company/Organisation: Allerdale and Copeland Green P	Document: LP
	Name: Mrs Jill Perry	Policy: S1

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

**Summary:** This policy is incomplete in that it contains no reference to the 5 principles of sustainable development, working with the community as well as the developer and no reference to climate change.

**Full Response:** This policy is incomplete in that it contains no reference to the 5 principles of sustainable development, working with the community as well as the developer and no reference to climate change.

**Changes :** When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development and the definition of Sustainable Development set out in the UK Strategy, Securing the Future as living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. The Council will always work proactively with applicants and the community jointly to find solutions which mean that proposals can be approved wherever possible, in order to secure development that as a whole, improves together the economic, social and environmental conditions in the area, and in particular tackles climate change

**Council's Response:** The model policy wording aims to help the Council meet the expectation of the NPPF by having clear policies on guiding how the presumption in favour of sustainable development will be applied locally. The three dimensions of sustainable development as set out within the NPPF are based upon the five 'guiding principles' of the UK Sustainable Development Strategy.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b> 12 / 2	<b>Company/Organisation:</b>	<b>Document:</b> LP
<b>Name:</b> Ms M Fitzgerald	<b>Policy:</b> S2	
<b>Support/Object:</b> Support	<b>Sound/Unsound:</b> Sound	<b>Positively Prepared:</b> Yes <b>Effective:</b> Yes
<b>Legally Compliant:</b> Yes	<b>Justified:</b> Yes	<b>Consistent:</b> Yes

**Summary:** Respondent supports Policy S2 as it encourages the use of previously developed land, as opposed to greenfield sites.

**Full Response:** Any resolution which encourages the use of previously developed land, as opposed to greenfield sites, is to be welcomed. This is especially appropriate in areas where high quality landscapes are a prominent feature and tourism is a significant contributor to the local economy.

**Changes :**

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

<b>Rep ID:</b> 37 / 17	<b>Company/Organisation:</b> English Heritage	<b>Document:</b> LP
<b>Name:</b> Ms E Hrycan	<b>Policy:</b> S2	
<b>Support/Object:</b>	<b>Sound/Unsound:</b>	<b>Positively Prepared:</b> <b>Effective:</b>
<b>Legally Compliant:</b>	<b>Justified:</b>	<b>Consistent:</b>

**Summary:** We support reference to improving the quality of the built environment concerning economic development.

**Full Response:** We support reference to improving the quality of the built environment concerning economic development.

**Changes :**

**Council's Response:** Noted  
**Change :** N/A  
**Action:** No change required.

<b>Rep ID:</b> 37 / 18	<b>Company/Organisation:</b> English Heritage	<b>Document:</b> LP
<b>Name:</b> Ms E Hrycan	<b>Policy:</b> S2	
<b>Support/Object:</b>	<b>Sound/Unsound:</b>	<b>Positively Prepared:</b> <b>Effective:</b>
<b>Legally Compliant:</b>	<b>Justified:</b>	<b>Consistent:</b>

**Summary:** We welcome the need to promote sustainable, well-designed, safe and accessible places that respect the setting and character of the surrounding area.

**Full Response:** We welcome the need to promote sustainable, well-designed, safe and accessible places that respect the setting and character of the surrounding area.

**Changes :**

**Council's Response:** Noted  
**Change :** N/A  
**Action:** No change required.

Rep ID: 37 / 19	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S2	

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

**Summary:** We welcome the promotion of high quality design in new development so that it makes a positive contribution to the local area and ensure that a wide variety of assets including historic are enhanced and in all circumstances conserved.

**Full Response:** We welcome the promotion of high quality design in new development so that it makes a positive contribution to the local area and ensure that a wide variety of assets including historic are enhanced and in all circumstances conserved.

**Changes :**

**Council's Response:** Noted.

**Change :** N/A

**Action:** No change required.

Rep ID: 37 / 20	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S2	

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

**Summary:** We do not support these strategic policies as they do not appear to be consistent with other areas of the Plan as outlined below.

**Full Response:** We do not support these strategic policies as they do not appear to be consistent with other areas of the Plan as outlined below. Although there is some recognition that the diversity and distinctiveness of towns, villages and landscapes including character and appearance and significance of historic assets should be preserved and enhanced. The Plan does not include any proper assessment of the historic environment to inform this objective. Reference is also made to landscape character and local distinctiveness and its enhancement and conservation. It should be noted that this is the first time that this has been mentioned in the Plan. Consideration of the historic environment should flow through the Plan with a clear structure. Any aspects such as these needs to have a proper assessment and be identified as a key feature of the Borough. This will be in accordance with the NPPF. The spatial and area portraits need to explain what the landscape character of Allerdale is, so that it informs additional policies on what is to be conserved and enhanced.

**Changes :** Throughout the Plan, reference to the historic environment should ensure that it is consistent in defining what is important and assessing the contribution it makes to the character of the area. There has been a lack of assessment at the point in the Plan.

**Council's Response:** It is accepted that there should be more clarity in relation to the terminology and references to the historic environment.

**Change :** Partially accepted

**Action:** Policy S2 and the Plan have been updated accordingly.

Rep ID: 38 / 7	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S2

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

**Summary:** Queries whether policy will support and protect car parks at Crosscanonby

**Full Response:** Page 23 S2 - "Promote coastal recreation" - Again requirement to protect car parks on foreshore.

**Changes :**

**Council's Response:** Concern noted. It is not considered this response relates to the Plan, but will be addressed as a separate customer enquiry.

**Change :** No

**Action:** No action required.

Rep ID: 43 / 1	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S2

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

**Summary:** Respondent suggests that more time is required by communities involvement in the plan making process.

**Full Response:** In terms of the stated for involvement of communities, the Council is not sufficiently committed to this if it does not include a stipulation that there must be provision of adequate time for the community having adequate time to consider and raise issues prior to decision being made.

**Changes :**

**Council's Response:** The Council is fully committed to early and meaningful engagement with the community in both the plan making process and planning application stages. The Council sought community input into the emerging Local Plan in 2006 and 2009 (Issues and Options), 2012 (Preferred Options) and 2013 (Pre-Submission Draft) through a series of consultation exercises. Planning applications are advertised as regulations require and where it is considered appropriate due to the scale or nature of development, special consultation events are undertaken.

**Change :** No

**Action:** No action required.

Rep ID: 43 / 2	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S2

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

**Summary:** Respondent suggests that the Local Plan should prioritise development on PDL.

**Full Response:** Although the central Government have removed some requirements in relation to where developments are built, we feel Allerdale does not provide enough commitment here to use of brownfield sites first. Allerdale need to change this to prioritising the reuse of previously developed land. Encouragement is insufficient protection of our landscape areas, which are a major asset for Allerdale in terms of both quality of life, recreational use, and visitor attraction among others. Developers will be able to exploit the weakness as you can encourage as much of you like but this can be completely ignored whatever you may do.

**Changes :**

**Council's Response:** It is not considered appropriate to impose a rigid requirement in relation to previously developed land as this is not in conformity with the approach set out in the NPPF. However, the Council will always encourage the effective reuse of previously developed wherever possible( Policy S30), particularly when considering windfall development on greenfield land which may be required to carry out a sequential test (Policy DM16)

**Change :** No

**Action:** The Council has clarified its intention to encourage and, where appropriate prioritise, the reuse of previously developed land. Clarification will be given that the requirement for a sequential test may be triggered only on windfall development on greenfield land.

Rep ID: 43 / 3	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S2

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

**Summary:** Respondent suggests that the plan/policy is undermined by not having a clear statement to secure the long term maintenance of SUDs.

**Full Response:** Re: SuDS. There is a major weakness in this undermining the plan. There needs to be a qualification that any such proposals include and plan for maintenance of such schemes, along with financial responsibility, for their long term future. Otherwise the plan leaves the potential for the community to be negatively affected if at some point in the future there something untoward happens in relation to it's functioning.

**Changes :**

**Council's Response:** Policy S29 (Flood Risk and Surface Water Drainage) deals specifically with the issue of SUDs and explicitly sets out the requirement for management plans outlining how the systems will be maintained and managed in the long term

**Change :** No

**Action:** No action required.

Rep ID: 55 / 3	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S2

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

**Summary:** Welcome recognition offered to important principles around sustainable development

**Full Response:** Policy S2 concerns the principle of sustainable development that is to run throughout the plan. It is considered that the principles expressed within the policy are robust. In particular we welcome the recognition it offers to important principles around sustainable transport, recognition of the merit in communities sharing provision, and the recognition it gives to the delivery of school facilities and skills and training.

**Changes :**

**Council's Response:** Support noted.

**Change :** N/A

**Action:** No action required.

Rep ID: 58 / 3	Company/Organisation: Story Homes	Document: LP
	Name:	Policy: S2

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

**Summary:** Considers that some terms within this policy are ambiguous and require clarification.

**Full Response:** The following amendments/clarifications are sought; Social 8th bullet point: Refers to development not harming highway safety and not resulting in 'undue traffic congestion'. It is considered that the reference to 'undue' is ambiguous and open to interpretation and should be defined in the context of NPPF

**Changes :**

**Council's Response:** Accept the term 'undue' is ambiguous and does not provide clear guidance for developers. It is considered that the important principal in this section is the regard for highway safety and the local network capacity.

**Change :** Yes

**Action:** This section has been amended to clarify that new development (either cumulatively or in isolation) should not impede highway safety or exceed the capacity of the local transport network.

Rep ID: 60 / 5	Company/Organisation: REG Windpower	Document: LP
	Name: Mr Matt Olley	Policy: S2

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

**Summary:** We consider the Economic aspect of this policy to now be sound, as it provides for a more deliverable and effective core strategy.

**Full Response:** REG note that the criteria under the 'Economic' subheading has been updated following their Preferred Options representations. This confirms the Council will: Encourage the development of renewable or low carbon energy resources in appropriate locations given the potential wider environmental, community and economic benefits. On this basis, we consider the Economic aspect of this policy to now be sound, as it provides for a more deliverable and effective core strategy.

**Changes :**

**Council's Response:** Support noted

**Change :** N/A

**Action:** No action required



Rep ID:	2 / 11	Company/Organisation:	Friends of the Lake District	Document:	LP
		Name:	Dr K Wilshaw	Policy:	S3
Support/Object:	Object	Sound/Unsound:	Unsound	Positively Prepared:	No
Legally Compliant:	No			Effective:	No
				Justified:	No
				Consistent:	No

**Summary:** FLD are concerned that the policy will enable damaging development to take place in open countryside.

**Full Response:** Policy S3 lists proposals outside of defined settlements which would be acceptable. This includes d) The optimal viable use of a heritage asset or appropriate enabling development to secure the future of heritage assets; e) A recreation or tourism proposal requiring a countryside location j) Other development requiring a countryside location for technical or operational reasons.

FLD have concerns that these exceptions to the settlement hierarchy will enable damaging development to take place in open countryside. Exception e) in particular could be used facilitate the development of caravan parks and other tourist related facilities in locations where damage would be caused to landscape and habitats.

FLD consider that this part of policy S3 will make the plan ineffective as the exceptions will be able to override other parts of the plan relating to landscape and natural environment.

The exceptions are contrary to NPPF paragraphs 7, 17, 109 and 111.

**Changes :** Suggested Changes: Remove these three exceptions (d, e and j) from Policy S3

**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. These limited exceptions represent situations where development may be considered acceptable in line with the Council's wider strategy or in accordance with national policy.  
Exception d) Reflects national policy (NPPF:Para 55:Bullet 2);  
Exception e) Reflects the Council's strategy to enable and encourage rural economic activity, of which tourism is a vital source. Policy S17 (Tourism, Coastal and Countryside Recreation) provides greater detail to when this exception would apply and provides robust protection against inappropriate development in the countryside with particular emphasis on the potential impact of caravan sites.  
Exception j) Further reflects the Council's commitment to supporting the rural economy by acknowledging that some forms of development, are necessary for the ongoing sustainability of rural businesses.  
Further to the above comments, Policies S33 (Landscape), S34 (Development in the Solway Coast AONB) and S35 (Protecting and Enhancing Biodiversity and Geodiversity) set out the Council's commitment to protecting the natural environment from inappropriate development.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b>	8 / 1	<b>Company/Organisation:</b>	Aspatia Rural Partnership	<b>Document:</b>	LP
		<b>Name:</b>	Cllr B Finlay	<b>Policy:</b>	S3
<b>Support/Object:</b>	Object	<b>Sound/Unsound:</b>	Unsound	<b>Positively Prepared:</b>	Yes
<b>Legally Compliant:</b>	Yes			<b>Effective:</b>	Yes
				<b>Justified:</b>	No
				<b>Consistent:</b>	Yes

**Summary:** The Aspatia Rural Partnership believes that Policy S3 is unsound because it is not justified by a robust and credible evidence base, specifically the issue relates to the division of Rural Villages into 'Limited Growth Villages' and 'Infill/Rounding Off

**Full Response:** The Aspatia Rural Partnership believes strongly that Policy S3 is unsound because it is not justified. Guidance stated that the DPD should be founded on a robust and credible evidence base involving: Evidence of participation of the local community and others having a stake in the area.  
Research.  
Policy S3, Spatial Strategy and Growth, divides Rural Villages into two categories: 'Limited Growth Villages' and 'Infill/Rounding Off Villages'. The introduction of these two categories is a new addition at the Pre-submission Consultation Draft stage. It was not proposed nor referred to in any of the policy options in the previous consultation document. There is no evidence of participation of the local communities that will be directly affected by these proposals. The Allerdale Local Plan (Part 1) Spatial Strategy Topic Paper (May 2013) details policy options that were considered and explains how Rural villages were defined. However, it makes no reference to how or why the two sub-categories of Rural Villages were introduced to the Pre-submission Consultation Draft. The definition of 'Infill/Rounding Off Villages' gives less certainty of the limits of development to small villages and hamlets than that provided to larger settlements defined as 'Limited Growth Villages'. The additional criteria provided under Policy S5 do not provide sufficient certainty that the character of our rural villages and hamlets will be protected. In some cases villages will have current development boundaries removed boundaries which have been previously discussed and agreed with no consultation with the Parish Councils and communities. The results of the housing needs surveys have not been taken into account when projecting growth in the town and villages. It does not take account of the links between the town and villages; so, for example, if there is an outstanding need in one village could/should it be directed toward Aspatia? 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, Plumland, Bromfield, All Hallows and Blennerhasset & Torpenhow.

**Changes :** **Suggested Changes**  
Remove the sub-division of Rural Villages into 'Limited Growth Villages' and 'Infill/Rounding Off Villages'. This would apply under Policies S3 and S5 and the housing policies under Key Service Centres (e.g. Aspatia Locality).

**Council's Response:** Concerns are noted. The Local Plan directs 6% of overall growth to Rural Villages, encompassing Limited Growth Villages and Infill/Rounding Off Villages. The scale of development proposed will be expected to be commensurate to the size of the settlement and reflect its position in the settlement hierarchy. As the respondent states settlement boundaries will direct development of the Limited Growth Villages, while robust development criteria have been developed for Infill/Rounding Off Villages. This approach was considered to be an appropriate and sound approach.

The decision to split the Rural Villages tier was taken subsequent to the preferred options consultation based on analysis of the wide spectrum of the Rural Villages category. Allocation between the two categories took into account; population, physical scale and context, in addition to ensuring a geographic distribution.

**Change :** No

**Action:** No further action.

Rep ID: 16 / 1	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S3	

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

**Summary:** The plan is unsound as it will not be effective in delivering the strategy over the time horizon of the plan. It is recommended that the plan period be extended beyond 2028 to ensure a minimum of 15 years from the adoption of all Development Plan Documents

**Full Response:** Plan Period

The plan is unsound as it will not be effective in delivering the strategy over the time horizon of the plan. It is recommended that the plan period be extended beyond 2028 to ensure a minimum of 15 years from the adoption of all Development Plan Documents (DPDs).

The Foreword indicates that the plan aims to provide a 15 year vision for Allerdale which accords with the minimum number of years recommended by the NPPF (Framework). We are, however, concerned that the plan as presented will not achieve such a time horizon post adoption.

Policy S3 Spatial Strategy and Growth indicates the plan period as being 2011 to 2028, therefore requiring the plan to be adopted this year to achieve a 15 year post adoption time horizon. This appears unlikely given this pre-submission consultation will not be concluded until mid-June. We are also concerned that the time horizon is further compromised by the fact that the plan defers a number of important issues, including the review of settlement boundaries, until the Site Allocations DPD. The Council's Local Development Scheme (June 2012), against which this consultation is 6 months behind schedule, indicates the Site Allocations DPD will not be adopted until 2015 at the earliest. This will effectively mean many important elements of the plan, such as the review of settlement boundaries and housing allocations (which are discussed in greater detail later), will only have a maximum time horizon of 13 years. Given the complexity of bringing sites forward, the time taken to prepare planning applications, secure permission and build out developments (especially if these need to be co-ordinated with significant infrastructure investments) then a plan period beyond 2028 to ensure a minimum of 15 years is required.

Establishing the plan period is essential for the purposes of calculating the housing requirement, the housing trajectory, the five year land supply, and consideration of whether it is necessary to address any backlog in delivery.

**Changes :** Change plan period.

**Council's Response:** Accept this response.

**Change :** Yes

**Action:** The plan period will be extended to 2029.

Rep ID: 16 / 2	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: No Effective:
Legally Compliant: No	Justified: No	Consistent:

**Summary:** Duty to Cooperate: The Local Plan is unsound as it is not positively prepared or justified. The plan does not identify a planning strategy to ensure Allerdale Borough Council can deal with unmet housing needs from adjoining local authorities or other authorities are willing to take any shortfall from Allerdale.

**Full Response:** Duty to Co-operate  
The Local Plan is unsound as it is not positively prepared or justified. The plan does not identify a planning strategy to ensure Allerdale Borough Council can deal with unmet housing needs from adjoining local authorities or other authorities are willing to take any shortfall from Allerdale.  
The Council has not had sufficient regard to development beyond its borders in preparing its plan. The Local Plan and the accompanying Sustainability Appraisal, have not adequately considered the impact of plans produced by neighbouring authorities upon Allerdale or vice-versa. We have noted the Council's Statement of Compliance on the Duty to Cooperate. While this document explains the administrative mechanisms that are in place to facilitate planning discussions and jointly commissioned evidence, it does not show how any cross boundary impacts that have been identified will be addressed materially.

#### Sub regional issues

The Cumbria Sub-regional Spatial Strategy 2008 to 2028 indicates the region is relatively self-contained due to its geographical isolation and distance from regional, national and European markets. The study does, however, indicate cross boundary issues with neighbouring authorities particularly Carlisle and Copeland as evidenced within the Council's own Statement of Compliance on the Duty to Cooperate.

#### Neighbouring authorities

Allerdale Borough Council is bordered by four other local authorities; Carlisle City Council, Eden District Council, Copeland Borough Council and South Lakeland District Council. In addition the southeast quarter of the Borough is covered by the Lake District National Park. Eden and South Lakeland already have adopted plans, whilst Copeland will shortly be going through examination. Carlisle are, however, still at an early stage of production.

#### Copeland Borough Council

Allerdale is functionally connected to Copeland due to the proximity of major centres, travel to work areas and the effects of possible future economic investment. The Copeland Core Strategy is seeking a baseline target of 230 new homes per annum, in addition provision is made for a further 30%, raising the overall figure to 300. This additional 30% is identified to accommodate the potential for future economic growth including the possibility of nuclear new build adjacent to the existing Sellafield plant. The figure of 230 accords with the previous RS target for Copeland and is slightly below the 2008 based household projections figures of 240.

Modelling work undertaken as part of the Copeland Core Strategy indicates the following scenarios;\*\* Representor includes table of scenarios\*\*

The zero net migration figure is unfit for planning purposes as such a scenario would be planning for continued recession and decline. The Copeland Core Strategy argues that the job-based projections are valid for West Cumbria, but when sub-divided by district they should not be relied on as a basis for working out housing land supply. This is because they assume migration out of Copeland due to job losses in the nuclear sector, and migration into Allerdale due to job growth in the services, tourism and agriculture-based sectors. They do not make allowance for Copeland residents commuting into Allerdale, which does not reflect the fact that the main employment centres in Allerdale are close to the main centres of population in Copeland. The choice of 230 new dwellings per year therefore represents a slight under supply based upon the 2008 based household projections but with some in-built flexibility should the economic ambitions of the area be realised. In contrast Allerdale have chosen a rather arbitrary figure of 304 new dwellings per annum. This figure is derived from the same scenario modelling work used by Copeland (see table above) and is argued to take account of past delivery, available land and constraints. However the figure of 304 is simplistically the middle ground between the 5 year migration trend and Employment baseline scenarios. Given the functional relationships between the two authorities and interdependence of their two economies it is surprising and unjustified why Allerdale have chosen a different method of determining their housing requirement to Copeland.

#### Carlisle City Council

The northern parts of Allerdale were identified in the regional SHMA as being within the same market area as parts of Carlisle and the settlements within that area were identified as playing a complimentary role to Carlisle in terms of serving local housing and other markets particularly in relation to their rural hinterland. There is no recognition of this complementarity either in the Local Plan or the Council's own Statement of Compliance on the Duty to Cooperate. The Carlisle Housing Need and Demand Study (2011) identifies a need for up to 665 new dwellings per annum, if it is to meet forecast economic growth. Whilst Carlisle have yet to commit to an objectively assessed housing need requirement, and setting aside the appropriateness of the RS requirements, the 665 new homes per annum required to facilitate its economic ambitions is significantly greater than the 450 figure for Carlisle from the RS. It is also notable that Carlisle have consistently under-performed against the RS target in recent years (Carlisle AMR 2011-12) adding to a significant cumulative shortfall. Whilst Carlisle may be able to rectify this issue in the longer term the City Council still has significant work to undertake before it is in a position to adopt its Local Plan and

hence under delivery against this higher figure is likely to continue. This continued under performance will affect the economic prospects of both Carlisle and the wider region.

**Changes :** In view of the developments beyond Allerdale's border we recommend strongly that the Council reconsiders its strategy and puts in place material actions to address regional issues, including increasing its own housing requirement. The Council will be aware that the NPPF requires LPAs to meet their objectively assessed housing needs in full (paragraphs 14, 17 and 47) and if these needs cannot wholly be met within their own administrative boundaries, for authorities to co-operate to accommodate needs elsewhere (179 and 182). The NPPF attaches considerable importance to LPAs cooperating to address strategic planning issues. The NPPF expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities (paragraph 178). The HBF believe it is important that Allerdale accommodate an element of the unmet needs from neighbouring authorities and proactively plan for economic growth. We therefore consider an annual housing requirement figure in excess of 450 new homes per annum should be planned for. Failure to plan for the under-delivery by other authorities and potential for greater demand which will arise from an improved economy will rebound most severely on those on lower incomes.

---

**Council's Response:** Do not accept. A 'Duty to Cooperate' Statement of Compliance has been produced to clearly demonstrate how the Plan and the LA meets the DTC. The Statement document has been updated to provide greater clarity and evidence.

The Local Plan sets a realistic yet aspirational housing target of 5,471 dwellings over the plan period 2011-2029. This equates to an annual requirement of 304 dwellings. This requirement meets the full objectively assessed needs for the continued growth of the Plan Area and is in excess of the former RSS target and the 2008 ONS population projections.

A housing growth topic paper was produced to accompany the Allerdale Local Pre-Submission Draft to provide the background detail on the key data used, including evidence from the 2011 Census, and the key considerations. The Council has produced an update to the Housing Growth Topic Paper is required to provide a full and clear justification with regard to both the representations received and emerging data and trends.

**Change :** No

**Action:** No action required.

Rep ID: 16 / 3	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S3	

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

**Summary:** This policy is unsound as it is not positively prepared, effective or justified. The housing requirement does not take account of the Council's own evidence of objectively assessed need, the vision within the Local Plan or previous under delivery.

**Full Response:** Vision and Strategic Objectives

The Vision, as indicated on page 14 of the Local Plan, suggests that the Council are seeking economic growth; 'By 2028 Allerdale's communities will be sustainable, prosperous, safe, healthy and vibrant. 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.'

This aspiration for economic growth within the vision is further enhanced within the Strategic Objectives section which aims for 'maximising economic opportunities'. Given these strong and laudable economic aspirations the Council's objectively assessed housing need should be based upon a scenario of employment growth. As discussed previously in the representations on the duty to co-operate the Council have simplistically chosen a housing figure which represents the middle ground between the 5 year migration trend and employment baseline scenarios. If the Council and the region are serious about economic growth it should be planning for a figure closer to the 516 new dwellings per annum indicated in the nuclear new build scenario (table 1).

#### SHMA

The figure of 304 new dwellings quoted in the plan is significantly below the requirement identified within the SHMA (2011) and its subsequent update (2013). Within these documents there is an identified open market need for 1474 new dwellings over the next 5 years, this equates to 295 dwellings per annum. The Council also identifies an annual affordable housing requirement of 181 over the same period. This equates to an annual average of (295 + 181) 476 new dwellings per annum.

Even if the Council were planning to achieve 476 dwellings per annum it is unlikely it could achieve its affordable housing requirement as this would require 38% of all units to be affordable which would be unviable in the current market (Allerdale Housing Viability Study 2011). The Council will be aware that the NPPF requires LPAs to meet their objectively assessed housing needs in full (paragraphs 14, 17 and 47(A)).

#### Under-delivery

The Local Plan makes no reference or provision for the continued under-delivery against the previous RS target over recent years. The 2011/12 Allerdale AMR indicates the cumulative shortfall against RS requirements as 857 units. Whilst the RS has now been revoked the identified need is still evident and must be dealt with in the plan. It is also worth re-iterating at this point that the under-delivery is not confined to Allerdale but rather is a sub-regional issue for Cumbria which the Council needs to address through the duty to co-operate with firm actions and policy.

The Council indicates in its justification that the target housing figure of 304 dwellings per annum is partially based upon previous delivery rates. These rates must, however, be viewed in the context of previous under-delivery as well as a period of economic recession. The NPPF requires the plan to be positive. The use of historic delivery rates borne through a period of under-delivery and recession is not a sound basis to plan for the future as it will simply perpetuate current under-performance and economic decline.

**Changes :** It is recommended that the Council increase its housing provision to accord, as a minimum with its own objectively assessed need. The housing requirement figure should also take account of previous under-delivery across the region and the Council's aspiration for growth. It is therefore recommended that an annual housing requirement nearer 500 new dwellings should be planned for.

**Council's Response:** The Local Plan sets a realistic yet aspirational housing target of 5,471 dwellings over the plan period 2011-2029. This equates to an annual requirement of 304 dwellings.

This requirement meets the full objectively assessed needs for the continued growth of the Plan Area and is in excess of the former RSS target and the 2008 ONS population projections.

A housing growth topic paper was produced to accompany the Allerdale Local Pre-Submission Draft to provide the background detail on the key data used, including evidence from the 2011 Census, and the key considerations. The Council has produced an update to the Housing Growth Topic Paper is required to provide a full and clear justification with regard to both the representations received and emerging data and trends.

**Change :** No

**Action:** No action required.

Rep ID: 17 / 1	Company/Organisation:	Document: LP
Name: Ms B & A	McHugh & Smithie	Policy: S3

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

**Summary:** Believe that the criteria for making Brigham a Local Service Centre is tenuous based upon the poor capacity and limited availability of the qualifying services.

**Full Response:** We moved to Brigham because it is a quiet village location with green open aspects. It is therefore unsatisfactory to find that the status of Brigham is to be changed from a Rural Village with infill development, to a Local Service Centre. We understand that this is our opportunity to object to the status change for Brigham and make our views known. We do not believe that the status change for Brigham is sound. The criteria for making Brigham a Local Service is tenuous. We are told that the local school is at capacity with no room to expand. The bus service is limited in schedule and destination. The village shop has been on the market for some time and the sale is apparently generating little interest. These factors could be viewed as impractical rather than sustainable. However, it is not only the criteria, there are several reasons why we believe Brigham should remain a Rural Village and not a Local Service Centre, as follows: 1) Brigham is a greenfield site; 2) Problems for sites which have outline planning permission. With reference to the two sites which already have outline planning permission (oddly classified as 'discarded' in the Strategic Housing Land Availability Assessment - SHLAA). We together with many other villagers are unhappy about the number of additional houses that have been granted outline planning permission, as this will greatly increase the size, population and traffic flow of Brigham, adding to the already current problems, as follows: a) The village roads are narrow and as parking is essential for village residents, the roads are, in many places, down to one vehicle width only; b) Access onto the A66 is hazardous at either exist; c) The approach roads to the A66 are either physically narrow or narrowed by parked vehicles; d) Access/egress for new estates will merge onto these minor, ill repaired and congested roads (i.e. hazards such as poor visibility for drivers and pedestrians); e) School Brow takes most local through traffic, including added congestion during school drop off/pick up times; f) School Brow is also subjected to diversions when the A66 is blocked; g) The constant flow of quarry wagons are routed past the school along School Brow; h) Pedestrian safety is a key issue as the village footpaths are narrow and often non-existent; i) There appears to be on-going issues with drainage and sewage for further new builds; j) The school is full and additional children will need to be transported in and out of the village; k) There is a shortage of employment in and around the village. 3) Concurrence with statements for Sites which have been 'discarded' in the SHLAA report for Brigham. With reference to the discarded sites, the authorities have noted a number of reasons for not including these areas. The following reasons extracted from the SHLAA Discarded Sites list March 2013, could equally apply to other outlined and proposed developments for Brigham: a) 'Means of access to the site considered substandard to support residential development', (this reason was repeated in reference to a number of sites); b) 'Would have adverse landscape/visual impact' (noted against two discarded sites); c) 'Substandard access due to restricted visibility'. 4) Need for additional housing appears to be unproven. Whilst the affordable housing is understood to be a growing need in some rural communities, the size and impact of residential estates which allow building companies to provide the appropriate mix of housing and make a profit, appear to be too large for small villages like Brigham. Already in Brigham there are a number of unoccupied dwellings which we understand were classed as affordable housing and yet remain empty. It seems that the overall need for more housing in Brigham village is unproven. Finally, with reference to the sites highlighted in the SHLAA report as 'deliverable and/or developable' of which three are currently outlined for development in Brigham. We would suggest that all of the above observations, including the comments made by authorities for discarded sites, are valid reasons why these residential developments should not go ahead. We also believe that these same reasons serve to enforce the need to maintain Brigham as a Rural Village and prevent this Greenfield location becoming part of the urban sprawl.

#### Changes :

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b> 19 / 3	<b>Company/Organisation:</b> Associated British Ports - Port of	<b>Document:</b> LP
	<b>Name:</b>	<b>Policy:</b> S3

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

**Summary:** ABP strongly objects to the level of growth in Silloth and considers that a higher level of growth should be delivered to match Silloth's role as a Key Service Centre

**Full Response:** Policy S3: Spatial Strategy and Growth

Policy S3 outlines the Council's approach to the distribution of growth across Allerdale. It sets out a settlement hierarchy, with Workington being the Principal Centre in Allerdale, settlements including Maryport, Cockermouth, Wigton and Silloth as Key Service Centres and smaller settlements being designated as either Local Service Centres, Limited Growth Villages or Infill Villages. The majority of growth in Allerdale will be distributed to the Principal Centre (35%). The next highest levels of growth will be split between the Key Service Centres. The Pre-Submission draft of the Local Plan states that 12% of total growth will be delivered in Maryport, with Cockermouth and Wigton both receiving 10% of growth each. Despite also being a Key Service Centre, Silloth is only designated 3% of growth. This will be only slightly more growth than in some of the Local Service Centres, which have been designated 20% of total growth split between 11 settlements.

ABP strongly objects to the level of growth proposed in Silloth and considers that a higher level of growth should be delivered to match Silloth's role as a Key Service Centre.

Silloth is a Key Service Centre which provides services, facilities and employment opportunities for a large surrounding hinterland. In particular, the Port of Silloth acts as a source of direct and indirect employment for the town and its hinterland, and also provides vital transport infrastructure. A higher level of growth should therefore be promoted in Silloth to reflect its role as a key service centre and take advantage of the economic and transport benefits associated with the Port.

The National Policy Statement for Ports states that ports can have the affect of increasing overall productivity in the local economy and can encourage innovation and investment. As such, the Port of Silloth offers the potential to attract additional investment and development to Silloth in both business and housing. This would however be restricted by the low level of development that will be accommodated in Silloth under the proposed settlement hierarchy. As such, it is considered that Policy S3 is not positively prepared as it does not plan to take advantage of the opportunities for growth offered by the Port of Silloth, and is therefore unsound.

Furthermore, the National Planning Policy Framework (NPPF) requires that Local Plans are aspirational and positively prepared. It is therefore considered that Policy S3 is inconsistent with national policy in this respect.

It is considered that the level of growth designated to Silloth should therefore be increased to encourage growth and to take advantage of the opportunities offered by the Port. It is therefore requested that the level of growth in Silloth should be increased to a similar level as the other Key Service Centres of Cockermouth, Wigton and Maryport (i.e. 10-12%).

**Changes :** It is considered that the level of growth designated to Silloth should therefore be increased to encourage growth and to take advantage of the opportunities offered by the Port. It is requested that the growth in Silloth should be increased to a similar level as the other KSC's of Cockermouth, Wigton and Maryport (i.e. 10-12%)

**Council's Response:** Comments noted. The level of growth directed each of the KSC is specific to the scale, character and context of the existing settlements, and relates the overall spatial strategy. The level of growth suggested for Silloth is considered to be appropriate for the settlement, and appropriate for the overall spatial strategy.

**Change :** No

**Action:** No action required.



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

**Summary:** Objects to the omission of the village hall, along with church, public house, shop, post office, as an important constituent in the definition of a village

**Full Response:** My original concerns suggested three factors had been ignored:  
 a) The omission of the village hall, along with church, public house, shop, post office, as an important constituent in the definition of a village;  
 b) An urban assumption that a collection of buildings is the essence in the definition of a village;  
 c) The omission of mobile services in the sustainability of a village.

The village hall is now included in your more detailed thinking. (Alas post hoc ergo propter hoc!) (S26 259 p112)

I have now read the whole of the draft (apart from the detailed sections on Workington, Lillyhall etc about which I have no cognisance). This reinforces my reading the Planners begin from buildings.

- Because their main brief is to authorise the construction of new buildings and control the modification of old ones, industrial, commercial and civic buildings and the infrastructure which links them: roads, railways, electricity, sewerage etc Sustainability is achieved by numbers and type.

#### The Village Community

In contrast I begin with the social and economic relationships which define a village community. (To slip into jargon we have different mind sets). So the omission of Bromfield from your document is highly significant. Even using your definition Bromfield and Blencogo are a joint village: the pub and church are in Bromfield, the village hall in Blencogo. Even though separated by a mile and a half of Mann's sheep farm they cannot be considered separately. The PCC organises events such as the annual Produce and Flower Show in the village hall; the Parish Council which meets in the village hall finances events in St Mungos church.

You ignore Bromfield because you intend to allocate a percentage of new housing to Blencogo but not Bromfield. (My caveats apply equally to the joint village of Arkleby, Paronsby, Plumbland, Threapland as I demonstrated last time). But the social relationships which bind the village community are intertwined indeed to be accurate you need to include Langrigg and Scales as far as the A596.

These relationships are often focussed on a building: St Mungo's Church is used symbolically for weddings, christenings and funeral even by those who do not worship there. You tend to focus on the Heritage factor (S27 which is commendable but ignores the religious and social impact the Mother's Union, the PCC as a social organisation and organiser and the area within which they function.

The Greyhound public house is the social centre for a similar area and its male, female and mixed sporting teams darts, dominoes and snooker are more important sports than the outdoor soccer linked to the village hall, where indoor bowls and table tennis are more significant to the aging population and the arguments about sustainability.

The survival of these buildings for the present use is therefore vital. Any closure of use in the case of the pub must be resisted. The example of the closure of the Westnewton pub against the petitions of the inhabitants of the village is a shameful precedent and the recent closure of the pubs in Langrigg and Blencogo makes this even more pertinent.

#### Mobile Services

The population density of Bromfield and Blencogo is never likely to make a village shop economically viable, but the residents should not have to travel for basic necessities. The Council should therefore survey the existing mobile provision.

Food supplies: Travelling grocery, meat, fish vans and if possible negotiate reduced fuel costs, on condition that they follow agreed routes (At the moment the Government is considering the EEC reduced tax for rural areas the Council needs to lobby to ensure our area is included).

#### Civic Services

The existing mobile library service, currently under financial threat, must be assured. The Post Office is now piloting a simple cheque book account ideal for those unable or unwilling to bank online. Advice on benefits etc, via the Citizen Advice Bureaux or Benefits Office and possibly occasional counselling services (depression is now acknowledged as a rampant problem for carers) all should be rolled into one weekly Mobile Civic Service.

#### Bus Service

In view of the current retail provision the only viable centre for Bromfield is Wigton and a four times a day public service is required. The Rural Partnership Plan for a community bus will be an excellent addition to provide further transport on demand.

#### Organisation

These objectives cannot be assured unless there is a continuous professional oversight secure by the appointment within the Planning Department of a dedicated Rural Sustainability Development Officer able to interact with the empowered community and in particular the Aspatia Rural Partnership Community Action Plan. To Summarise: The document is an impressive overview and hopefully will be adopted in full. With regret, because of the number of omissions, I have to state that in my view the DPD is unsound:-Vis: The definition of the village and social facilities which should be supported; The omission of mobile services; Failure to spell out the detailed need for adequate public transport.

**Changes :**

---

<b>Council's Response:</b>	There is no specific Government guidance on how the quantum and location of future growth should be defined within a Local Plan, however the Council considers that the establishment of a settlement hierarchy provides a clear and appropriate framework. The Council accepts that there is not one 'right' way to establish which settlements should be included within the hierarchy, but has ensured that the approach it has taken follows sound methodology and has been developed using robust research and analysis of local evidence and issues, both quantitative and qualitative. It has been underpinned by extensive engagement and consultation with local residents, businesses and stakeholders to ensure the strategy reflects the collective vision and aspirations of the local community. Further details relating to the Council's methodology is available in the Allerdale Spatial Strategy topic paper.
<b>Change :</b>	No
<b>Action:</b>	No action required.

Rep ID: 24 / 1	Company/Organisation:	Document: LP
Name: H & P Moore & Albion	Policy: S3	

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

**Summary:** Do not agree with the inclusion of Brigham as a Local Service Centre

**Full Response:** We have purchased 32 High Brigham, a home we purchased for several reasons, including:-

Open outlook onto countryside and view to the fells from the rear garden and from the bedrooms-

Propensity of wildlife in the area pheasants, red squirrels, buzzards, owls, wrens, various other birdlife in and around our garden since we moved in (1st February 2013)

Privacy we're currently not overlooked when we're in our rear garden-

Peaceful and quiet environment to live in, which is extremely important to us Imagine our disappointment when we read about your plan to make our rural village into a local service centre.

Regarding the proposition to make Brigham a local service centre, please see our opposition to the proposal below:

Increased traffic through the village. There are narrow, and in some places, no pavements along the village main street, and I have witnessed cars mounting the pavements many times at several locations through High Brigham....not good for pedestrians - young children, mothers pushing prams, the elderly.....

The road is narrow, and there are cars parked along one side, making it difficult to drive throughout the village at times, particularly for buses and large vehicles. We need to reverse onto / off the drive next to our house, and we're not the only people who have to do this. It's fairly manageable, though difficult to see with cars parked in front of the houses. This manoeuvre would be even more difficult if there was increased traffic through the village.

The access onto the A66 is fairly hazardous at both the Broughton Cross and Ellerbeck Brow junctions.

The roads in Brigham are already narrow, which is further restricted by parked cars. The safety of pedestrians particularly children walking to / from school, cyclists and other drivers needs to be considered with the increase in traffic flow through the village. In addition, the access onto the A66 at Broughton Cross (if turning right to Cockermouth) and Ellerbeck Brow (if turning right towards Keswick) are both extremely hazardous junctions, and there have been accidents at these locations. With increased traffic flow, surely this would increase the risk of an accident at both junctions?

Management of surface water, foul drainage Apparently, the drainage is at its full capacity. Is it realistic to expect the infrastructure works would incorporate the construction of a higher capacity surface water / foul drainage network? Currently, we have very little confidence that this would be seen as an important addition / expansion to the existing infrastructure.

More housing As mentioned previously, how can the construction of yet more houses be justified. There are currently houses up for sale / rent in Brigham are houses really in such a demand that an additional 322 need to be constructed in a village which really wasn't designed for so many people. It should also be mentioned that there is a block of flats near the old police station / Brigham social club which does not appear to be inhabited. There may be other reasons behind this, but if these aren't populated, will there really be the demand for all the houses which are proposed to be constructed in Brigham and High Brigham? There is the potential for 750 houses to be developed at the former Corus steelworks, so why we, within Brigham have new developments imposed upon greenfield land?

What value is placed on open land / countryside? I would like to think the open areas within villages, towns and cities are preserved to be enjoyed by future generations. Not to be exploited by property developers. Let us pose the question - why build on a greenfield site when there are plenty of brownfield sites within Allerdale? In addition, shouldn't agricultural land be protected from development?

Capacity of the local schools The construction of a housing estate at Kirk Cross Quarry will place a burden on local schools. If an additional 34 houses were constructed, it is very unlikely that parents would be able to send their children to the school of their choice within the catchment area. If we were to become parents in the future, I would like the choice to be able to send my child to school in Brigham.

Keeping Brigham a village We are extremely happy living in High Brigham, in a lovely village with an open outlook. It would be a terrible loss to construct more non-descript houses, almost turning Brigham / High Brigham into a small town.

Adverse impact on wildlife, ancient hedgerows We have seen a vast array of wildlife (red squirrels etc) / birdlife since moving, and as a keen nature lovers, we want it to stay this way. It is beyond my understanding why a lovely piece of countryside should be destroyed for the sake of yet more new housing which people may not even want. We thought that one of Allerdale's planning principles was to protect the natural landscape, not destroy it?

Impact of the value of peoples' homes We purchased our house, after saving long and hard for the deposit to buy a home we want to stay in for several years. It may be that the construction of an estate at the rear of our property will adversely affect its value, even in the long term. I'm sure the same applies for other people living in close proximity to the proposed site of the housing.

Construction not sympathetic to the rest of the houses in this area The design of the houses do not appear to 'fit in' with the character and distinctiveness of Brigham. They would stick out like a sore thumb.

It is not a 'light' development of Brigham and surrounds that are being suggested as part of this local service centre proposal. It is a full on re-development of our village. How can this be justified when taking in all the factors are detailed above?

I would appreciate an acknowledgement that you have received this opposition from us.

**Changes :**

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b> 28 / 1	<b>Company/Organisation:</b>	<b>Document:</b> LP
	<b>Name:</b> Ms L Varey	<b>Policy:</b> S3

**Support/Object:** Object

**Sound/Unsound:**

**Positively Prepared:**

**Effective:**

**Legally Compliant:**

**Justified:**

**Consistent:**

**Summary:** Do not agree with the inclusion of Brigham as a Local Service Centre.

**Full Response:** I write to object again at the inclusion of Brigham as a Local Service Centre. Brigham has insufficient infrastructure to support this designation.  
1. The local shop is up for sale, the post office has already closed.  
2. There are no pubs left in the village.  
3. There is no room for expansion at the local school.  
4. Of particular concern, the road network and pavements through the village are insufficient to support any further expansion of the village. Currently many parents drive their children the short distance to school due to concerns over road safety and the lack of pavements. Both accesses on to the A66 are difficult.  
5. The bus service is insufficient, meaning that any expansion will only serve the problems listed in point 4 above, whilst also going against the green agenda in increasing car use.

**Changes :**

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 29 / 1	Company/Organisation:	Document: LP
Name: Mr A Graham	Policy: S3	

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

**Summary:** Objects to the SHLAA

**Full Response:** I accept that Allerdale Borough Council has targets to meet to ensure that the Government priority of ensuring that land is not a constant in the delivery of new housing is met.

However the Strategic Housing Land Availability Assessment Draft main report, which supports the Local Plan, states that the majority of development will be located in existing urban areas that provide the best range of services, employment opportunities and access to public transport, and that smaller rural settlements should have the opportunity to accommodate small scale infill development where appropriate. This contradicts the decision to identify two parcels of land in the small village of Bridekirk (SHLAA ref. numbers RU58 and EXRU22) with a total potential capacity of 73 houses. This has been downscaled from the original assessment which identified a potential for 86 houses. This would more than double the number of houses in Bridekirk, and could hardly be regarded as small scale infill development.

Bridekirk is one of the few Allerdale villages outside of the Lake District National Park which has a special Lake-District type charm. It is this special feel to the village which has enticed many residents to relocate from all parts of the UK. It has a small primary school at Dovenby, which is full to capacity, no shops or any other services, and a very limited bus service to Cockermouth which provides three buses a day Monday to Saturday only, with the last bus at 14:10. This was once an hourly service, but was drastically reduced several years ago, and is at risk of being withdrawn at any time.

It is difficult to see how this scale of development could be suggested in a Limited Growth with such a limited range of services and access to public transport, and very few employment opportunities within a 20 mile radius. This part of the plan is not based on a strategy which meets objectively assessed development and infrastructure requirements.

It would be extremely short sighted of Allerdale Borough Council to think that developers would not want to maximise their profits by squeezing as many houses as possible into these sites. It would be costly and very difficult to defend the inevitable appeal if planning permission is refused when the potential number of houses has already been identified in the SHLAA.

**Changes :** Review the SHLAA for Bridekirk. The assessment should be realistic and achievable. For this Limited Growth Village a maximum of 10 new houses would be much more realistic.

**Council's Response:** The Council considers that this response does not relate to Policies within the Plan, but specifically to the SHLAA and specific sites within the village of Bridekirk. Site specific housing numbers will be dealt with as part of the Allerdale Local Plan (Part 2): Site Allocations. This response will be fed into ongoing work which is progressing the Site Allocations document, but will not be taken further at this stage of the Local Plan process.

**Change :** No

**Action:** No action required.

Rep ID: 36 / 5	Company/Organisation: Blennerhasset and Torpenhow P	Document: LP
Name: Mrs B	Kavanagh	Policy: S3

Support/Object: Object

Sound/Unsound: Unsound

Positively Prepared:

Effective:

Legally Compliant: Yes

Justified:

No Consistent:

**Summary:** The Plan details how policy options were considered and explains how Rural Villages were defined, however it makes no reference to how or why the two sub-categories of Rural Villages were introduced to the Pre-Submission Consultation Draft

**Full Response:** It is the view of Blennerhasset & Torpenhow Parish Council that Policy S3 is unsound because it is not justified. Guidance stated that the DPD should be founded on robust and credible evidence base involving:  
- Evidence of participation of the local community and others having a stake in the area;- Research.  
Policy S3, Spatial Strategy and Growth, divides Rural Villages into two categories:  
Limited Growth Villages and Infill/Rounding Off Villages. The introduction of these two categories is a new addition at the Pre-submission Consultation Draft stage. It was not proposed nor referred to in any of the policy options in the previous consultation document. There is no evidence of participation of the local communities that will be directly affected by these proposals.

The Allerdale Local Plan (Part 1) Spatial Strategy Topic Paper (May 2013) details policy options that were considered and explains how Rural villages were defined. However it makes no reference to how or why the two sub-categories of Rural Villages were introduced to the Pre-submission Consultation Draft.

The definition of 'Infill/Rounding Off Villages' gives less certainty of the limits of development to small villages and hamlets than that provided to larger settlements defined as 'Limited Growth Villages'. The additional criteria provided under Policy S5 do not provide sufficient certainty that the character of our rural villages and hamlets will be protected. In some cases, such as Torpenhow, villages will have current development boundaries removed - boundaries which have been previously discussed and agreed - with no consultation with the Parish Councils and communities.

There is no evidence of housing need in either Blennerhasset or Torpenhow as demonstrated by houses that have stood empty for considerable periods - both for sale and to let. This has not been taken into account when projecting growth.

We are keen to work with Allerdale Borough Council to define or review development boundaries for our Parish.

#### Changes :

**Council's Response:** Concerns are noted. The Local Plan directs 6% of overall growth to Rural Villages, encompassing Limited Growth Villages and Infill/Rounding Off Villages. The scale of development proposed will be expected to be commensurate to the size of the settlement and reflect its position in the settlement hierarchy. As the respondent states settlement boundaries will direct development of the Limited Growth Villages, while robust development criteria have been developed for Infill/Rounding Off Villages. This approach was considered to be an appropriate and sound approach.

The decision to split the Rural Villages tier was taken subsequent to the preferred options consultation based on analysis of the wide spectrum of the Rural Villages category. Allocation between the two categories took into account; population, physical scale and context, in addition to ensuring a geographic distribution.

**Change :** No

**Action:** No action required.

Rep ID: 37 / 21	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S3	

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

**Summary:** There is no reference to the impact of development on the historic environment and the reflection of character and appearance of the local area as mentioned in various policies throughout the Plan

**Full Response:** There is no reference to the impact of development on the historic environment and the reflection of character and appearance of the local area as mentioned in various policies throughout the Plan. The NPPF requires that a proper assessment should be made to identify land, which would be inappropriate for development because of its historic significance. This needs to be detailed in this policy. We object to the scale of development proposed only relating to the size of the settlement and the position in the settlement hierarchy. There is no reference to individual character, appearance and the historic environment etc. Consideration should be given on the ability of settlements to accommodate growth and not harm setting, character and landscape.

**Changes :** Insert additional criteria:  
 The ability of the settlement to accommodate growth without harming its character or setting or that of the surrounding landscape.

---

**Council's Response:** It is accepted that criteria suggested would provide greater clarity and therefore it is concluded that this text would be best within the policy wording following the policy.

**Change :** Partially Accepted

**Action:** Paragraph 79 has been amended accordingly.

Rep ID: 37 / 22	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S3	

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

**Summary:** We support the recognition of the need for development to find the optimal viable use of a heritage asset or appropriate enabling development to secure the future of heritage assets

**Full Response:** We support the recognition of the need for development to find the optimal viable use of a heritage asset or appropriate enabling development to secure the future of heritage assets

**Changes :**

---

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further action required.

Rep ID: 37 / 23	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S3	

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

**Summary:** We support reference to the historic environment in reviewing settlement boundaries for the site allocations DPD.

**Full Response:** We support reference to the historic environment in reviewing settlement boundaries for the site allocations DPD.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further action required.

Rep ID: 37 / 24	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S3	

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

**Summary:** We support reference to the historic environment in reviewing settlement boundaries for the site allocations DPD.

**Full Response:** We support reference to the historic environment in reviewing settlement boundaries for the site allocations DPD.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further action required.

Rep ID: 38 / 8	Company/Organisation: Crossscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: S3	

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

**Summary:** Queries in relation to settlement hierarchy and growth figures for limited growth/infill villages

**Full Response:** Page 26 Limited Growth / Infill Villages - Please ensure no large developments in Crosby as current Moor Park development represents in itself 7 years growth in the parish of Crossscanonby. What is the status of the settlements of Birkby and Crossscanonby as they are not mentioned?

**Changes :**

**Council's Response:** By the definition of its designation as a Limited Growth Village, Crosby will not see large scale developments, being restricted to small scale development only within the designated settlement boundary. Birkby and Crossscanonby have not been included within the settlement hierarchy due to their limited size/services and will therefore be classed as 'open countryside' where development will be restricted other than in exceptional circumstances (set out in the Policy).

**Change :** No

**Action:** No action required.



Rep ID: 38 / 9	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S3

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

**Summary:** Queries the definition of small in relation to development to be allowed within Limited Growth Villages

**Full Response:** Page 28 - Limited Growth Villages restricted to small development. Again, what is the definition of "small"?

**Changes :**

**Council's Response:** The Allerdale Local Plan (Part 2) Site Allocations will define the level of growth expected at this level of the settlement hierarchy by revising settlement boundaries to permit levels of growth that are both appropriate and sustainable. This exercise will take into account various factors such as context, character, constraints and level of affordable need. Part 1 of the Plan provides the policy context for this process. Part 2 and the settlement boundary review will be subject to full public consultation.

**Change :** No

**Action:** No action required.

Rep ID: 43 / 4	Company/Organisation: Susco (Sustainable Cockermouth	Document: LP
Name: Mr M	Porter	Policy: S3

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

**Summary:** SUSCO suggest that spatial strategy directs too much growth to Cockermouth.

**Full Response:** S3 Spatial Strategy and Growth The percentages allocated to the various areas within the Borough are inappropriate, and in relation to Cockermouth are completely inaccurate in terms of appropriate growth. Allerdale are looking for 35 houses per year over 15 years of the plan in Cockermouth. Cockermouth would have 525 extra homes by 2028. There are 383 planned dwellings now, plus 369 for sale in June 2013 gives us 752, exceeding the required housing need for the full duration of the plan. If only new build are included, with 383 already agreed to be built, this only requires a further 156 additional homes over the duration of the plan. The figure of 10% growth is therefore excessive and unjustifiable and does not make for sustainable and sound planning for the requirements of the town. It is felt that with the current numbers of agreed to be built dwellings in place, a very minimal amount of growth should be allocated to Cockermouth. It has been suggested 2% growth would give Allerdale sufficient flexibility, as even this low figure would result in exceeding the required home figure. It was felt that to be consistent with other objectives in the plan, and the aspirations of other towns who actively want further developments, the towns of Maryport (eg 13%), Wigton (eg 12%) and Aspatria (eg 4% as the town is keen to have development) should be considered as locations which could be allocated a greater percentage, if Cockermouth's was reduced. They are towns in a better position than Cockermouth to sustain further growth. It also fits with the aims of the Plan in terms of increased use of public transport, and reductions in journeys (if development in the towns included increases in local employment opportunities). They all have good links by rail and bus to other major centres of employment and services within and outwith the Borough. Cockermouth does not have good public transport links. A slight increase (eg 1% extra) in the Limited Growth and Infill/Rounding Off villages combined may be an option given there are a large number of these settlements to spread the increase amongst.

**Changes :**

**Council's Response:** The Plan allocates approximately 10% of the residential growth to Cockermouth over the Plan Period. This allocation includes committed (or dwellings with planning permission) development. The Plan has been revised to provide clarity on this issue.

**Change :** No

**Action:** Policy S3 (paragraph 79) S6 have been amended to emphasis that the allocations must take into account committed development.

Rep ID: 51 / 1	Company/Organisation: Winscales Parish Council	Document: LP
	Name: Ms Hazel Blacklock	Policy: S3

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

**Summary:** Queries Winscale parish's omission from Settlement Hierarchy

**Full Response:** After reading this document we notice there is no planned housing development for the parish of Winscales. How would this affect planning applications for new build?

**Changes :**

**Council's Response:** Winscales has not been included within the settlement hierarchy due to its limited size and sustainable services - it is therefore classed as 'open countryside' where development will be restricted other than in exceptional circumstances (as set out in the Policy).

**Change :** No

**Action:** No action required.

Rep ID: 55 / 4	Company/Organisation: Cumbria County Council	Document: LP
	Name: Mr Michael Barry	Policy: S3

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

**Summary:** Support the hierarchy and distribution of development as this is considered to reflect the County Council's preferred approach.

**Full Response:** Housing. 9. This is a most important aspect of the Local Plan. It establishes the key principles around the quantum and the distribution of development across the Borough. 10. We note Allerdale's intention to deliver 304 new homes per annum, but with recognition that where evidence demonstrates that it is necessary, higher levels of housing may be delivered. The delivery of the right amount and types of housing in sustainable locations is recognised as a very important role of the planning system and is amplified within the NPPF. This is also of importance to the County Council given the role of housing 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, well-being and educational achievement. 11. The baseline target of 304 new homes is based on evidence contained within the Strategic Housing Market Area Assessments (SHMA) for Allerdale. This requirement represents an uplift on the previous annual target of 267 homes set out in the now revoked North West of England Regional Spatial Strategy. This proposal is welcomed as it should help ensure the availability of a flexible supply of housing land that can respond to changes in demand and therefore support the creation of balanced housing markets together with economic development. 12. Moreover, given the reduction of Government grant for affordable housing and in light of an evidenced requirement for such housing, the raised housing target will help deliver necessary affordable housing through the cross subsidy of affordable housing by open market housing. Employment. 13. This Policy also highlights a requirement for at least 51 ha of additional employment land over the plan period. This requirement reflects the evidence of the West Cumbria Employment Land Review Update 2012 and is supported on this basis. Settlement Hierarchy 14. The settlement hierarchy, as a foremost planning consideration, represents an important aspect of this policy. The Cumbria Sub Regional Spatial Strategy makes clear the importance of sufficient levels of development being delivered to meet identified requirements for homes and employment. It requires that development should be concentrated in sustainable locations where there is sufficient local infrastructure and services to allow people to access schools, services and jobs with ease, and preferably by minimising the use of the private car. To guide this process the Cumbria Sub Regional Spatial Strategy identifies a settlement hierarchy across which development in Cumbria should be distributed. The location of each settlement within the hierarchy is based on the range of services and facilities, the size of the population and its role and function and this hierarchy should be used to determine how much development would be accommodated sustainably at each settlement. These principles are also recognised in Paragraph 34 of the NPPF which states; plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. 15. In Allerdale, the Sub Regional Spatial Strategy highlights the need for major levels of development in Workington which, together with Whitehaven, represents a very important service centre within the County. Recognising their role, the Spatial Strategy highlights the need for the development of these towns, along with Maryport and Cleator Moor, to take place in a complementary way that builds on their individual strengths. The Strategy also identifies the need for 'Significant' levels of development at Maryport, and 'Moderate' levels of growth in the Key Service Centres of Maryport, Cockermouth, Wigton, Silloth and Aspatria. In addition, it highlights the need for 'small scale' development to take place in other rural locations to help sustain services and meet needs, including the needs of local businesses and for housing. 16. While giving the largest share of development to the most sustainable settlements, the proposed hierarchy in the draft Allerdale Local Plan recognises the role of smaller rural settlements and the importance of small scale development in enhancing/protecting their sustainability. When considering the levels of development at individual settlements it will be important that there is the ability to respond to evidence of housing requirements. For example, in the Cockermouth sub area the housing market may face pressures due to housing costs and the occupancy restrictions on new housing within the Lake District National Park Authority. In time, these pressures may manifest with a requirement for even further housing land, and it is suggested that this policy does need to be implemented in a flexible manner, with the ability to provide more land in the smaller of the Key Service Centres should a need for it become apparent. 17. The Local Service Centres have been identified on the basis that they have a school, shop and public transport which are all important in the achievement of sustainable communities. At these settlements, modest growth is intended to support such services and to help ensure local needs can be met in a relatively sustainable location. The recognition of the value of schools in creating sustainable settlements is welcome and new housing development can help support the continuing vitality of schools. With respect to public transport it should be noted that there is no guarantee that such services will be maintained in the future, but the level of development proposed should help to sustain current services and may enable improved levels of service to become commercially viable in the longer term. 18. In the Limited Growth Villages and Infill/Rounding Off Villages the Local Plan proposes that low levels of open market housing and small scale employment and other services would be acceptable. It is suggested that Allerdale should consider whether the very small settlement of Wiggonby would be able to operate as an Infill/ Rounding Off Village given the school and sports facility identified in the settlement and its proximity to the other services available at nearby Aikton. Elsewhere the Local Plan's policies require that development would be limited to that which has a specific locational requirement, such as affordable housing to meet local needs or to support rural enterprises. This is considered important as housing and employment development to meet local needs have a very important role in helping to sustain the vitality of rural communities. 19. The proposed hierarchy, and the distribution of development, is supported as this is considered to reflect the County Council's preferred approach and should facilitate the delivery of sustainable development within Allerdale Borough.

**Changes :**

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

<b>Rep ID:</b> 58 / 1	<b>Company/Organisation:</b> Story Homes	<b>Document:</b> LP
<b>Name:</b>		<b>Policy:</b> S3
<b>Support/Object:</b> Object	<b>Sound/Unsound:</b> Unsound	<b>Positively Prepared:</b>
<b>Legally Compliant:</b>		<b>Effective:</b>
		<b>Justified:</b>
		<b>Consistent:</b>

**Summary:** This needs to be amended to reflect the minimum 15 year period post adoption.

**Full Response:** This needs to be amended to reflect the minimum 15 year period post adoption.

**Changes :** Amend plan period

**Council's Response:** Accept comment.  
**Change :** Yes  
**Action:** Amend Plan period to extend to 2029.

Rep ID: 58 / 4	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S3	

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

**Summary:** Considers this policy to be unsound in relation to growth levels, settlement hierarchy, role of settlements, housing allocations and employment allocations

**Full Response:** The policy is unsound. The housing requirement does not appropriately deal with housing requirements as it does not address the evidence base requirements before the authority. There is no clear justification as to why the housing figure has been selected. It does not align with any of the scenarios testing undertaken in the evidence work, as set out in the Housing Growth Topic Paper May 2013. These issues are fundamental throughout the whole plan and given that the authorities Sustainability Appraisal April 2013 has been based upon the pre-submission draft plan approach that is also considered to be fundamentally flawed given that the plan would not be considered to be sound. In this regard, Figure 3-2 housing trajectory table in Appendix 3 to the pre-submission draft is flawed in that it does not carry forward the under delivery from the previous plan period, which stood at 857 units up to 2011/12. Neither does it include 20% buffer from later in the plan period which needs to be reflected in the calculations. Appended to this response are tables that identify the housing requirements should the evidence base scenarios for employment and Nuclear build programme be utilised. The authorities vision is to capitalise on skills and opportunities in nuclear energy sectors tied into Strategic Objective 23b maximising economic opportunities identified in the West Cumbria Economic Blue Print implementation plan, however has arbitrarily used a housing requirement figure that does not reflect that economic aspiration. It is considered that the dwelling provision proposed significantly underestimates the requirements. Signet have prepared tables appended to this submission setting out scenarios using the Council's own evidence base and the need to include under delivery within 5 year supply. Paragraph 47 of the NPPF is clear that authorities need to boost significantly the supply of housing and that local planning authorities should: Use their evidence base to ensure their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in this framework, including identifying key sites which are critical to delivery of the housing strategy over the plan period. This paragraph also goes on to state that the local planning authority should. Identify supply as specific, developable sites or broad locations for growth and identifies supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements. In addition, the NPPF specifies that authorities should illustrate the expected rate of housing delivery through a housing trajectory and set out the strategy for both market and affordable housing. (Signets emphasis) No housing trajectory is available in the evidence base documents to support how the authority envisage meeting their affordable housing targets in full. The Vision and Objectives of the plan are based upon high employment and capitalising on the opportunities in the nuclear and energy sectors. However the housing requirement does not align itself with the housing requirement scenarios of employment baseline of 497 per annum or the Nuclear New Build programme of 516 units per annum. This is contrary to the plans own objectives and vision. The proposed figure of 304 units per annum is un-aspirational and will not accord with the Government objectives and policy as set out in paragraph 47 of the NPPF seeking Local Planning Authorities to significantly boost housing supply. Pages 25-28 Settlement Hierarchy and Role of Settlement No fundamental objections are raised to the actual settlement hierarchy itself, however there is no clarity in the plan document or any evidence base documents as to the percentage proportion split between the different settlements. It is considered that this is particularly relevant when there are disparities between the affordable housing needs within different settlements. For example, Cockermouth has the highest affordable housing requirement and in the context of no significant public funding to meet such needs, the reliance upon market housing to cross-subsidies such delivery is considered essential. However, it is noted that the affordable housing policy (Policy S8, pg 62) seeks 40% provision on sites within Cockermouth, notwithstanding Cockermouth is identified as a settlement of moderate value and the Viability Study demonstrates that such a requirement renders the majority of schemes undeliverable.

In the context of the position that the plan does not meet the full housing needs identified by evidence balanced with the under delivery of both market and affordable housing, the level of housing requirement should be increased. An increase in market housing would then dilute the extent of affordable being sought on individual developments and assist in overcoming viability issues that are intrinsic in the plan at present. Further commentary on this is made in relation to each settlement hierarchy discussed below.

-Page 28 Housing Allocations Paragraph 79 of the plan refers to Site Allocations DPD identifying broad distribution of housing and employment growth. Without indicating specific deliverable sites or broad locations, it is considered that the plan does not demonstrate it is sound, particularly as settlement boundaries will need to be changed. It is considered that by taking this approach, the authority are not meeting one of the core planning principles about proactively driving and supporting sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving places that the country needs. Plans should take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development in their area. These points were raised in previous representations and remain as a fundamental concern of the process. Without amending settlement boundaries at this stage the Authority will not be able to meet its housing requirements as its limiting development opportunities. This cuts across all the settlements including the Limited Growth Villages where paragraph 71 sets out that new housing and employment will be restricted to small scale development within the designated settlement boundary. The current settlement boundaries are dated and do not reflect the housing requirement needs for this plan and need to be aligned with the strategy. Villages such as Branthwaite will be unduly restricted which will impact on rural villages and their sustainability.

-Page 29 Employment Allocations. In regards to approach to employment land, there is again no clear rationale as

to why the plan proposes to allocate at least 51 hectares of land for the plan period, however the evidence base in the joint West Cumbria Employment Land and Premises Study and subsequent update projects the need for 60 hectares. In addition, the approach to delaying review of employment land to a later DPD fundamentally undermines the Local Plan. The NPPF is clear that such assessment should be undertaken in parallel or combined with Strategic Housing Land Availability Assessments as set out in paragraph 161. The ability to deliver employment land alongside housing are fundamental to meeting the Government's agenda of economic and housing growth set out in the NPPF.

#### Changes :

**Council's Response:** The Local Plan sets a realistic yet aspirational housing target of 5,471 dwellings over the plan period 2011-2029. This equates to an annual requirement of 304 dwellings. This requirement meets the full objectively assessed needs for the continued growth of the Plan Area and is in excess of the former RSS target and the 2008 ONS population projections.

A housing growth topic paper was produced to accompany the Allerdale Local Pre-Submission Draft to provide the background detail on the key data used, including evidence from the 2011 Census, and the key considerations. The Council has produced an update to the Housing Growth Topic Paper is required to provide a full and clear justification with regard to both the representations received and emerging data and trends.

**Change :** No

**Action:** No action required.

Rep ID: 66 / 1	Company/Organisation:	Document: LP
	Name: Mrs Susie Davies	Policy: S3

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

**Summary:** Does not believe that Brigham should be designated as a Local Service Centre

**Full Response:** The allocation of Brigham as a Local Service Centre is unsound. It should be a Rural Village.

The current existing services are limited with one small shop which is up for sale and not a post office, limited buses and a school at capacity. There are no medical, dental, fuel or entertainment facilities so the needs of the community have to be got elsewhere.

The roads in the village are at capacity with any large vehicles having to mount the kerb to get through. All access out of the village is dangerous in all directions. Both A66 junctions, Chapel Brow junction to A595 and the very narrow lane to Eaglesfield with dangerous junction at Paddle school.

Brigham can only cope with limited in fill or brownfield site development as it was in the local plan.

Brigham is currently being flooded with major planning applications for housing estates, which it cannot sustain for all the above reasons. One planning application 2/2013/0260 has not taken into consideration any issues of SUDDS and if passed would increase the drainage into a beck through the east end of the village and potential flooding of several homes and the road again. As seen in 2012 twice. The Local Flood Management Team of the County Council is not consulted for any planning applications at present.

**Changes :** Change Brigham from a Local Service Centre to a Limited Growth Village.

Amend Figure 6.

The definition for LSC should include shops not a single shop and good internal road infrastructure and good access in and out of the village.

The local village school should also have capacity or at least land available to expand which Brigham does not.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 73 / 1	Company/Organisation:	Document: LP
	Name: Mr Richard Wilson	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 74 / 1	Company/Organisation:	Document: LP
	Name: Mrs Joan Wilson	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 75 / 1	Company/Organisation: Lindens	Document: LP
Name: Mrs Sheila Houghton	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 76 / 1	Company/Organisation:	Document: LP
	Name: Mr Allan Boardman	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 77 / 1	Company/Organisation:	Document: LP
Name: Ms Alicia Crane	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 78 / 1	Company/Organisation:	Document: LP
Name: Mr Robert Van Den Bossche	Policy: S3	

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 79 / 1	Company/Organisation:	Document: LP
	Name: Mrs Anne Myres	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 80 / 1	Company/Organisation:	Document: LP
	Name: Mrs Sandra Boardman	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. We really do not have, nor will building more houses bring, the same facilities as Flimby for example. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 81 / 1	Company/Organisation:	Document: LP
Name: Mr William Patterson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 82 / 1	Company/Organisation:	Document: LP
Name: Mr Melvyn McGowan	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 83 / 1	Company/Organisation:	Document: LP
Name: Mrs Lorraine Dixon	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 84 / 1	Company/Organisation:	Document: LP
Name: Mr Steven Dixon	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 85 / 1	Company/Organisation:	Document: LP
	Name: Mrs Deborah Redmond	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 86 / 1	Company/Organisation:	Document: LP
	Name: Mrs Gillian McGowan	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 87 / 1	Company/Organisation:	Document: LP
	Name: Mrs Linda Patterson	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 88 / 1	Company/Organisation:	Document: LP
	Name: Mrs Daphne Beck	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 89 / 1	Company/Organisation:	Document: LP
Name: Mrs Alison Lowes	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 90 / 1	Company/Organisation:	Document: LP
	Name: Dr Ian Lowes	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 91 / 1	Company/Organisation:	Document: LP
Name: Mrs Mary Burns	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 92 / 1	Company/Organisation:	Document: LP
Name: Mis Julie Tyson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 93 / 1	Company/Organisation:	Document: LP
Name: Mr Mark Kinghan	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 94 / 1	Company/Organisation:	Document: LP
	Name: Mrs Katrona Kinghan	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 95 / 1	Company/Organisation:	Document: LP
Name: Mrs Fiona Weakley	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 96 / 1	Company/Organisation:	Document: LP
Name: Mrs David Weakley	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 97 / 1	Company/Organisation:	Document: LP
Name: Mrs Mary Scally	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 98 / 1	Company/Organisation:	Document: LP
Name: Mr Steven Scally	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 99 / 1	Company/Organisation:	Document: LP
Name: Mrs Jean Bridge	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 100 / 1	Company/Organisation:	Document: LP
Name: Mr David Bridge	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 101 / 1	Company/Organisation:	Document: LP
Name: Mr Terence Rickerby	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 102 / 1	Company/Organisation:	Document: LP
Name: Mrs Julie Rickerby	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 103 / 1	Company/Organisation:	Document: LP
	Name: Mrs Margaret Robinson	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 104 / 1	Company/Organisation:	Document: LP
Name: Mr John Robinson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 105 / 1	Company/Organisation:	Document: LP
Name: Mrs June Wheeler	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 106 / 1	Company/Organisation:	Document: LP
	Name: Mr Francis Wheeler	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 107 / 1	Company/Organisation:	Document: LP
	Name: Mrs Jacqueline Winstanley	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 108 / 1	Company/Organisation:	Document: LP
	Name: Mrs Rachel Murray	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 109 / 1	Company/Organisation:	Document: LP
Name: Mrs Julie Hicks	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 110 / 1	Company/Organisation:	Document: LP
	Name: Mr Richard Wilson	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 111 / 1	Company/Organisation: Brigham Parish Council	Document: LP
	Name: Mrs Rebecca Hanson	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 112 / 1	Company/Organisation:	Document: LP
Name: A	Wandal	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 113 / 1	Company/Organisation:	Document: LP
Name: Mrs Myra Kirkpatrick	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 114 / 1	Company/Organisation:	Document: LP
Name: Mr Clive Kirkpatrick	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 115 / 1	Company/Organisation:	Document: LP
Name: Mis Alison Church	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 116 / 1	Company/Organisation:	Document: LP
Name: Mis Alison	Church (second)	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 117 / 1	Company/Organisation:	Document: LP
	Name: Mr Warwick Bailey	Policy: S3
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 118 / 1	Company/Organisation:	Document: LP
Name: Mis Linda Hughes	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 119 / 1	Company/Organisation:	Document: LP
Name: Mr David Sharpe	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representer suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 120 / 1	Company/Organisation:	Document: LP
Name: Mr Andrew Butler	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 121 / 1	Company/Organisation:	Document: LP
	Name: Mrs Sandra Butler	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 122 / 1	Company/Organisation:	Document: LP
Name: Mr Bruce Mumford	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 123 / 1	Company/Organisation:	Document: LP
Name: Mrs Eileen Bowers	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 124 / 1	Company/Organisation:	Document: LP
Name: Mr Keith Bowers	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 125 / 1	Company/Organisation:	Document: LP
	Name: Mr Howard Holden	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 126 / 1	Company/Organisation:	Document: LP
Name: Mrs Joan Poucher	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 127 / 1	Company/Organisation:	Document: LP
	Name: Mr Anthony Poucher	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 128 / 1	Company/Organisation:	Document: LP
Name: Mr John Sutton	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 129 / 1	Company/Organisation:	Document: LP
	Name: Mrs Maureen Sutton	Policy: S3
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 130 / 1	Company/Organisation:	Document: LP
Name: Mr Bill McCallum	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 131 / 1	Company/Organisation:	Document: LP
Name: Mr Alan Davies	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 132 / 1	Company/Organisation:	Document: LP
Name: Mr Philip Brews	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 133 / 1	Company/Organisation:	Document: LP
Name: Mrs Caroline Brews	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 134 / 1	Company/Organisation:	Document: LP
	Name: Mrs Janet North	Policy: S3
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified:	No Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 135 / 1	Company/Organisation:	Document: LP
Name: Mr	Anothony North	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 136 / 1	Company/Organisation:	Document: LP
	Name: Mr Sean Knapp	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

---

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 138 / 1	Company/Organisation:	Document: LP
Name: Mis Emma Birkett	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 139 / 1	Company/Organisation:		Document: LP
	Name: Mr John Maddison	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared:	Effective:
Legally Compliant:		Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 140 / 1	Company/Organisation:	Document: LP
Name: Mr Allan Sykes	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 141 / 1	Company/Organisation:	Document: LP
Name: Mrs Brenda Sykes	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 142 / 1	Company/Organisation:	Document: LP
Name: Mr Mark Sykes	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 143 / 1	Company/Organisation:	Document: LP
Name: Mrs Angela Kirkbride	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 144 / 1	Company/Organisation:	Document: LP
Name: Mr Stewart Kirkbride	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 145 / 1	Company/Organisation:	Document: LP
	Name: Mrs Janet Douglas	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 146 / 1	Company/Organisation:	Document: LP
Name: Mr Colin Nicholson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 147 / 1	Company/Organisation:	Document: LP
	Name: Mrs Brenda Nicholson	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 148 / 1	Company/Organisation:	Document: LP
Name: Mr Andrew Douglas	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 149 / 1	Company/Organisation:	Document: LP
Name: Ms Manson Plouffe	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 150 / 1	Company/Organisation:	Document: LP
Name: Mr Andrew May	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 151 / 1	Company/Organisation:	Document: LP
Name: Dr Mark Greaves	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 152 / 1	Company/Organisation:	Document: LP
Name: Mrs Lisa Varey	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 153 / 1	Company/Organisation:	Document: LP
Name: Ms Pamela Watson	Policy: S3	
Support/Object: Object	Sound/Unsound: Unsound	Positively Prepared: Effective:
Legally Compliant:	Justified: No	Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 154 / 1	Company/Organisation:	Document: LP
Name: Mr Mark Walton	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept. 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 155 / 1	Company/Organisation:	Document: LP
Name: Mrs Jennifer Walton	Policy: S3	

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

**Summary:** Representer suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 156 / 1	Company/Organisation:	Document: LP
	Name: Dr Robert Bernard	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 157 / 1	Company/Organisation:	Document: LP
Name: Mrs Jennifer Bernard		Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 158 / 1	Company/Organisation:	Document: LP
Name: Mr Brian Gynn	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement. 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 159 / 1	Company/Organisation:	Document: LP
Name: Mrs Zena Gynn	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 160 / 1	Company/Organisation:	Document: LP
Name: Mr Dacre Caley	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 161 / 1	Company/Organisation:	Document: LP
Name: Mrs Joyce Caley	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 162 / 1	Company/Organisation:	Document: LP
	Name: Mrs Patricia Hutton	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 163 / 1	Company/Organisation:	Document: LP
	Name: Mr Anthony Macey	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 164 / 1	Company/Organisation:	Document: LP
	Name: Mr Nicholas Cockton	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.

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

**Change :** No

**Action:** No action required.

Rep ID: 165 / 1	Company/Organisation:	Document: LP
Name: Mr Derek Jackson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 166 / 1	Company/Organisation:	Document: LP
	Name: Mrs Maureen Jackson	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 167 / 1	Company/Organisation:	Document: LP
Name: Mrs Nicola Bell	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b> 168 / 1	<b>Company/Organisation:</b>	<b>Document:</b> LP
	<b>Name:</b> Mr David Bell	<b>Policy:</b> S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 169 / 1	Company/Organisation:	Document: LP
Name: Mr David Brown	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 170 / 1	Company/Organisation:	Document: LP
	Name: Mrs Nicola Caley	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 171 / 1	Company/Organisation:	Document: LP
	Name: Mrs Margaret Warren	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 172 / 1	Company/Organisation:	Document: LP
	Name: Mrs Jean Stroker	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 173 / 1	Company/Organisation:	Document: LP
Name: Mrs Eleanor Bainbridge	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 174 / 1	Company/Organisation:	Document: LP
	Name: Mrs Maureen Hindle	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 175 / 1	Company/Organisation:	Document: LP
	Name: Mrs Kathleen Moore	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 176 / 1	Company/Organisation:	Document: LP
	Name: Mr Victor Thompson	Policy: S3

Support/Object: Object      Sound/Unsound: Unsound      Positively Prepared:      Effective:

Legally Compliant:      Justified: No      Consistent: No

**Summary:** Representer suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.

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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 177 / 1	Company/Organisation:	Document: LP
Name: Mrs Jean Thompson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 178 / 1	Company/Organisation:	Document: LP
Name: Mr William Thompson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 179 / 1	Company/Organisation:	Document: LP
Name: Mrs Carol Thompson	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 180 / 1	Company/Organisation:	Document: LP
Name: Mrs Judith Cockton	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 181 / 1	Company/Organisation:	Document: LP
Name: Mrs Pauline Boyes	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 182 / 1	Company/Organisation:	Document: LP
	Name: Mr William Boyes Peter	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 183 / 1	Company/Organisation:	Document: LP
Name: Mr Stewart Gimber	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 184 / 1	Company/Organisation:	Document: LP
	Name: Mr Caroline Gimber	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 185 / 1	Company/Organisation:	Document: LP
Name: Mr Kevin Scott	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes:** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change:** No

**Action:** No action required.



Rep ID: 186 / 1	Company/Organisation:	Document: LP
Name: Mrs Angela Scott	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 187 / 1	Company/Organisation:	Document: LP
Name: Mr Robert Hardgreaves	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 188 / 1	Company/Organisation:	Document: LP
	Name: Mrs Jacqueline Hardgreaves	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 189 / 1	Company/Organisation:	Document: LP
Name: Ms Barbara Burton	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 190 / 1	Company/Organisation:	Document: LP
Name: Mr Neil Bassett	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 191 / 1	Company/Organisation:	Document: LP
Name: Mrs Susan Moore	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 192 / 1	Company/Organisation:	Document: LP
Name: Mr John Moore	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 193 / 1	Company/Organisation:	Document: LP
Name: Mrs Florence Sanderson		Policy: S3

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

**Summary:** Representer suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 194 / 1	Company/Organisation:	Document: LP
	Name: Mrs Paula Wilcock	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 195 / 1	Company/Organisation:	Document: LP
Name: Mr Charles Wilcock	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 196 / 1	Company/Organisation:	Document: LP
Name: Mr Anthony Allaker	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's** Do not accept.

**Response:** 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 197 / 1	Company/Organisation:	Document: LP
Name: Mrs Helen Allaker	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 198 / 1	Company/Organisation:	Document: LP
Name: Mr Paul Wren	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 199 / 1	Company/Organisation:	Document: LP
Name: Mrs Lorna Wren	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings.  
 Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 200 / 1	Company/Organisation:	Document: LP
	Name: Mr Michael Myers	Policy: S3

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.

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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.

Rep ID: 201 / 1	Company/Organisation:	Document: LP
Name: Mr Derek Bainbridge	Policy: S3	

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

**Summary:** Representor suggests that Policy S3 is unsound because Brigham should not be in the category of LSC given declining services and constraints.

**Full Response:** It is unsound because Brigham should not be in the category of LSC. It should be a Rural Village. It cannot justifiably move from Infill Village to Local Service Centre when services have reduced (post office, 3 pubs etc) from the time of the last Plan. It can accept limited growth only, of the in-fill or Brownfield site types as preferred by the NPPF. Brigham does not have the road infrastructure to cope with development like Dearham for example, and building will not bring the same facilities as Flimby. With no fuel, medical, dental or leisure services it does not meet day-to-day needs as in ABC's definition. Recent planning applications for Brigham such as at Kirkcross (02/2012/0784) rely on bussing children out to other village schools. This is unsustainable and the presumption that Brigham could be an LSC is unsound because the school is full, the bus service is intermittent throughout the day and not available on Sundays and the shop is limited in size, unlikely to expand and up-for-sale. It should be noted that large vehicles such as school buses, bin lorries and the emergency service vehicles sometimes have to mount pavements in the narrow, traffic pinch-points in the village to travel through. This Cumbrian Rural Village characteristic is in stark contrast to the sort of infrastructure associated with other LSCs.

**Changes :** Change Brigham from LSC on page 25 to Limited Growth Village on p26. Amend Figure 6. Make the definition on p181 clearer. LSCs may have a school, shop and a bus service but you should add to the definition consideration must be given to the ability of those services to support, and the settlement's infrastructure to cope with, any increased development. The definition should, for sustainability reasons, include the word 'shops' and refer to having a good internal road infrastructure as a prerequisite.

**Council's Response:** Do not accept.  
 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. The designation of Brigham as a Local Service Centre closely follows this methodology and therefore it is considered that it is a sustainable settlement.  
 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. Given the level of recent housing approvals within designated Local Service Centre tier which contribute to this target, it is considered that the scope for substantial further growth in these settlements is limited within the Plan Period. This process, combined with subsequent planning applications, will ensure that individual developments are of a scale and design which do not detract from the character of the settlement and include sufficient infrastructure to support the any increase in dwellings. Site Allocations will be subject to a separate consultation and examination process which will commence shortly.

**Change :** No

**Action:** No action required.



Rep ID: 205 / 3	Company/Organisation: Copeland Borough Council	Document: LP
Name: Mr Chris Hoban	Policy: S3	

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

**Summary:** The proposed level of growth in Policy S3 (304 dwellings per annum) would appear to be an appropriate figure to support growth within Allerdale.

**Full Response:** The proposed level of growth in Policy S3 (304 dwellings per annum) would appear to be an appropriate figure to support growth within Allerdale. This is because: It supports and complements the growth figure in the Copeland Core Strategy (230-300 per annum), and will enable the likely future demand for housing across west Cumbria (that is projected to support the Economic Blueprint) to be met in a flexible and sustainable manner by both local authorities. It is greater than was originally outlined in the Regional Spatial Strategy, making it challenging, but potentially deliverable based upon historic build rates.

Proposing significantly higher build rates could adversely affect sustainable development in west Cumbria and could also result in Allerdale consistently failing to achieve its housing target. It should also be remembered that any target set is not a maximum and there may be occasions when the target is exceeded. The settlement hierarchy outlined will enable the best use of existing infrastructure (and aid future planning of infrastructure) by focussing the majority development within the main towns (and villages) that provide the best range of services. The scale of development attributed to each settlement also appears appropriate to support sustainable development and regeneration aspirations, and is complementary to that in the Copeland Core Strategy where a similar approach has been taken forward. Anything other than minor revisions to this could result in a skewing of development to less sustainable areas. The proposed distribution of development in Policy S3 will also help support the preference given to brownfield sites, as well as other development principles outlined in Policy S5.

**Changes :**

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

Rep ID: 2 / 7	Company/Organisation: Friends of the Lake District	Document: LP
Name: Dr K Wilshaw	Policy: S4	

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

**Summary:** Friends of the Lake District supports Policy S4.

**Full Response:** Friends of the Lake District supports Policy S4 as it provides strong guiding principles for good development design including safeguarding the landscape and the natural environment. It provides Allerdale Borough Council with the means to refuse development which offers a poor standard of design.

**Changes :**

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

Rep ID: 37 / 25	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S4	

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

**Summary:** We support that this policy will provides an overarching framework for the design of all development and is to be used in conjunction with all other policies in the local plan.

**Full Response:** We welcome the proposals outlined in this section particularly:· The requirement that all development proposals should be of the highest standard of design and contribute positively to the site and the surroundings in terms of visual amenity.· That they are of an appropriate scale and appearance.· Respond positively to the character,history and distinctiveness of allocation and integrate well with existing development.· Improve the public realm and green spaces.· Enhance, protect and integrate effectively with the historic environment.We support that this policy will provides an overarching framework for the design of all development and is to be used in conjunction with all other policies in the local plan.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further action required.

Rep ID: 37 / 26	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S4	

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

**Summary:** We support the recognition that all development must contribute positively to the local character, history and identity of an area and the surroundings.

**Full Response:** We support the recognition that all development must contribute positively to the local character, history and identity of an area and the surroundings.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further action required.

Rep ID: 37 / 27	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S4	

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

**Summary:** Subject to the textual change, which would assist users of the Plan in dealing with development in the historic environment, we support reference to good practice guidance. The Plan should refer to English Heritage Guidance. These documents do not appear

**Full Response:** Subject to the textual change, which would assist users of the Plan in dealing with development in the historic environment, we support reference to good practice guidance. The Plan should refer to English Heritage Guidance. These documents do not appear in the evidence base.

**Changes :** Insertion of the English Heritage publication  
 Building in Context and Constructive Conservation: Sustainable Growth for Historic Places.

**Council's Response:** Changes accepted.

**Change :** Accepted

**Action:** Changes reflected in the Plan.

Rep ID: 38 / 10	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C Freeland	Policy: S4	

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

**Summary:** Queries compliance of specific criteria against specific development site

**Full Response:** Page 31 - S4. "Safeguard environmental quality and the amenities of both proposed and existing property".  
 Development of land near Birkby Lodge would environmentally challenge Birkby Lodge and adjoining agricultural land due to drainage problems and would also conflict with SO1g.

**Changes :**

**Council's Response:** Concerns noted. 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. However these comments will be fed into the ongoing work for the Allerdale Local Plan (Part 2): Site Allocations.

**Change :** No

**Action:** No action required.

Rep ID: 55 / 5	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S4	

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

**Summary:** Considers this policy combined with DM12 adequately addresses each of the key design principles contained in the Development Principles of the Cumbria Sub Regional Strategy

**Full Response:** The Development Principles of the Cumbria Sub-Regional Spatial Strategy sets out that development should bring high standards of design and construction methods that adopt the principles of energy efficiency and waste minimisation and management, encourage low carbon energy production, minimise vulnerability to future effects of climate change. It also requires that the siting, scale and use of materials in development should enhance townscape/landscapes and promote safe and secure environments that designs out crime and make proper provision for people with restricted mobility.21. It is considered that the proposed Allerdale Local Plan policy combined with Policy DM12 Sustainable Construction adequately addresses each of the key design principles contained with the Development Principles of the Cumbria Sub-Regional Spatial Strategy. It is therefore supported.

**Changes :**

**Council's Response:** Support noted.

**Change :** N/A

**Action:** No action required.

Rep ID: 12 / 3	Company/Organisation:	Document: LP
Name: Ms M Fitzgerald	Policy: S5	

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

**Summary:** Respondent supports Policy S5.

**Full Response:** It is reassuring to note that any proposed development 'will be expected to be commensurate to the size of the settlement' and also that 'preference will be given to the development of previously used land and buildings...' This is especially appropriate in areas where high quality landscapes are a prominent feature and tourism is a significant contributor to the local economy. This is a sound policy which, if used effectively, should prevent unnecessary and uncontrolled encroachment into unspoiled rural areas.

**Changes :**

**Council's Response:** Support noted.

**Change :** N/A

**Action:** No action required.

Rep ID: 16 / 4	Company/Organisation: Home Builders Federation	Document: LP
Name: Mr M Good	Policy: S5	

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

**Summary:** The policy is unsound because it is ineffective as it delegates important decisions on the location of development to a later document. The policy is also inconsistent with national policy by requiring preference to previously developed land.

**Full Response:** Policy S5: Development Principles requires new development to be concentrated within the physical limits of settlements as identified within the Local Plan settlement hierarchy. Paragraph 79 of the Local Plan indicates that the Site Allocations DPD will review and revise settlement boundaries as appropriate so that the level of growth identified in the plan can be accommodated. The Local Plan (Part 1) is clear that the settlement boundaries will need to be revised to accommodate the housing requirement but does not provide any real guidance upon location or a methodology for undertaking the revisions. The HBF are concerned that this important matter is being delegating to another document at some unspecified point in time. If the delivery of the housing targets requires amendments to the settlement boundary this should be explicitly indicated within the Local Plan (Part 1). Failure to do this is likely to perpetuate continued under-delivery on the Councils housing targets, uncertainty for the development industry and an increase in planning appeals.  
 The policy also identifies a preference to the development of previously developed land. This issue is dealt with in greater detail under policy S30 but it is worth noting at this point that such a preference is unnecessary and the NPPF provides no justification for this. If a site is in a sustainable location for housing, or indeed other forms of development, and is required to achieve the requirement then there is no reason to delay granting permission.

**Changes :** We recommend that the Council carries out its settlement boundary review prior to submission, and identifies the revised boundaries on a map. It is also recommended the preference towards brownfield sites be removed.

**Council's Response:** Comments noted. As suggested the Site Allocations DPD will review and revise settlement boundaries. The consultation for the methodology for the site allocations commenced in September 2013, and will be progressed over the coming year. The Council will continue working with developers to deliver appropriate housing sites as they arise.

Policy related to development of previously developed land has been clarified in this policy and throughout the Plan.

**Change :** Partially accepted.

**Action:** Policy regarding PDL has been revised.

Rep ID: 37 / 28	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S5	

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

**Summary:** In identifying locations for new development, we support the first priority being given to those sites, which have been previously used. We welcome the introduction of criteria to be used in determining new proposals. To ensure consistency reference should be made to some of the keywords, references used in section S4.

**Full Response:** In identifying locations for new development, we support the first priority being given to those sites, which have been previously used. We welcome the introduction of criteria to be used in determining new proposals. To ensure consistency reference should be made to some of the keywords, references used in section S4.

**Changes :**

**Council's Response:** Noted.

**Change :** No

**Action:** No change required.

Rep ID: 55 / 6	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S5	

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

**Summary:** Whilst considering this policy appropriate, there are concerns that the reference 'undue strain' with respect to infrastructure is not easily defined. Revision to wording suggested.

**Full Response:** Policy S5 concerns the key sustainable development principles that new development should adhere too. Consistent with the principles of sustainability, it rightly establishes that the scale of development within settlements should be commensurate with its size and can be accommodated by sufficient infrastructure.23. Nonetheless, reference to 'undue strain' with respect to infrastructure is not easily defined and it is suggested that a revised form of words would be more appropriate. 24. To further enhance this policy it is suggested that there should be acknowledgement that development should also adhere with the other Policy contained within the Local Plan.

**Changes :** With respect to criteria c) of Policy S5 it is suggested that it could be rewritten to state:  
 The capacity of local infrastructure and/or environmental assets would not be exceeded by the proposed development

At the beginning of the second paragraph state after provided that:  
 The proposed development is in conformity with all Policy set out within the Local Plan and:

**Council's Response:** Accept suggestions for changes to policy wording.

**Change :** Yes

**Action:** Amend policy to incorporate word changes as suggested.

Rep ID: 58 / 5	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S5	

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

**Summary:** Considers the policy to be unsound as it does not address settlement boundaries within the Plan but defers the review of these to Local Plan (Part 2)

**Full Response:** NPPF requires authorities to allocate sites to promote development and address spatial implications within the plan. The evidence base is clear that settlement boundary review will be required in addition to release of greenfield sites to meet the plan aspirations. The acknowledgement of this in the plan and evidence is based upon a lower housing requirement than we consider essential for delivery. To delay consideration of such important matters to a later document does not provide sound justification and evidence that the plan is deliverable. There is also a fundamental objection to the inclusion of a brownfield site priority approach which does not accord with national policy

**Changes :**

**Council's Response:** Settlement boundaries will be considered in the site allocations process. The Plan will be updated to provide a clear strategy for greenfield allocation reflecting the evidence base.

**Change :** Partially Accepted

**Action:** Policies have been revised to give a clear strategy for future allocation of greenfield land. Additionally the strategy regarding PDL has also been clarified.

Rep ID: 64 / 1	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S5	

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

**Summary:** Support policy

**Full Response:** United Utilities supports the principles of this Policy, particularly bullet point (c): The development will not put undue strain on existing local infrastructure or environmental assets. In terms of both fresh water supply and wastewater treatment some potential network constraints have been identified but continued close working between United Utilities and the Council should mean that these can be tackled and any future issues identified at an early stage and most appropriately addressed through the detailed design and phased delivery of development to ensure a co-ordinated approach with the delivery of infrastructure. As part of any application for planning permission, it will be necessary for the applicant to consider the impact of the proposal on wastewater infrastructure. Consideration of the location of the point of connection to wastewater infrastructure for new development and attenuation can also help to minimise flood risk and impact on watercourses.

**Changes :**

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

Rep ID: 18 / 1	Company/Organisation: The Ramblers	Document: LP
Name: Mr I Brodie	Policy: S6	

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

<b>Rep ID:</b> 35 / 1	<b>Company/Organisation:</b> Workington Town Council	<b>Document:</b> LP
<b>Name:</b> Mr C Bagshaw	<b>Policy:</b> S6	

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

**Summary:** Workington Town Council considers the Area based strategic policy for Workington to be lacking sufficient acknowledgement of the town's potential for developing the tourist/visitor economy

**Full Response:** Workington Town Council considers the Area based strategic policy for Workington to be lacking sufficient acknowledgement of the town's potential for developing the tourist/visitor economy

**Changes :** Promote Workington as a tourism destination and encourage the development of strategic visitor attractions such as Workington Hall and Park, the Helena Thompson Museum, the town's conservation areas, retail infrastructure and seashore

**Council's Response:** Do not accept. Workington's role as the principal residential, commercial, educational, leisure and cultural centre is highlighted throughout the Plan and spatial strategy.

**Change :** No

**Action:** No action required.

<b>Rep ID:</b> 46 / 4	<b>Company/Organisation:</b> Natural England	<b>Document:</b> LP
<b>Name:</b> Mr Janet Baguley	<b>Policy:</b> S6	

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

**Summary:** References should be corrected to the England Coast Path in the area based policy

**Full Response:** While we do not consider the area policies (S6) 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. These comments relate to a bullet point under the 'natural environment' heading of the area based policies: The following, incorrect, wording appears in S6a Workington, S6b Maryport, S6d Wigton and S6e Silloth: Support the development of the Cumbrian Coastal Access project which seeks to establish an unbroken public right of way along the coast of Britain

**Changes :** The text should read: 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. This text should also be included in S6f Aspatia. It would also be useful to add: The council will seek to protect and enhance the England Coast Path 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:** Correct title as suggested.



Rep ID: 55 / 7	Company/Organisation: Cumbria County Council	Document: LP
Name: Mr Michael Barry	Policy: S6	

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

**Summary:** This policy is welcomed as it is considered is properly reflects key issues - however it would benefit from great weight to the areas relationships with the LDNP

**Full Response:** Policy S6 provides a locality based interpretation of the key principles of the Local Plan. 28. The Cumbria Sub-Regional Spatial Strategy (SRSpS) emphasises the interrelationships between settlements and localities. These principles are reflected within the settlement hierarchy and the principles of development set out within this document.29. Within the SRSpS the complementary nature of Workington and Whitehaven (along with Cleator Moor and Maryport) and the need for development and regeneration of these towns should take place in a complementary way,building on their strengths and exploiting their assets is highlighted.30. Policy S6 of the Local Plan places focus upon the topics of Housing, Economy, Sustainable Communities and Infrastructure, Built and Historic Environment and the Natural Environment within each locality. It also highlights the relationships and issues affecting key towns, and their surrounding localities. 31. Assessment of the characteristics of the Cockermouth Sub-Area, would benefit from giving greater weight to this areas relationship with the Lake District National Park and the pressures this can place upon the Local Housing Market - given the potential for the need for overflowhousing from the Park area. 32. The content of these policies predominately reflect earlier County Council advice and it is considered to properly reflect key issues. On this basis the proposed policy is welcomed.

**Changes :**

**Council's Response:** Support noted.

**Change :** N/A

**Action:** No action required.

Rep ID: 33 / 5	Company/Organisation: Stagecoach North West	Document: LP
Name: Mr N Winter	Policy: S6a	

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

**Summary:** S6a - Suggest more emphasis should be given to improving bus services within Workington town centre.

**Full Response:** S6a Sustainable communities and Infrastructure.  
 The rail station requires a bus shuttle to connect passengers with the retail centre and bus station. The rail station is too far from the retail centre of Workington to be attractive to commuters.

Growing rail passengers from places served by commercial bus services puts sustainable bus routes at risk. In many cases meaning bus routes which serve communities that the train cannot serve, are then put at risk. State and local government funding should not be used as a state subsidy to undermine a commercial bus service. There is no mention of improvements to bus infrastructure in Workington town centre for passengers. Yet many more people use the bus in Workington and West Cumbria than the train;  
 More people travel to work by bus than all other forms of public transport combined.  
 Nationally people use the bus to make shopping and leisure trips to a value of £27.2bn p.a of which £21.5bn is spent in the town or city centre.  
 Over half of all 16-19 year olds are regular bus users  
 30% of those who are dependent on bus services to access their education and training live in areas in the top 10% of most deprived areas in Great Britain.  
 A quarter of bus commuters have turned down a job because of frequency or availability of bus service at some point in time  
 The bus has many advantages over other modes; flexibility, cost, ease of access, lower commercial risk. It requires support to aid commercial sustainability.

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

**Council's Response:** Accept that bus links between Workington town centre, the train station and the wider area are important sustainability factors for the town centre and the locality.

**Change :** Partial

**Action:** Amend policy to promote improved bus links between Workington train station and town centre.

Rep ID: 37 / 29	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6a	

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 Workington, 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.

Page 38 of the Plan has a specific section on the built and historic environment but the area description does not state that there is any. There needs to be some consistency. The Plan should make specific references to the historic environment in the locality section and not just the built and historic environment section (Page 38).

**Changes :** The Plan should be expanded to include a description of the historic environment in Workington 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 / 30	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6a	

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 action required.

Rep ID: 37 / 31	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6a	

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

**Summary:** Whilst we support reference to specific aspects of the historic environment. There is no mention of these in the area description (Page 35), (they obviously must be of some importance to be highlighted).

**Full Response:** Whilst we support reference to specific aspects of the historic environment. There is no mention of these in the area description (Page 35), (they obviously must be of some importance to be highlighted).

**Changes :** Specific references to the historic environment need to be assessed within paragraphs 93 to 98.

**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 / 32	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6a	

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

**Summary:** We welcome the proposal to protect Grade I listed Workington Hall, which is currently on the Heritage at Risk Register.

**Full Response:** We welcome the proposal to protect Grade I listed Workington Hall, which is currently on the Heritage at Risk Register.

**Changes :**

**Council's Response:** Noted.

**Change :** N/a

**Action:** No further changes required.

Rep ID: 58 / 6	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S6a	

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

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

**Full Response:** It is noted that the local plan progresses area based localities which take forward the approach from the Cumbria Sustainable Communities Strategy. These locality areas do not align themselves with the Strategic Housing Market Assessment areas. The NPPF advises that authorities should meet the full objectively assessed needs for market and affordable housing in the housing market area. There does not, however appear to be consistent linkage between the SHMA Assessments undertaken, the level of housing need identified both in terms of market and affordable or the approach to locality area based policies within the plan. Other specific elements are set out below: Workington Area Housing

- No demonstration or justification for 35% of overall housing growth to Workington and how this aligns itself with overall housing and affordable requirements;
- The average of 106 homes per year proposed is insufficient to meet the evidenced housing needs of both market and affordable provision;
- The expectation of 20% affordable housing on site subject to viability is not supported by the Council's own Viability Assessment. It is acknowledged that improvements over the plan period to market conditions may improve the viability of delivery however that is not the current position. Given that the housing requirement level is in question, and that an increase in market housing may enable the percentage requirement to be lowered site by site this element needs to be re-assessed. At present it renders the plan undeliverable. The evidence base identifies Workington as being an area of housing renewal requirement. The imposition of 20% affordable housing policy will seek to stymie development contrary to paragraph 173 of the NPPF relating to ensuring viability and deliverability.

Economy - The ability to meet the plans employment needs in the Workington locality is supported, however the review process of allocations should be undertaken in tandem with development of this 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:** No action required.

Rep ID: 64 / 2	Company/Organisation: United Utilities	Document: LP
	Name: Ms Jenny Hope	Policy: S6a

**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 suggestion.

**Change :** Yes

**Action:** Amend policy to include suggested word changes.

Rep ID: 7 / 5	Company/Organisation: Network Rail	Document: LP
Name: Ms D Clark	Policy: S6b	

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: Maryport Area Policy. Sustainable Communities and Infrastructure

Work with partners to support the improvement and integration of bus and rail services through the development of a Maryport transport hub;

Support improvements to the West Cumbria Coastal Railway service;

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.

<b>Rep ID:</b> 18 / 2	<b>Company/Organisation:</b> The Ramblers	<b>Document:</b> LP
<b>Name:</b> Mr I Brodie	<b>Policy:</b> S6b	

**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 Sillioth (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 :** Partial

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

<b>Rep ID:</b> 37 / 33	<b>Company/Organisation:</b> English Heritage	<b>Document:</b> LP
<b>Name:</b> Ms E Hrycan	<b>Policy:</b> S6b	

**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 Maryport, 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 a Roman fort and maritime history but no consideration of the historic environment. The area also has the WHS, (where reference has been made in the specific built and historic environment policies page 41) but no mention in the description (page 39) 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 Maryport and an assessment be made of its character and the contribution it makes to the area.39 Map Unsound The map does not illustrate the historic environment.

**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 / 34	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6b	

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 / 35	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6b	

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

**Summary:** We welcome the promotion of Roman Maryport in your tourism objectives but what about the WHS? This should be particularly emphasised.

**Full Response:** We welcome the promotion of Roman Maryport in your tourism objectives but what about the WHS? This should be particularly emphasised.

**Changes :** Include reference to the WHS in your tourism objectives.

**Council's Response:** Accepted.

**Change :** Accepted

**Action:** The omission has been corrected.

Rep ID: 37 / 36	Company/Organisation: English Heritage	Document: LP
Name: Ms E Hrycan	Policy: S6b	

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

**Summary:** Page 42 of the Plan in the section on the natural environment refers to protecting the historical park of Netherhall (which is supported) but this is the first time that it is mentioned in the local plan. Again, this should be highlighted in the area description of Maryport (Page 39).

**Full Response:** Page 42 of the Plan in the section on the natural environment refers to protecting the historical park of Netherhall (which is supported) but this is the first time that it is mentioned in the local plan. Again, this should be highlighted in the area description of Maryport (Page 39).

**Changes :** Specific references to the historic environment need to be assessed within paragraphs 99 to 103.

**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: 38 / 11	Company/Organisation: Crossscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S6b

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

**Summary:** Queries exclusion of Birkby and Crossscanonby as settlements in the hierarchy

**Full Response:** Page 39, Para 99. As Birkby and Crossscanonby are apparently not recognised as settlements is the implication that they are part of Crosby. If so, is 'limited growth' outside what this Council understands to be the village line?

**Changes :**

**Council's Response:** Birkby and Crossscanonby have not been included within the settlement hierarchy due to their limited size/services and will therefore be classed as 'open countryside' where development will be restricted other than in exceptional circumstances (set out in the Policy).

**Change :** No

**Action:** No action required.

Rep ID: 38 / 12	Company/Organisation: Crossscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S6b

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

**Summary:** Queries definition of small in relation to growth targets

**Full Response:** Page 40 - Maryport Area Policy "Crosby will see small scale growth" - again please quantify "small".

**Changes :**

**Council's Response:** The Allerdale Local Plan (Part 2) Site Allocations will define the level of growth expected at this level of the settlement hierarchy by revising settlement boundaries to permit levels of growth that are both appropriate and sustainable. This exercise will take into account various factors such as context, character, constraints and level of affordable need. Part 1 of the Plan provides the policy context for this process. Part 2 and the settlement boundary review will be subject to full public consultation.

**Change :** No

**Action:** No action required.

Rep ID: 38 / 13	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S6b

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

**Summary:** Suggests contradiction between protecting AONB and promoting AONB for visitors in later policies

**Full Response:** Page 41 "Relieve visitor pressure on AONB contradicts Page 132, Para 310 where visiting AONB is to be promoted.

**Changes :**

**Council's Response:** The Council's strategy is to promote the AONB as a visitor destination whilst ensuring that inappropriate / harmful development is prevented. As part of this strategy, the Council will particularly encourage visitor developments in areas which are accessible to/from the AONB but are less environmentally sensitive. The objective of this approach is to divert and relieve visitor-related pressure on the more sensitive locations within the AONB.

**Change :** No

**Action:** No action required.

Rep ID: 38 / 14	Company/Organisation: Crosscanonby Parish Council	Document: LP
Name: Mrs C	Freeland	Policy: S6b

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

**Summary:** Questions whether this policy will prevent wind turbine development within the AONB

**Full Response:** Page 42, Natural Environment "Continue to safeguard Solway Coast AONB from harmful development" - Again, does this include Wind Turbines?

**Changes :**

**Council's Response:** This section refers to all development which is inappropriate or harmful to the AONB, not one specific type of development. It is important to not that the Plan should be read as a 'whole' and issues and protections relating specifically to wind farm developments are dealt with in Policy S19 (Renewable Energy and Low Carbon Technologies).

**Change :** No

**Action:** No action required.

Rep ID: 58 / 7	Company/Organisation: Story Homes	Document: LP
Name:	Policy: S6b	

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:** No justification/evidence base relating to 12% overall housing growth figure for Maryport on an average of 37 homes per year; Housing Growth Topic Paper Evidence Base indicates a significantly higher annual requirement to reflect employment or nuclear build baseline of 96 or 99 units per annum in the first 5 years; Reliance of 20% of affordable housing in Maryport subject to viability is fundamentally flawed and not supported by the Council's Viability Assessment.

**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 / 3	Company/Organisation: United Utilities	Document: LP
Name: Ms Jenny Hope	Policy: S6b	

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 / 1	Company/Organisation: Friends of Rural Cumbria's Envir	Document: LP
Name: Mis S	Hemsley-Rose	Policy: S6c

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

**Summary:** Support the text regarding ensuring development has regard to landscape character and the setting of the national park. Suggest some changes.

**Full Response:** Our members note the resolution to have regard for the local landscape character and 'the setting of the Lake District National Park.' The recently constructed wind farm at Tallentire is an important consideration in this regard.

**Changes :** Changes Suggested  
 The following statement of purpose on page 45 requires some clarification:  
 'Address lack of available employment sites and increase the range on offer to meet both ongoing local needs and those of the nuclear and energy supply sectors.'  
 'Nuclear' is part of the 'energy sector' and an explanation as to which other forms of energy the Council and its 'partners' are referring is lacking from this paragraph.

**Council's Response:** These policies provide summaries of the important issues and opportunities that will be addressed for each locality and are not intended to provide specific details relating to each topic. It is important that the Plan is read as a 'whole' and further information relating to the Council's energy supply aspirations can be found in Policy S19 (Renewable Energy and Low Carbon Technologies).

**Change :** No

**Action:** No changes required.

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

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 Cockermouth, 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 a conservation area and listed buildings but no consideration of specific aspects of the historic environment.

Page 46 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 in this section on Cockermouth and should be highlighted 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. For example, Cockermouth Castle, which is on the Heritage at Risk Register.

**Changes :** The Plan should be expanded to include a description of the historic environment in Cockermouth 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 accepted

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