



CONSULTATION STATEMENT

Workington Town Centre Supplementary Planning
Document

A public consultation on the draft Workington Town Centre SPD was carried out over a six-week period from 23rd October until Friday 4th December 2020.

During this period, the Council received 17 responses including from members of the public, stakeholders, retailers and local interest groups; this document summarises the consultation responses received.

The document also provides the Council's response to the comments and identifies if changes to the document are required.

Consultee ID	Summary of comments	Council response
1	The topic of the SPD is unlikely to have major effects on the natural environment - therefore there are no specific comments to make	Comments noted
1	The SPD could consider making provision for Green Infrastructure within development	Green Infrastructure is well referenced throughout the text. Additional reference to Policy SA52 of the ALPP2, Protecting and Creating Green Infrastructure incorporated.
1	The SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the NPPF	Passing reference incorporated in paragraph 10.18 This topic more appropriately addressed in green infrastructure/biodiversity guidance.
1	The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment	Comments noted. The Design section in particular references the local distinctiveness and character of the built environment. Further reference incorporated into strategic objectives.
1	The NPPF includes several design principles which could be considered, including the impacts of lighting on landscape and biodiversity	Lighting is discussed in paragraph 10.4. Amendment incorporated to include reference for careful design to limit impact on wider landscape and nature conservation interests.
1	If the SPD requires a SEA or HRA, Natural England must be consulted in line with the Planning Practice Guidance	The Council prepared a SEA/SA Screening Report upon which NE was consulted
2	Supportive of the investment and sympathetic restoration to be made in Workington town centre	Comments noted
2	The historic value of the town should be fully exploited, not only for the benefit of locals, but in order to attract tourists to the town centre	Agree. Further reference to historic environment incorporated.
2	Could the Council look at offering reduced, or free, parking at some car parks for certain times (e.g. after 6:30pm to support an evening economy)?	Comments Noted. This suggestion has been passed on to the carparking team and reference to the need for a carparking strategy that will support town centre vitality and viability and the nighttime economy has been inserted into the document (9.10).

2	More specifically, very supportive of the plans for and around Ladies Walk Brewery - the improvements here will benefit the whole town	Comments noted
3	The document does not reflect the need to move people out of their cars and onto public transport in order to reduce carbon emissions	The promotion and encouragement of pedestrian travel, cycling and sustainable transport options is embedded throughout the document. The benefits of these options are multiple, and include the reduction in carbon emissions, as referenced in paragraphs 9.6 (low carbon agenda) and 9.13 (greenhouse gases).
3	Flooding/flood risk is only mentioned five times in the document	Noted. New paragraph referencing flood risk after paragraph 6.2
3	Pleased to see discussion about repurposing surplus retail space into housing	Noted
3	However, the plan proposes further retail development despite the decline of the high street	The Town Centre faces competition with out of town retail development. The development sites identified within the SPD are potential locations for specific new purpose-built retail premises within the town centre in preference to out of town locations. The sites are however available for other town centre uses (See glossary)
3	There should be more reference made to Covid-19 and its effect on the high street	The pandemic is ongoing, and although it appears to have accelerated existing trends, the final outcomes are yet to be determined. Amendments to planning legislation seek to support the high street in this period of change, and the SPD supports flexibility and the repurposing of buildings.
4	Traffic lights at pedestrian crossings need to be improved in order to favour pedestrians, rather than vehicles in order to reduce pedestrian waiting times	Suggestion passed to the highway authority. Have inserted reference to the support for all measures encouraging walking which could include smarter pedestrian crossings to reduce waiting times

4	The cycle track up the hill past Curwen Hall should connect to Stainburn Road	Comments noted, and will be fed back to CCC who are preparing the Workington Local Cycling & Walking Infrastructure Plan (LCWIP)
4	X4/X5 bus services should start at the railway station	Decisions on routes and timetables are ultimately made by the operator. Suggestion forwarded to Cumbria County Council Scheduled Bus Services Officer for discussion.
4	The footpath/cycle track between the railway track and Derwent How Retail Park needs to be improved with regards to access and litter	Comments noted. Although the SPD focuses on the town centre as defined in the Allerdale Local Plan (Part 2), networks and connections to other parts of the town are important. These comments will be raised with CCC Public Rights of Way Team and in connection with the Workington Local Cycling & Walking Infrastructure Plan.
4	When planning new cycle tracks, officers should talk to cyclists to ensure they are fit for purpose	Comments noted, and will be fed back to CCC who are preparing the Workington Local Cycling & Walking Infrastructure Plan (LCWIP)
4	Figure 4 does not show the Leisure Centre or the new Travelodge	Noted - 1:10000 Scale base map has not been updated, but is a good base to display the notable buildings in relation to one another. Map modified to show location of Travelodge and leisure centre for accuracy and clarity.
5	There are links between the SPD and the Town Fund bid	Yes.
5	The document fails to utilise the resources already in the town centre to capitalise on those visitors staying overnights and shopping and eating in the town centre	Comments noted.
5	The SPD references Finkle Street but it is not significant enough to encourage investment; there is no reference to the Carnegie Theatre which is Grade II listed. There are opportunities to make public realm improvements and to encourage new investment in the area	Agree. Reference to Finkle Street strengthened.

5	There are plans to open two floors of the Carnegie as business centres and there has been recent investment in the café - however, the SPD (and Towns Fund) seems to be encouraging direct competition of these uses elsewhere in the town centre	The initiatives undertaken by the Carnegie are welcomed and supported. The SPD promotes the town centre for a range of town centre uses seeking to ensure it retains its vitality and viability. The objective of the Towns Fund is to drive economic regeneration of towns to deliver long term economic growth. Plans in the Town Investment Plan are complementary to the proposals from the Carnegie rather than in direct competition and have different target markets.
5	How is the Council going to enhance the cultural offer of Workington by supporting existing theatres?	The Promotion of Workington's existing cultural venues and facilities is to be raised with the Council's tourism team. Supporting the vitality and viability of the town centre, increasing footfall, and improving the town centre venue will all contribute to supporting existing venues.
6	The SPD recognises that the nature of town centres is changing through a move away from a dominant retail focus.	Comments noted
6	Need to understand more as to why people prefer the out of town centres of Derwent Drive and Dunmail Park to the town centre	Comments noted.
6	Need to look at more children/family friendly options for the town centre (e.g. soft play, crazy golf, bowling alley)	Agree. Comments noted. need to expand leisure offer. Bowling alley is located out of the town centre. There is an existing soft play facility.
6	More town centre spaces should be converted into affordable housing - this will naturally increase footfall in the town centre	Noted, particularly in regard to affordable housing. Agree that additional housing will increase footfall. The conversion of the upper floors of buildings in particular is encouraged by the Council, and in many circumstances does not need planning permission. Paragraphs 11.7-11.20 relate specifically to the conversion of buildings in the town centre to residential use. A balance needs to be struck with the protection of town centre viability and

		a critical mass of services and shops. However, changes to planning legislation are increasingly promoting residential development in town centres.
6	A covered pedestrianised shopping complex (e.g. The Lanes, Carlisle) should be a long-term objective	Comments noted
6	Late night shopping should be a weekly event, not just something that happens at Christmas	Comments noted
6	Whilst clean travel to the town centre (bus, walking, cycling) should be encouraged, it is recognised that the preferred method of travel is by car. Therefore, it should be noted that the car parking charges are excessive and may discourage those on low incomes to visit the town centre. Could the car parks rates be reduced or made free after a certain time?	Comments noted and to be passed to the Carparking team. The Council recognises that car usage is sometimes the only realistic travel option for many Allerdale residents in para 9.3. Additional text in paragraph 10 reflects the need for an appropriate carparking strategy that maximises town centre vitality and viability and supports the nighttime economy.
6	What happens at Central Car Park is crucial - it is an important area, currently not used to its full potential. It is a large, strategically placed site which should compete favourably with Dunmail Park and Derwent Drive	Agree.
6	Section 6.6 - need to be equally as successful in regenerating the town centre but not at the expense of places such as Dunmail Park and Derwent Drive	The SPD is focused on Workington town centre as defined in the Allerdale Local Plan (Part 2) that represents the heart of the town. It is the preferred location for town centre development where it is accessible and sustainable to all.
6	Section 8.1 - Workington is blessed with fantastic biodiversity in terms of flora and wildlife. However, this is regularly sacrificed for commercial development, with areas destroyed completely or by cutting connectivity corridors	The SPD is focused on Workington Town Centre as defined in the Allerdale Local Plan (Part 2). Green infrastructure is identified as a strategic objective which references biodiversity
6	Section 9 - don't forget about those residents who cannot walk or cycle far	Agree. We do reference the necessity for suitable carparking and inclusive design in sections 9.2 & 9.3

6	There is room for another convenience store on Central Car Park	Agree.
7	Cumbria GeoConservation applauds the vision for improving the environment of Workington Town Centre	Comments Noted
8	Supportive of the documents strategic objectives which includes reference to supporting existing theatres, music venues and cinemas	Comments Noted
8	The design and heritage principles rightly identify Carnegie Hall and Theatre Royal as distinctive buildings within the town centre and their protection is supported.	Comments Noted
8	Concern over wording of paragraph 10.27 regarding encouraging change of use where it improves long term viability. Suggest revision to encourage change of use of vacant premises, and no need or demand for existing use. Alternative social cultural uses for existing social/cultural facilities	Para 10.27 does not relate solely to community buildings. Policy S26 of the Allerdale Local Plan (Part 1) seeks to protect Community facilities and sets out circumstances where changes of use will be permitted. The paragraph has been reworded to change emphasis.
8	Suggest revision so that document more explicit in the need to ensure noise generating uses such as performance venues and pubs are protected either through sufficient design and acoustic protection or by locating residential units away from such uses (with reference to paragraph 182 of the NPPF)	Agree. Paragraph 11.10 amended to make this point.
8	Encourage a full recording and photographic record of remaining historic and decorative fabric and features.	A hole in the roof for a number of years has resulted in significant damage to the interior. Recent internal inspections by the Head of Planning Services has confirmed that no features of historic or architectural interest remain
8	Query the condition of the Opera House. A heritage and Community cultural project could have the potential to secure funding to restore it for community	The Opera House has been designated as a dangerous structure by the Local Authority Building Control team; access along adjacent public rights of way have been

	uses. The document could promote the Opera House positive restoration and re-use.	closed. There is no prospect of the building being restored and re-used
9	Sport England welcomes the desire to strength links between the town centre and the leisure and nearby sports facilities, including the Derwent Valley.	Comments Noted
9	Support the inclusion within the Vision a desire to improve the town centre environment through high quality distinctive design, public realm, green open spaces and green infrastructure; along with improving accessibility to and within the town for all including pedestrians, cyclists and those using public transport. This will help to provide a welcoming and vibrant environment for existing and new visitors to the area.	Comments Noted
9	Broadly supports objectives to improving connectivity and accessibility; creating an attractive townscape and public realm; and enhancing and improving green open spaces and green infrastructure.	Comments Noted
9	Sport England advocates the concept of “active design” to promote the role of sport and physical activity in creating healthy and sustainable communities. Modern-day life can make us inactive but the design of where we live, and work can play a vital role in keeping us active. Embracing a lifestyle change to be more active can have real benefits including improving physical health, increasing mental wellbeing and building stronger communities.	Comments Noted
9	Sport England has produced guidance documents and a checklist relating to active design	Noted. It is considered that the focus of the SPD on connectivity, walking, cycling and green infrastructure accords with many of the principles of Active design. Reference incorporated in design section. Provides useful input for further design guidance to be produced.

10	Homes England do not wish to make any representations on this SPD	Comments Noted
11	Supportive and agree with the Council that the sites selected are the most appropriate locations for expansion and improvement of Workington Town Centre and to deliver the Council's aspirations with regards to the Town Centre.	Comments noted
11	Believe that a mixed use development is the most appropriate planning framework for Central Car Park	Comments noted and Policy SA46 would support a mixed use scheme
11	There should be a threshold on the maximum size of retail units (convenience and comparison) imposed to ensure that the site is not dominated by a large footprint development which would not accord with the Council's vision for the site	Part 12 of the SPD identifies aspirations for the key Sites, and a mix of uses is encouraged at Central carpark. However, It would not be appropriate to cite a specific threshold limiting the size of any retail unit which may come forward on the site, potentially as part of a mixed use scheme, when Central carpark has been identified for Main Town Centre Uses in the Allerdale Local Plan (Part 2). Such Inflexibility would not accord with Policy SA47 of the Allerdale Local Plan (Part 2) or the National Planning Policy Framework.
11	Agree that any development of Central carpark should be supported by a full masterplan, in order to avoid piecemeal development.	Noted
11	In terms of key design principles, the central carpark site would be better used as a pedestrianised high street style extension to the town centre. Suggest the addition of text to encourage design with a clear focal point, which will increase the legibility, connectivity and walkability of any development that may come forward.	Comments noted. Relating specifically to Central carpark, Paragraph 12.11 makes reference to the need for distinctive design that increases legibility, and the issues of connectivity and pedestrian and cycle linkages are also referenced in paras 12.9 - 12.11. Significant elements of the SPD relate to design and connectivity, and Local Plan Policies contain further detailed design guidance. It will be for any potential developer to address these issues in the design of any scheme. No further amendment to text necessary

11	Welcome the Council's desire to enhance the existing National Cycle route which runs through central carpark and the provision of high-quality public realm to improve accessibility by cycle/foot and to create a feeling of 'destination' in this part of the Town Centre.	Comments Noted
11	A combination of smaller town centre uses designed around walkable streets is far more appropriate in this location, rather than a development of a larger footprint, which could have adverse impact on the residential amenity.	Comments noted. The site has been identified for Town Centre Uses in the Allerdale Local Plan (Part 2) which also references the need for any development to have regard to the adjoining residential properties. The design principles relating to Central carpark within the SPD make reference to residential amenity in paragraph 12.12. Local plan policies relate to the protection of amenity. Amenity is a recognised material planning consideration in the determination of planning applications. No amendment of text necessary.
11	Request 'Preferred Mix of Use' section is adapted to say <ul style="list-style-type: none"> • Small-scale Retail (convenience) and • Small-scale Retail (comparison) 	The SPD identifies aspirations for the identified key Sites, and a mix of uses is encouraged at Central carpark. It is unclear exactly what size of retail unit constitutes 'small-scale', and It would not be appropriate to cite a specific limit to the size of any retail unit which may potentially come forward, possibly as part of a mixed use scheme, when Central carpark has been identified for Main Town Centre Uses in the Allerdale Local Plan (Part 2). Such Inflexibility would not accord with Policy SA47 of the Allerdale Local Plan (Part 2), or the National Planning Policy Framework.
12	Embed the historic environment within the vision. Workington town centre contains a host of heritage assets, and it is important that the vision and strategic objectives reflect the contribution that the historic environment makes to Workington's sense of place,	The vision and strategic objectives have been amended to include reference to the towns heritage and historic assets, and their contribution to locally distinctive places.

	and the positive role that heritage plays in regeneration and placemaking	
12	Encourage the preparation of Conservation Area Appraisals and identifying buildings of local interest, undertaken in line with guidance published by Historic England.	The Conservation Area appraisals will be carried out in accordance with English Heritage Guidance. The Council will consider whether to identify a list of locally important buildings in Workington.
12	Some of the key development sites included in chapter 12 are located within Conservation areas or within the settings of listed buildings. Reference should be made to Historic England advice on setting in refining guidance for each site	Noted reference to Historic England guidance to setting. This publication has now been referred to in the text.
12	Addition of text encouraging early pre-application discussions with Historic England in respect of development where HE is a statutory consultee	Additional commentary inserted.
12	note that the draft SPD appears to propose no site allocations/policies that would have significant environmental effects upon the historic environment or which have not previously been screened as part of the Local Plan process, and as such we concur that in this regard Strategic Environmental Assessment is not required.	Comments noted
13	The strategic objectives of the SPD are supported, particularly those relating to economy/employment opportunities and connectivity and accessibility.	Comments noted
13	The County Council supports the objectives of the connectivity theme and will work with the Borough Council to support the delivery of the proposed connectivity improvements	Comments noted
13	Pinch point funding, if awarded, would enable the County Council to prepare a full business case through which delivery funding can be secured. The initial application will not secure funding	Comments noted

13	In respect of Ramsay Brow, while there are pedestrian benefits arising by improving this junction, the A596 is a key strategic route providing connectivity with the Port of Workington.	The Council acknowledges that the A596 is a strategic route (Para 9.5). Nevertheless, it does sever the town centre and represents a barrier to pedestrians. It is vitally important that any interventions at the Ramsay Brow junctions offer enhancements for pedestrians rather than just vehicular traffic.
13	The County Council is facilitating the development of a Local Walking and Cycling Infrastructure Plan for Workington (LCWIP), working with partners to identify local priorities for walking and cycling. The LCWIP will help to deliver the objectives of the cycling strategy in Workington and will help to identify improvements that enable more walking and cycling within the town centre. There is a need to ensure alignment between the SPD and LCWIP proposals as they emerge.	The SPD sets out how the Council will support proposals in the LCWIP to deliver the objectives of the cycling strategy and help identify improvements that enable more walking and cycling within the town centre.
13	The County Council agrees that the routes identified in para 9.15 offer the opportunity to increase 'active travel' through better signage and waymarking, improvements to public realm and green infrastructure.	Comments noted
13	The County Council supports the inclusion of the wording in para 9.18 re facilities for cycle parking.	Comments noted
13	The County Council supports the aims of para 9.19 re enabling residents and visitors to undertake more and safer trips by cycle	Comments noted
13	While the railway station is mentioned, we consider that there should be reference to the ongoing work on the business case for the upgrade of the Cumbria Coast Rail Line and the importance of improvements being delivered to boost capacity and to support increased pedestrian access within the Town Centre.	Noted. Additional text added to para 9.11
13	Paragraph 10.41 refers to the integration of public art. Is this an opportunity to highlight the Rails Which	This paragraph refers to public art rather than information boards. However, the boards are welcomed

	Circled the World boards going up at the railway station?	in explaining Workington's history, and additional text has been incorporated in paragraph 10.32
13	Support Para 10.47 re permeability. There is a need to improve the wayfinding facilities from the railway station to the town centre, where do I get a taxi, where do I get a bus	This is referenced in Para 9.11 Text amended to make more explicit.
13	Paragraph 10.49 states that, "The Council seeks to improve legibility and movement patterns for all users, reconnecting spaces within the centre to adjacent neighbourhoods, and break through the perceived barriers of the A596 and A597 wherever possible." The County Council would welcome dialogue with the Borough Council on paragraph 10.49 to identify the improvements needed.	Noted. Dialogue welcomed.
13	Allerdale Local Plan (Part 2) allocates three key sites for development in the town centre. The SPD encourages uses for these sites that would enhance town centre vitality and activity, which is supported	Noted
13	The SPD should refer to the importance of key employment and education sites and the importance of links radiating from the town centre to connect these. In this respect, it would be helpful to refer to the Port of Workington, Lillyhall and the Academy and key locations that need to be connected to create a cohesive spatial plan for the town.	The SPD is principally focused on the Town Centre, and whilst wider linkages are relevant, parag 9.19 - 9.20 is sufficient
13	Should development progress at this site a full re-design of the Oxford Street roundabout will be required along with consideration for restrictions to be implemented to reduce the likelihood of additional traffic using these residential streets.	This site has been allocated for town centre development (Policy SA47) in the local plan process with the input of the highway authority. A transport assessment will be required to accompany any planning application on the site, and the highway authority will need to be engaged in any proposals. The policy makes it clear that wider transport infrastructure

		improvements will be needed as determined by the transport assessment, and this is sufficient for the SPD.
13	Support para 12.10 regarding Route 72 of National Cycle Network	Comments noted
13	Commentary in Para 12.14 regarding public access and St Johns Court is supported	Comments noted
13	This area for development is only accessible to vehicular traffic one way down Ladies Walk from the A596 Hall Brow, this section is not wide enough for two way traffic, therefore if the development proposals for this site resulted in an increase in vehicular traffic utilising Ladies Walk carriageway improvement works would be required. Due to the access being within close proximity to the traffic signals on Washington Street it can be difficult to exit and turn right into this junction. Improvements would be required at this access.	Noted. These are existing sites within the town centre that the Council is keen to be redeveloped. There is no intention or suggestion for Ladies Walk to serve them for vehicular access. The supporting text has been amended to make it clear that Tiffin Lane and Ladies Walk are pedestrian routes. As yet, access is undetermined. Vehicle access options (and the lack of) will need to be determined at the detailed design stage with the engagement of the highway authority. Vehicular access to the former fusion nightclub building and the annexe is currently via the lane in front of the police station, next to the mill stream. Additional text added for clarity.
13	The SPD refers to 'railway station', 'train station', 'rail station', 'Workington station', and 'the station.' It is suggested that all references are to the 'railway station'.	Noted and amended accordingly.
13	It is considered that the SPD provides a pragmatic framework to guide development in the town centre which will promote regeneration, encourage investment into the area and facilitate positive change. We support this and want to work with the Borough Council to ensure that the infrastructure in the town centre is improved to facilitate access, especially by active modes that will contribute to the levels of activity in the town and improve its vitality	Comments noted

14	Commend commitment to high standard of design and architectural quality and recognition that heritage is important to Workington's heritage and uniqueness.	Comments noted
14	Nothing said about improving the attractiveness of access up Station Road from the railway station. Its current state is enough to put off anyone returning to the town.	Agree that there is scope for the improvement of Station Road/Oxford Street. Para 9.11 identifies this route as a potential scheme to increase walking and cycling. An amendment has been incorporated to make the paragraph clearer. Para 10.10 also identifies Station Road and Oxford Street as one of the routes where public realm improvements would be of significant benefit.
14	The Old Market hall is ripe for development as a location offering currently viable office or workshop space. It is a wonderful location that would be attractive to young creative entrepreneurs.	Agree that the Old Market Hall is suitable for redevelopment in a form sensitive to its conservation area location with limited access.
14	John Street represents a dismal access street to the town centre. Could a partnership with owners be established to improve the external appearance of the houses and can anything be done about the former social club building.	Most of John Street lies outside the town centre boundary but it is a key pedestrian access route. It has not been identified specifically for improvement works as part of this Town Centre SPD, but these comments are noted. The potential for John Street to be considered as part of a housing renewal scheme and the condition of the former social club building will be examined.
14	Offering more retail in the new sites for development is hardly likely to promote the viability of the existing shopping streets	The Town Centre faces continues to face competition with out of town retail development. The development sites identified within the SPD are potential locations for specific new purpose-built retail premises within the town centre in preference to out of town locations. The sites are however available for other town centre uses (See glossary).
15	At no point does the adopted Local Plan for Allerdale set out a requirement for a SPD to guide development in Workington town centre	It is not a requirement that an SPD has to be mentioned in the Local Plan before it can be drafted.

15	The Local Development Scheme (LDS) has not been kept up to date and no mention has been made of the Workington Town Centre SPD in the LDS. No explanation as to why the Workington Town Centre SPD has been progressed ahead of the Design SPD and Green Infrastructure SPD which are laid out in the LDS and Local Plan.	It is not a requirement that an SPD has to appear in the Local Development Scheme. Council priorities can change in response to emerging issues.
15	Para 1.2 of the SPD. The role of the SPD is to respond to the 'vision and objectives' set out in the Local Plan rather than defining them itself.	Disagree that the SPD is redefining the Local Plan vision and objectives rather it is adding detail to the Vision and Objectives as they relate to Workington town centre.
15	The scope of the SPD includes " identify potential new uses". The acceptable town centre uses are identified in the adopted Local Plan. The SPD is not complementing the Local Plan is evidently redefining it and may well be a basis for challenge	Text modified and deleted
15	Para 12.4 SPD. Rather than providing clarity on Policy SA47, the SPD is redefining the Policy. In particular the introduction of small scale and a host of alternative uses including commercial and residential in conflict with the underlying policy.	Text modified and deleted
15	Recommend amending the SPD to supplement rather than alter existing Local Plan or withdraw the SPD and progress an Area Action Plan.	The Council considers it is beneficial to proceed with the SPD to support and enhance the town centre at a particularly challenging time.
16	The SPD fails to deal with the potential ramifications and long-term effects of the COVID 19 pandemic. The reference to evidence of extended pavement trading is noted. The SPD needs to deal much more fully with potential effects on the High Street of a further shift towards online retail and what that means for the preservation and management of central shopping areas.	The pandemic is ongoing, and although it appears to have accelerated existing trends, the final outcomes are yet to be determined. Amendments to planning legislation seek to support the high street in this period of change, and the SPD supports flexibility in the use of buildings.

16	pleased that Washington Square is acknowledged as the heart of the primary shopping area. The importance of Washington Square to the overall health, vitality and viability of the town centre should be set out explicitly in the SPD. Specifically, the SPD should refer to the importance of seeking to safeguard its role and function and working with its owner to ensure that it is given maximum possible support to continue in its role at the heart of the town centre.	The SPD relates to the town centre as identified in the Allerdale Local Plan. Washington Square lies as the heart of the primary shopping area, and it is felt that its importance, and the need to retain the commercial core of the town centre is reflected within the SPD. The Council will work with the owners of Washington Square to ensure that its crucial role is supported.
16	Support SPD reinforcing national guidance that flexibility should be employed, allowing adaption and change as required. Agreed a flexible approach to the use of floorspace is a positive way to support enhancement of the retail, leisure and cultural offer of the town centre and evening economy.	Comments noted
16	Agreed that a flexible approach to the delivery and use of employment space has the potential to support existing employers and create new employment opportunities.	Comments noted
16	The repurposing of empty/surplus town centre floorspace is a justifiable strategy. It would be useful if the SPD acknowledged that commercial premises can be in multiple uses at the same time. The SPD should encourage floorspace to be used in different ways at different times of the day/week.	Noted. Text added to para 11.2
16	Support in the SPD would be helpful to encourage planning permission to avoid using tightly worded conditions relating to the use of floorspace, except where absolutely necessary.	Paragraph 55 NPPF makes it clear that planning conditions should be kept to a minimum and only used where they meet the 6 tests. Planning conditions are applied at planning application stage.
16	It would be useful if the SPD refers directly to the new permitted development rights and changes to the use classes order	The use classes order has changed during production of the SPD and more changes are being consulted on.

		Have referenced changes in planning legislation and consider this sufficient.
16	Paragraphs 12.4 to 12.13 (Central Car Park) are not entirely consistent with policy SA46. Care needs to be taken in seeking to identify preferred uses. There is no requirement for there to be a mix of uses or a combination of uses including small scale retail. The SPD should not be used to change the emphasis of the Local Plan allocation. A single use or a mixed use would be equally consistent with development plan policy.	Agree. Preferred uses removed from the development sites
16	Para 12.8 to 12.13 should be consistent with design policies in the local plan	Comments noted. Text modified, although reference to general design principles retained.
16	Para 12.14 The Royal British Legion- similar comments in terms of ensure the SPD is consistent with policy SA46 and the design policies of the local plan.	Comments noted. Text Modified
16	Para 12.16 Opera House site- this site is not allocated in the Local plan and the SPD should not give the impression that it is seeking to identify additional sites. Also, the SPD should mention the need for a sequential test for this site as part lies outside the primary shopping area and the need to comply with local plan policies including S16, DM 7-9	The Central car park and British legion sites are now identified as being allocated in the Local Plan. The Opera house site lies within the primary shopping area, and the remainder of the site outwith. Text modified.
16	Welcome support of night time economy. It is important that town centre floorspace can be used in different ways concurrently to serving day and night time economies	Noted. See text within para 11.2
16	Welcome focus on improvements to public realm. Focus should on improving routes into the central area, gateway enhancements and connectivity to Washington Square. Agree with the aim to reduce	Comments noted

	barriers for pedestrian to access Washington Square from the Wilson Street area.	
17	Public realm provides opportunities to increase flood resilience in the town, reduce surface water runoff and deliver biodiversity enhancements. Similarly walking and cycling network provide opportunities to incorporate sustainable drainage features. Inclusion of suitable wording into the SPD to encourage this at the design stage would be beneficial.	Agree. Reference to sustainable drainage features included in new paragraph 6.3