



Cumberland
Council

Cumberland Local Plan

Issues and Options Consultation
Main Document - September 2025



cumberland.gov.uk

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Managing our future supply of aggregate minerals
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Glossary

List of Abbreviations

ALC	Agricultural Land Classification
BMV	Best and Most Versatile Agricultural Land
BNG	Biodiversity Net Gain
CMWLP	Cumbria Minerals and Waste Local Plan
CPTED	Crime Prevention Through Environmental Design
GI	Green Infrastructure
HIA	Health Impact Assessments
HWRC	Household Waste Recycling Centre
LGR	Local Government Reorganisation
LLW	Low Level Waste Repository
LNRS	Local Nature Recovery Strategy
MPA	Minerals Planning Authority
MSA	Minerals Safeguarding Area
NSIPs	Nationally Significant Infrastructure Projects
NPPF	National Planning Policy Framework
SuDS	Sustainable Drainage Systems

1. Introduction

What is a Local Plan?

- 1.1 The Local Plan is a document that the Council must legally produce to provide a strategy for future development in the area covering a minimum of 15 years (the plan period). Planning policies contained within the Local Plan, in conjunction with national planning policies, will form a key part of the framework for the determination of planning applications that are submitted to the Authority.
- 1.2 The Local Plan policies will be based upon the needs of existing and future communities; these needs will be identified throughout the process of developing the Local Plan through consultation and evidence-based research. The policies will cover a wide range of topics including housing, employment, retail, environment, health, energy, minerals and waste. It will also identify sites that are considered appropriate for development, as well as identifying the areas that need to be safeguarded from development.
- 1.3 However, there are some limits on the scope of the document. The new Cumberland Local Plan will cover the area of Cumberland that lies outside the Lake District National Park; the Lake District National Park Authority will produce its own Local Plan for that area. It will also exclude the area of Carlisle which will be covered by the St. Cuthbert's Garden Village Local Plan.
- 1.4 In addition, the Council does not determine planning applications which are over a certain size; these types of applications are determined nationally by the Planning Inspectorate and are referred to as Nationally Significant Infrastructure Projects (NSIPs). These tend to be applications which are for larger scale infrastructure in terms of energy, transport, nuclear, water, waste and wastewater. Policies contained within the Local Plan may be considered by the Planning Inspectorate when they determine NSIP applications.

Why do we need a Local Plan?

- 1.5 Notwithstanding the legal requirement for the Council to have an adopted Local Plan, we recognise the importance of the Local Plan to the delivery of high quality and sustainable new development, whilst providing protection and enhancements to Cumberland's natural, built and historic environments.
- 1.6 Without a Local Plan in place, it would be difficult for us to manage growth in the area leading to ad hoc, unsustainable and unplanned development that is not supported by the required physical and social infrastructure. If we were unable to produce our own Local Plan, the Government could intervene and write the Local Plan for Cumberland; this could lead to localised issues being left out of adopted planning policies, meaning that the Local Plan does not fully reflect local needs and opportunities.
- 1.7 Furthermore, having an adopted Local Plan which identifies development needs will help support bids for infrastructure funding; projects seeking funding are normally required to show how they are aligned with and support local

strategies. Collectively, this will all help to deliver the Council Plan and the Council's housing, economic and environmental plans and targets.

- 1.8 The development trajectories included within the Local Plan are also used by stakeholders (such as National Highways, United Utilities, the Environment Agency and the relevant energy network operators) to inform their business plans and funding programmes as they can see where the forecasted demand is likely to be on their infrastructure over the plan period.
- 1.9 There is a need for the Council to prepare a new Local Plan for the Cumberland area following the Local Government Reorganisation which took place on 1st April 2023. This involved the former district authorities of Allerdale Borough Council, Copeland Borough Council and Carlisle City Council and the County Council being replaced by the Cumberland Council unitary authority.
- 1.10 Until the new Cumberland Local Plan is completed and adopted, we will use the [Cumberland Consolidated Planning Policy Framework](#) as the planning policy framework; this is made up of the existing Local Plans and other planning policy documents from the previous Legacy Authorities.

What are the timescales and stages of Local Plan preparation?

- 1.11 There are several stages involved in the preparation of a new Local Plan. Our current [Local Development Scheme](#) summarises the expected programme of preparing the Local Plan; Table 1 highlights the stage the Local Plan is currently at.

Table 1: Stages of Local Plan preparation

The Town and Country Planning (Local Planning) (England) Regulations 2012	Stage	Expected Timescales
Regulation 18	Scoping work/evidence gathering/review of data.	September 2025-
	Consultation on Issues and Options and Preferred Options documents.	Spring/ Summer 2026
Regulation 19	Consultation on the draft Local Plan.	Spring 2027
Regulation 22	Submission of the draft Local Plan to the Government.	Autumn 2027
Regulation 24	Independent Examination of the draft Local Plan by the Planning Inspectorate (on behalf of the Secretary of State).	Autumn/ Winter 2027
Regulation 26	Adoption.	Spring 2028

- 1.12 It should be noted that these timescales have been determined based on the current planning system and legislation; should there be any national changes to these requirements, then the expected stages, timescales and consultation dates will need to be amended.

- 1.13 Any changes to the timetable will be included in reviews of the Local Development Scheme and updated documents will be published on our website.

What is this consultation about?

- 1.14 To begin to identify how to accommodate sustainable development in Cumberland, the consultation document identifies the key issues within Cumberland that we consider the Local Plan should address.
- 1.15 The document also provides a number of options that could be implemented to overcome the issues; we would like your opinions on which options you consider to be the most appropriate.
- 1.16 To allow for focussed discussion, this consultation document does not include questions for every issue for all the topic areas the Local Plan will contain as there are standard policies which Local Plans always contain. However, we would like to know if there are any specific issues that you feel that the Local Plan should address. You can suggest these topics as answers to the relevant questions which are at the end of each chapter. We would also welcome any suggestions you may have on how to resolve these identified issues.
- 1.17 At this stage, the consultation does not identify potential locations for development, although it does consider how to distribute development across Cumberland's settlements. Future consultations will be undertaken that will seek comments on detailed policies and on specific sites/locations where development could occur.

How you can get involved

- 1.18 We encourage everyone to get involved in the preparation of the Local Plan at the earliest stages to share your local knowledge and to allow for maximum opportunities to influence planning for your area.
- 1.19 The Issues and Options consultation document has been published on the [Council's website](#)¹. A paper copy is also available at the Council's main offices: Cumbria House, Carlisle, Civic Centre Carlisle, Allerdale House, Workington and the Market Hall, Whitehaven, as well as libraries across Cumberland.
- 1.20 We will be holding public drop in sessions in various locations across Cumberland; details of the dates and times can be found on our website: www.cumberland.gov.uk/planning-and-building-control/planning-policy/local-plan.
- 1.21 Responses can be submitted via our consultation form either online or by post; the consultation form is available on our website at: www.cumberland.gov.uk/planning-and-building-control/planning-policy/local-plan. For postal submissions, the address is: Chris Hoban, Planning Policy Team, Carlisle Civic Centre, Carlisle, CA3 8QG.

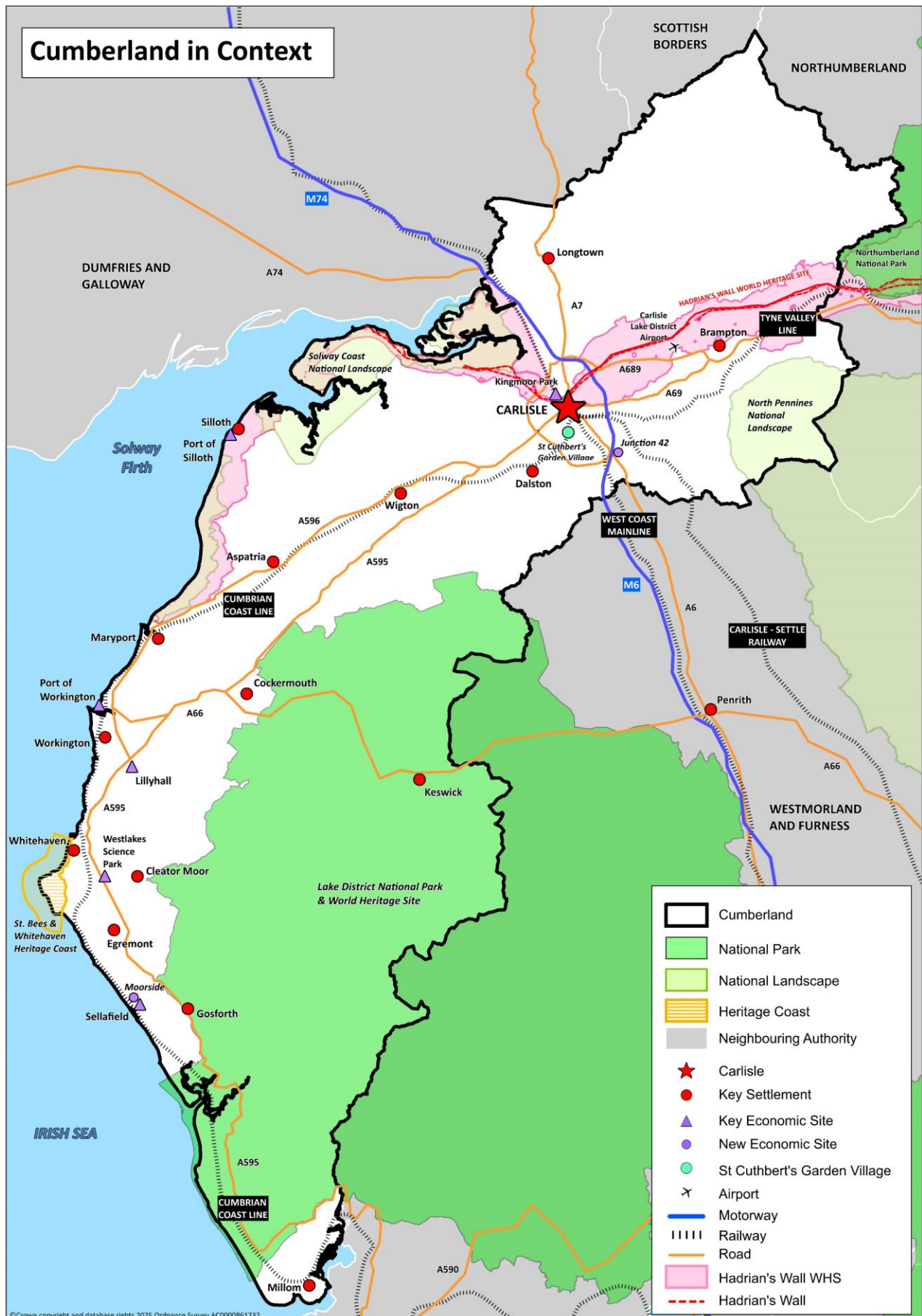
¹ www.cumberland.gov.uk/planning-and-building-control/planning-policy/local-plan

- 1.22 Comments must be received by Friday 31st October 2025; submissions received after this deadline will not be considered.
- 1.23 Should you have any questions about this consultation, or the new Local Plan, please contact us either via 0300 373 3730 or email planningpolicy@cumberland.gov.uk.

What are the next steps?

- 1.24 This consultation is the first stage in the production of the new Cumberland Local Plan. Once the consultation closes, we will read and analyse all the comments received; following this, we will publish a Consultation Report on our website which summarises the comments received and will consider our response to them.
- 1.25 We will continue to develop our evidence base through data collection and engagement with stakeholders and key partners. This engagement, in conjunction with the comments received for the Issues and Options consultation, will be used to inform and develop the Preferred Options version of the Local Plan. All policies in the Preferred Options will need to be justified using sound evidence (i.e. assessments and studies) to ensure that they are effective and meet the identified needs of the area. The Preferred Options version will be made available for consultation at a later date.
- 1.26 The draft version of the Local Plan will be made available for public consultation; for those that have told us that they wish to be informed about the progress of the new Local Plan, we will maintain communication with you and let you know when key stages are taking place.
- 1.27 To keep up to date with Local Plan progress (and other planning policy news), stakeholders can sign up for notifications at <https://public.govdelivery.com/accounts/UKCUMBERLAND/signup/42091>.

2. Spatial Portrait of Cumberland



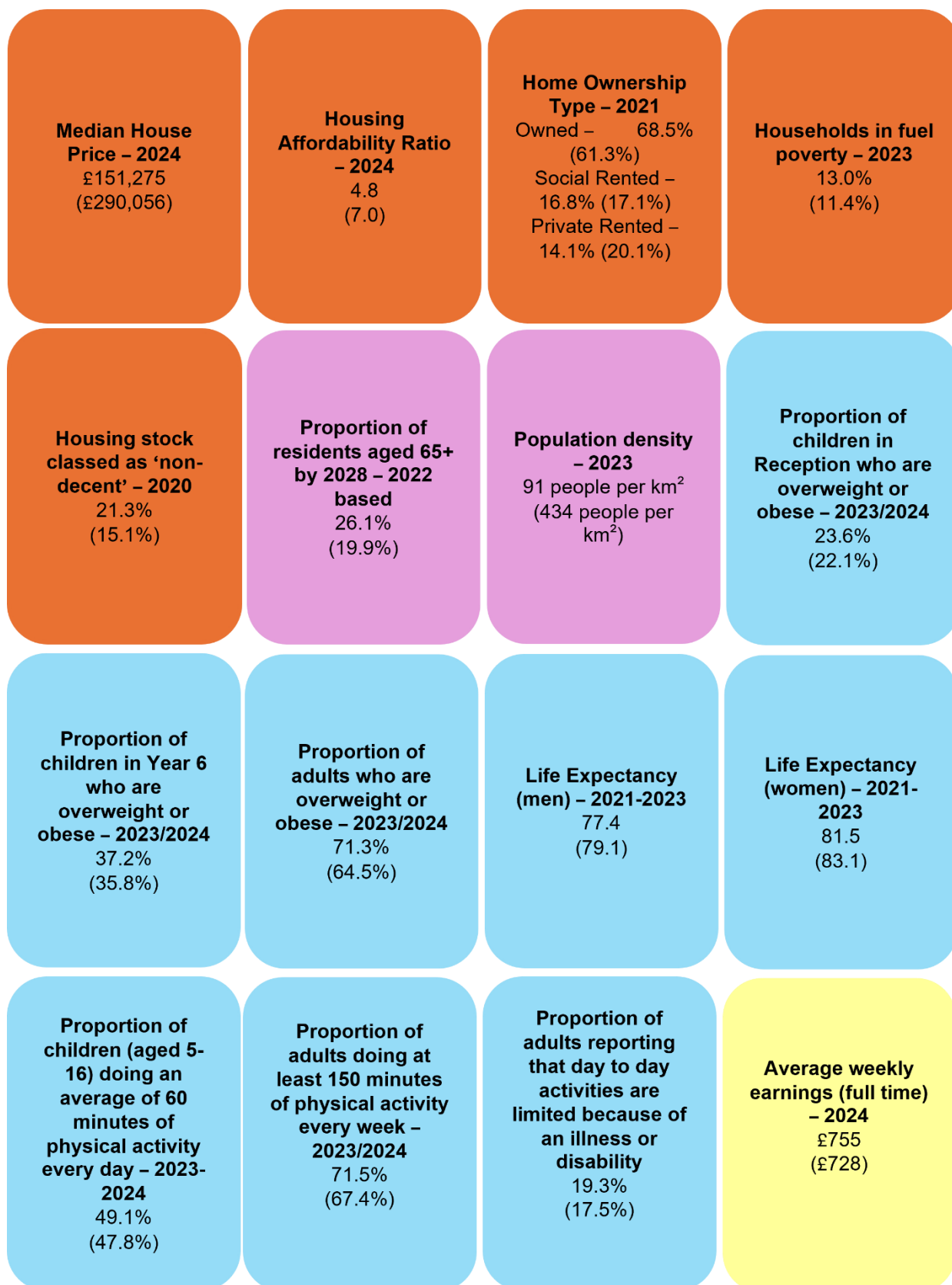
- 2.1 Cumberland is home to some of the most striking geography and landscapes in England. It is home to the most mountainous areas of the country with the high fells falling into the upland moorland and high plateaus. This landscape continues to fall into the coastal plains that stretch from West Cumbria to the Solway, while the coastline itself varies from the dunes and mosses in the north and south surrounding the sandstone cliffs of the St. Bees and Whitehaven Heritage Coast in the middle.
- 2.2 The uniqueness of the landscape is matched by our rich ecological vibrancy with otters in the waterways, seabirds along the coastlines, and the occasional red squirrel in the woodlands. Our environment provides habitats to highly protected and vulnerable flora and fauna such as natterjack toads, small blue butterflies and a variety of wildflowers.
- 2.3 Its special and historical rural and coastal landscapes are reflected by the designations of the Lake District National Park, two World Heritage Sites (Hadrian's Wall and English Lake District), two National Landscapes (Solway Coast and the North Pennines) and two Ramsar Sites (Duddon Estuary and the Upper Solway Flats and Marshes), all of which contribute to a thriving visitor economy.
- 2.4 The landscapes of West and South Cumberland are closely intertwined with human activity from the worked fells and the scattering of old mines and wagonways, to the wind turbines and solar farms of the more modern green energy development and the factories of strategically important industries. Its built environment is closely woven to the coast with its largest post-industrial towns located along the coastline.
- 2.5 In contrast, the northern areas of Cumberland are focused upon the Roman city of Carlisle and a series of market towns and villages which have a more classically agricultural pattern of development.
- 2.6 Given the size and geographic scale of Cumberland, it is no surprise that it has a number of varying challenges, strengths and opportunities presenting specific and unique challenges that require integrated strategic policy solutions.
- 2.7 Cumberland has excellent road and rail connections to cities such as Glasgow, Edinburgh, Manchester, London and Birmingham via the M6 and the West Coast Main Line. More locally, a number of key settlements and places of employment are served by the Cumbrian Coast, Tyne Valley and Carlisle-Settle rail lines and the strategic road networks of the A66, A69, A595 and A596. There is a heavy reliance on the use of the private car, due to the highly rural nature of most of Cumberland and the limited public transport services in these areas.
- 2.8 Together with Carlisle Airport and the Ports of Workington, Millom and Silloth, the rail network enables local, regional, national and international freight movements to support the Cumberland economy.
- 2.9 Cumberland has a population of around 275,000 people and it is one of the least densely populated areas in the country with more than half of the population living in a rural area (compared to 17.1% nationally).

- 2.10 Historically Cumberland has struggled with digital connectivity as the geography and sparse population has discouraged commercial investment by both fixed line and mobile networks. However, in the last 10 years there has been significant improvements in connectivity with further improvements expected until at least 2028. More than 71% of properties in Cumberland are able to access gigabit capable broadband services, and outdoor 4G coverage from all major mobile networks is available to more than 76% of the Cumberland landmass.
- 2.11 It does have an ageing population but, unlike the national trend, the area has shown only limited population growth. Combined, this means that its population is getting both older and reducing in number.
- 2.12 Whilst the life expectancy for both males and females has risen, it remains below the national averages with the overall levels of good health worsening. On average, males in Cumberland will spend 19 years of their life in ill-health and females 22.4 years.
- 2.13 One key health inequality is obesity, with annual increases to the levels of both child and adult obesity which is reflective of the national trend.
- 2.14 14 community areas in Cumberland fall within the 10% most deprived of areas in England, but 10 are amongst the least deprived.
- 2.15 Home ownership levels in Cumberland are higher than the national average but it is key to ensure that the housing market provides housing that is safe, secure, suitable and affordable for all. In some areas, almost half of residents live in socially rented housing, whilst in other areas almost half of properties are privately rented. Overall, housing is generally more affordable compared to the national data, but this masks disparities across the area, with rural house prices being higher than those in more urban areas.
- 2.16 There are opportunities to raise education attainment levels and develop the skills base with large levels of investment and exciting expansions to the University of Cumbria and alternative education provision that reflects the economic needs of the area (Energy Coast UTC and vocational courses at Carlisle College, Lakes College and various Sixth Forms). This is a key part of the approach to retain Cumberland's working age population and to recruit people from outside the area to strengthen the local workforce.
- 2.17 Cumberland has a strong manufacturing and engineering economy and is home to many nationally and internationally recognised brands including New Balance, SIS Pitches, Pirelli, Innovia Films and Sealy Beds. This is reflected in the fact that manufacturing is the largest employment sector, followed by the wholesale and retail sectors and health and social work. However, when looking at the number of enterprises in the area, this is dominated by the agriculture, forestry and fishing sector and the construction and accommodation and food services sectors, reflecting its strong rural and visitor economies typified by smaller businesses. Sellafeld is a key employer and supports the local supply chain as

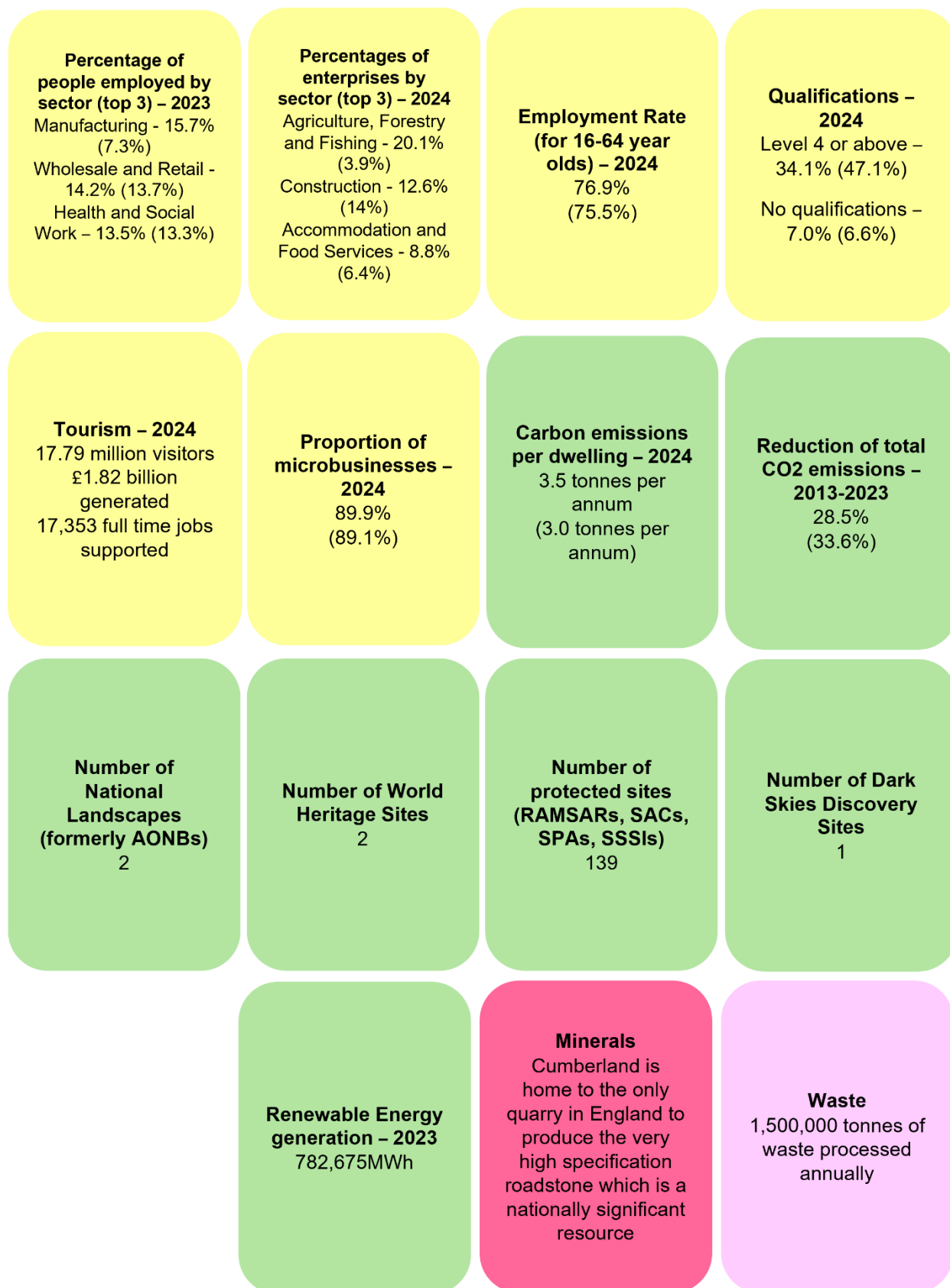
a nationally important centre for nuclear decommissioning and research and development.

- 2.18 Globally and nationally, climate change is a key issue; in Cumberland, the current prevalent issues presented by more extreme and more frequent weather events are flooding and coastal erosion, but there is also the issue of summer droughts, wildfires and poor water and air quality in certain areas.
- 2.19 Cumberland plays an important national role in the provision of minerals and the management of waste. The mineral aggregates produced by its sand and gravel and crushed rock quarries are of regional and national importance, with Cumberland being home to the only quarry in England that produces the very high specification roadstone essential for the building and maintenance of roads, especially motorways. Cumberland is also unique in that it hosts the majority of the UK's legacy radioactive waste in specialist facilities at Sellafield and the Low Level Waste Repository (LLWR) at Drigg.
- 2.20 It is recognised that given the size of Cumberland, the data provided at authority level will not be fully reflective of the distinctive social, economic and physical characteristics experienced in different areas. Therefore, the Council intends to publish a more detailed Spatial Portrait as a standalone document to support its Preferred Options document. This will contain data analysis of different sub-areas within Cumberland to highlight such variations and, in combination with the responses from this Issues and Options consultation, will be used to inform, and provide evidence for, our preferred policy options.
- 2.21 The boxes on the following two pages highlight some key statistics about Cumberland, with the national figure included in brackets alongside to provide a comparison where relevant.

(Note: figures in brackets are national data)



(Note: figures in brackets are national data)



3. Vision and Objectives

Spatial Vision

In 2045 Cumberland will be healthy and prosperous, with interdependent and sustainable places that safeguard equal opportunities. The health of our people and our environment will be at the centre of everything we do.

We will support high quality housing, education and healthcare for all and provide access to nature through our high quality rural and coastal environment. We will mitigate developmental impacts on our soil, water, air and landscapes, with a particular focus on flooding and coastal erosion.

We will be proud of our strong and diverse cultural identity, which seeks to respect our heritage whilst championing innovations that look forward to the future.

Investment in infrastructure will provide better physical, social and technological connections, creating more empowered and resilient communities which have equal access to services and facilities.

We will strive to be self-sufficient and provide diverse education and employment opportunities to retain our working population and to recruit working age people from outside the area to support economic growth.

We will utilise our natural capital prudently to ensure we are green economy leaders in renewable technologies to support our energy resilience and address fuel poverty.

Question 1

Do you agree with the proposed Vision for the Cumberland Local Plan?

Question 2

If not, please explain why and what changes should be made.

Local Plan Objectives

1. Designing healthy environments – to ensure new buildings and open spaces encourage active and healthy lifestyles to support the health and wellbeing of our communities and reduce inequalities.

2. Tackling the climate emergency – to ensure all new development aligns with achieving net zero through minimising the carbon-cost of development, and that we mitigate, adapt and improve our resilience to climate change, including flood risk and coastal change.

3. Designing high quality places – to protect, enhance and promote Cumberland's varied and high-quality built environment, including its rich heritage, public spaces, local character and identity.

4. **Natural environment** – to protect, enhance and promote the Cumberland’s varied and outstanding natural environment, landscapes, habitats and biodiversity, and our network of green and blue infrastructure and open space.

5. **Supporting jobs and the economy** – to support business investment and job creation opportunities to sustain a resilient economy to deliver prosperity for the whole community.

6. **Promoting vibrant town and retail centres** – to encourage investment and ensure vitality to meet the needs of our communities and visitors.

7. **Meeting future housing needs** – to provide housing to meet our residents’ needs, including affordable housing, which meets a range of needs over people’s lifetime.

8. **Promoting sustainable transport** – to promote sustainable modes of travel by locating development sustainably and to enhance travel networks for walking, cycling and public transport in order to provide a range of transport choices.

9. **Infrastructure** – to collaboratively work with partners and stakeholders to secure the necessary infrastructure needed at an appropriate time to support new development.

10. **Minimise environmental impact** – to reduce and mitigate environmental impacts including flood risk, greenhouse gas emissions and air pollution and, where necessary, ensure appropriate mitigation, compensation and enhancement measures.

11. **Protecting and enhancing communities** – to ensure that the appropriate provision of community, social and cultural facilities are protected and enhanced to support a high quality of communal life for residents

12. **Supply of minerals** – to maintain a steady and adequate supply of minerals to deliver the housing and infrastructure we need. To ensure that the minerals from Cumberland that are required to meet local, regional and national needs are supplied from appropriately located and environmentally acceptable sources.

Question 3

Do you agree with the proposed Cumberland Local Plan objectives?

Question 4

If not, please explain why and what changes should be made.

4. Strategic Issues

Your Priorities

- 4.1 The Local Plan covers a wide range of issues such as housing, employment, health, the environment and infrastructure. There are opportunities within the Local Plan strategy and policies to focus on specific priority issues.

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?

Cross boundary issues

- 4.2 Cumberland operates within a sub-regional (Cumbria), regional (North-West) and national context. It is important that in developing the Local Plan, it aligns with neighbouring local plans; it should also take into account and support the delivery of projects and infrastructure that cross plan boundaries. This could include road, rail or utilities infrastructure, flood management at a river catchment level, delivering nature recovery schemes and biodiversity net gain, managing waste, delivering housing and economic growth and planning for an adequate supply of minerals.

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?

5. The Development Strategy

How growth could be distributed across Cumberland

- 5.1 The Cumberland Local Plan will determine how development is distributed within the area; this is known as the 'Development Strategy'.
- 5.2 The National Planning Policy Framework (NPPF) requires the Local Plan to prioritise sustainable development and there are different ways in which this can be delivered.
- 5.3 The following pages outline a number of different approaches for producing a development strategy, each of which would give distributions of development across Cumberland. They are described in turn, with an indication of their respective strengths and weaknesses, and are accompanied by an indicative map to show what the spread of development may look like. The options are listed below; there is also an additional question on the principle of settlement clusters.
 - Urban focused;
 - Urban focused with Sustainable Windfall criteria and proportions for development;
 - All towns plus additional tier comprising villages containing essential services;
 - All towns plus additional tier(s) comprising villages that have a range of services; and
 - Public transport focused.

Option 1 – Urban Focused Development

- 5.4 Option 1 seeks to direct development to the urban areas of Cumberland, focusing growth on its city and the main settlements. This option would mean that development would be extremely limited in Cumberland's villages and rural areas; an example of how this could look in Cumberland is shown in the map on the next page.
- 5.5 This option helps to ensure that development is focused in settlements that generally have a high provision of services and infrastructure. Also, focussing and concentrating new growth can enable more effective infrastructure investment.
- 5.6 The main weakness with this option is that many of Cumberland's communities, who live in rural areas, will not receive growth, additional housing or investment and service provision in these areas may reduce.

Question 11

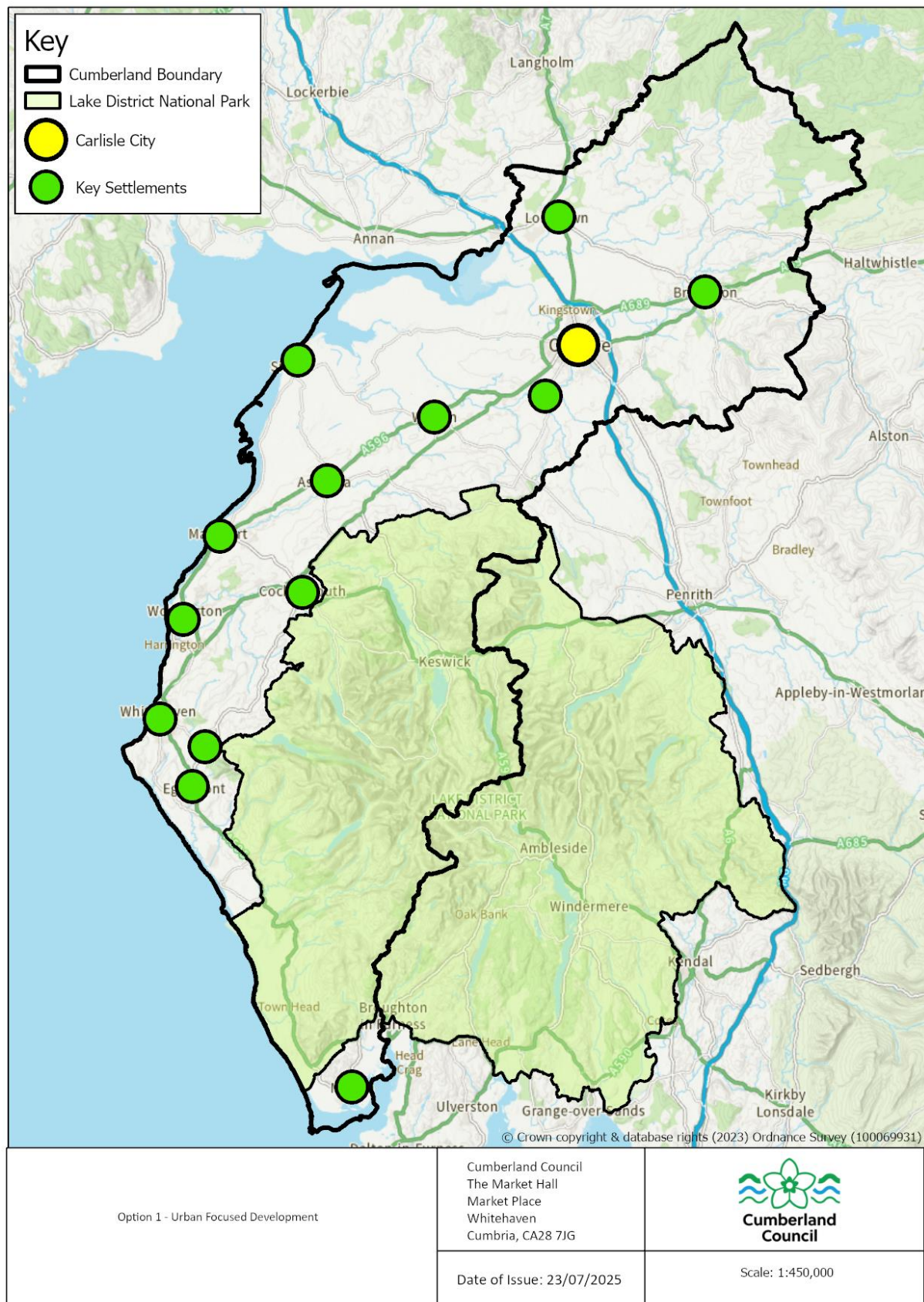
Would Option 1 be an appropriate approach to promote sustainable development?

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?



5.7 As recognised with Option 1, a large number of people live outside of Carlisle and the main towns. The next four options consider different ways to expand the settlement hierarchy to meet the needs of such communities.

Option 2) – Urban Focused with Sustainable Windfall Criteria

- 5.8 Option 2 seeks to provide a development pattern which is still urban focused but promotes an allowance for development to take place outside identified key settlements, so long as it meets sustainability criteria outlined in policy. This means that a settlement hierarchy will only be defined for the key settlements. Outside of the key settlements, planning applications will be considered against a detailed set of policy criteria that would determine whether a development proposal would deliver sustainable development.
- 5.9 This approach provides flexibility and an ability to respond to local needs and demands, providing opportunities for sustainable development across more of Cumberland than Option 1; an example of how this could look in Cumberland is shown in the map on the next page.
- 5.10 However, there can be a level of uncertainty about where and how much development would be acceptable in different villages, if villages are not named, and may have some risk of being more market led.

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?

Question 16

What are the **three most** important services for facilitating sustainable development?

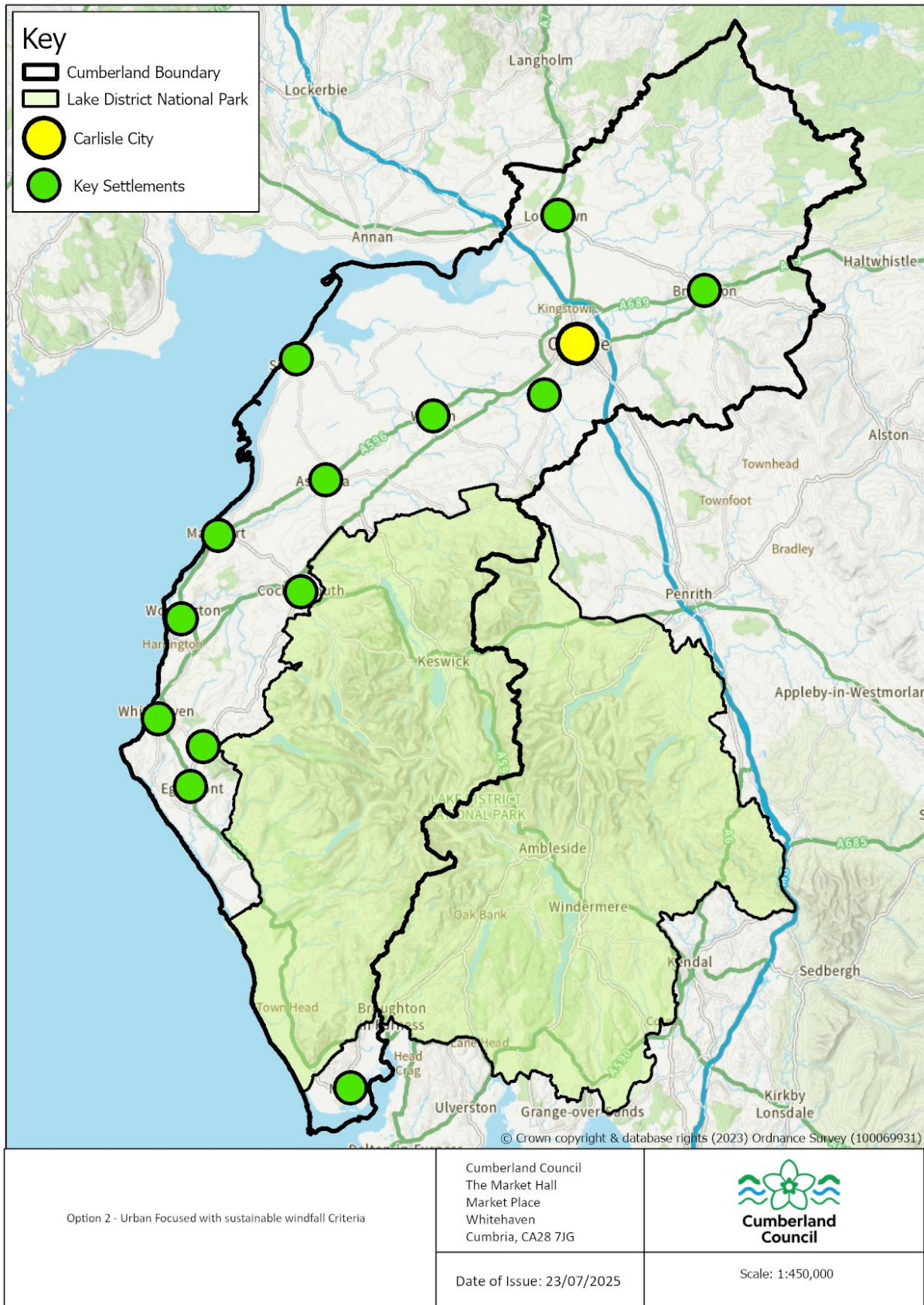
- School
- Convenience Shop
- Village hall
- Pub
- Restaurant
- Post Office
- Public transport
- Church
- Playground/playing field
- Other – please specify

Question 17

What are the **three least** important services for facilitating sustainable development?

- School
- Convenience Shop
- Village hall

- Pub
- Restaurant
- Post Office
- Public transport
- Church
- Playground/playing field
- Other – please specify



Option 3 – All towns plus additional tier comprising villages containing essential services

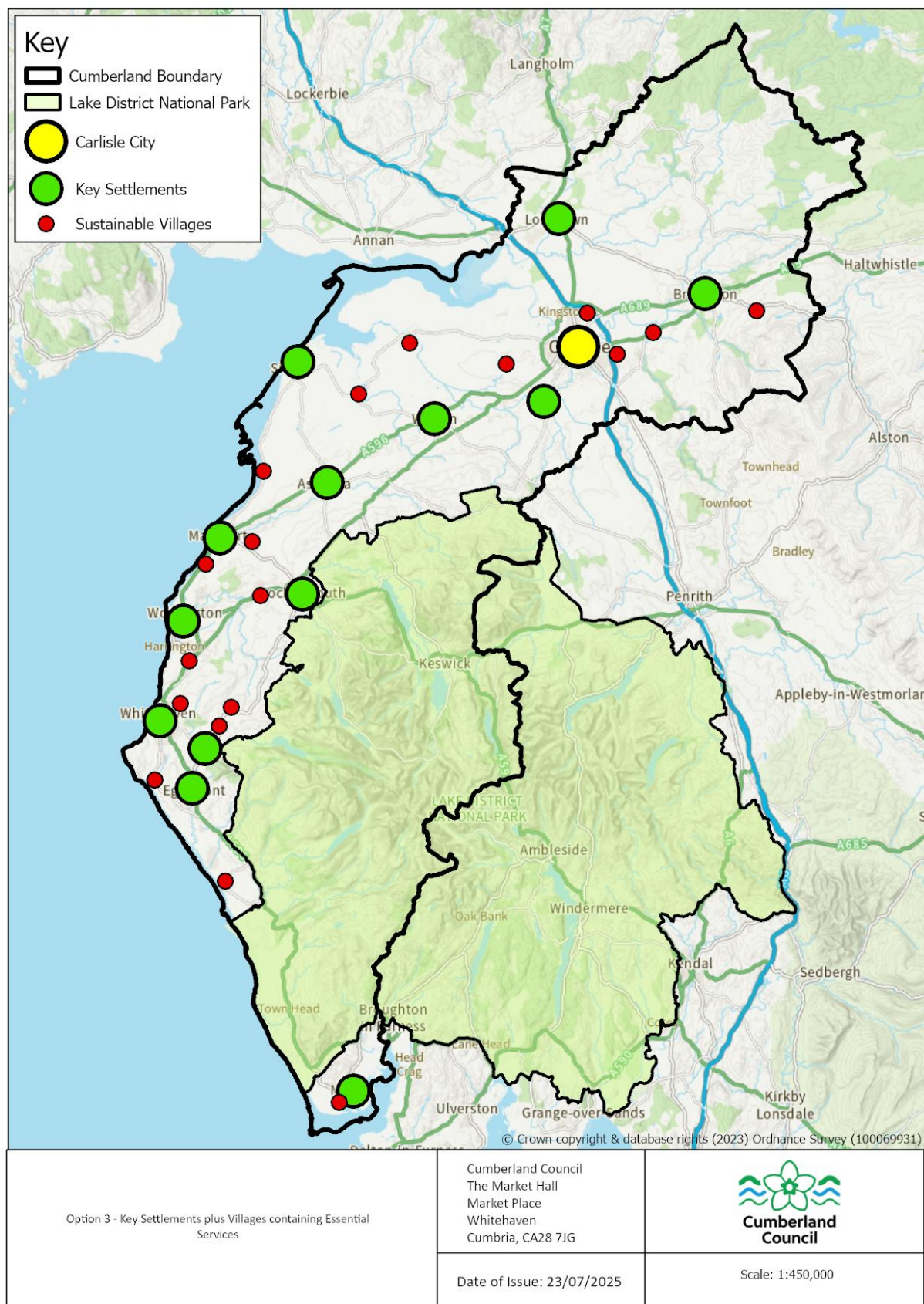
- 5.11 This Option seeks to focus development on settlements that contain a minimum level of service provision. In doing so, it means that these settlements can maintain a certain degree of sustainability through the provision of certain services which are considered most essential.
- 5.12 This option is likely to provide more growth to the rural areas of Cumberland than Option 1 while still focusing on villages that have a certain level of service provision. It also defines which villages are considered to be sustainable. However it could lack flexibility and still mean that large rural areas only receive development as an exception.
- 5.13 If Option 3 were taken forward, it would be necessary to determine which services should be considered as the most important for facilitating sustainable development. In the example map on the following page, the services chosen are primary school, shop and a village hall.

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?



Option 4 – All towns plus additional tier(s) comprising villages that have a range of services

- 5.14 This option seeks to focus development on settlements that contain a sufficient number of key services that facilitate sustainable development. In contrast to Option 3, this approach would score the total number of services available instead of simply requiring the presence of certain essential services.
- 5.15 Therefore this option means that the more services a settlement has, the higher it will score and the more likely it is to be part of the settlement hierarchy. It also more easily allows for more than one tier of village(s) to be included in the settlement hierarchy and a greater spread of development across Cumberland.
- 5.16 In the example map on the following page, the services chosen are primary school, convenience shop, pub, playground, playing field or a village hall.

Question 20

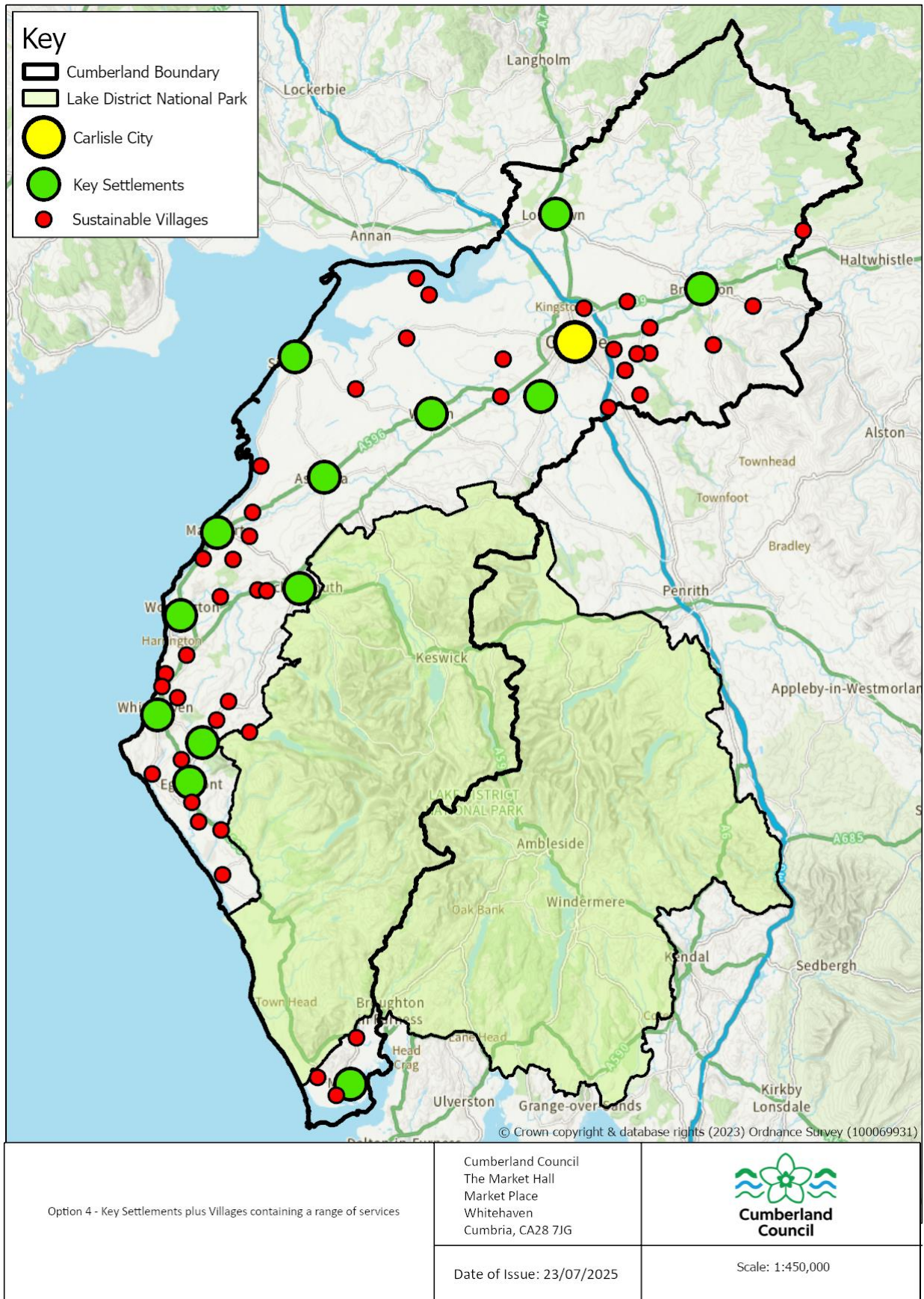
Would Option 4 be an appropriate approach to promote sustainable development?

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?



Option 5 – Public Transport Focused

- 5.17 Option 5 seeks to focus development within settlements that contain connections to sustainable public transport networks. This approach would recognise that while a settlement may not have extensive services, it may be possible to travel in a sustainable manner from them to larger settlements which do.
- 5.18 The example illustrating this option defines settlements connected by sustainable transport as having either a frequent bus service – one which receives at least one bus service every two hours, for at least six days of every week – or containing a railway station within the settlement/village. Additionally, settlements also needed to have the provision of at least a school, village hall, or convenience shop to be included in this network.

Question 23

Would Option 5 be an appropriate approach to promote sustainable development?

Question 24

Are the current criteria in paragraph 5.18 robust in terms of considering a settlement as “connected” through the public transport network with regard to frequency and usability?

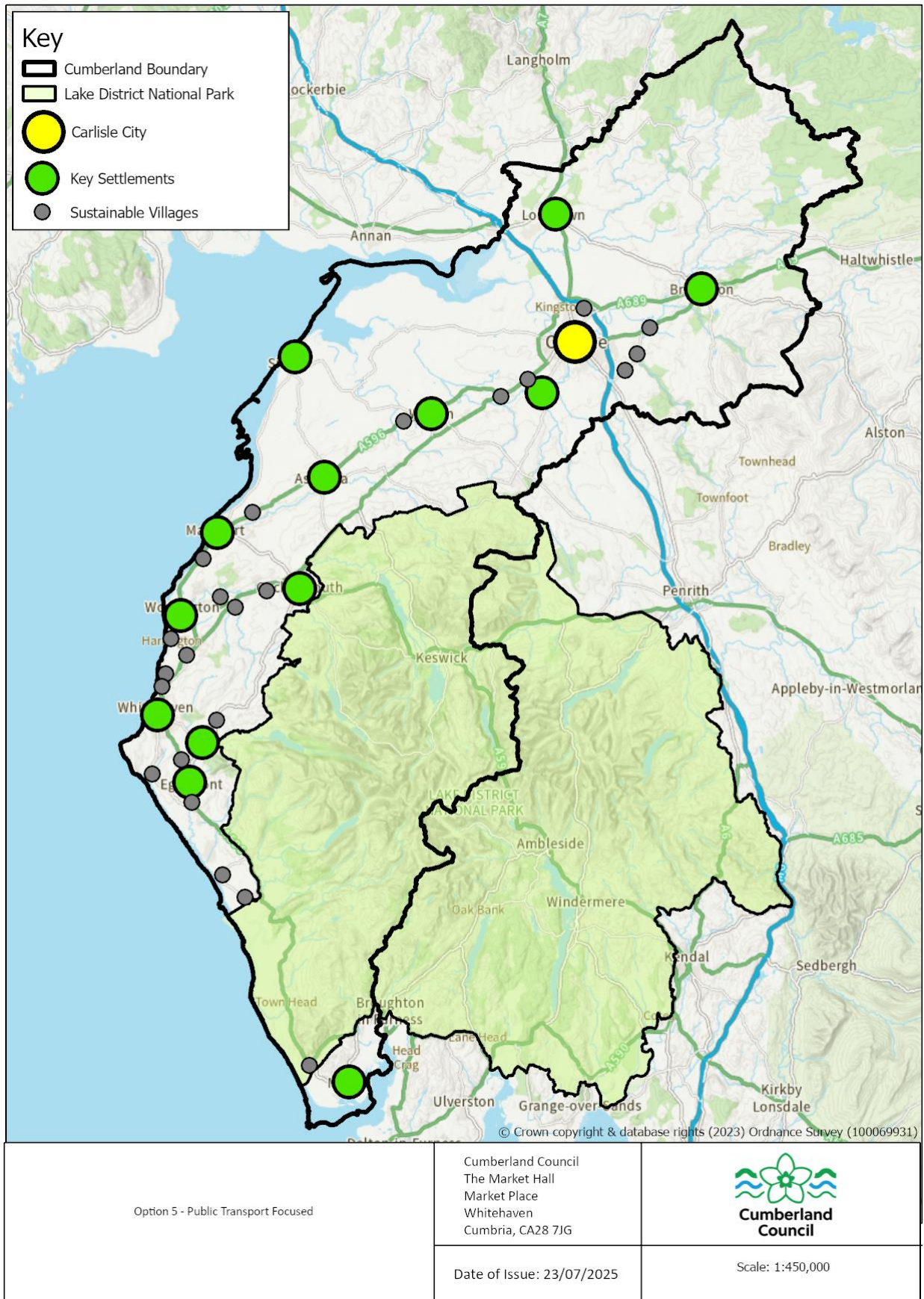
Question 25

What tiers of settlements should be connected by public transport to warrant inclusion into the Development Strategy (e.g. should a regular bus connection be required to the larger of the key settlements such as Carlisle, Workington or Whitehaven or could it be any key settlement)?

Question 26

What travel times are reasonable to travel on public transport to a more sustainable settlement?

- 0-30 minutes
- 31-60 minutes
- Over 60 minutes



Settlement Clustering

- 5.19 The principle of settlement clustering seeks to focus development in accordance with both service provision and location. In doing so, it would allocate development in accordance with the proximity of a settlement to services even if the service is located in a different settlement. In effect, settlements are considered more closely as clusters rather than meeting their own needs independently.
- 5.20 It shares similarities with many of the previously discussed options. As with Options 3 and 4, development would be organised in accordance with the provision of services. However, this option does not purely focus on the services *within* a settlement, but rather the distance required to travel to a service *from* a settlement. This has similarities to Option 5, however it expands the scope from public transport to other forms of transportation including walking and cycling. Different approaches to clustering could include:
- A number of settlements in close proximity provide a broad and sustainable range of services that support them all, but individually only have limited services
 - Where a number of settlements may be linked and served by a particular service (e.g. a school)
 - Close proximity and good access to a town with services
- 5.21 Taking forward settlement clustering would require an extensive understanding of how far someone would be prepared to travel to a service, whether this should be restricted to specific modes of transport and whether specific services ought to have a specific reasonable distance within which to consider a cluster to be sustainable.

Question 27

Would settlement clustering be an appropriate approach to promote sustainable development?

Question 28

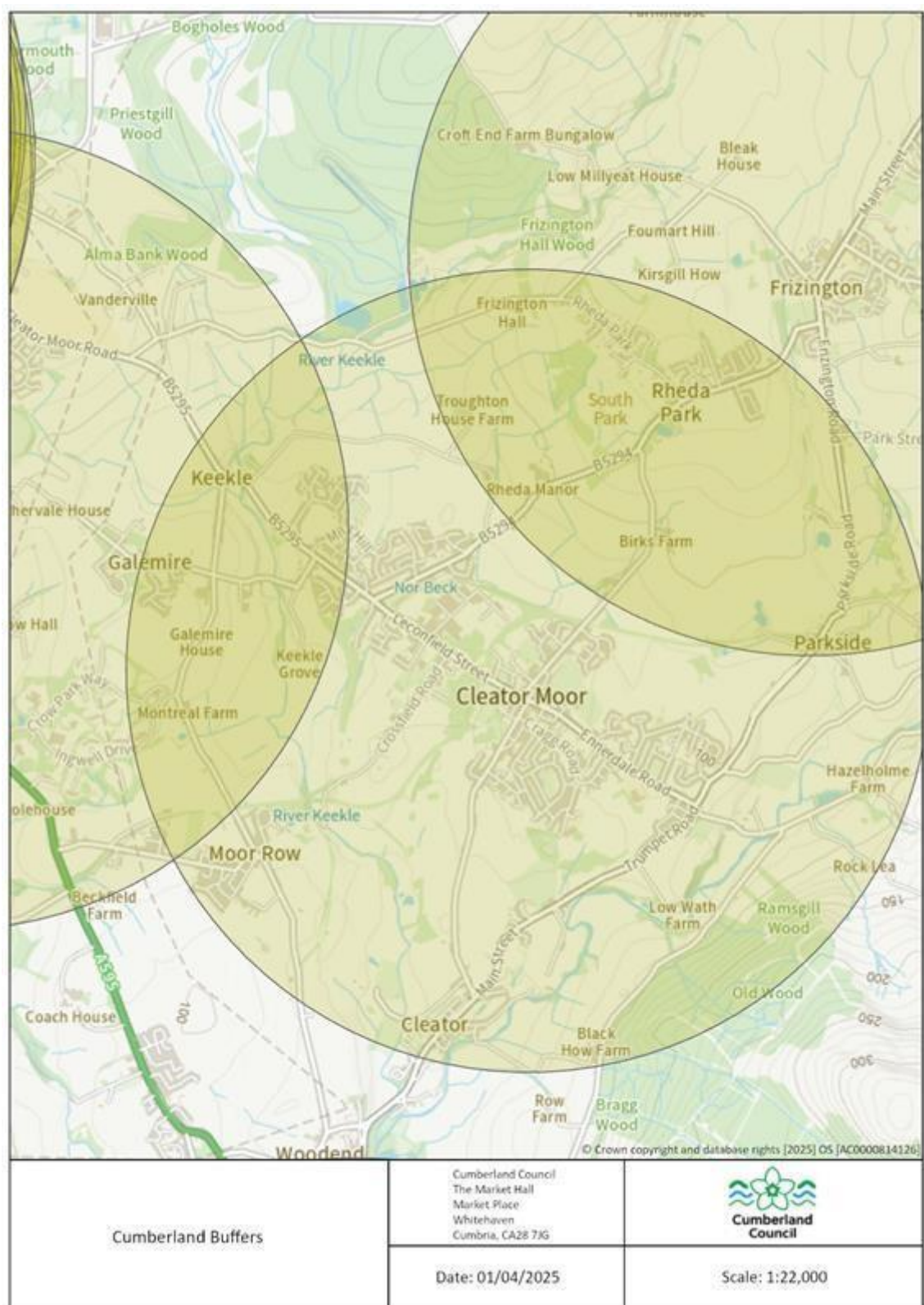
How close should settlements be to each other to be considered as a settlement cluster for the usage of services?

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?



Settlement Boundaries

- 5.22 On the Policies Map of the Local Plan, the Council can draw boundaries around individual towns and villages to define the physical built edges of a settlement. It enables a clear and simple distinction to be made between those places where sustainable development may be acceptable (i.e. areas within a settlement boundary) and those areas where it generally will not (i.e. areas outside a settlement boundary).

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?

Brownfield Land

- 5.23 Brownfield land is a planning term for land which has been previously developed; this may include former industrial spaces or dilapidated housing stock, but it does not include farm or agricultural buildings.
- 5.24 The NPPF gives substantial weight to the use of brownfield sites within settlements for homes and other identified needs. It also supports the development of under-utilised land and buildings especially if it would help meet identified housing needs.

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 land be required to engage with relevant Brownfield development funds?

Net Developable Area

- 5.25 Developments need to be designed so that they provide land for infrastructure which supports the development, such as play areas, public open space, drainage systems, healthcare facilities and schools. There might also be

situations where development buffers need to be provided to provide protection for things like heritage assets and flooding.

- 5.26 The land area which is reserved for these uses needs to be removed from the total site area as it cannot be developed on to provide housing or employment units. This will leave the site area which can be built upon which is referred to as the net developable area.

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 the Local Plan needs to address that have not been identified in this chapter?

6. Housing

- 6.1 Housing is central to the creation of sustainable, inclusive and mixed communities. It is important that enough homes are provided to meet the need and aspirations of local people and to attract new people to live in the area to provide the workforce and skills to support economic growth. Housing delivery is best achieved by encouraging and providing the opportunity for different sectors of the market to participate, such as small and medium builders and self-build, as well as volume house builders. Equally important is to ensure that the homes that are built are affordable, well designed and meet the needs of the local community now and in the future.

Affordable Homes

- 6.2 In 2024 the median house price in Cumberland was £151,275. While this is not considered high by national standards, when compared to median household income it is considered unaffordable as it equates to a borrowing requirement of 5.3x gross annual income. An affordable ratio for borrowing is considered 3.5x for a single income household and 2.9x for a two-income household. The affordability gap is particularly pronounced for young people trying to buy their first home.
- 6.3 The findings of the general Housing Needs Study 2024 for Cumberland concludes that over the next five years there will be an annual shortfall of 676 affordable homes to meet the backlog and emerging needs. When put in the context of the housing growth target of 1,104 homes per year for the plan period, this equates to 60% of the annual housing requirement. The Study also indicates a need for a broader mix of affordable dwelling sizes with a greater need for social rented rather than affordable home ownership homes.

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 39

Where the Council has agreed to allow developers to provide a lower percentage of affordable homes than is required by policy due to viability reasons, should there be a

policy mechanism to allow the Council to request a viability review when the development is completed to ensure it has delivered the maximum amount of affordable homes possible?

Short Term Lets

- 6.4 In the changing economy that surrounds tourism, and to some extent around contract-based work, short-term lets have become increasingly popular through platforms such as “Airbnb”.
- 6.5 While short-term lets can provide an important and flexible form of the tourist offer in Cumberland, there is the issue that an excessive proportion within a particular locality can have a damaging effect on local communities. Local housing stock is depleted for permanent occupation, rents can become inflated, communities can become less resilient and local businesses can suffer from excessive tourist economy rhythms.

Question 40

Do you consider short-term letting an issue? If so, please provide evidence as to why and where it is an issue.

Question 41

If short-term lets are an issue, what would be the preferred planning policy approach to manage the number of short-term lets in certain areas?

Flexible Homes for All

- 6.6 It is imperative that the Local Plan makes provision for housing stock that is of good quality, offers choice and can provide flexibility for all needs.
- 6.7 Cumberland has an ageing population whereby the proportion of the local population aged 65 and over is growing more quickly than the population aged below 65. By 2040, it is projected that there will be a 39.8% increase in those residents aged 65 and over who will experience mobility problems².
- 6.8 Data shows that there is also expected to be an increase in those with autistic spectrum disorders, learning disabilities, visual and hearing impairments and those who suffer falls (including falls which lead to hospital admissions).

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?

² www.cumberland.gov.uk/book/export/html/4018679

- 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

- 6.9 In 2015, 'Approved Document M' was released which sets out the Building Regulations for the access to and the use of buildings.
- 6.10 Category 1 of these Regulations is mandatory and must be included in all new residential builds; this includes design features such as: enabling a disabled person to visit the dwelling by walking; wall mounted switches and sockets are reasonably accessible to people who have reduced reach; and step free access to habitable rooms (including the toilet) on the entrance storey.
- 6.11 Approved Document M also contain two further categories which are both optional standards within the Building Regulations. A Local Plan can include a policy requiring these optional standards, if the Council can provide clear evidence of local need. These are:
- M4(2) – reasonable provision must be made to allow occupants with differing needs gain access to the dwelling and use its facilities (e.g. wider doorways/corridors, step-free access to all entrance level rooms). (Although it should be noted that in 2022, the Government announced its intention to make this optional standard mandatory through Building Regulations. Currently this has not yet happened but should this change occur before the adoption of the Cumberland Local Plan, then a Local Plan policy for this optional standard will not be required).
 - M4(3) – there are two elements to this standard; where the local authority is responsible for allocating or nominating a person to live in the dwelling, the requirement is for the home to be wheelchair accessible. Where the local authority is not responsible for this, the provision must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs.

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?

Houses of Multiple Occupation

- 6.12 Houses of Multiple Occupation (HMO) provide an accommodation option for those seeking flexible, affordable rented housing.
- 6.13 A single dwelling house is defined as being in multiple occupation when it is rented by separate tenants and they share facilities (e.g. kitchen/bathroom); under housing licensing regulations this is if at least five separate tenants live at the property and share facilities. In planning, permission is not required unless it is for seven separate occupants unless the property is subject to an Article 4 Direction removing the Permitted Development Rights.
- 6.14 This type of housing is popular as it often offers shorter-term rental agreements, providing a more flexible approach to temporary living, with the most common forms of houses of multiple occupation usually relating to student accommodation and shared housing (i.e. for young professionals).
- 6.15 This type of accommodation offer has a number of benefits such as the provision of more affordable rental options, the flexible nature of the accommodation being more attractive to those looking for work and the potential higher yield financial returns are attractive to landlords so it can incentivise them to bring empty properties back into use.
- 6.16 However, there are some negatives to using housing stock like this especially as it can lead to the loss of larger family homes from the housing market. The increase in the transient residential population can lead to a lack of support for local services (e.g. school enrolments) and community spirit and engagement. Where there is a high concentration of the student population in an area, there is an increased risk of negative impacts on residential amenity (e.g. noise and litter

pollution). There is also the issue that the quality of this house type can vary considerably and there are often problems with poor standards of accommodation.

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.

Self-Build and Custom-Build Housing

- 6.17 Self-build and custom-build housebuilding covers a wide spectrum, from projects where individuals participate in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation.
- 6.18 Self-build and custom-build housing can provide greater flexibility within Cumberland's housing offer by allowing for specific requirements, needs and preferences. As such, the Local Plan may choose an array of different approaches to best support this necessary element of the housing mix.

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; or
- 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%; or
- 10%; or
- 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?

Small and medium housing sites

- 6.19 Small and medium house builders make an important contribution to the delivery of housing locally. National planning policy requires us to identify sufficient land to accommodate at least 10% of the local plan housing requirement on sites no larger than one hectare which typically accommodates 30 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?

Replacement Dwellings

- 6.20 Replacement dwellings within the countryside allows the delivery of more energy-efficient, accessible homes that can enable families and residents to remain within local communities and make an efficient use of land. However, such development also has the potential to harm the character of the area with the loss of vernacular building styles and historic layouts, and the trend towards larger suburban style dwellings that are increasingly prominent in the rural landscape. Development can also lead to a loss of smaller housing in rural areas which makes it more difficult for first time buyers or those needing smaller homes.

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?

7. Economy

Community Wealth Building

- 7.1 We are committed to taking a community wealth building approach to deliver sustainable growth in our local economy; this is a people centred approach to ensure that the economic benefits of development are retained in the local area. Its aim is to encourage more spending in the local economy by using local businesses and supply chains, as well as employing and developing the local workforce.
- 7.2 One way the Local Plan can support this is to include a requirement for planning applications to be supported by an Employment and Skills Statement. Employment and Skills Statements provide a mechanism to ensure that the use of a local workforce and supply chain is being maximised in a construction project and if there are training opportunities that can be provided by the developer.

Question 55

Should the Local Plan ask for an Employment and Skills Statement to accompany the submission of planning applications? If yes, what type and scale of development should be required to submit an Employment and Skills Statement (e.g. based on number of employees or level of capital invested in the development)?

Question 56

What information/criteria should an Employment and Skills Statement contain?

Question 57

Are there any other approaches or requirements the Local Plan could include to support community wealth building?

Tourism

- 7.3 Cumberland is home to some spectacular scenery and fantastic attractions which helped attract 17.79 million visitors to the area in 2024, which boosted the economy by £1.82 billion and supported 17,353 full time jobs³.
- 7.4 Whilst the Council is keen to promote Cumberland as a key visitor destination, it is important to ensure that this drive for economic growth does not negatively impact on the sensitive landscapes and natural/historic habitats that attract visitors in the first place.
- 7.5 The Local Plan will have a key role in ensuring that it can facilitate the implementation of high-quality development in the areas in Cumberland which will benefit from tourism investment. This will be particularly important for

³ <https://cumberland.moderngov.co.uk/documents/s18116/Tourism%20Report.pdf>

supporting local tourist attractions in order to attract visitors to Cumberland who may not usually consider leaving the Lake District National Park.

Question 58

What can the Local Plan do to encourage and support sustainable tourism, especially in sensitive locations, with regard to tourism accommodation and tourist attraction development?

Question 59

In which locations should the Local Plan support the location of new tourist accommodation and attractions?

Question 60

Is there a need for the Local Plan to consider provision for motorhomes and campervans?

Safeguarding Employment Sites

- 7.6 The NPPF requires that Local Planning Authorities take a positive approach to applications for alternative uses of land which is currently developed but not allocated in the plan for specific purposes where it would meet an identified need.
- 7.7 Some existing employment sites may fall within this category, especially where there has been long-term vacancy. To provide flexibility, there are already rights for commercial premises to change from one use to another without requiring planning permission. Currently, the adopted Local Plans seek to protect employment sites and estates from loss to non-employment uses.

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?

8. Town Centres

Mix of Uses

- 8.1 In order to be vibrant places that are attractive to all, town and city centres need to have a mix of uses. This is especially important with the declining national trends in retail which has traditionally been the core activity for town and city centres. Therefore, centres need to be repurposed into mixed use areas to increase footfall, including developing the leisure, recreation and residential offer.
- 8.2 As well as looking to vary the uses, services and facilities in centres to meet people's day to day needs, it will also be important to improve the environment to make people want to be there. Not only do we want to encourage people to visit our centres, but it is also important to get them to want to stay and spend time in them, rather than just making quick functional visits.

Question 64

What types of uses should be promoted within town and city centres?

Question 65

What can the Local Plan do to make town/city centres more attractive to encourage you to visit them?

Question 66

What sort of uses should be resisted within town and city centres?

Meanwhile Uses

- 8.3 Meanwhile uses are temporary uses for premises, sites or spaces which are vacant/underutilised, or are part of a wider regeneration strategy when the premises, site or space is either waiting for development or whilst a long-term project is being delivered.
- 8.4 Such premises, sites or spaces can be used for a wide range of uses until they can be brought back into commercial use. The wide variety of uses that can be implemented will help to retain existing visitors and attract new people to the area.
- 8.5 Whilst many people may think that pop up shops and cafes will be the main types of businesses to use such schemes, there are a number of social and cultural uses which can also be supported including art exhibition spaces, community meeting places, flexible workspaces, repair cafes and outdoor cinemas/theatres.
- 8.6 In addition to the obvious economic benefits such uses could have (i.e. increased footfall and more money spent in the local economy), there are a number of other advantages of promoting meanwhile uses including making use

of areas which would otherwise have a negative visual impact (e.g. closed shutters, use of hoardings, empty windows and rundown facades) and improving the safety and security of places.

- 8.7 The potential to utilise premises, sites and spaces for uses that reflect the needs and aspirations of the local community could enrich the cultural fabric of areas, provide opportunities for social interaction and community engagement and lead to improvements in people's mental and physical health.
- 8.8 The short-term nature of meanwhile uses is likely to appeal to new business startups which may see it as an opportunity to test the market without many of the usual overhead costs and commitments. Once the temporary use has come to an end, businesses may look to permanently establish themselves in the area if they have had a positive experience.

Question 67

Should the Local Plan include a policy that supports meanwhile uses in city/town centres? If yes, what kind of meanwhile uses would you like to see in your area (please also name the area)?

Night-time Economy

- 8.9 The term 'night-time economy' refers to commercial and leisure activity in town and city centres which takes place between 18:00 and 06:00. Such activities incorporate a wide range of uses including retail, leisure and culture and spectator sports but also transport and accommodation; these uses also support sectors such as security and supply chains.
- 8.10 A vibrant and varied night-time economy can provide attractions for both residents and visitors to the area, lead to an increase in prosperity through job creation and market growth and contribute to reducing social isolation.
- 8.11 However, it is acknowledged that developing the night-time economy will bring its own challenges in terms of the potential for a rise in crime, anti-social behaviour, demands on emergency services and pollution (e.g. noise, air and litter).
- 8.12 Whilst the Council is keen to explore opportunities to develop the local evening economy, it is aware that this must be well managed and protect the wellbeing of all those who will use and work within it. This will not be an instant change to the economy; to ensure any success is long-lasting and sustainable, it will need to be a well-planned collaborative approach between key partners (communities, businesses, public health and emergency services).

Question 68

What kind of leisure and cultural uses would you like to see more of to develop the evening/night-time economy?

Question 69

In which locations should the evening/night-time economy be developed?

Question 70

Are there any areas in which the evening/night-time economy should not be developed?

Retail Hierarchy

- 8.13 The Local Plan will direct retail development to places depending on their position in a retail hierarchy.
- 8.14 Generally, the position in the hierarchy will reflect the size of the area, with larger settlements being located at the top of the hierarchy and expected to accommodate higher levels of retail development to serve a wider audience. Smaller settlements will be located at the lower end of the hierarchy and they will be expected to provide services and facilities to more localised areas.
- 8.15 Usually, a retail hierarchy will follow a general pattern of the main city/town centres being at the top of the hierarchy followed by smaller town centres, village centres and local centres (i.e. a small group of shops in a localised area). Due to the size of Cumberland, there are a large number of settlements within the area which leads to questions about how the retail hierarchy should be established.

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; or
- The retail hierarchy should only focus on the city and town centres, with an additional policy to support retail development in the smaller settlements

Question 72

Are there any issues relating to town centres which you think that the Local Plan needs to address that have not been identified in this chapter?

9. Health and Quality of Life

Development and Health

- 9.1 Although the Local Plan will encourage new development to positively influence health and wellbeing through measures such as the promotion of good design and active travel, the Council is mindful that it also has the potential to negatively affect the health and wellbeing of its residents depending on its use, design, location and operation.
- 9.2 Higher concentrations of the same use types in the same location can often exacerbate negative amenity impacts such as odours, noise pollution, litter and parking, as well as contributing to health inequality.
- 9.3 The most obvious development uses that can negatively affect health and have associated amenity impacts are hot food takeaways. The health impacts of hot food takeaways have been widely reported to include contributing to obesity (both childhood and adult), cardiovascular disease and high blood pressure.
- 9.4 To enable and support healthy communities, the NPPF states that local planning authorities should refuse applications for hot food takeaways and fast food outlets that are within walking distance of schools and other places where children and young people congregate (unless it is within a designated town centre). Applications should also be refused in areas where there is evidence that a concentration of hot food takeaways is causing an adverse impact on health (as well as pollution or anti-social behaviour). Furthermore, the Planning Practice Guidance *Healthy and Safe Communities* states that local planning authorities “can, where justified, seek to limit the proliferation of particular uses.”

Question 73

Are the restrictions on hot food takeaways included in the NPPF sufficient or should the Local Plan include a policy that allows the Council to further manage the amount/location of hot food takeaways within Cumberland? If yes, what kind of local data and evidence should be used to define any restrictions?

Question 74

Should the Local Plan seek to manage the amount/location of other development uses in order to improve public health and wellbeing? If so, which uses should be included?

Health Impact Assessments

- 9.5 One method of assessing the potential impact of development on health is through the use of Health Impact Assessments.
- 9.6 Health Impact Assessments are a tool used to ensure that the health impacts of range of a proposed development types are fully considered at the earliest opportunity in the development process.

- 9.7 The Assessments can vary in detail depending on the nature and scale of the proposed development and will identify the positive and negative potential impacts, both direct and indirect. The outcome will be to provide recommendations on how to overcome the identified potential negative impacts and how to enhance the positive impacts through improvements to the proposed development.

Question 75

Should the Local Plan include a policy that requires a Health Impact Assessment to be submitted as part of planning applications? If yes, what would be the appropriate thresholds to apply for the requirement of Health Impact Assessment in terms of types and scale of development?

Pollution

- 9.8 New development has the potential to contribute to, be put at unacceptable risk from or be adversely affected by soil, air, water or noise pollution or land instability. Pollution can also take the form of dust, lighting, vibration or odours. It is important to ensure that new development is appropriate to its location taking into account any effects (including cumulative effects) on public health, living conditions and the natural environment.
- 9.9 Planning policies can have an important role in helping to minimise pollution by influencing the scale and location of new and polluting developments.
- 9.10 Much of Cumberland is rural in nature, but some of our urban areas are subject to Smoke Control Orders and there are four Air Quality Management Areas in Carlisle. Traffic generation is a key source of pollution which must be taken into consideration.
- 9.11 Protected nature conservation sites in Cumberland and within the Lake District National Park are sensitive to air pollution, nitrates in particular, and the coastal marine environment includes designations as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Marine Conservation Zones and a Highly Protected Marine Area which are susceptible to disturbance and pollution. There are a number of Groundwater Source Protection Zones, Drinking Water Safeguarding Zones and Drinking Water Protected Areas within Cumberland which all require consideration in relation to development.
- 9.12 Pollution also comes in the form of noise and vibration which can affect amenity of people during the construction and operation of new development. Noise and vibration can also come from changes to existing buildings due to increasing need for cooling/heating systems.
- 9.13 Light pollution can adversely affect residential amenity and the natural environment. Cumberland has some of the UK's darkest skies including areas within and around the National Park, the North Pennines and Solway Coast Natural Landscapes and to the northeast of Carlisle. Areas that are already dark should be protected to remain dark, particularly in rural areas.

- 9.14 A history of mining and heavy industry, especially in the western and southern parts of Cumberland, means that some sites require remediation prior to development. It is the responsibility of the developer to ensure that a site can and will be made suitable and safe for its proposed future use and that there are no unacceptable risks to human health, the environment, property and/or controlled waters.
- 9.15 Measures to control smells and odours associated with new development such as commercial kitchen ventilation/extraction systems are needed to ensure that surrounding amenity is protected.

Question 76

Are there any particular issues and areas of concern relating to the following 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 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?

Allotments and Local Food Production

- 9.16 Providing spaces to grow our own food is important; research shows that having access to places like allotments and community orchards provides multiple physical and mental health benefits including increased aerobic activity (benefitting heart health and muscle strength) and social engagement (meeting new people and swapping produce), with those who grow their own food more likely to eat at least five fruit and vegetables a day.
- 9.17 As well as the numerous health benefits associated with local food growing and the exposure to the natural world, it also contributes to sustainable development by providing increased food security, providing access to low cost sources of food and reducing the carbon emissions associated with how far products have to travel before it reaches the consumer (also known as food miles).

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?

Question 84

Should the Local Plan safeguard existing allotments?

Question 85

In what other ways could the Local Plan support access to healthier food/food growing spaces?

Community and Cultural Facilities

- 9.18 A key element of a settlement are its cultural and social hubs, through which a sense of place is created and meaningful interactions between people are enabled. However, due to economic pressures many of these spaces (e.g. village halls, theatres, pubs, or small museums) are threatened with closure and a subsequent change of use.
- 9.19 The Council recognises that places and economies unavoidably change. However, it is important to ensure that wherever possible community and cultural facilities are safeguarded and continue to contribute to the social and cultural life of a community.

Question 86

In order to protect community facilities, which of the following requirements should 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?

10. Built Environment

Design

- 10.1 The creation of high quality, beautiful and sustainable buildings and places is fundamental to whole purpose of the planning process. Good design relates not only to the appearance of buildings and places, but also how they function in their location and how they contribute to achieving healthy, inclusive and safe places. 'Design' therefore encompasses a wide range of matters.
- 10.2 The Local Plan will need to ensure that new development meets high standards of design and relates well to existing development, enhances public realm and develops locally distinctive and high-quality places. Development will need to respond positively to the character, history and distinctiveness of Cumberland's varied settlements and landscape.
- 10.3 Local planning authorities are also expected to prepare design guides or codes which reflect local character and design preferences consistent with the principles set out in the [National Design Guide](#)⁴ and [National Model Design Code](#)⁵.
- 10.4 A design guide is a document providing direction on how development can be carried out in accordance with good practice whereas a design code is a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area.
- 10.5 National guidance identifies ten characteristics of well-designed places:
- 1: Context – enhances the surroundings.
 - 2: Identity – attractive and distinctive.
 - 3: Built form – a coherent pattern of development.
 - 4: Movement – accessible and easy to move around.
 - 5: Nature – enhanced and optimised.
 - 6: Public spaces – safe, social and inclusive.
 - 7: Uses – mixed and integrated.
 - 8: Homes and buildings – functional, healthy and sustainable.
 - 9: Resources – efficient and resilient.
 - 10: Lifespan – made to last.

Question 90

From the design characteristics listed in paragraph 10.5, please choose the three principles which you consider to be the most important.

Question 91

Are there particular issues that you think that a design guide or design codes need to address in any specific area or on a Cumberland-wide basis?

⁴ www.gov.uk/government/publications/national-design-guide

⁵ www.gov.uk/government/publications/national-model-design-code

Question 92

Are there any new developments (either a new building or a new housing development) in Cumberland that you like? Please explain why.

Design Toolkits and Standards

- 10.6 There are various design toolkits available aimed at creating better places. There is an opportunity to embed some of their principles within local plan policies or design codes. Some principles from the different toolkits are similar, whilst others promote different things.
- 10.7 [Building for a Healthy Life](#)⁶ (BHL 2020) is England's most widely used design tool which was updated in partnership with Homes England, NHS England and NHS Improvement. It reflects the Government's increased emphasis on the design of places that can support sustainable and healthy living, focused on integrated neighbourhoods, distinctive places and streets for everyone.
- 10.8 [Active Design](#)⁷ is promoted by Sport England⁸ and sets out how the design of our environments can help people to lead more physically active and healthy lives. It seeks to help create 'active environments', promoting activity for all irrespective of gender, disability, health, or where they live, to create healthier communities.
- 10.9 [Secured By Design](#)⁹ is a UK Police initiative that seeks to improve the security of buildings and their immediate surroundings to provide safe places, reducing crime through good design. The [design guide for housing](#)¹⁰ includes development design and layout, and physical security (windows, doors etc). '[Crime Prevention Through Environmental Design](#)'¹¹ (CPTED) refers to measures taken to reduce crime and the fear of crime through the design, layout and specification of the built environment, for example through incorporating natural surveillance and clearly defining public and private space.
- 10.10 [Building with Nature](#)¹² regards high-quality green infrastructure as integral to placemaking, putting nature at the heart of development in a way that is good for people and for wildlife. Helping nature to recover has multiple benefits including generating wealth, building the country's resilience to climate change and for food security. There are health and wellbeing benefits from connecting with nature such as reduced stress levels. The [Building with Nature Standards Framework](#)¹³ promotes connectivity, responding to climate change, distinctive places and maximising environmental net gains, and addressing themes around wellbeing, water and wildlife.

⁶ www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf

⁷ www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design

⁸ Government body that is responsible for developing grassroots sports and getting more people active

⁹ www.securedbydesign.com

¹⁰ www.securedbydesign.com/images/HOMES%20GUIDE%20May%202024.pdf

¹¹ www.securedbydesign.com/images/safer-streets/pdf/pcpi_crime_prevention_through_environmental_design_web.pdf

¹² www.buildingwithnature.org.uk

¹³ www.buildingwithnature.org.uk/standards-form

Question 93

Should the Local Plan look at adopting the standards of an existing toolkit?
If yes, do you have a preference for, or an opinion on which of the toolkits the Local Plan should adopt, if any?

Question 94

Is there another design toolkit that the Local Planning Authority should consider?

Question 95

How should the Local Plan apply design toolkit standards to development?

- All development; or
- All housing developments with 10 or more dwellings or sites larger than 0.5 hectare; or
- All housing developments with 30 or more dwellings or sites larger than 1 hectare; or
- All housing developments with 50 or more dwellings or sites larger than 2 hectares.

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.

Development Briefs

- 10.11 Development Briefs, masterplans and design codes can provide a clear structure and parameters for the development of sites, especially larger sites that may be developed over a number of years and phases. They can provide clarity around issues such as number of homes, open space, the range of materials and finishes to be used, scale and massing whilst still allowing for creativity and innovation in the detailed design process.
- 10.12 As such they can be a helpful tool on site allocations to guide developers when designing schemes to an acceptable standard and give them certainty on what the Council expects. They can also be produced by a developer to express their vision and the framework for the long term development of a particular site.

Question 97

Should the Local Plan include design codes, development briefs or masterplans for land allocations within the Local Plan?

- Yes, on all allocations greater than 50 homes or 2 hectares; or
- Yes, on all allocations greater than 100 homes or 4 hectares; or
- Yes, on all allocations greater than 200 homes or 8 hectares; or

- No, there should not be a standard threshold and it should be considered on a site by site basis

Question 98

Should the Local Plan require design codes and/or masterplans for planning applications on larger sites?

- Yes, on all applications greater than 50 homes or 2 hectares; or
- Yes, on all applications greater than 100 homes or 4 hectares; or
- Yes, on all applications greater than 200 homes or 8 hectares; or
- No, there should not be a standard threshold and it should be considered on a site by site basis.

Efficient Use of Land

- 10.13 Planning policies need to ensure that all development makes the best and most effective use of land, while safeguarding and improving the environment and ensuring safe and healthy living and working conditions. Using land efficiently, particularly suitable brownfield land, minimises the need for greenfield sites to be developed.
- 10.14 One method of measuring how land is efficiently used is to calculate the density of a development; usually this is measured by the number of dwellings constructed in a hectare. In sustainable locations, the more houses built in one hectare (high density) helps to maximise opportunities to make trips by public transport, cycling and walking, and supports improvements to infrastructure and economic growth.
- 10.15 Not only do developers need to think about the number of houses they provide on a site, but it is also important for them to provide different types of housing which reflects the varied local need and demand. With relatively historically low levels of housing need and little shortage of land, Cumberland has not experienced the same pressures that other more constrained urban authorities have faced. However, it is important to use land efficiently and focus development to ensure that the best possible use can be made of the area's finite land resources to meet competing demands for food production, economic development, nature recovery, net zero goals and infrastructure.
- 10.16 Balanced against making the most efficient use of land is ensuring that the character of Cumberland's settlements is maintained, conserved and, where possible, enhanced as the density of a development will still need to respond to local context and character.

Question 99

How can the Local Plan ensure that the most efficient use is made of land? Please choose from the following options:

- Include a policy on housing density in the Local Plan to ensure an efficient use of land; or
- Include an overarching design policy in the Local Plan requiring the efficient use of land in all new development; or
- Reflect density and efficient use of land in a Design Code; or
- 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; or
- Other

Please provide details of what you consider to be the most appropriate approach

Question 100

If the Local Plan does include a policy on housing density, should it:

- Be one single standard across the whole of Cumberland? or
- Provide different densities in urban, suburban and rural areas?

What should the minimum density standards be?

Heritage

- 10.17 Heritage assets consist of buildings, monuments, sites, places, areas and landscapes identified as having significance because of their heritage interest. They are either ‘designated heritage assets’ or ‘non-designated heritage assets’.
- 10.18 Designated heritage assets include listed buildings, scheduled ancient monuments, registered historic parks and gardens, registered battlefields, world heritage sites and conservation areas. Designated heritage assets receive a greater degree of protection within the planning system than non-designated heritage assets.
- 10.19 Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified locally as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.
- 10.20 Cumberland’s diverse and varied history and heritage assets have a significant influence on its character and identity, contributing to local distinctiveness and creating a sense of belonging. In addition to its role as a driver for economic growth, attracting investment and tourism, and providing a focus for successful regeneration, research has shown that interaction with heritage or the historic environment can be a positive factor in supporting individual and community wellbeing. Historic buildings, places, landscapes and archaeology provide a tangible physical link between the past and present and can be source of local and national pride. They are an important component of high-quality, liveable places that help provide the conditions for communities to thrive.

10.21 One of the greatest challenges facing Cumberland's historic environment is the effects of climate change, which acts as a risk-multiplier for less significant threats while creating entirely new challenges. Likewise, our heritage is also impacted by our responses to climate change e.g. flood defences, sustainable energy generation, or improving energy efficiency (including within historic buildings).

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 103

Are there any issues relating to the built environment which you think that the Local Plan needs to address that have not been identified in this chapter?

11. Climate Change

- 11.1 Through the NPPF, the planning system is tasked with supporting the transition to net zero carbon by 2050 and to take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. Furthermore, the Local Plan should shape places in ways that contribute to “radical reductions” in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure.

Carbon Planning

- 11.2 There are two main ways through which development contributes to carbon production:
- Embodied Carbon – the carbon emissions caused by the construction of the development such as labour, materials use and construction methods and end-of-life processing.
 - Operational Carbon – the carbon emissions caused by the day-to-day usage of the building such as heating and electricity.
- 11.3 Addressing the embodied carbon of a proposal can provide a cost-effective potential for carbon savings and cost savings for the long-term operation of the development. One tool to reduce a development’s embodied carbon content would be the introduction of embodied carbon assessments which looks at the carbon emissions across the whole life cycle of a development from design, construction, occupation and end-of-life.

Question 104

Do you think that planning policy should seek to reduce the carbon emissions across the whole life cycle of a development?

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

Should development proposals be required to submit a whole life-cycle carbon reduction assessment as part of its planning application?

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 106

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 well as meeting energy efficiency standards?

If so, what proportion of the energy needs of the development should be met by renewable energy?

Net Zero and existing buildings

- 11.4 The existing building stock will continue to make up the majority of buildings within Cumberland. As such, most of the climate impacts and mitigation measures relating to buildings will involve those already built. Where planning permission is required for proposals such as conversions, change of use and residential householder applications, retrofitting opportunities could be taken to secure additional measures such as the installation of solar panels and heat pumps to existing buildings.

Question 108

Should the Local Plan include a policy that **requires** the retrofit of climate change measures, such as solar panels and heat pumps for all building proposals relating to existing buildings that require planning permission- including conversions, change of use and householder residential applications? Or should the local plan simply **encourage** the above?

Flood Risk and Water Management

- 11.5 With its varied topography, high rainfall and extensive coastline, Cumberland is at risk of both river (fluvial) and coastal flooding. Other forms of flood risk arise from rainfall on the ground and runoff flooding, surface and rising groundwater, and overwhelmed sewers and drainage systems because of heavy rainfall.
- 11.6 The impacts of climate change will see more extreme weather events, leading to increased rainfall, rainfall intensity and sea level rises all of which will intensify the impact of all sources of flooding in Cumberland.
- 11.7 The Local Plan will need to support increased resilience to climate change and resistance to flood risk. It will influence where development can be sustainably located so that it does not adversely impact existing developments, infrastructure, public safety and agricultural productivity.
- 11.8 National planning policy is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, it needs to be made safe for its lifetime and not increase flood risk elsewhere.

- 11.9 An up-to-date Strategic Flood Risk Assessment will be undertaken to help prepare policy relating to managing flood risk in Cumberland and determining the location of development and allocation of sites.
- 11.10 Managing surface water flooding at its source is one of the most effective ways to minimise run off from a site and prevent flood risk in the surrounding area. The NPPF requires that major developments incorporate sustainable drainage systems (SuDS) unless there is clear evidence that this would be inappropriate. SuDS mimic natural drainage patterns and therefore reduce the amount of water entering the public sewer system which in turn reduces the likelihood of flooding. The provision of SuDS can provide additional benefits such as improved water quality, habitats for wildlife and positive impacts on health and well-being of residents. Other flood mitigation strategies include the provision of good quality infrastructure, retention of existing trees, tree planting within the catchment and natural flood management solutions on a catchment scale.

Question 109

How can the Local Plan support natural flood management techniques and green infrastructure provision to reduce flood risk?

Question 110

Should SuDs be required to achieve net gains for nature or other multifunctional benefits?

Question 111

The Council would welcome any comments on approaches it should take in relation to addressing flood risk issues arising in Cumberland.

Coastal Change

- 11.11 The coastal areas of Cumberland are particularly vulnerable to the immediate effects of climate change through coastal erosion and sea-based flooding. As such, it is important to ensure the Local Plan correctly addresses this significant vulnerability.
- 11.12 There are different ways in which the Local Plan can manage the coastal environment and the risks it contains. For instance, it could designate some areas as “undeveloped coast” where development will be extremely limited (or not permitted at all), and other areas as “developed coast” where sensitively designed development might be allowed.
- 11.13 In addition, the Council is required by national policy to review and define Coastal Change Management Areas (CCMAs) in locations which have been identified as particularly vulnerable to physical changes to the coast. Having CCMAs will help focus decision making processes for the shorelines which are affected.

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

Are 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?

12. Environment

- 12.1 Cumberland benefits from a high-quality natural environment which extends from the high fells of the Lake District and North Pennines to the West Cumbrian coastal and Solway Plains to the Irish Sea beyond. It includes the Solway Coast National Landscape, the Duddon Estuary and parts of the North Pennines National Landscape and the Lake District National Park.
- 12.2 Cumberland has the only heritage coast in the northwest, and marine designations include the Allonby Bay Highly Protected Marine Area, the Solway Firth Marine Conservation Zone and the West of Copeland Marine Conservation Zone.
- 12.3 In terms of internationally designated sites, the plan area contains 2 Ramsar sites, 14 Special Areas of Conservation, and 3 Special Protection Areas. A number of these sites extend beyond the Plan Area into the National Park and neighbouring local authorities.
- 12.4 Cumberland provides a range of important habitats for a number of key protected species. Coastal areas are recognised as being home to Natterjack Toads and the Small Blue Butterfly. Great Crested Newts, Otters and Red Squirrels are also found throughout the Plan Area. The North Pennines is a breeding zone for Hen Harriers whilst the area in and around Dean Moor is recognised as a Hen Harrier Protection Zone for its function as an overwintering area. The marshes in the northern western part of the area provide important habitat for wild geese and swans and the Duddon Estuary is also very important to overwintering waterfowl and terns in particular¹⁴.
- 12.5 Parts of Cumberland are sparsely populated, with large tracts of open countryside and dark skies. The fertile plain in the northwest is important to the rural economy, supporting dairy, livestock and arable farming.
- 12.6 With these environmental advantages and the protection conferred by statutory designations there can be a perception that Cumberland has fewer environmental issues than other areas. However, the Local Plan will need to ensure that Cumberland's high-quality environment is adequately protected and enhanced and that opportunities for net environmental gains are secured in addition to meeting statutory obligations.

Biodiversity Net Gain

- 12.7 Biological diversity, or 'biodiversity', is the variety of all life on earth, encompassing genes, species and ecosystems. The term includes all species of plants, animals and microorganisms, the genetic diversity within them and the variety of ecosystems and component habitats that support them. Biodiversity is important for its own sake and intrinsic value, but it also supports the vital benefits that humans get from the natural environment.

¹⁴ Cumbria Biodiversity Data Centre - www.cbdc.org.uk

- 12.8 Statistics compiled for the State of Nature Report 2023 show that UK's wildlife is continuing to decline with the result that the UK is now one of the most nature-depleted countries on Earth. The data show that since 1970, UK species have declined by about 19% on average, and nearly one in six species (16.1%) are now threatened with extinction.
- 12.9 The Environment Act 2021 introduced mechanisms to secure improvements to nature and protect and restore the natural environment, including the mandatory requirement for the delivery of net gains for biodiversity through the planning system (Biodiversity Net Gain or BNG) and the preparation of Local Nature Recovery Strategies (LNRS) or 'spatial strategies for nature'. LNRSs are expected to guide the delivery of BNG and other nature recovery measures by helping developers and planning authorities avoid the most valuable existing habitat and focus habitat creation or improvement where it will achieve the most benefits to nature and people. They are the foundation of the Nature Recovery Network, a national network of wildlife-rich places that will improve extend and connect habitats to help address wildlife decline. Work is well underway on the Cumbria Local Nature Recovery Strategy.
- 12.10 It is the intention of the Council to include a policy requirement in the new Cumberland Local Plan for development to deliver 10% BNG to complement the mandatory BNG required by legislation. The policy would enable the Council to apply a sequential approach to the delivery of BNG in terms of location and bring some development that is currently exempt from the legislation within the scope of BNG.

Question 115

Should the Council be considering a policy that requires development to deliver more than 10% BNG? If yes,

- What should the level be, and
- 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?

Green Infrastructure

- 12.11 Green infrastructure (GI) is a network of multi-functional green and blue spaces and other natural features in both urban and rural areas, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity (NPPF, 2024). It can include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.
- 12.12 Well-designed and integrated green infrastructure increases biodiversity, supports wildlife, and enhances climate change resilience by addressing the heat island effect in urban areas and reducing surface water with the use of Sustainable Drainage Systems (SuDS). It is important to human health and wellbeing with green spaces providing opportunities for active travel and physical activity and contributing to improved mental health, whilst economic benefits are shown to accrue from well-designed, attractive environments.
- 12.13 Protecting and enhancing existing green infrastructure assets and incorporating and creating GI within new development is essential, but there is also a need to ensure it is delivered in a coordinated way to ensure that connectivity and functionality is maintained and to secure maximum network benefits.

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).

Green Wedges

- 12.14 Green wedges, or strategic gaps, comprise the open areas around and between parts of settlements that maintain the distinction between the countryside and built-up areas, prevent the visual or physical coalescence (merging) of adjacent places and/or maintain the character and identity of settlements.

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?

Local Green Spaces

- 12.15 Paragraphs 106 to 108 of the NPPF allow communities to identify and protect green areas of particular importance to them through the designation of land as Local Green Space in Local Plans, which provides a much greater degree of protection than general open spaces within settlements.

12.16 The NPPF states that Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance; and
- c) local in character and is not an extensive tract of land.

12.17 Currently, only part of the Cumberland Local Plan area has adopted Local Green Spaces and the Council would like to know whether this policy approach should continue, and if so whether it should be expanded to cover the whole of Cumberland.

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

Trees and Hedgerows

12.18 The NPPF recognises the strong contribution that trees make to the character and quality of the environment and their role in climate mitigation and adaptation. It directs that *“new streets should be tree-lined, opportunities taken to incorporate trees in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...”* (paragraph 136).

12.19 The economic and other benefits of trees and woodland and their contribution to the natural environment are also acknowledged (paragraph 187), and that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists (paragraph 193). Community Forests are seen to offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife.

12.20 The Cumbria Coastal Community Forest launched in 2021 aims to create minimum of 5,000 hectares of new woodland along the western coast of Cumberland. The intention is to create a community forest comprising healthy ribbons of woodland that will improve biodiversity and increases access to nature for local people.

12.21 Hedgerows are an important element of the landscape, contributing to the character of the countryside and functioning as important ecological networks. They provide habitats, function as wildlife corridors and slow soil erosion and

water run-off. They also support crop pollinators and sequester carbon in addition to being of visual, historic and cultural value.

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?

Swift bricks and hedgehog highways

12.22 Many species of plants and animals in England, and often their supporting habitats, are protected by law. There are specific considerations to undertake and procedures to follow especially in connection with European-designated species with an emphasis on avoidance, mitigation and compensation. In some circumstances a license from Natural England may also be required where development affects protected species.

12.23 The mandatory requirement for 10% BNG in the planning system is an approach to development that seeks to leave the natural environment in a measurably better state than beforehand based on the enhancement, management, restoration and creation of wildlife habitats. The Biodiversity Metric used to quantify biodiversity outcomes is based on habitat alone; it does not account for the presence of specific species on the site. BNG does not override the various

existing statutory legal and policy protections in place for protected or priority species and the habitats that support them. They will need to be assessed and carefully considered in any ecological evaluation of the site. Irrespective of the BNG regime there are opportunities to integrate wildlife-friendly spaces and structural features in new development that benefits particular species, some of which may not be statutorily protected.

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)

Protection of agricultural land

- 12.24 The best and most versatile (BMV) agricultural land is land in Grades 1, 2 and 3a of the Agricultural Land Classification (ALC Grades 1, 2 and 3a). The NPPF recognises the economic and other benefits of the BMV land and planning authorities must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares of BMV land if the land is not included within a development plan.
- 12.25 There is little Grade 1 and 2 Agricultural land within Cumberland, with potentially more ALC Grade 3a. Increasing numbers of non-agricultural development schemes such as solar power and battery storage are coming forward in rural areas and have the potential to affect good quality agricultural land.

Question 130

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?

Soil Health

- 12.26 There is an increasing awareness of the importance of soil health to biodiversity. Soil health in the UK is plummeting due to a combination poor waste management, industrial processes, and intensive agriculture. The economic cost of this is currently estimated at £1.5 billion pounds a year; through drops in agricultural yields, increased exposure to erosion and, by extension, flooding.

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?

13. Energy

Renewable Energy

- 13.1 Cumberland has an essential role to play mitigating the effects of Climate Change through its natural aptitude for commercial renewable energy generation. The coastal and rural nature of Cumberland provides a multitude of opportunities for solar, wind and other forms of renewable energy generation.
- 13.2 However, it is important that these developments are located in areas which provide the most potential benefits while minimising the impacts as much as possible.

Question 134

From the options listed below, which option would be the most appropriate approach to dealing with commercial renewable energy?

- The Local Plan should identify broad suitable areas; or
- The Local Plan should allocate specific sites; or
- The Local Plan should provide a criteria-based policy against which all commercial renewable energy generation developments are determined; or
- The Local Plan seek to use a combination of the approaches identified above; or
- None of the above

Question 135

If you consider that the Local Plan should either identify suitable areas or allocate specific sites for commercial renewable energy generation, what principles should be used to guide their identification?

Question 136

Do you consider that Cumberland should set targets for different types of local renewable energy generation?

Battery Storage

- 13.3 Electricity storage technologies (including battery storage) allow surplus electricity to be stored until it is required. Electricity storage can be used with a range of renewable generation to help provide a more constant supply. It can also provide flexibility services to help balance the electricity grid, as well as help reduce the power that is needed to be carried on certain parts of the network. Battery storage can also be deployed at a range of scales. For example, domestic battery storage can store excess electricity from a household's rooftop solar panels, whilst large utility battery storage can store excess electricity from a power generator, such as a wind farm or solar farm.

Question 137

Should the Local Plan include a specific policy on battery storage development? If yes, what should it include?

Decentralised Energy Systems

- 13.4 Decentralised energy systems supply heat and/or power to specific residential or commercial developments or localities. This may be by capturing waste heat from other processes or generated on site. Decentralised energy systems can be the most efficient way to provide energy, heating and cooling to homes where a development is of sufficient size, mix of uses and density to make such a scheme viable. This may be in the form of District Heating Systems (heat only), Combined Heat and Power, or Micro-grid (power only).

Question 138

From the options listed below, which option would be the most appropriate approach to dealing with decentralised energy systems?

- A Local Plan policy that requires decentralised energy systems to be utilised for developments over a certain size threshold, where viable (if yes, what should be the threshold?); or
- A Local Plan policy that encourages the consideration of decentralised energy systems in developments; or
- A Local Plan policy that requires decentralised energy system infrastructure to form part of the design of development that can connect to future systems; or
- Other, please specify; or
- None of the above

Question 139

Are there any issues relating to energy which you think that the Local Plan needs to address that have not been identified in this chapter?

14. Connectivity and Infrastructure

Sustainable Transport

- 14.1 Improving sustainable transport options and infrastructure is key to supporting sustainable growth within Cumberland, both for those who live in the area and those who visit for leisure and business purposes. It is particularly important to direct new development to locations with strong public transport access and to improve access to public transport and walking and cycling infrastructure in those areas where there are low car ownership levels (for example through Local Cycling and Walking Infrastructure Plans, the Bus Service Improvement Plan and the emerging Cumberland Local Transport Plan).
- 14.2 Improving sustainable transport options will have the additional benefits of contributing to improvements in carbon emissions, congestion, air quality and public health.
- 14.3 However, it is acknowledged that this can be difficult in many places within Cumberland given its highly rural nature and this can make it difficult for people to easily get around places and access services.

Question 140

What can the Local Plan do to encourage you to rely less on private modes of transport and to use public transport more, especially for shorter journeys and in urban areas?

Question 141

How can the Local Plan ensure that new developments are designed to give priority to pedestrian and cycle movements over private vehicle movements?

Question 142

Which areas in Cumberland would benefit from improved cycling and walking infrastructure? What kind of infrastructure would you like to see in these areas that will link to existing networks?

Question 143

In which areas is more cycle parking required?

Strategic Connectivity

- 14.4 The Port of Workington has a key role as a strategic gateway and economic driver for the West Cumbria economy. It aims to expand its core customer base and develop skills and facilities to support green industries and logistics, assuming the role of a key multi-modal hub for Cumbria.
- 14.5 The Port of Silloth also makes a significant contribution to the local economy. Its facilities and services support the region's farming industry through the importing

of Agribulks. Imported grain is directly delivered to the Carr's Flour Mills within the port, with molasses also stored and distributed from the port; it also handles specialist windfarm components for nearby onshore windfarms. It is currently safeguarded in the Minerals and Waste Local Plan as having potential for the sustainable transport of minerals and waste.

- 14.6 Whilst smaller in scale, but with potential to further develop, Port of Millom provides a number of key marine services to commerce and industry for south and west Cumberland and the wider North West region.

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?

- 14.7 Carlisle Airport represents a strategic economic and transport asset in Cumberland and the Local Plan has a role in supporting its development and secure a long-term sustainable future.

Question 145

Is the current Carlisle Airport policy in the Carlisle Local Plan (Policy IP7¹⁵) still relevant and effective? If not, please state why and suggest how it could be improved.

Question 146

Are there particular opportunities that a policy should include to ensure a sustainable future for Carlisle Airport? If yes, please provide further details.

Priorities for Developer Contributions

- 14.8 When determining planning applications, the Council can ask the applicant to provide contributions towards the provision of infrastructure which is required to support the development (e.g. roads, schools and open space) to make it acceptable in planning terms and to create sustainable communities.
- 14.9 Each development is likely to have some surplus revenue when things like development costs (e.g. land value and building costs) and developer profit are taken into consideration and then compared to the value expected to be generated by the development; this is known as development viability.
- 14.10 The viability of developments can sometimes be limited due to issues such as unforeseen abnormal site costs (e.g. ground contamination and ground conditions) and local market conditions (such as lower sales values). In these circumstances, the Council may be limited in the type/amount of infrastructure it can seek due to financial viability restrictions, and as such it may be necessary to prioritise the infrastructure that is negotiated.

¹⁵ www.carlisle.gov.uk/Portals/24/Documents/Local_Plan/Carlisle%20District%20Local%20Plan%202015-2030/Carlisle%20District%20Local%20Plan%202015-2030.pdf?ver=jDXfEK0YJ9ZjI0i0jPvGuw%3d%3d

Question 147

What do you think are the key infrastructure priorities for Cumberland? Please select all options that you consider are relevant.

- Active Travel
- Affordable Housing
- Community Facilities (e.g. libraries, playgrounds)
- Education (primary, secondary, higher and further education)
- Flooding
- Health
- Highways (road networks)
- Open space/playing fields
- Public transport
- Other (please specify):

Question 148

How best can the identified infrastructure priorities be delivered (e.g. financial legal agreements, delivered on site by developers)?

Electric Charging Points

- 14.11 It is expected that the number of electric vehicles being used will continue to increase, with the Government's aim to eventually phase out the sale of new petrol and diesel cars and vans.
- 14.12 One of the main drivers in the expansion of the electric vehicle sector is the national target of net-zero carbon emissions by 2050; transport is the largest emitting sector in the UK economy, with over half of vehicle emissions coming from cars¹⁶.
- 14.13 To support this expansion, the Government updated Building Regulations Part S in 2022¹⁷ to require most types of development (both new and major renovations) to install electric vehicle charge points. The Regulations set out how many charge points will be required for each type of development. For example, Part S1 states that all new residential dwellings that have associated parking must have access to electric vehicle charge points.
- 14.14 Part S4 relates to the erection of new buildings which are not residential or mixed-use; if a development of this type has 10 or more parking spaces, then one of those parking spaces must have access to at least one electric charge vehicle charge point, with cable routes for at least one in every five parking spaces.

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

¹⁶ <https://commonslibrary.parliament.uk/research-briefings/cbp-7480/>

¹⁷ https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf

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 151

Is there a requirement for Electric Vehicle charge points at non-residential development locations (e.g. tourist locations, key travel corridors, retail/business parks)? If so, where?

Digital Connectivity

- 14.15 Digital connectivity, both fixed location and mobile, is critical to facilitating corporate economic ambitions. It is also key to support the provision of electric charge points across Cumberland as the charge points need both power and digital connectivity, ideally both fixed line and mobile coverage by all major networks, to be utilised effectively.
- 14.16 While a great deal of work has been undertaken to ensure connectivity to existing communities over the past 10 years, as of July 2025 over 71% of Cumberland properties are able to access gigabit services, it is essential that connectivity provision is considered for all new developments to prevent exclusion, deliver excellent public services and support inclusive economic growth.
- 14.17 The Buildings (Amendment) (England) (No.2) Regulations 2022 introduced gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England. Developers are required to provide a connectivity plan to demonstrate how they will ensure that physical infrastructure and a functional gigabit connection will be made available to each dwelling. These national regulations are subject to a cost cap of £2,000 per dwelling to install and there is a risk that this cap will be exceeded in very rural areas.
- 14.18 The UK Government target is for 4G and 5G mobile connectivity to be available in all communities and transport corridors. As of July 2025, outdoor 4G connectivity from all mobile networks is available to over 76% of the Cumberland landmass however 5G coverage is still limited and more infrastructure will be required to expand this critical national infrastructure. Robust and universal mobile coverage is increasingly important as the UK's telecoms networks transition to digital calling and mobile connectivity will become the primary option for making voice calls during power disruption.

Question 152

In order to ensure that developers consider reasonable provision of broadband infrastructure and connectivity requirements for new homes in locations in the more rural locations of Cumberland, should the Local Plan require all new developments to

be connection ready for superfast broadband or should the requirement only apply to developments of a certain size? If so, what should threshold be?

Overnight lorry parks

14.19 HGV drivers should have access to a safe place to park that is on level ground, in well-marked bays, with good lighting and facilities and with appropriate security measures in place.

Question 153

Are the lack of suitable overnight lorry parks an issue in Cumberland? If so, where is the need?

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?

15. Minerals

- 15.1 Together, Cumberland Council and Westmorland and Furness Council will plan strategically for the supply of aggregates across Cumbria.
- 15.2 The majority of sand and gravel quarries are located within Cumberland, and whilst the majority of crushed rock reserves and quarries are located within Westmorland and Furness, we are home to important quarries which produce nationally and internationally important aggregates.
- 15.3 Supply and demand for these aggregates is monitored annually through production of a Local Aggregates Assessment produced jointly between the two councils together with the Lake District National Park Authority which is also a minerals planning authority (MPA) and has some crushed rock quarries within its boundaries as well as smaller sites for extraction of building stone.

Managing our future supply of aggregate minerals

- 15.4 When planning for minerals, there are three broad categories that need to be considered – aggregate minerals (e.g. sand and gravel and crushed rock including limestone and sandstone) that are used in construction for buildings, roads and other infrastructure; energy minerals (e.g. coal but also oil and other hydrocarbons such as shale gas) used for fuel, and industrial minerals (e.g. industrial grade limestone used in steel making or pharmaceuticals; gypsum for plaster and plasterboard; clay for brick-making, and peat used for horticultural purposes).
- 15.5 Each of these require a different policy approach and all are currently included within the Cumbria Minerals and Waste Local Plan (CMWLP). In addition, critical minerals (e.g. lithium used for batteries and zinc) are becoming increasingly important in today's technological world. There is also a need to maintain an appropriate supply of local building stone and slate where there is a need for local stone to match the local architectural style and for conservation and repair of heritage assets.
- 15.6 For aggregate minerals, the NPPF requires minerals planning authorities to maintain a land bank of at least seven years' supply for sand and gravel, and 10 years supply for crushed rock. Therefore we need to have enough 'permitted reserves' (with planning permission in place to allow its extraction) to last for the next seven or 10 years based on expected demand.
- 15.7 The latest Local Aggregates Assessment shows that across Cumbria we currently have a landbank of less than six years for sand and gravel that could potentially run out by the end of 2028, and a landbank of 40 years for crushed rock. The crushed rock reserves in Cumbria include High and Very High specification aggregates which are essential for the building and maintenance of roads, especially motorways, because of their high or very high skid resistance properties. Cumberland is in a unique position, having the only quarry in England to produce the Very High specification aggregates which are geologically rare and therefore a nationally important resource.

- 15.8 St. Bees Sandstone is an internationally important product as it is highly sought after for use in projects in the USA and Canada.
- 15.9 Secondary and recycled aggregates (e.g. slate and other quarry waste, or aggregate produced by the crushing/recycling of inert construction and demolition waste) should also be encouraged through appropriate planning policy.
- 15.10 When developing the minerals policies in the Cumberland Local Plan we need to consider a range of issues including: the most appropriate policy approach to maintain the required landbank of aggregate minerals (at least seven years for sand and gravel and at least 10 years for crushed rock); what are the appropriate types of minerals to plan for and how do we manage their supply going forward; the most effective way to safeguard our existing mineral resources and prevent their sterilisation by non-minerals development; how minerals extraction should be managed to ensure it has a positive impact on climate change and biodiversity net gain.

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? or
- The Local Plan should have a policy that is flexible enough to allow viable mineral extraction to be considered on its own merits? or
- A combination of the above?

Question 157

Should we consider including more Site Allocations than we potentially need to make sure sufficient aggregate reserves come forward to maintain the required landbanks throughout the Plan period (at least seven years for sand and gravel and 10 years for crushed rock)?

Energy minerals and industrial minerals

- 15.11 The CMWLP currently includes policies relating to the following energy minerals – coal, oil and gas (including hydrocarbons and underground coal gasification).

Question 158

What type of energy minerals do you think the new Cumberland Local Plan should plan for?

- 15.12 The CMWLP currently includes policies relating to the following industrial minerals: gypsum, brick clay/mudstones, industrial limestone and peat.

Question 159

What types of industrial or critical minerals do you think the new Cumberland Local Plan should plan for?

Safeguarding our existing mineral resources

- 15.13 The CMWLP safeguards known minerals resources through the designation of a Minerals Consultation Area and Minerals Safeguarding Area as part of the Policies Map. It is a requirement of Policy DC15 (minerals safeguarding) that all non-minerals development proposals (e.g. housing, commercial) within the Minerals Safeguarding Area (MSA) should extract any viable minerals resources present, prior to construction.
- 15.14 Proposals for non-minerals development within the MSA that do not allow for the prior extraction of minerals will only be permitted where: the need for the development outweighs the need to extract the mineral; it can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to development taking place; it can be clearly demonstrated that the mineral is either not present or of no economic value or would lead to land stability problems, or is too deep to extract in relation to the proposed development; and the development would not prevent mineral extraction taking place in the future.
- 15.15 A fifth criterion refers to a list of developments that are exempt from the need to consult the MPA on whether or not prior extraction should be required. Examples of these exemptions include applications for householder development; applications for reserved matters after the outline consent has been granted, or where the site has already been assessed on the need for prior extraction as part of the Site Allocation process for that Local Plan.
- 15.16 Prior to Local Government Reorganisation (LGR), implementation of this policy was through each of the relevant district councils consulting the County Council as MPA on planning applications for non-minerals development to establish whether the applicant should consider the need for prior extraction.
- 15.17 As a unitary authority, Cumberland Council is the MPA so the policies on minerals safeguarding can now be incorporated within the Cumberland Local Plan.
- 15.18 As part of the review of the CMWLP it was noted that this policy was not being applied consistently to all planning applications for non-minerals development. There is no clear policy guidance on how a developer should demonstrate, with reference to the various criteria, that prior extraction of the mineral is not justified. For example through the submission of a Mineral Resource Assessment as part of the planning application; this would be required to assess the type and quality of the mineral resource present, its economic value and viability for prior extraction (e.g. market interest, site constraints). The level of detail required would be proportionate to the nature of the development.

15.19 It is also clear that there are other forms of development that are not currently included on the list of exemptions which do not trigger the need for prior extraction to be considered. Examples of additional development that could be exempted from the need to consider prior extraction include the covering over of farm yard areas and variation of conditions relating to matters such as design or operational hours that do not change the principle of the original development approved.

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?

16. Waste

- 16.1 The Council is responsible for disposing of items that people no longer need or want; the waste hierarchy ranks how the waste is managed and dealt with. The focus is on prevention, but secondly to re-use material where possible either through repairing/refurbishing the items or by turning the waste into a new product through recycling.
- 16.2 If this is not possible, then the waste can be 'recovered' which is where items that are at the end of their usable life are used to produce energy or raw materials. For waste which cannot be reused, recycled or recovered, then the material will be sent to landfill or incinerated.
- 16.3 The Council currently hosts waste services for both Cumberland and Westmorland and Furness and this arrangement is expected to continue until 2034 when the waste disposal contract between the council and Biffa (formerly Renewi) comes to an end.
- 16.4 Linked to the waste disposal contract is the operation of the two Mechanical Biological Treatment (MBT) plants at Hespin Wood, Carlisle (Cumberland) and Sowerby Woods, Barrow (Westmorland and Furness). Currently residual waste is contracted to be disposed of at these sites but once the contract comes to an end, alternative arrangements will need to be made. The last Waste Needs Assessment (published in 2022 by Cumbria County Council) identifies a gap in capacity for managing this residual waste once these contracts end.
- 16.5 2034, when the current waste contract ends, will fall within the Plan period for the new Cumberland Local Plan. We need to ensure that waste planning policies within the Plan provide enough flexibility to accommodate the Council's waste management needs now and for this future stage.
- 16.6 We already know that requirements for separate collection and recycling of food waste will have an impact on the type of facilities required. We also know that many of the household waste and recycling centres (HWRCs) are not ideally sized or located to allow for the provision of modern, efficient facilities and previous Site Allocations for replacement HWRC facilities made in the CMWLP have not come forward. It is also likely that new technologies for waste management will be developed that may be considered more appropriate than the facilities currently planned for in the CMWLP. Exact requirements will become clearer over time as a new waste strategy is developed for the Council which the new Local Plan will help to implement.
- 16.7 When developing our waste policies in the Cumberland Local Plan we need to consider a range of issues including: the most appropriate policy approach to direct the location of new or extended waste management facilities; what are the appropriate types of waste management facility and associated infrastructure to plan for; the need to safeguard existing waste management facilities; the contribution waste planning policies can have on achieving the council's broader objectives around the circular economy, climate change and net zero ambitions.

- 16.8 As well as planning for the very low level radioactive wastes typically associated with universities and hospitals, Cumberland Council is also unique in hosting the majority of the UK's legacy nuclear waste at Sellafield and the Low Level Waste Repository so our Plan needs to include policies that deal with the management of both low level and high level radioactive wastes as well as boundary level waste which is waste that sits between the low and high levels.
- 16.9 Again, the issues around radioactive waste management are changing. The re-characterisation of some lower level radioactive wastes means that more mainstream waste management options, including recycling, landfill and on-site disposal, may now be considered suitable. Planned decommissioning of Sellafield and other nuclear sites in the UK means there will be an increased demand for management and disposal of these lower level radioactive wastes. There is also the ongoing siting process for the planned Geological Disposal Facility (to provide final disposal for the UK's higher level radioactive wastes), for which there are currently two Areas of Search within Cumberland Council.
- 16.10 In addition, recent government policy (May 2024) announced proposals to explore smaller Near Surface Disposal sites to dispose of less hazardous radioactive waste within a shorter timescale. So, we need to consider whether the current radioactive waste management policies in the CMWLP are sufficient to bring forward or whether additional policy requirements should be included.

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?

Question 166

Should there be fewer but larger waste facilities located in strategic locations, or should there be more facilities which are smaller in size but more dispersed across Cumberland? Or should it be a mix of the two approaches?

Question 167

Where would HWRC sites be best located within Cumberland to allow residents convenient access to recycle their waste and provide an efficient and manageable network for the council's waste collection services?

Question 168

Are there new waste treatment and management technologies that we need to plan differently for? And are there current technologies that we should no longer be planning for or should apply different criteria to?

Question 169

Which of the following policy approaches should we use for directing the location of new waste management facilities?

- Formal site allocations which establish the principle of certain waste management facilities being permitted on that site? or
- Broad areas which indicate broader locations (not specific sites) that are considered most likely to be acceptable for waste management facilities? or
- Flexible criteria-based policy allowing proposals to be assessed on a case- by- case basis? or
- A combination of the above?

Question 170

Should we be safeguarding all existing waste management facilities to ensure their continued viability for future use?

Question 171

What should our policies on radioactive waste management include, taking into account the planned decommissioning of Sellafield and other nuclear sites in the UK, as well as proposals 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?

Glossary

Active Travel – physically active journeys and movement that involves walking, wheeling and cycling.

Affordable housing – homes for rent or sale for residents whose needs are not being met by the private sector. Homes are available for rent or sale at a price below the market value.

Allocated sites – sites designated for a specific type of development in a Local Plan.

Biodiversity Net Gain – requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development.

Brownfield Land – land which has been previously developed, excluding gardens of houses, agricultural land and forestry land.

Coastal Change Management Area – areas identified as likely to be affected by physical changes to the shoreline through erosion, coastal landslip, permanent inundation or coastal acceleration.

Custom Build Housing – homes which are commissioned by a person and designed to their specification by a specialist developer.

Density – the amount of housing or people within a specific area (normally per hectare or km²).

Design Code – a set of design requirements for the physical development of a site or area.

Green Infrastructure – all green spaces which are new and existing, rural and urban, natural and managed, which have developed as a network of spaces and linking 'corridors'. The purpose of green infrastructure is to promote biodiversity as well as supporting the health and quality of life of communities.

Green Wedges – designations on the Policies Map to deter future development in a specific area to prevent the erosion of the defined gap between two settlements.

Greenfield Land – land which has never been built on before or where the remains of any structure or activity have blended into the landscape over time. This applies to most sites outside of built up area boundaries.

Heritage Coast – areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility to visitors.

Heritage Statements – a document that is submitted with a planning application which assesses the potential impact of the development on relevant heritage assets.

Infrastructure – essential facilities and services needed to create neighbourhoods and support new development. It refers to the full range of transport networks, utilities,

services and facilities such as roads, sewers, as well as social infrastructure such as schools and healthcare centres.

Legacy Authorities – the former authorities (Allerdale Borough Council, Carlisle City Council, Copeland Borough Council and Cumbria County Council) that made up what is now Cumberland Council prior to the Local Government Reorganisation on 1st April 2023.

Local Cycling and Walking Infrastructure Plans – document that sets out the strategic approach to improving cycling and walking infrastructure in specific locations.

Local Development Scheme – a document produced by the Council which sets out the scope and timetable for producing a Local Plan and other planning policy documents.

Local Plan – a document that sets out the plan for the future development of an area which is created by the Council in consultation with the local community.

National Landscapes – areas designated for their natural beauty and high landscape value (formerly known as Areas of Outstanding Natural Beauty).

Nationally Significant Infrastructure Projects – larger scale major infrastructure projects determined by the Planning Inspectorate which relate to energy, transport, waste, waste water and water.

Net Zero Carbon – achieving a balance where the amount of greenhouse gas emissions produced from an activity is offset by the same amount that is removed from the environment.

Permitted Development Rights – householder development that can take place without the need for planning permission.

Plan Period – the timescale covered by a Local Plan; a minimum of 15 years from the adoption of the document.

Renewable Energy – energy that comes from natural sources and is continuous (e.g. from the wind, sun and tide).

Self-Build Housing – homes built by individuals or communities who organise the design and construction of their own homes.

Settlement Hierarchy – settlements that are categorised into a hierarchy based on a set criteria.

Stakeholder – any person with an interest in the Local Plan and wider planning policy.

Sustainable Development – meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable Transport – modes of transport that is accessible and efficient whilst having an overall low impact on the environment (e.g. active travel, public transport and low emission or electric vehicles).

Sustainable Drainage Systems – drainage systems that absorb rainwater back into the ground rather than into man-made drains and sewers.