

Cumberland Local Plan

Issues and Options Consultation - September 2025 Main Consultation Document Response Form

Cumberland Council has launched its Issues and Options consultation for the Cumberland Local Plan.

The Issues and Options is the first round of public consultation on the new Local Plan and is designed to gather information about what the issues and opportunities are across Cumberland. This will help to outline the scope for the Local Plan and inform future policies, proposals and allocations, and we would like to hear you views.

This comment form contains all of the questions within the Main Issues and Options Consultation Document, and you can answer as many or as few as you wish or feel are relevant.

The consultation runs from **Monday 1 September 2025 to Friday 31 October 2025**. Comments must be received by Friday 31 October 2025; submissions received after this deadline will not be considered.

Before responding, please read the consultation information available on the Local Plan website: www.cumberland.gov.uk/local-plan

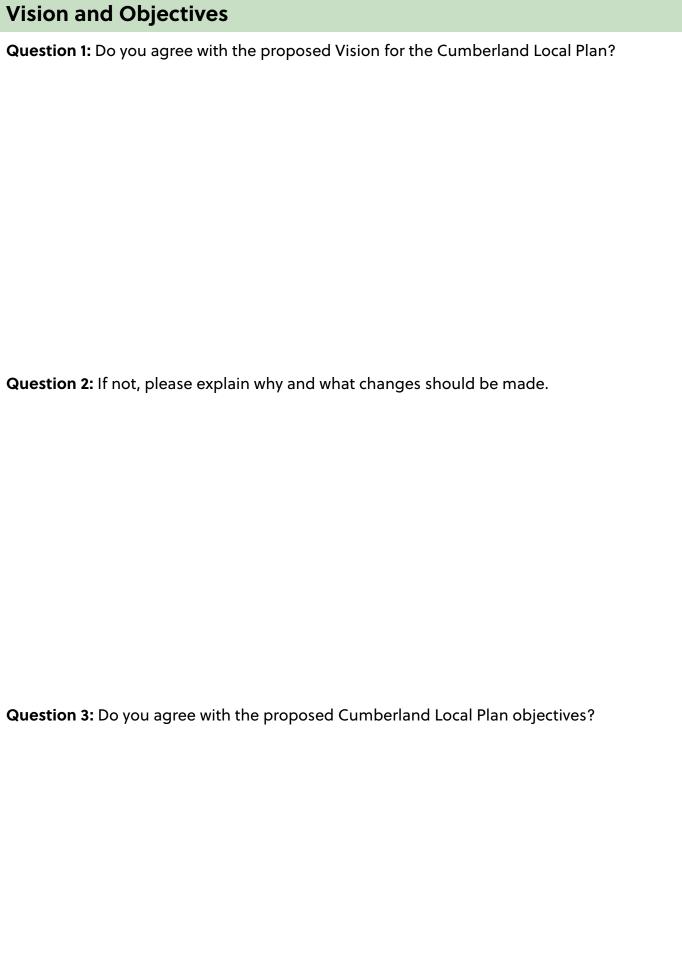
Once complete, please return this form either:

- By email to: planningpolicy@cumberland.gov.uk
- By post to: Chris Hoban, Planning Policy Team, Carlisle Civic Centre, Carlisle, CA3 8QG

By submitting this form you are consenting to your personal information and representations being stored and your response being summarised and made publicly available in a Consultation Statement.

If you have any questions about this consultation, or the new Local Plan, please contact us either via **0300 373 3730** or email <u>planningpolicy@cumberland.gov.uk</u>.

four Details	
Name	
Position	
Organisation	
Address	
Postcode	Telephone
Email	
Agent (if applicable) Name	
Position	
Organisation	
Address	
Postcode	Telephone
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Question 4: If not, please explain why and what changes should be made.
Question 5: What is special about the area you live in that the Local Plan should protect and enhance?
Question 6: Is there anything you think that needs to change in your area? If so, please tell us about it.

Question 7: What are your priorities for new development in Cumberland? Please select up to five from the following list:

More, and a variety of, affordable housing.

More housing that is designed to be flexible so it can still meet the changing needs of residents throughout life and can be easily adapted as people become less mobile and get older.

Bringing empty properties back into use.

Attracting inward investment and creating more jobs.

Revitalising town centres.

Encouraging appropriate development that supports rural communities.

Investing in active travel for everyday journeys.

Investing in active travel for visitor/recreational use.

Providing good quality, accessible open spaces (parks, play areas).

Providing more opportunities for communities to grow their own food (e.g. allotments).

Ensuring new buildings are highly efficient and fitted with renewable energy sources such as solar panels.

Making genuine efforts to protect existing, and creating new areas for nature.

Protecting the character of all of Cumberland's settlements and countryside.

Delivering accessible and high quality designed places.

Other – please specify.

Question 8: What can we do to encourage existing young residents to stay and to encourage younger people and families to move here?

Question 9: Are there any strategic cross boundary issues that the Cumberland Local Plan needs to address? Please include details of which areas these issues affect.
Question 10: Are there any other strategic issues which you think that the Local Plan needs to address that have not been identified in this chapter?
Question 10: Are there any other strategic issues which you think that the Local Plan needs to address that have not been identified in this chapter?

The Development Strategy

The Development Strategy
Question 11: Would Option 1 be an appropriate approach to promote sustainable development?
Question 12: Which settlements in Cumberland should be considered for inclusion within the 'Key Settlements' tier?
Question 13: How should development be distributed across the 'City' and 'Key Settlements' development tiers?

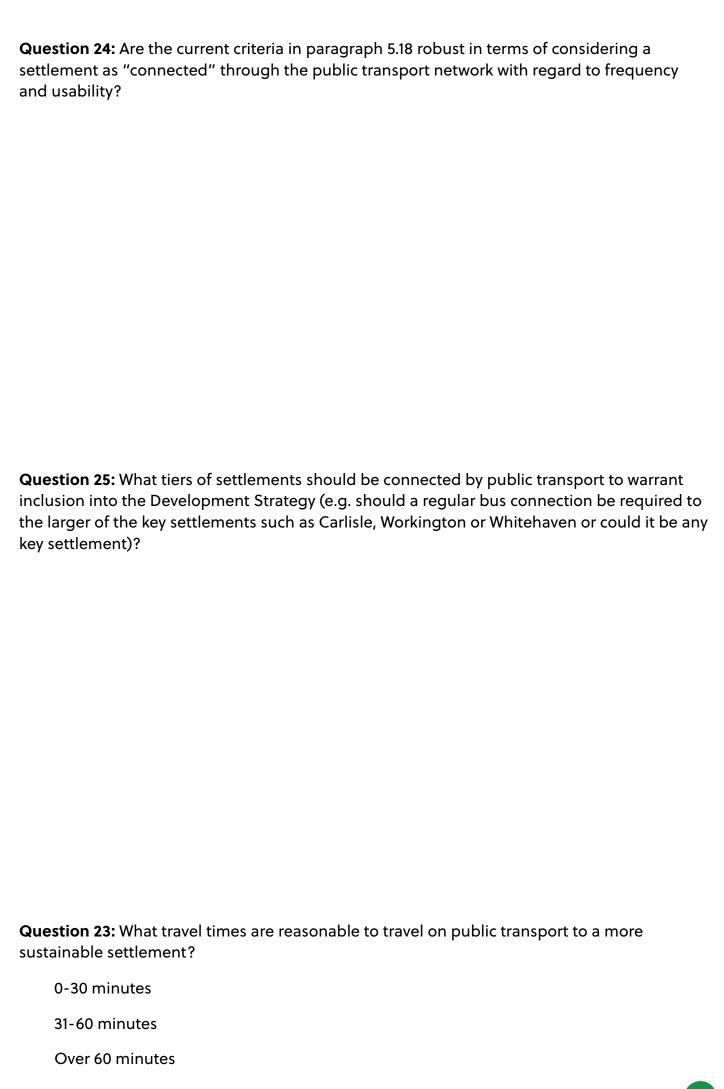
Question 14: Would Option 2 be an appropriate approach to promote sustainable development?
Question 15: Should the criteria policy have any specific provisions? If so, what should they be?

deve	elopment?
	School
	Convenience Shop
	Village hall
	Pub
	Restaurant
	Post Office
	Public transport
	Church
	Playground/playing field
	Other – please specify
	estion 17: What are the three least important services for facilitating sustainable elopment?
	School
	Convenience Shop
	Village hall
	Pub
	Restaurant
	Post Office
	Public transport
	Church
	Playground/playing field
	Other – please specify

Question 16: What are the three most important services for facilitating sustainable

Question 18: Would Option 3 be an appropriate approach to promote sustainable development?
Question 19: Is using three services an appropriate number to determine a sustainable settlement?
Question 20: Would Option 4 be an appropriate approach to promote sustainable development?

Question 21: Which services should be included within the scoring system?
Question 22: Should all the services identified be worth the same number of points, or should
some services be considered more important for contributing to sustainable development and
therefore worth more points?
Question 23: Would Option 5 be an appropriate approach to promote sustainable development?



Question 27: Would settlement clustering be an appropriate approach to promote sustainable development?
Question 28: How close should settlements be to each other to be considered as a settlement cluster for the usage of services?
Question 29: How much time is reasonable to travel to a service? Does this vary depending
on the means of travel?

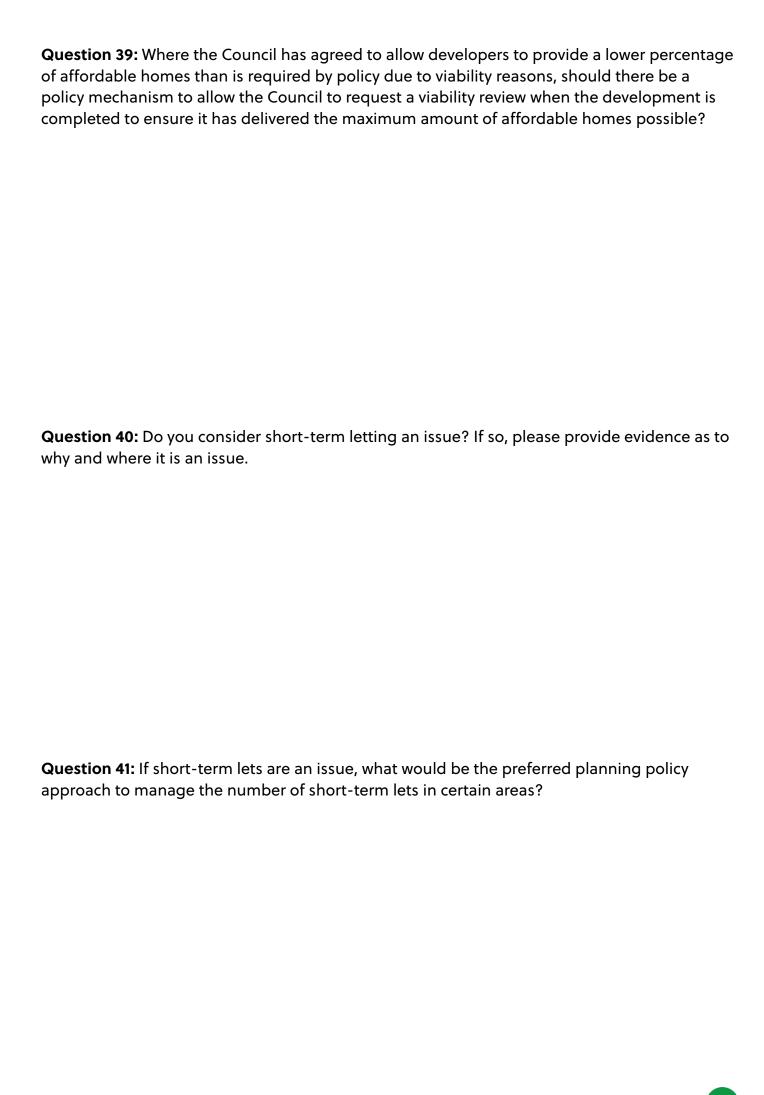
Question 30: Should clustering only be considered when considering transportation through certain modes of sustainable transport?
Question 31: How should the Local Plan consider the issue of settlement boundaries?
The Local Plan should identify settlement boundaries around all defined towns and villages in the hierarchy; Or
The Local Plan should not identify settlement boundaries and instead rely on a criteria-based policy where any proposals for new development will be assessed against set criteria (e.g. settlement form, landscape character and the particular characteristics of the location); Or
The Local Plan should have a mixed approach, with settlement boundaries provided around some settlements in certain tiers of the hierarchy and then it should use criteria policy for the rest. If so, which tiers should they be drawn for?
Question 32: Should the Council adopt a "Brownfield First" approach? If yes, what criteria should the Council include in any sequential test to prioritise the use of Brownfield Land?

Question 33: Should developers building on Brownfield be required to engage with relevant Brownfield development funds?
Question 34: Would it be reasonable for the Local Plan to assume an indicative standardised net developable area of 70% for the sites it needs to allocate until all relevant site constraints are explored?
Question 35: Are there any issues relating to the development strategy which you think that he Local Plan needs to address that have not been identified in this chapter?

Housing Question 36: Should smaller housing developments (below 10 dwellings) be required to provide a proportion of affordable homes?

Question 37: Should the policy requirement for affordable homes vary across the plan area to reflect the different housing market areas and housing need that exist in Cumberland?

Question 38: Should the policy specify the expected percentage split between affordable home tenures (i.e. social rent, affordable rent or discounted home ownership)?



Question 42: How can the Local Plan make provision for extra care, independent living and supported living schemes to ensure the needs of those requiring these schemes are met? Please select all applicable options.

Should the Local Plan allocate sites for this purpose?

Should the housing mix in developments include provision for these needs?

Should the Local Plan include a policy which actively seeks the development of smaller dwellings (including more bungalows/single storey homes)?

Other - please provide details

Question 43: Should the Local Plan include standards higher than current Building Regulations to require developments to provide accessible and adaptable dwellings as part of wider housing schemes? Please select all applicable options.

Yes – the Local Plan should require developments to achieve M4(2) requirements.

Yes – the Local Plan should require developments to achieve M4(3) requirements.

No – the Local Plan should not include a policy that requires developments to provide standards higher than the current Building Regulations.

Question 44: If the Local Plan includes a policy requiring the higher standard to be implemented for M4(2), what development size threshold should be applied?

All housing developments with 10 or more dwellings

All housing developments

Question 45: If the Local Plan includes a policy requiring the higher standard to be implemented for M4(3), what development size threshold should be applied?

All housing developments with 30 or more dwellings

All housing developments with 50 or more dwellings

All housing developments with 100 or more dwellings

Question 46: If a higher standard requirement is implemented, should the approach be different for market housing and affordable housing? If yes, how should it be different?
Question 47: Do you consider Houses of Multiple Occupation to be an issue? If so, please provide details about where it is an issue and provide evidence as to why it is a problem.
Question 48: How can the Local Plan best support the delivery of self-build and custom build housing in Cumberland?
Should the Local Plan identify a range of specific sites within or on the edge of existing settlements to be developed only for self-build and custom build homes?
Should the Local Plan require housing developments to provide a proportion of self-build and custom-build homes within their schemes?
Should the Local Planning Authority determine applications for self-build and custom build housing on a case-by-case approach where they will be assessed against a range of criteria to determine their suitability?

Question 49: If you think that housing developments should provide a proportion of self-build and custom build housing within schemes, what size of development should this requirement be applied to?

All housing developments with 30 or more dwellings

All housing developments with 50 or more dwellings.

If so, what percentage of the development should be set aside as self-build and custom build plots?

5%

10%

20%

Question 50: Should a Design Code be required for self and custom build developments? If yes what size development should the requirement apply to?

Developments with two or more relevant dwellings?

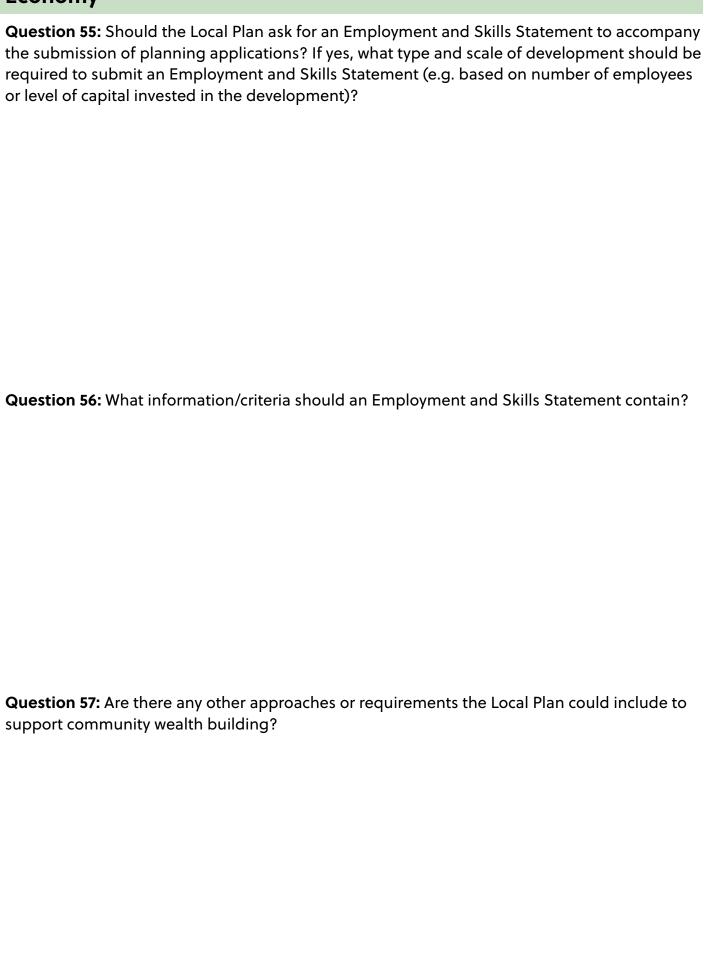
Developments of five or more relevant dwellings?

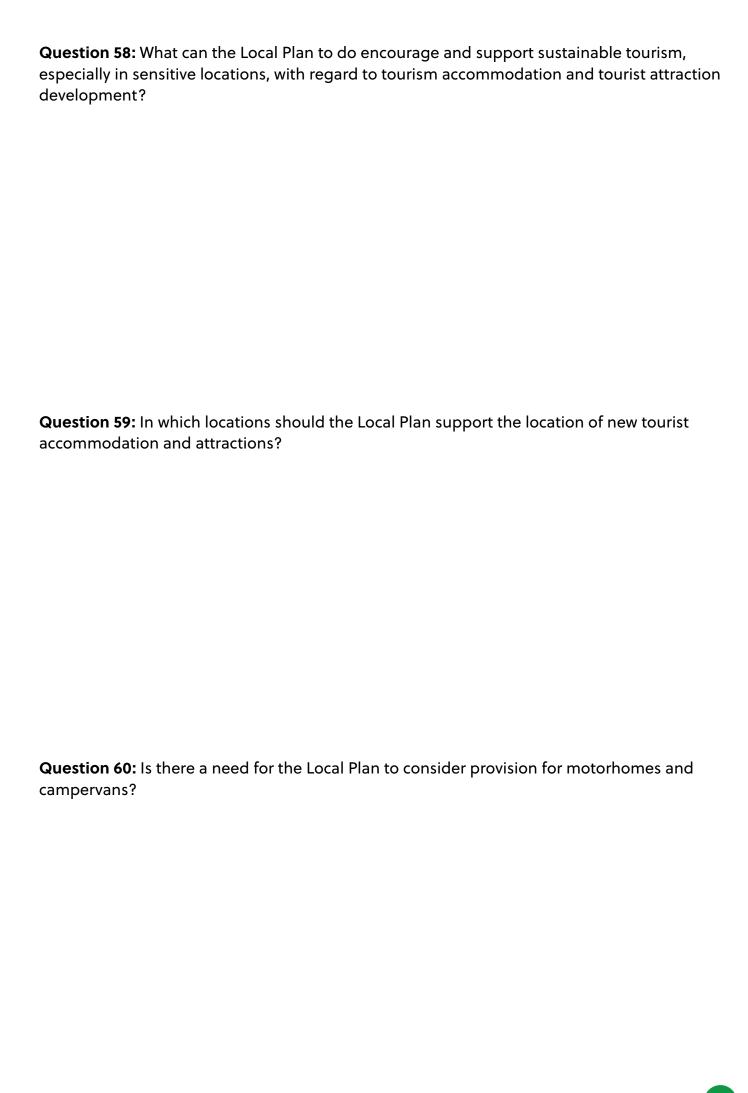
Developments of ten or more relevant dwellings?

Question 51: Should we allocate or identify land for more than 10% of housing need on small sites? If yes what should be the percentage?

Question 52: Are there any other factors that need to be considered in order to support smaller house builders deliver homes in Cumberland?
Question 53: Should the Local Plan include a policy which limits the size of replacement dwellings within the open countryside in relation to the dwelling being replaced? If yes, should the Local Plan require that the replacement dwelling be sited on the original footprint? Should the building have been previously in residential use?
Question 54: Are there any issues relating to housing which you think that the Local Plan needs to address that have not been identified in this chapter?

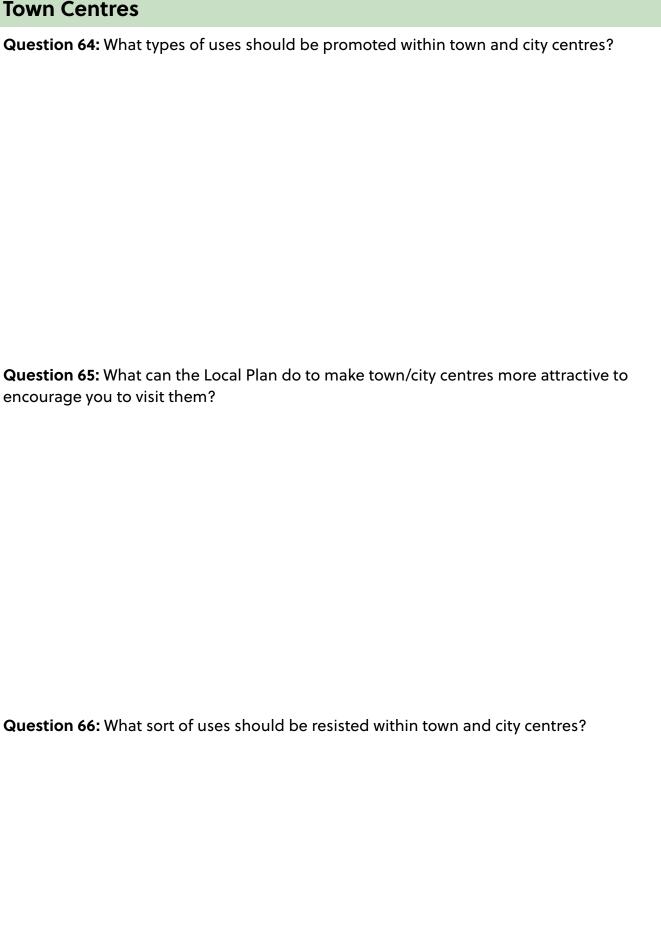
Economy

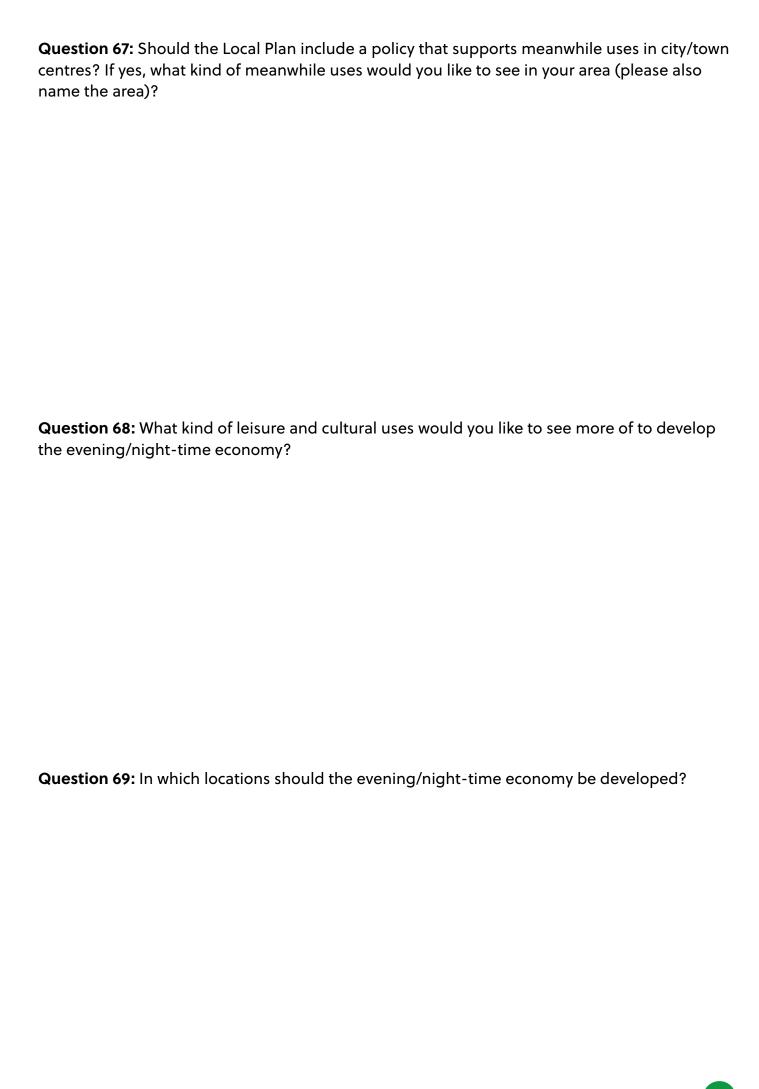




Question 61: Should the Local Plan seek to protect existing employment sites from alternative uses? If yes,
 Should that apply to all existing employment sites or only sites of strategic significance?
Are there any sites in particular that should be protected – please specify?
Question 62: Do you agree that proposals seeking the loss of a business, or commercial facility should be subject to marketing, viability and alternative use tests? Please specify what you consider to be an appropriate test.
Question 63: Are there any issues relating to the economy which you think that the Local Plan needs to address that have not been identified in this chapter?

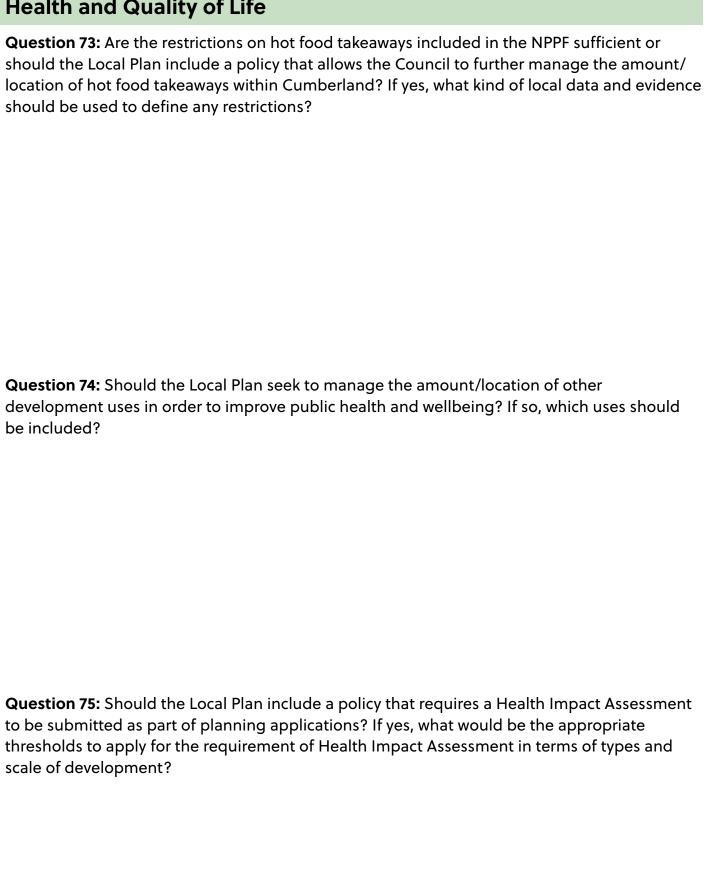
Town Centres





Question 70: Are there any areas in which the evening/night-time economy should not be developed?
Question 71: How should the Local Plan address the retail hierarchy in its policy?
The retail hierarchy should follow the more traditional pattern and include all levels of settlements
The retail hierarchy should only focus on the city and town centres, with an additional policy to support retail development in smaller settlements
Question 72: Are there any issues relating to town centres which you think that the Local Plar needs to address that have not been identified in this chapter?

Health and Quality of Life



issues that should be reflected in the Local Plan:	
Air Quality	
Water Quality	
Noise	
Light Pollution	
Odours	
Please give details of the issues and how they might be addressed in the Local Plan.	
Question 77: Should the Local Plan include a policy which sets out when Air Quality Assessments and mitigation plans will be required?	

Question 76: Are there any particular issues and areas of concern relating to the following

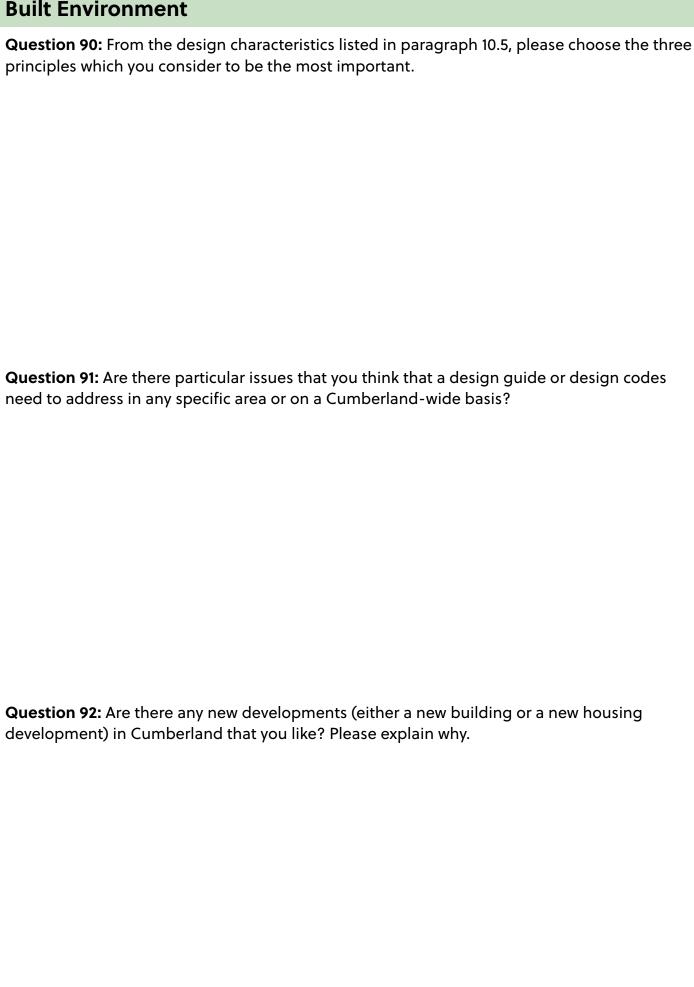
Question 78: Should the Local Plan set out when noise assessments and mitigation plans will be required and what they should include?
Question 79: How best can the Local Plan address light pollution and its effect on amenity and the natural environment?
Question 80: Should the policy set out in detail what will be needed in terms of construction
management plans during the construction phase of new development?

Question 81: Should a specific policy be developed for controlling smells/odours from new commercial kitchen ventilation and extraction systems?
Question 82: Should the Local Plan include a policy that requires developments over a certain size to provide food growing space? If yes, what should the threshold be?
Question 83: If provision cannot be made onsite, should a financial contribution be sought to deliver offsite community food growing projects?

Ruestion 84: Should the Local Plan safeguard existing allotments?
Question 85: In what other ways could the Local Plan support access to healthier food/ bood growing spaces?
Question 86: In order to protect community facilities, which of the following requirements
nould be met before considering the loss of a community/cultural facility
Appropriate marketing for its current use?
Consideration of alternative uses?
Community ownership option? (e.g. Asset of Community Value)
Other? Please state

Question 87: If marketing is required, how long should the marketing exercise last and what evidence should be required to demonstrate a robust marketing exercise has been completed
Question 88: How else could the Cumberland Local Plan protect these facilities?
Question 89: Are there any issues relating to health and quality of life which you think that the Local Plan needs to address that have not been identified in this chapter?

Built Environment



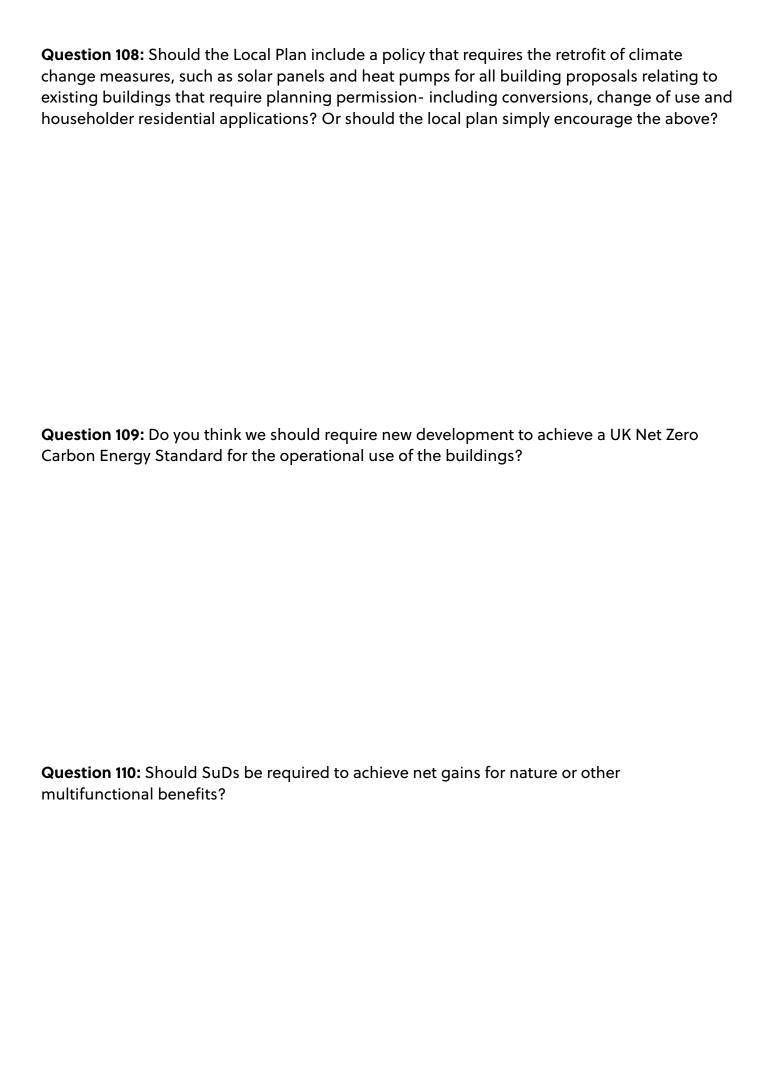


Question 96: Are there any types of development that should be exempt from being subject to a design toolkit standard? If yes, please provide details.		
	estion 97: Should the Local Plan include design codes, development briefs or masterplans land allocations within the Local Plan?	
	Yes, on all allocations greater than 50 homes or 2 hectares	
	Yes, on all allocations greater than 100 homes or 4 hectares	
	Yes, on all allocations greater than 200 homes or 8 hectares	
	No, there should not be a standard threshold and it should be considered on a site by site basis	
	estion 98: Should the Local Plan require design codes and/or masterplans for planning lications on larger sites?	
	Yes, on all applications greater than 50 homes or 2 hectares	
	Yes, on all applications greater than 100 homes or 4 hectares	
	Yes, on all applications greater than 200 homes or 8 hectares	
	No, there should not be a standard threshold and it should be considered on a site by site basis.	
	estion 99: How can the Local Plan ensure that the most efficient use is made of land? ase provide details of what you consider to be the most appropriate approach	
\checkmark	Include a policy on housing density in the Local Plan to ensure an efficient use of land	
√	Include an overarching design policy in the Local Plan requiring the efficient use of land in all new development	
√	Reflect density and efficient use of land in a Design Code	
√	Allow densities to be determined on a site-by-site basis with a requirement for developers to demonstrate why their chosen approach is appropriate as part of their planning application	

✓ Other

Question Iou: If the Local Plan does include a policy on housing density, should it:
Be one single standard across the whole of Cumberland
Provide different densities in urban, suburban and rural areas
What should the minimum density standards be?
Question 101: How best can the Local Plan support the conservation and enhancement of our heritage assets?
For instance, should the Local Plan include a policy relating to the loss of heritage assets or one which requires the provision of heritage statements as part of planning applications?
Question 102: How can historic buildings be sensitively adapted in light of climate change?

Question 105: Should development proposals be required to submit a whole life-cycle cark reduction assessment as part of its planning application?	on
If yes, should it be required for all applications or should a size threshold be implemented?	?
If a threshold should be applied, what should this be?	
Question 105: Do you think we should require new development to achieve a UK Net Zero	
Carbon Energy Standard for the operational use of the buildings?	
Question 107: Should all developments be required to include on-site renewable energy as	S
well as meeting energy efficiency standards? If so, what proportion of the energy needs of the development should be met by renewabl	e
energy?	



Question 111: The Council would welcome any comments on approaches it should take in relation to addressing flood risk issues arising in Cumberland.	
Question 112: Should the Council seek to define a "Developed Coast" and an "Undeveloped	
Coast"?	
If yes, what forms of development should be facilitated within the 'Developed Coast'?	
Question 113: Should the Council seek to allocate further Coastal Change Management Areas?	

Question 114: SAre there any issues relating to climate change which you think that the Local Plan needs to address that have not been identified in this chapter?
Environment
Question 104: Should the Council be considering a policy that requires development to deliver more than 10% BNG?

If yes,

- What should the level be?
- What scale of development should it apply to (i.e. number of housing units or minimum site size)?
- What evidence can be provided in support of such an approach?

Question 116: Do you agree that BNG should apply to development that is currently exempt, for example custom and self-build housing?
Question 117: Do you agree that there should be a sequential approach to the delivery of BNG
in terms of locality? If yes, how should this be defined (e.g. on site, within that settlement, within a certain distance of that settlement or within Cumberland)?
Question 118: How should the LNRS be incorporated within the Local Plan?

Question 119: Should the Local Plan identify strategic green infrastructure assets and/or corridors on the policies map?
What should this include? (e.g. river corridor; traffic free cycle routes; long-distance
recreational paths and bridleways; water bodies; dismantled railway lines).
Question 120: Should the Local Plan identify and protect such green areas/wedges? If yes, is
there anywhere in particular that you consider should be protected in this way?
Question 121: Should the Local Plan seek to identify Local Green Spaces?
✓ Yes – for all towns and villages
Yes – for the main towns and larger villages
Yes – for the main towns only
✓ No

Question 122: Is it necessary for the Local Plan to include specific requirements for tree planting and hedge planting in new developments given the NPPF and the Biodiversity Net Gain regime within the planning system which takes into consideration the loss of trees and hedgerows within the accounting metric? If yes, what should the policy contain?
Question 123: Where a development involves the removal of a tree, and this is justified, should the planting of replacement trees at a ratio of at least 2:1 be required?
Question 124: The NPPF expects that new streets are tree-lined and that opportunities are taken to incorporate trees in new development. Should the Local Plan require developers to set out how these trees are to be maintained in the long-term?

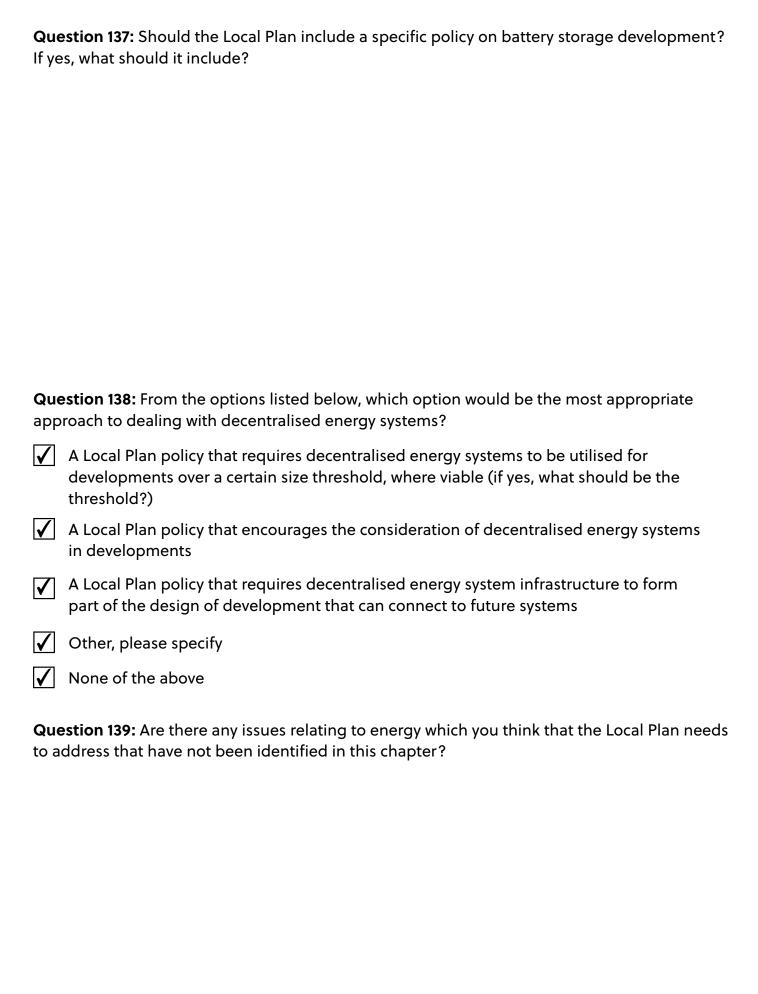
Question 125: Should new trees be native unless otherwise justified?
Question 126: How can policy support the development of the Cumbria Community Forest? Should the Local Plan allocate areas of land as community woodland? Should the Local Plan set out specific requirements for tree planting in new developments within the Cumbria Community Forest Area?
Question 127: Should the Local Plan require all developers and developments to install 'habitat bricks' (for small nesting birds, bats, and invertebrates) in all new housing developments? Or should there be a minimum housing unit number per development for when the installation of 'habitat bricks' would be required? What should that minimum number be and why? What evidence exists to support such an approach?

Question 128: Should the Local Plan require developers to install 'hedgehog highways' in new developments?
If yes, should this apply to all types of development or should there be a minimum site size/housing unit number per development for when 'hedgehog highways' would be required?
What evidence exists to support such an approach?
Question 129: Are there any other species for which specific provision should be made? (Please provide as much detail and evidence as possible to explain your answer)
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Question 124: Should the Local Plan include a policy regarding Best and Most Versatile
agricultural land? If so, what should it contain?

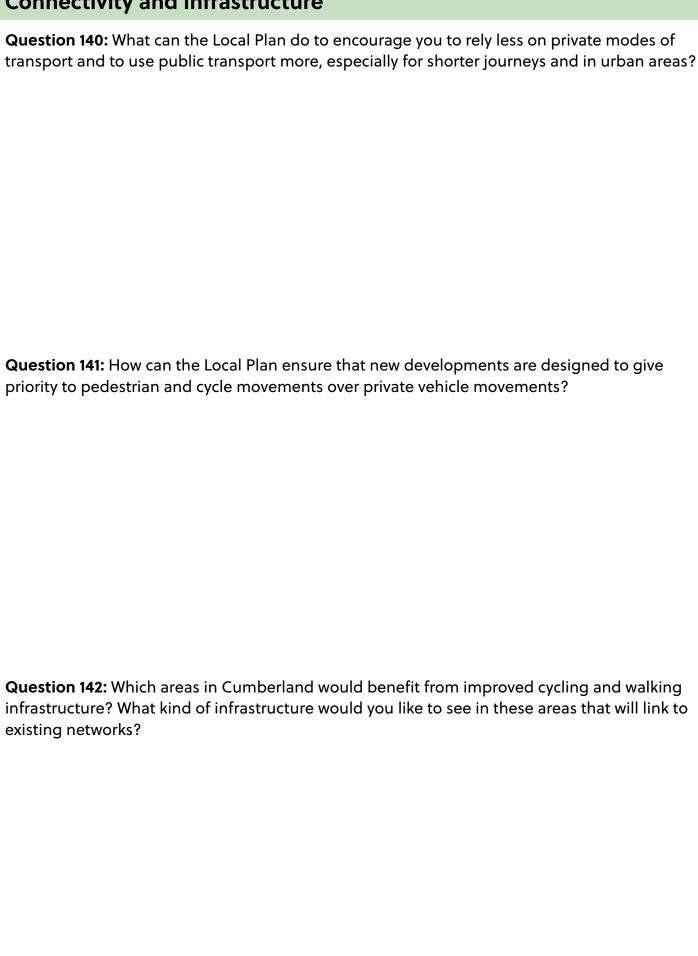
Question 131: Should development on the Best and Most Versatile agricultural land be avoided, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?
Question 132: Should the Local Plan require planning applications for developments to be accompanied by a Soil Resource Plan which sets out the methods that will be undertaken to recover, store and re-use soils whilst minimising a loss in quality? If yes what scale and type of development?
Question 133: Are there any issues relating to the environment which you think that the Local Plan needs to address that have not been identified in this chapter?

Energy

	ion 134: From the options listed below, which option would be the most appropriate ach to dealing with commercial renewable energy?
√ Th	ne Local Plan should identify broad suitable areas
√ Tŀ	ne Local Plan should allocate specific sites
*	ne Local Plan should provide a criteria-based policy against which all commercial enewable energy generation developments are determined
√ Tŀ	ne Local Plan seek to use a combination of the approaches identified above
✓ N	one of the above
allocat	ion 135: If you consider that the Local Plan should either identify suitable areas or te specific sites for commercial renewable energy generation, what principles should be o guide their identification?
	ion 136: Do you consider that Cumberland should set targets for different types of local able energy generation?



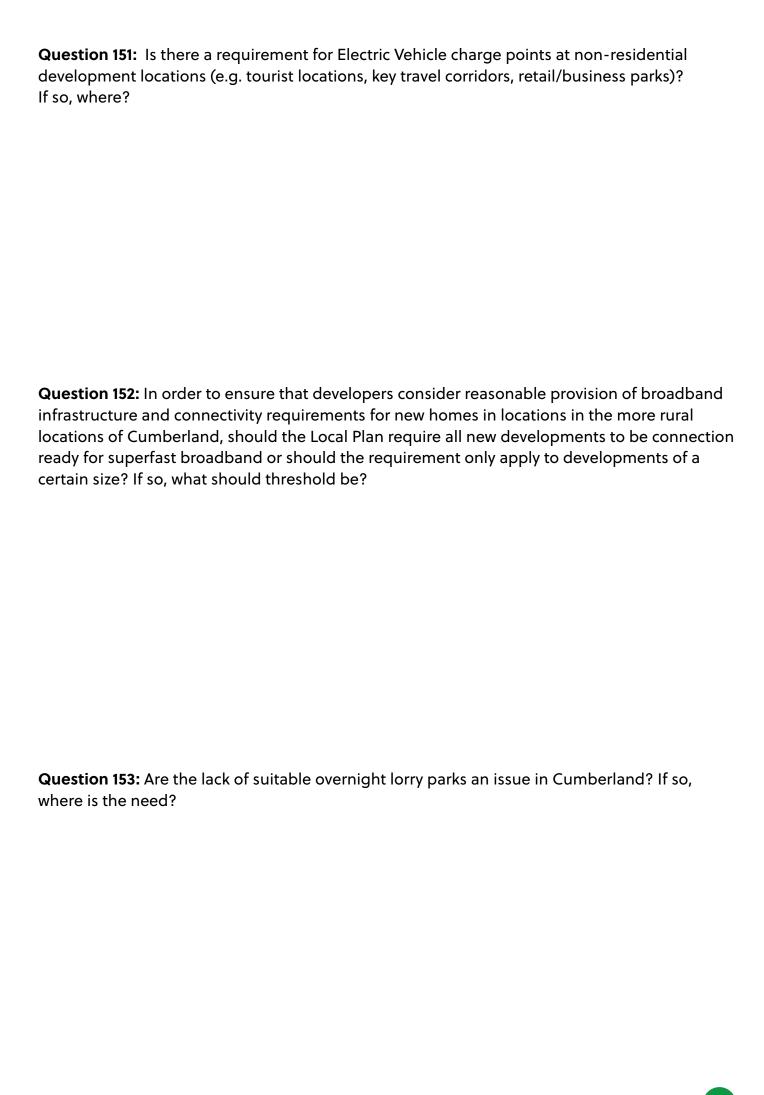
Connectivity and Infrastructure



Question 143: In which areas is more cycle parking required?
Question 144: Should there be a specific policy for the ports in Cumberland? If yes, are there specific opportunities that a policy should address to support the long-term sustainability of the ports in Cumberland?
Question 145: Is the current Carlisle Airport policy in the Carlisle Local Plan (Policy IP7) still relevant and effective? If not, please state why and suggest how it could be improved.

	estion 146: Are there particular opportunities that a policy should include to ensure a ainable future for Carlisle Airport? If yes, please provide further details.
	estion 147: What do you think are the key infrastructure priorities for Cumberland? se select all options that you consider are relevant.
√	Active Travel
√	Affordable Housing
\checkmark	Community Facilities (e.g. libraries, playgrounds)
\checkmark	Education (primary, secondary, higher and further education)
√	Flooding
\checkmark	Health
\checkmark	Highways (road networks)
\checkmark	Open space/playing fields
\checkmark	Public transport
\checkmark	Other (please specify):

Question 148: How best can the identified infrastructure priorities be delivered (e.g. financial legal agreements, delivered on site by developers)?
Question 149: Should the Local Plan include a policy that goes beyond the requirements of Building Regulations Requirement S4 when assessing applications for developments which are not residential buildings or a mixed-use building (e.g. a ratio of charge points to the number of parking spaces)? If yes, what should be requirement?
Question 150: Should the Local Plan include a policy that requires development to provide Electric Vehicle charge points for electric bikes?

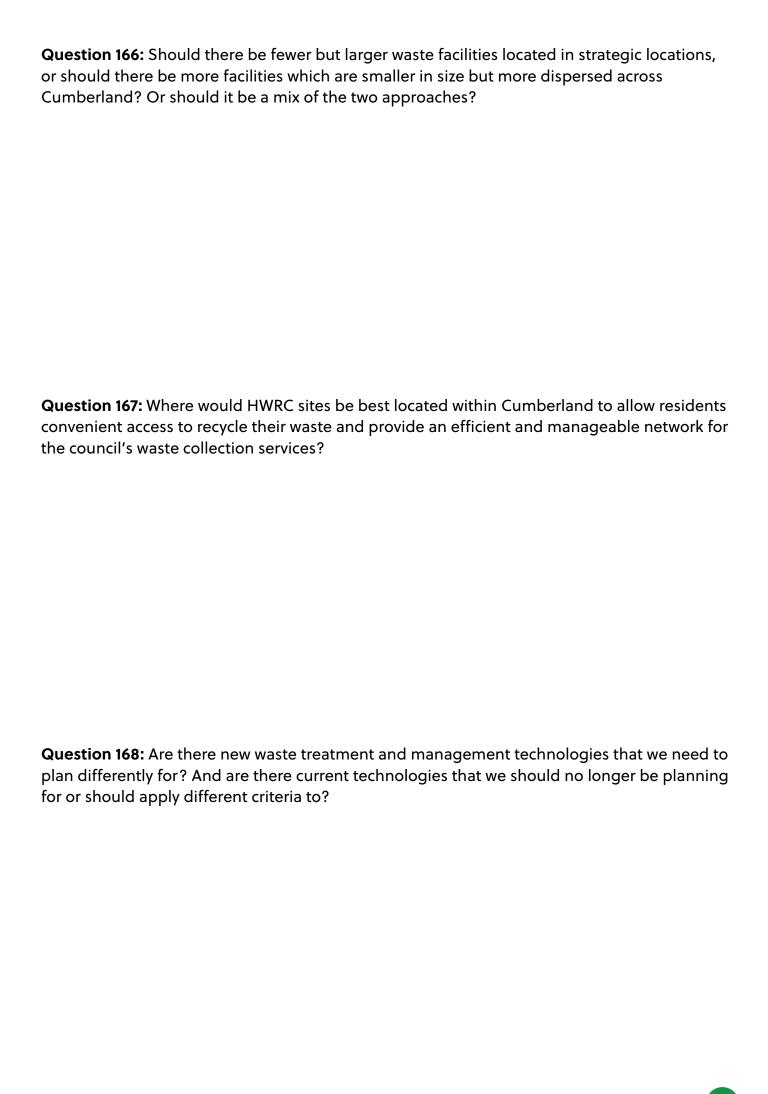


Question 154: Should there be a specific policy on overnight lorry parks? Please explain your answer.
Question 155: Are there any issues relating to connectivity and infrastructure which you think that the Local Plan needs to address that have not been identified in this chapter?
Minerals
Question 156: How should we plan for the provision of the additional aggregate minerals reserves we require over the Plan period and beyond?
The Local Plan should identify specific Site Allocations in locations where minerals extraction is more likely to be considered acceptable
The Local Plan should have a policy that is flexible enough to allow viable mineral extraction to be considered on its own merits
✓ A combination of the above



Question 160: In order to ensure that Local Plan policies on minerals safeguarding are more effective in preventing sterilisation of existing mineral resources, should a Minerals Resource Assessment be submitted for all planning applications for non-minerals development?
Question 161: Are there certain types of development that should be excluded from this requirement to consider prior extraction (e.g. specific types of development, or based on site area?)
Question 162: Should the approach to Minerals Safeguarding be the same for all types of mineral resource, or only certain ones (for example, those considered to be scarcer, or where there is evidence of insufficient landbank already)?

Question 163: Are there any other key issues relating to planning for minerals supply that the new Cumberland Local Plan should address?
Waste
Question 164: What can the Local Plan do to encourage more waste to be managed higher up the waste hierarchy?
Question 165: Should the Local Plan allocate sites for specific waste management technologies or should it allow the market to decide what facilities go where?



	stion 169: Which of the following policy approaches should we use for directing the tion of new waste management facilities?
√	Formal site allocations which establish the principle of certain waste management facilities being permitted on that site
√	Broad areas which indicate broader locations (not specific sites) that are considered most likely to be acceptable for waste management facilities
√	A flexible criteria-based policy allowing proposals to be assessed on a case- by-case basis
√	A combination of the above
	stion 170: Should we be safeguarding all existing waste management facilities to ensure continued viability for future use?
acco	stion 172: What should our policies on radioactive waste management include, taking into unt the planned decommissioning of Sellafield and other nuclear sites in the UK, as well roposals for Near Surface Disposal sites and a Geological Disposal Facility?

Question 172: Are there any other issues relating to the storage, treatment and management of waste that the new Cumberland Local Plan should address?		
Thank you for completing this form		