



Cumberland Local Plan

Issues and Options Feedback Report

September 2026

Contents

Introduction	3
1 Summary of Consultation Undertaken	4
2 Summary of Consultation Responses	5
High-level summary	5
Key takeaways to topic areas	6
Comments made to the SA Scoping Report	10
3 Next steps in the preparation of the Local Plan	11
Appendix A: Summary of feedback from the graffiti wall	12
Appendix B: Summary of Representations made to the Summary Document.....	24
Appendix C: Summary of Representations made to the Main Document	43
Appendix D: Summary of Representations made to the SA Scoping Report.....	157

Introduction

This Feedback Report has been prepared to summarise and conclude upon the Issues and Options Consultation that formed the first stage of public engagement in the preparation of the new local plan for Cumberland.

The Cumberland Local Plan Issues and Options Consultation took place between 1 September and 31 October 2025. Although this early stage of the plan-making process is 'non-statutory', meaning there is no legal requirement to carry it out, it is regarded as an important first step. It provides an opportunity to identify issues and opportunities across Cumberland at the outset of preparing the new local plan. This included identifying and considering challenges and opportunities relating to housing, infrastructure, jobs and the environment.

Please note, the Issues and Options Consultation relates to the areas of Cumberland which are outside the St. Cuthbert's Garden Village (Carlisle) and the Lake District National Park as these areas are covered by separate Local Plans (which can be viewed online at www.tcuthbertsgv.co.uk and www.lakedistrict.gov.uk/planning/planningpolicies/local-plan).

Purpose and Scope

The purpose of this feedback report is to summarise the consultation process and provide an initial response on how the main issues and comments raised during the Issues and Options Consultation will inform the development of the emerging Cumberland Local Plan.

This report sets out:

- Section 1: Summary of consultation undertaken
- Section 2: Summary of consultation responses
- Section 3: Next steps in the preparation of the Local Plan

Please note that, as the Council is still at an early stage in plan-making, it is not possible to provide definitive responses to each individual comment. However, the main issues identified during the consultation are summarised in this report and will be considered in greater detail as the Council progresses with developing the local plan.

1 Summary of Consultation Undertaken

- 1.1 An 8-week programme of consultation took place between 1 September and 31 October 2025.
- 1.2 The package of consultation documents published comprised:
 - Issues and Options Consultation Main Document - a comprehensive set of detailed questions covering a range of place making topics.
 - Issues and Options Consultation Summary Document - containing the same topics as the Main document but asking more general questions about each.
 - Sustainability Appraisal (SA) Scoping Report - identifying the proposed framework of the SA against which the potential impacts of the emerging Local Plan will be assessed.
- 1.3 In addition to the main documents, a consultation response form and Frequently Asked Questions (FAQs) document were also made available.
- 1.4 Respondents were able to view all consultation material on the Council's website, and where able to submit comments in several ways; these being through the online consultation form, by email or by post.
- 1.5 The Council notified all contacts registered on its Local Plan Consultation database. These included public, statutory agencies such as neighbouring Councils and Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.
- 1.6 The Council used its official social media accounts on Twitter and Facebook to promote the consultation consistently throughout the consultation window. Promotional posters were also produced to promote the consultation opportunity and were displayed in libraries, public buildings and Parish Council noticeboards across Cumberland.

Public Drop-in Sessions

- 1.7 To support the consultation, by providing an opportunity for local residents to view the consultation material and directly discuss with Council officers, the Council held sixteen public drop-in sessions at key locations across Cumberland.
- 1.8 In total more than 300 people attended the drop-in sessions. Feedback was collected at each drop-in event using a graffiti wall; this feedback is summarised in Appendix A.

2 Summary of Consultation Responses

- 2.1 In total, 225 people responded to the Issues and Options consultation. This included:
- 180 people made comments on the main consultation document
 - 40 people made comments on the summary document
 - 5 people made comments on the SA Scoping Report
- 2.2 Alongside the formal responses, hundreds more views were captured at public drop-in sessions using a graffiti-wall exercise; this feedback captures a broad range of valuable localised issues and is summarised in Appendix A.
- 2.3 An analysis of the feedback collected during the consultation is set out below.

High-level summary

- 2.4 The consultation feedback across the main Issues and Options document, the summary consultation document, and the drop-in sessions paints a consistent picture of a place that values its distinctive landscapes, communities and heritage, while recognising the need for planned, sustainable growth.
- 2.5 Respondents emphasised the importance of development that is well-designed, appropriately located, and supported by robust infrastructure, with strong preferences for brownfield-first development, smaller-scale growth in villages, and the revitalisation of empty or underused sites.
- 2.6 Across all consultation routes, people highlighted the need for a diverse mix of affordable, energy-efficient homes, designed to meet the needs of older residents, young families, and people with disabilities, alongside strong concern about the impacts of second homes, holiday lets, and generic large-scale developments.
- 2.7 Feedback pointed to a desire for stronger, more resilient communities supported by reliable public transport, safe walking and cycling routes, improved healthcare access, adequate school places, and better drainage, digital connectivity and utilities. Drop-in session comments especially highlighted the strain on existing infrastructure, from overloaded schools and GPs to unreliable buses, poor road conditions, flooding, and overwhelmed utilities, reinforcing concerns raised in the feedback received from the consultation documents. Respondents also stressed the importance of vibrant, accessible town centres with repurposed vacant buildings, better parking and public facilities, stronger support for local businesses, and more cultural, leisure and youth activities.

- 2.8 Across all three consultation streams, there was a clear expectation that the Local Plan should support a resilient and diverse economy while protecting the area's environmental assets. This included support for green jobs, sustainable farming, nature recovery, renewable energy, and climate-adaptive design, alongside strong concerns about flooding, coastal erosion, water quality, and the long-term sustainability of new development.
- 2.9 People want a Local Plan that strengthens local identity, supports the wellbeing of all age groups, protects valued green spaces and habitats, and ensures that future growth is sustainable, well-served, and reflective of Cumberland's unique communities and landscapes.

Key takeaways to topic areas

- 2.10 The following provides a high-level summary of the feedback received from both the Issues and Options main consultation document and the summary document, highlighting the main messages raised across all core topic areas.
- 2.11 Given the technical nature of the consultation, a detailed question-by-question account of the responses received is set out in Appendix B (Summary Consultation Document) and Appendix C (Main Consultation Document).

Vision and Objectives

- 2.12 Main document: Respondents broadly supported the draft Vision but asked for clearer commitments to environmental protection, nuclear safety, climate resilience, active and sustainable transport, and strong links between nature, culture and wellbeing. They also wanted more precision regarding the spatial hierarchy, housing needs, and how the Vision supports both economic growth and resilience.
- 2.13 Summary document reinforced/added: People emphasised the importance of ensuring that investment in infrastructure and services is fairly distributed across Cumberland, alongside better access to nature in urban as well as rural areas. They also wanted a greater focus on healthy lifestyles, inclusive planning, and clearer monitoring of progress.

Strategic Issues

- 2.14 Main document: Strategic concerns include climate adaptation, flood and water management, cross-boundary infrastructure, and demographic change. Respondents also highlighted pressures from tourism, service capacity challenges, and the importance of aligning housing, employment, skills and environmental priorities across administrative boundaries.

- 2.15 Summary document reinforced/added: Residents emphasised the need to reduce reliance on private cars, improve rural mobility, support high-quality jobs, and ensure regular communication about progress. They also suggested strengthening objectives on healthy environments, wildlife protection, and near-zero-carbon housing.

The Development Strategy

- 2.16 Main document: People supported a balanced distribution of growth that reflects local infrastructure, transport connectivity, settlement roles and land constraints. There was strong support for brownfield-first principles, though with flexibility to ensure deliverability, and general support for using settlement boundaries appropriately.
- 2.17 Summary document reinforced/added: Residents reiterated that brownfield land should be prioritised and highlighted concerns about infrastructure capacity, particularly sewage, traffic and schools. They stressed the importance of maintaining village identity, protecting green spaces, and ensuring communities are not cut off from transport or essential services.

Housing

- 2.18 Main document: Respondents called for a wider mix of homes, including affordable housing, accessible and adaptable homes, alongside measures to address pressures from second homes and short-term lets. They supported quality design, energy-efficient homes, small and medium sites, and bringing empty homes back into use.
- 2.19 Summary document reinforced/added: People emphasised the lack of affordable housing in high-pressure areas, the need for retrofitting and healthy housing standards, and more transparency in affordable housing delivery. They also highlighted shortages of bungalows for older residents, the importance of active-travel-friendly neighbourhoods, and better use of vacant buildings in town centres.

Economy

- 2.20 Main document: There was strong support for protecting strategic employment sites, enhancing the nuclear and clean-energy sectors, supporting SMEs and diversifying the economic base. Respondents also highlighted the importance of digital and transport infrastructure, flexible workspace, and linking housing growth with employment opportunities.
- 2.21 Summary document reinforced/added: Residents emphasised the need for higher-quality job opportunities, stronger support for local shops, and improvements to transport links that help people access employment and training. They also raised concerns about tourism-led economic pressures, the need for business hubs for home-workers, and protecting productive agricultural land.

Town Centres

- 2.22 Main document: Respondents want town centres to continue evolving as attractive, mixed-use places that combine shopping with leisure, cultural activities, community spaces, and high-quality public realm. They highlighted the need for improved green infrastructure, safer and more appealing pedestrian environments, and better integration of housing within town centres. Out-of-town retail was viewed as a threat to the vitality of existing centres, and respondents supported the use of temporary pop-up or short-term community and business activities to animate vacant premises and maintain vibrancy.
- 2.23 Summary document reinforced/added: People asked for free or reduced parking, better public facilities (especially toilets and seating), and more activities for young people. They also supported converting empty units into cultural, community or residential uses, clearer sustainable transport routes, and more pedestrian-friendly public spaces.

Health and Quality of Life

- 2.24 Main document: Health and wellbeing themes centred on improving access to green and blue spaces, active travel routes, sports and play provision, and ensuring new development contributes to healthcare capacity. Many supported the use of Health Impact Assessments for large or sensitive developments.
- 2.25 Summary document reinforced/added: People highlighted rural isolation, limited public transport, poor disabled access, and a shortage of social spaces for older residents. There was also a strong focus on healthy food, outdoor activity, local growing opportunities and safe infrastructure for walking and cycling.

Built Environment

- 2.26 Main document: Respondents supported strong design standards that reflect local character, enhance sustainability, and integrate nature-positive features such as habitat bricks and hedgehog highways. Design codes should be used proportionately to avoid undue burdens, with clear attention to heritage, landscape and long-term quality.
- 2.27 Summary document reinforced/added: Respondents emphasised using vacant buildings before new development, designing for mental health and wellbeing, providing better public conveniences, and ensuring green spaces are included in all developments. They also highlighted issues around surface-water management, accessible routes and the maintenance of historic buildings.

Climate Change

- 2.28 Main document: Climate-related feedback focused on the need for resilient development, sustainable drainage (SuDS), whole-life carbon reduction and prioritising low-carbon energy solutions. Respondents also stressed the need to address coastal change, flood risk and the impact of extreme weather on communities and infrastructure.
- 2.29 Summary document reinforced/added: Residents asked for more active-travel routes, electric public transport, urban greening, and policies to reduce car dependency. They also called for sustainable farming, rewilding, renewable energy expansion, watercourse maintenance and climate-adaptive building design.

Environment

- 2.30 Main document: Key environmental priorities include protecting landscapes, water quality, soils, habitats and species, and ensuring strong alignment with the Local Nature Recovery Strategy. Many called for ambitious Biodiversity Net Gain requirements, improved pollution management, and nature-based solutions to support ecological recovery.
- 2.31 Summary document reinforced/added: People stressed the need for environmentally sustainable farming practices, local conservation support, tree planting, recycling on the go, green wedges and better waste-reduction measures. They also highlighted conflicts between development and wildlife, emphasising the need for local mitigation rather than distant offsetting.

Energy

- 2.32 Main document: There was strong support for renewable energy, particularly solar, alongside recognition of the continued national importance of the nuclear sector. Respondents noted the need for grid upgrades, careful siting of infrastructure, and balanced policies that consider landscape, amenity and safety.
- 2.33 Summary document reinforced/added: People raised issues about local benefits from renewable energy schemes, retrofitting older homes, insulation, micro-generation, and fair compensation for affected communities. They also referenced reopening rail stations to support low-carbon transport and questioned the suitability of energy-intensive developments such as data centres

Connectivity and Infrastructure

- 2.34 Main document: Respondents emphasised the need for improved public transport, rail resilience, safe walking and cycling routes, and better digital connectivity. They also stressed the importance of infrastructure being delivered in step with new development.

- 2.35 Summary document reinforced/added: Residents highlighted severe bus service gaps, dangerous roads, slow broadband roll-out, and barriers to employment caused by transport limitations. They asked for more cycling infrastructure, better car-free environments, EV charging, public conveniences, and improved community facilities

Minerals & Waste

- 2.36 Main document: Respondents raised concerns about environmental, landscape and transport impacts of mineral extraction, supported low-carbon practices and emphasised strong restoration requirements. Waste comments focused on circular economy approaches, new recycling technologies, and nuclear waste safety.
- 2.37 Summary document reinforced/added: People asked for reduced mineral-related HGV impacts, more recycling facilities, education on waste reduction, and support for repair, reuse and upcycling initiatives. They also expressed strong concerns about nuclear waste imports, disposal methods and long-term risk, requesting clear policy direction and safeguards

Comments made to the SA Scoping Report

- 2.38 Stakeholders provided a broad range of views across all Sustainability Appraisal topics. Overall, responses highlighted both support for the draft objectives and a desire for greater clarity, ambition, and measurable outcomes in several areas. Key themes included the importance of protecting the environment, managing climate and flood risks, safeguarding biodiversity, supporting high-quality and locally appropriate development, and ensuring infrastructure and services keep pace with community needs. Some respondents also called for stronger recognition of local circumstances, improved consultation processes, and clearer alignment with national policy.
- 2.39 A comprehensive, question-by-question summary of all comments is provided in Appendix D.

3 Next steps in the preparation of the Local Plan

- 3.1 The Issues and Options consultation took place between September and October 2025; since then, the national plan-making system has undergone significant reform, meaning all local planning authorities must now prepare Local Plans using the Government's new plan-making process.

A new Plan-Making process for Local Plans

- 3.2 In March 2026, the Government formally brought into force the new regulations that set out how Local Plans must now be prepared. The Town and Country Planning (Local Planning) (England) Regulations 2026 were signed into law and will come into effect on 25 March 2026, replacing the 2012 Regulations. This marks the start of a new plan-making system with a clearer structure, national guidance, and a fixed 30-month timetable for producing a Local Plan.
- 3.3 Alongside the Regulations, MHCLG also published updated guidance and a new national Plan-Making Roadmap on 2 March 2026 to support councils in transitioning to the new system. The new process includes defined "Gateway" stages, new procedural requirements, and strengthened expectations around digital engagement and consistent evidence.
- 3.4 A new National Planning Policy Framework (NPPF) is also expected to be published in summer 2026, which will further shape the policies that Local Plans must follow.

What this means for the Cumberland Local Plan

- 3.5 The work completed for the Issues and Options consultation will not be lost. Instead, it now becomes an important part of the evidence base for preparing the new Local Plan under the updated national system. The themes, issues and feedback captured from respondents during the Issues and Options Consultation will inform the direction of the new Local Plan, and there will be further opportunities for communities, stakeholders and organisations to be consulted and to engage throughout the new plan-making process.
- 3.6 The Council remains committed to preparing a Local Plan that responds to local priorities while meeting national requirements and will in due course prepare a Local Plan Timetable; this will set out the key stages of the new plan-making process and the expected dates for each milestone. Once finalised, the Timetable will be published to provide clarity for communities, stakeholders and partners on how the new Cumberland Local Plan will progress.

Appendix A: Summary of feedback from the graffiti wall

This section summarises the feedback collected across sixteen consultation drop-in sessions. Comments are grouped under the key recurring themes identified.

The drop-in sessions were open to any interested party and were held in:

- Aspatria Library
- Brampton Community Centre
- Carlisle The Lanes
- Cleator Moor Civic Hall
- Cockermouth Library
- Dalston Victory Hall
- Egremont Market Hall
- Frizington Library
- Longtown Library
- Maryport Town Hall
- Millom Tin Chapel
- Seascale Library
- Silloth Library
- Whitehaven United Reform Church
- Wigton Market Hall
- Workington Carnegie Theatre

Where should development go?

Feedback generally points to support for a balanced approach between urban and rural areas. It advocates for well-designed townhouses in Carlisle to support its vitality, alongside smaller developments in villages to maintain their character. Brownfield sites are prioritized for development, particularly those with good transport links. Large-scale developments are discouraged in favour of smaller, organic growth that supports local services and avoids imposing settlement boundaries.

Feedback highlights the importance of integrating infrastructure improvements with housing projects. It stresses that development should benefit local communities, avoid flood-prone land, and consider the impact of St Cuthbert's Garden Village on surrounding areas like Dalston. Suggestions include housing for older people near town centres, revitalizing empty properties, and ensuring rural development helps retain local populations while resisting second homes.

Specific locations mentioned include Wigton, Aspatria, Seaton, and Millom, with calls for dispersed allocations across Cumberland and better leisure facilities. The document also raises opportunities for redeveloping sites like Derwent Forest and old steel works. Overall, the focus is on sustainable, community-oriented growth that respects existing settlements and infrastructure capacity.

Housing Issues

Affordable and Social Housing

The most significant concern expressed was the lack of affordable and social housing. Residents emphasized that affordability should be genuine, not limited to discounted market homes. There were repeated calls for the council to build more council houses and to support alternative models such as community-led housing, self-build projects, and shared ownership schemes. Starter homes for single people and couples were highlighted as a gap in provision, and respondents stressed that affordable housing should meet minimum size standards to ensure quality living conditions.

Housing for Specific Groups

Feedback revealed a strong need for housing tailored to different demographic groups. Older residents require more bungalows and downsizing options, as well as extra-care housing to support independent living. Younger families need affordable homes to help them onto the housing ladder, while accessible housing for disabled people was also identified as a priority. Maryport was singled out for its lack of sheltered accommodation for older people, and there was support for housing initiatives that assist refugees through local networks.

Housing Design and Quality

Participants expressed dissatisfaction with generic housing designs and called for homes that reflect local character and vernacular architecture. Energy efficiency was a recurring theme, with suggestions for insulation, solar panels, and EV charging points to be mandatory in new developments. Respondents opposed executive-style housing, preferring smaller homes of two to three bedrooms. Wildlife-friendly features and sustainable materials were also recommended to enhance environmental quality.

Location and Scale of Development

There was strong opposition to large-scale developments, with a preference for small-scale growth in villages rather than major allocations in larger settlements. Many respondents opposed restrictive settlement boundaries, advocating for organic village growth. Brownfield sites and the repurposing of empty properties, including vacant shops and housing stock, were seen as priorities. Concerns were raised about the impact of holiday lets, Airbnb conversions, and second homes, which reduce housing availability for local residents. Specific sites mentioned include Dalston (old nursery and oil refinery), Strawberry How, and Queens Park.

Infrastructure and Services

Infrastructure provision emerged as a critical issue. Residents stressed that housing development must be accompanied by adequate school places, healthcare facilities, and public transport. Improvements to sewerage, drainage, and other utilities were considered essential. Respondents also called for the inclusion of community amenities such as playgrounds, libraries, and green spaces. Parking and traffic management were highlighted as recurring concerns.

Policy and Planning

Several comments focused on planning processes and governance. There were calls to speed up planning consent and to involve Parish Councils more actively in decision-making. Respondents urged enforcement to ensure developers complete projects to a high standard and recommended alignment with existing Housing Survey findings. Greater transparency and accountability in planning were seen as necessary to build public trust.

Other Issues

Additional concerns included risks associated with Houses in Multiple Occupation (HMOs), the need to address decaying housing stock, and the importance of bringing empty homes back into use. Support for co-housing models and communal facilities was

noted, alongside strong opposition to building on community green spaces or biodiverse sites.

Summary of Key Themes

The consultation feedback demonstrates a clear public preference for housing that is affordable, sustainable, and integrated with local infrastructure. There is strong opposition to large-scale, generic developments and executive-style housing. Instead, communities favour smaller, well-designed homes that reflect local character and meet the needs of diverse groups, particularly older residents and young families.

Town Centres

Feedback on town centres reflects a strong desire for revitalization and improved functionality. Many respondents emphasized the need to repurpose empty shops, either converting them into housing or using them for community purposes, leisure facilities, or pop-up shops. This theme of tackling vacant units appears repeatedly, alongside calls for a clear strategy for empty buildings and investment to bring them back into productive use.

There is consistent support for affordable spaces for small businesses and independent retailers, with suggestions to reduce rents and business rates to encourage local enterprise. Pop-up shops and artisan businesses were mentioned multiple times as ways to inject creativity and variety into high streets. Similarly, respondents stressed the importance of supporting local businesses and creating vibrant hubs that attract footfall.

Parking emerged as a recurring concern. While some noted that parking is not an issue in certain areas, many others called for better parking provision, including free parking, improved disabled parking, and maintaining existing car parks. This is linked to the belief that convenient parking would encourage people to spend more time and money in town centres.

Safety and accessibility were also highlighted repeatedly. Suggestions included CCTV, more police presence, and measures to reduce anti-social behaviour, particularly in Wigton. Accessibility for blind or partially sighted people was noted as essential, and pedestrian priority was raised, with calls for crossings and safer walking routes.

Several comments focused on community and leisure facilities, such as youth centres, sports fields, indoor sports provision, and venues for activities aimed at young people. Ideas ranged from ice rinks and theatres to debate events and teenage markets, all intended to make town centres more appealing to families and younger demographics.

Infrastructure and transport issues were mentioned frequently, including concerns about heavy traffic on the A596, pinch points on the A595, and the need for improved public transport connections, especially between employment hubs like Barrow and Sellafield. Respondents also stressed the importance of upgrading basic infrastructure, such as sewers and rainwater systems, before major development.

Environmental and aesthetic improvements were suggested, including more tree cover, bicycle stands, and better maintenance of older buildings. However, there were also warnings against spending excessively on decorative projects, with some questioning the necessity of certain enhancements.

Finally, there was a strong call for events and cultural activities to reinvigorate town centres, such as food festivals, teenage markets, and community gatherings. These were seen as ways to create excitement and increase visibility for local businesses.

Infrastructure

The consultation responses reveal widespread concern that existing infrastructure is already under significant strain and cannot easily accommodate further housing development. A recurring theme is the inadequacy of transport links, particularly the poor reliability and frequency of bus services across rural and urban areas. Many respondents emphasize that improved and coordinated public transport, both buses and trains, is essential to reduce reliance on private vehicles and prevent social isolation. Rail connectivity, especially along the Energy Coast Line and routes to Carlisle, is described as unreliable, impacting employment and apprenticeships. Suggestions include extending Border Rail and creating better transport hubs.

Road infrastructure is another dominant issue. Several comments highlight congestion, insufficient road capacity, and deteriorating conditions, with potholes and unsafe pavements frequently mentioned. There are repeated calls for upgrades to major routes such as the A595 and A66, bypasses for towns like Whitehaven and Harrington, and better traffic management at key junctions. Speeding and road safety are also concerns, with proposals for speed bumps and improved pedestrian crossings, particularly near rivers and in villages.

Active travel measures, such as safe cycling routes and well-maintained walking paths, are strongly supported, with respondents urging that new developments include connected cycleways and footpaths. Drainage and foul water flooding are noted as persistent problems, alongside pressure on utilities like electricity and broadband, which are seen as inadequate for modern needs, including EV charging and digital connectivity.

Community services feature prominently in the feedback. There is anxiety about the lack of school places, healthcare provision (GPs and dentists), and other facilities to support growing populations. Dalston, in particular, is repeatedly cited as being under severe strain, with its schools and services struggling to cope. Similar concerns arise in Cleator Moor, Harrington, and Thursby, where respondents stress that housing growth must be matched by investment in local amenities.

Other issues include parking shortages, poor mobile signal, and the need for better maintenance of historic streets and public spaces. Environmental considerations appear in comments opposing solar panels on farmland and advocating for their use in car parks instead. Tourism-related pressures, such as campervan parking and seasonal traffic peaks, are also mentioned.

Overall, the feedback underscores a strong desire for integrated planning that prioritizes reliable public transport, road safety, active travel infrastructure, and essential community services before further housing development proceeds.

The top five recurring issues are:

Public Transport Reliability and Coverage

Bus services are repeatedly described as poor, unreliable, and infrequent, especially in rural areas. Rail connectivity is also criticized, with calls for better coordination and extended routes.

Road Capacity and Condition

Concerns about congestion, insufficient road capacity for new housing, and deteriorating road surfaces (including potholes) appear throughout the feedback. Major routes like the A595 and A66 are frequently mentioned for improvement.

School Places and Community Services

There is strong anxiety about the lack of school capacity and healthcare provision (GPs and dentists) to support new housing developments. Dalston and other villages are repeatedly cited as being under severe strain.

Active Travel Infrastructure

Respondents consistently call for safe cycling routes, improved footpaths, and pedestrian crossings. Connectivity between new developments and existing routes is emphasized.

Drainage, Utilities, and Digital Connectivity

Drainage problems, foul water flooding, and pressure on utilities (electricity for EV charging, broadband access) are recurring concerns. Poor mobile signal and lack of hyperfast broadband are seen as barriers to modern living.

Minerals and waste

The consultation revealed strong public interest in improving waste management and recycling transparency. A recurring concern was the lack of clarity on how much household recycling is genuinely recycled rather than sent to landfill. Several respondents called for better facilities for waste disposal and recycling, including improved layouts at Household Waste Recycling Centres (HWRC), specifically mentioning Bousteads Grassing, and the need for smaller 'bring' sites in more locations. Accessibility was also raised, with comments stressing that tips should accept walk-in waste and that the loss of doorstep/local collection services, such as the ash van in Wigton, negatively impacts residents, particularly those with mobility issues.

Bins and collection services were another repeated theme. People noted that bins not being collected is a common problem, and there were calls for more bins in town centres, which were praised for looking "so good." Concerns were expressed about extra charges for garden waste collection, and respondents emphasized the importance of maintaining current recycling and fly-tipping removal services without reductions.

On waste policy, there was strong opposition to inappropriate incineration developments in North Carlisle and to burning rubbish that produces poisonous gases. Several comments urged the council to stop Carlisle becoming the 'waste centre of the north' and to plan for waste reduction, ensuring government targets are met. Suggestions included making supermarkets responsible for packaging, supporting refill shops, and reducing fast fashion outlets. There was enthusiasm for shops where packaging is minimized and for introducing refill stations to encourage sustainable practices.

Regarding minerals, the feedback showed clear resistance to new developments. The phrase "No coal mine!" appeared emphatically, reflecting strong opposition to any revival of the West Cumbria coal mine issue. Similarly, there were repeated calls for no more quarries, citing concerns about impacts on the water table and poor road infrastructure. A specific site, Els Syke near Maryport, was mentioned in relation to gravel extraction and its potential impact on heritage sites and ancient settlements, with respondents urging that

future expansion be resisted. Additionally, there was a suggestion for a museum dedicated to the iron ore industry, highlighting interest in preserving industrial heritage.

Environmental concerns were also raised, such as the orange water in Whitehaven harbour, and there was opposition to using prime agricultural land for solar farms, suggesting a preference for protecting food production areas.

Key Repeated Issues

- Transparency in recycling (where does it go? how much is truly recycled?)
- Better waste disposal and recycling facilities (HWRC improvements, more bring sites)
- Opposition to coal mines and new quarries
- Concerns about incineration and burning waste
- Need for waste reduction strategies and packaging responsibility
- Problems with bin collection and accessibility
- Support for refill shops and sustainable retail options

Place-Specific Comments

- Bousteads Grassing – HWRC layout needs improvement.
- Wigton – Loss of ash van/local collection criticized.
- North Carlisle – Opposition to incineration developments.
- Els Syke near Maryport – Gravel extraction concerns (heritage impact).
- Whitehaven harbour – Orange water issue noted.
- West Cumbria – Strong opposition to coal mine revival.

Environment

The consultation responses reflect a strong desire to balance environmental protection with sustainable development and community well-being. A recurring theme was the need to protect and enhance green spaces, with multiple comments emphasizing their importance for recreation and mental health, especially in urban areas where residents may lack gardens. Concerns were raised about inadequate management of existing green spaces, attributed to funding issues, and suggestions included installing interpretation boards to improve communication and engagement.

Nature conservation featured prominently. Respondents called for tree planting projects, maintenance of wildlife habitats, and the creation or protection of nature reserves, including specific sites such as Solway Mosses. There were repeated appeals to protect local wildlife as a first priority, with particular mention of butterfly habitats (small blue, marsh fritillary). The importance of hedgerows and greenery in new developments was highlighted, alongside calls for innovative building designs that respect local character and features like cobbled streets.

Flooding and drainage emerged as a major concern, mentioned multiple times. Respondents stressed the need for strong surface water drainage policies, catchment areas, and consideration of run-off rates from fields in planning. Increased flooding risk was noted in specific areas, such as Station Road, and there were calls to clear out beckes and rivers to mitigate problems. Coastal issues were also significant, with repeated

warnings about coastal erosion, tidal pollution, and rising sea levels, particularly affecting Millom and Workington's coastline, including Harrington Marina.

Water quality was another repeated issue, with concerns about sewage discharge into rivers, including the River Derwent, and local septic tanks. Tidal pollution in Millom was specifically mentioned. Respondents urged action to address these problems to protect ecosystems and public health.

On development and sustainability, there was strong support for renewable energy and sustainable design, including solar panels on all new housing and features that encourage wildlife (e.g., nesting spaces for swifts and swallows). Food security was raised, with suggestions to produce food locally and avoid excessive mowing of road verges to support biodiversity. There were also calls to recognize the ecological value of brownfield sites and old quarries, and to limit Biodiversity Net Gain (BNG) requirements on brownfield while capping greenfield at 10%.

Heritage and cultural assets were another focus. Respondents emphasized the need to protect historic buildings and monuments, with repeated comments about preventing decay of Grade II listed buildings in Wigton and maintaining cultural facilities such as local churches. Suggestions included making more use of Egremont Castle, promoting Maryport's history, and ensuring comprehensive habitat assessments for Broughton Moor RNAD before any development.

Finally, there were broader community and accessibility concerns, such as making built and natural environments accessible for people with disabilities, maintaining footpaths and preventing farmers from blocking them, and listening to local knowledge in planning decisions.

Key Repeated Issues

- Protection and management of green spaces (including urban areas).
- Flooding and drainage policies (surface water, run-off, catchment areas).
- Coastal erosion and rising sea levels.
- Sewage discharge and water pollution (rivers, tidal areas, septic tanks).
- Wildlife and habitat protection (tree planting, hedgerows, butterfly habitats).
- Sustainable development (solar panels, renewable energy, wildlife-friendly housing).
- Heritage conservation (monuments, historic buildings, cultural facilities).
- Accessibility and community engagement.

Place-Specific Comments

- River Derwent – Sewage discharge.
- Millom – Tidal pollution; open space provision; Old Coop building safety concern.
- Egremont Castle – Suggested for more funding and heritage promotion.
- Maryport – History promotion (Stevenson plaque).
- Wigton – Protect decaying Grade II listed buildings.
- Station Road – Increased flooding risk from development.
- Workington coastline & Harrington Marina – Investment and protection.
- Solway Mosses – Should be protected as a nature reserve.
- Longtown area – Former gravel pits suggested for reuse.
- Carlisle city centre – Improvements praised.

Transport

Transport emerged as a critical concern, with public transport reliability and frequency being the most repeated issue. Respondents consistently reported that bus services are poor, infrequent, and often fail to turn up, leaving people stranded and contributing to social isolation. This problem affects access to schools, colleges, workplaces, and hospitals, with specific complaints about morning gaps in services and difficulties attending appointments. Several comments stressed that if buses were more frequent, they would be used more, and called for reliable, subsidised public transport with coordinated bus and train timetables.

There were multiple requests for express bus services to Carlisle and for direct links between towns, such as Maryport and Cockermouth, which currently lack a connection. Rural areas were highlighted as particularly underserved, with Dalston noted for its poor bus service despite good rail access, and Bowness Parish mentioned for gaps in its Carlisle link. The Carlisle city bus service was also flagged for needing better investment and integration with rural routes.

Rail transport was another repeated concern. Respondents described the overall rail service as unreliable, impacting employment and apprenticeships, particularly in Barrow. There were calls for critical improvements to the Energy Coast Line (Barrow to Carlisle), including better connectivity, rolling stock, and more regular services. Support was expressed for extending the Border Rail from Tweedbank to Carlisle, with stations reopened at Longtown and Newcastleton.

Road infrastructure and traffic management were also prominent themes. The A595 was repeatedly mentioned for needing improvement and possible dualling, while the A66 Brigham roundabout was cited for congestion and suggested for dualling as well. Respondents raised concerns about traffic congestion, lorry movements through settlements, and problems at Junction 45 (J45), which becomes a bottleneck when the M6 is blocked. There were calls for a motorway policy to manage closures and emergency service access, and for better coordination of roadworks. Cross-border issues were noted, particularly Scottish Highways closing the A7 without adequate communication on the Cumberland side, prompting calls for improved cross-boundary coordination.

Other suggestions included resisting the de-trunking of the A7, addressing speeding in villages (with ideas like traffic lights triggered by speed, as seen on the A75 at Springholme), and improving cycle and walking routes, especially linked to developments like St Cuthbert's Garden Village. Respondents also mentioned poor 4G connectivity, which hampers the use of transport apps.

Key Repeated Issues

- Poor bus service: infrequent, unreliable, often not aligned with school, work, and appointment times.
- Need for express and direct bus routes (e.g., Carlisle, Maryport–Cockermouth).
- Rail unreliability: impacts employment and apprenticeships; Energy Coast Line improvements needed.
- Integration of bus and rail timetables and investment in rural connectivity.
- Traffic congestion and road infrastructure improvements (A595, A66, J45).
- Cross-border coordination (A7 closures).
- Social isolation due to unreliable transport.
- Better planning for motorway closures and emergency access.

Place-Specific Comments

- Dalston – Poor bus service; good rail access; cycle/walkway improvements planned.
- Carlisle – Rail reliability issues; city bus service needs investment.
- Maryport–Cockermouth – Lack of direct bus link.
- Bowness Parish – Morning gaps in Carlisle bus link.
- Barrow – Rail unreliability affecting apprenticeships.
- Junction 45 (J45) – Traffic problems, especially during M6 closures.
- A595 – Needs improvement and possible dualling.
- A66 Brigham roundabout – Suggested for dualling.
- A7 – Concerns about de-trunking and lack of communication during closures.
- Longtown/Newcastleton – Proposed stations for Border Rail extension.
- Springholme (A75) – Speed control system cited as model for villages.

Health and Wellbeing

The consultation responses reveal a strong emphasis on improving access to health services, promoting active lifestyles, and creating safer, healthier communities. A major recurring concern was the lack of GPs and other healthcare professionals, with multiple comments calling for better access to doctors, dentists, and opticians, as well as retention of qualified staff and improved financial rewards for nurses and frontline workers. Respondents stressed the need for ongoing health investment, including maintenance of adequate health services, timely GP appointments, vaccinations, and better communication from health providers.

Hospital services were also highlighted, particularly the West Cumberland Hospital, where respondents requested more beds, retention of A&E, and increased consultant availability from Carlisle. Transport infrastructure was linked to health outcomes, with concerns that poor roads hinder ambulance access between Whitehaven and Carlisle hospitals, and repeated mentions that roads are unable to support emergency vehicles.

Food security and nutrition were another repeated theme. Respondents emphasized the importance of producing food locally, access to affordable and healthy food, and reducing reliance on hot food takeaways. Calls for allotments (more and protected) were frequent, reflecting interest in community-based food production.

Community wellbeing featured strongly, with suggestions for improved green spaces and play parks, including specific mention of Lowca, and new leisure facilities in Millom, which were praised—especially the swimming pool.

Respondents requested youth centres, community projects, and spaces like The Oval, particularly in town centres and near ports. There was also strong support for arts and cultural facilities, such as the Carnegie Theatre, festivals, and workshops, which were seen as integral to community cohesion and wellbeing.

Safety and active travel were recurring concerns. Respondents called for safer pavements and crossings, addressing issues with parked cars, roundabouts, and lack of pedestrian consideration, and promoting cycling and walking. Linked to this were suggestions for campaigns to reduce car use, safe zones around schools and town centres, and recognition of the health risks from traffic, air pollution, and road building.

Other notable points included the need for public toilets, incentives to use sports facilities, and support for pre-teen activities, as respondents noted a lack of provision for children around nine years old.

Place-Specific Comments

- Millom – Ageing population noted; new leisure facilities (including swimming pool) praised.
- Lowca – Play park provision requested.
- Whitehaven–Carlisle corridor – Poor transport infrastructure affecting ambulance access.
- Carnegie Theatre – Highlighted as a vital community and cultural asset.

Top Three Recurring Themes

1. Access to healthcare services – Lack of GPs, dentists, opticians; hospital capacity; staff retention and pay.
2. Food security and healthy living – Local food production, affordable healthy food, allotments, reducing unhealthy takeaway options.
3. Community spaces and active wellbeing – Green spaces, play parks, leisure facilities, youth centres, arts and cultural hubs.

Economy and employment

The feedback reflects a strong desire for a diverse, resilient local economy that supports sustainable growth and provides opportunities for all communities. Respondents emphasized the importance of creating more jobs for young people, with strategies to retain talent and prevent outmigration. There were repeated calls for better job variety and diversification, reducing reliance on major employers such as Sellafield, and promoting green jobs, particularly in Maryport and Aspatria, not just Workington.

Several comments stressed that employment and skills planning should be embedded in the Local Plan, ensuring that housing developments are supported by a strong local economy. Respondents highlighted the need for enterprise hubs, space for small start-up businesses, and investment in small businesses through financial support and grants. There was also a clear preference for supporting local providers over multinationals, building “true community wealth” through models like the Preston Model and leveraging local skills in construction contracts.

Tourism was seen as a major economic driver, with suggestions to use tourism as a catalyst for investment, increase hotel provision, and make more of the area’s history and heritage. Specific opportunities were identified, such as Haverigg for tourist accommodation, and improving facilities for coastal walks near Grune Point, where a lack of toilets and formal parking was noted. Respondents also mentioned Skinburness, where formal car parking for tourists is lacking, and concerns about camper vans parking on dunes due to campsite costs. There were calls to develop the night-time economy in Carlisle, with more outdoor seating, and to improve city centre retail, including reviewing parking charges and introducing park-and-ride schemes.

Infrastructure and connectivity were recurring themes. Respondents stressed the need for better road infrastructure to attract good jobs, investment in public transport, and

government support for improved internet connectivity to enable remote working. Suggestions included developing light industry or retail at Junction 42 of the M6 as a gateway to Carlisle, and expanding the airport for internal flights and freight, though some raised concerns about the climate impact of such development.

Education and skills development were also highlighted, with calls for training beyond basic subjects, and investment in the arts sector, which was seen as beneficial for multiple areas of life and employment. The University of Cumbria's Citadel campus was identified as a key asset for creating a research and scientific hub to retain young people in the region.

Place-Specific Comments

- Maryport and Aspatria – Calls for more green jobs.
- Millom – Noted as very different from Longtown; tailored economic approach needed.
- Longtown – Staffing issues, high unemployment; suggested expansion of employment areas.
- Haverigg – Proposed location for tourist accommodation/hotel.
- Skinburness – Lack of formal car parking for tourists.
- Grune Point – No toilet facilities for coastal walkers.
- Carlisle – Night-time economy development; improved retail offer; exploit University of Cumbria presence; light industry/retail at Junction 42; airport development suggested.

Top Three Recurring Themes

1. Job creation and diversification – More jobs for young people, green jobs, reducing reliance on single industries, better job variety.
2. Support for local businesses and community wealth – Enterprise hubs, financial support for small businesses, prioritizing local providers over multinationals.
3. Tourism and infrastructure development – Hotels, heritage promotion, improved transport and connectivity, tailored facilities for visitors.

Climate change

The feedback strongly emphasizes that climate change should underpin all decision-making in the Local Plan. Respondents repeatedly called for a commitment to reducing climate change impacts, with suggestions that the entire plan be built around mitigation and adaptation strategies that improve residents' lives. This includes local energy generation, better public transport, and community engagement through citizens' assemblies and participatory budgeting.

Energy sustainability was a major recurring theme. Multiple comments advocated for solar panels on all new housing, with questions about how well solar uptake has been implemented so far and whether solar panels could be fitted on listed buildings. Respondents stressed the need for sustainable energy options, greater use of green energy, and reducing reliance on fossil fuels. There was also support for using local power locally to avoid reliance on the national grid.

Nature-based solutions were highlighted repeatedly, with strong calls to promote tree planting and protect wild spaces as part of climate resilience strategies. Respondents linked these actions to biodiversity benefits and flood mitigation.

Flooding and coastal impacts were another significant concern. Comments noted that Duddon Bridge is becoming more impassable due to wetter conditions and warned of serious coastal erosion and rising sea levels, which threaten to flood parts of the area. Specific mention was made of flooding in Wigton, along with concerns about water run-off and the need for robust drainage planning.

Overall, respondents stressed that climate change is very important and must be taken into account in all aspects of planning, from housing design to infrastructure and community engagement.

Place-Specific Comments

- Duddon Bridge – Becoming more impassable due to wetter conditions.
- Wigton – Flooding noted as a concern.
- Coastal areas – Serious erosion and risk of flooding from rising sea levels.

Top Three Recurring Themes

1. Integration of climate change into all planning decisions – Making it the guiding principle for development and policy.
2. Renewable energy and sustainable housing – Solar panels on new homes, green energy adoption, reducing fossil fuel use.
3. Flooding and natural resilience – Addressing coastal erosion, rising sea levels, and promoting tree planting and wild spaces.

Appendix B: Summary of Representations made to the Summary Document

This section outlines a detailed question by question summary of the comments received to the Issues and Options Consultation Summary Document.

Q.1 Does this draft Vision reflect what you would like Cumberland to look like in 2045? Is there anything you would like to change or add?

- Better access to natural areas.
- Reducing waste, maximising efficiencies, and reducing the carbon footprint of all residents should be included as a priority.
- Add the word "Equitable" in front of "Investment in infrastructure..."
- There is mention of recruiting working age people but no mention of supporting young people's aspirations or support for an aging population.
- Transport and digital connectivity would be captured under 'investment in infrastructure' but there is no direct reference to sustainable transport which is key for reducing emissions and improving rural mobility
- It should be clearer about how the vision will be monitored/tracked.
- It should outline the aspiration for higher waged employment, not just low wage hospitality and retail.
- It should outline the aspiration for a stronger educational sector at college and university level, making Cumbria a place where students want to come to study,
- The county needs to prioritise people who were born in Cumberland. A lot of people are moving here from other areas because they have more money to spend on housing compared to where they live. This depletes the options for residents on lower incomes.
- Its important that services grow in accordance with the population.
- A self-sufficient and interconnected Cumberland which is proud of its culture is very important, but whilst also improving our connection to major cities such as Manchester and Newcastle.
- The vision should include a commitment to hold regular community meetings so the voice of residents can be heard
- The vision should explicitly commit to inclusive planning principles. In particular regarding gender.
- Provide more exercise opportunities for residents to help reduce obesity rates. This could include improved play parks for children, accessible outdoor spaces for recreation, and a wider range of community activities.
- "Support high quality housing for all" could this be phrased with greater intent? i.e. to deliver what communities need rather than just support?
- There isn't a direct reference to physical activity, wellbeing, active lifestyles, or movement as part of the current Vision. A suggestion would be to include language around creating Active Environments, supporting Active Travel, or embedding movement into everyday life.
- A suggestion would be to add a commitment to reducing barriers to participation in physical activity across all demographics and tackling the health inequalities that currently exist.
- The Vision talks about "empowered communities" but, doesn't emphasize local collaboration or community-led initiatives in the context of health and wellbeing. It

would be good to highlight the importance of local voices shaping active living opportunities.

- The Vision mentions infrastructure and access to nature, but doesn't explicitly link this to active travel, walkable communities, or sport and leisure facilities. We would advocate for the inclusion of Active Design Principles and investment in inclusive sport and leisure infrastructure.
- It states access to nature in only rural and coastal environments, urban should be included as most people live in an urban setting.
- Broadly agree with the proposed vision. Welcome the role that health and the environment will continue to have.
- Emphasise the importance of health, environment, housing, education, crime, employment, transport and communications as foundations for prosperity.
- Prosperity should include the well-being of local people and their ability to prosper.

Q.2 What do you think of these draft objectives? Is there anything you would like to change or add?

- Promoting new businesses/housing should not be at the expense of well used outdoor space.
- Yes, removing parking charges for town centre parking would greatly aid town centre growth.
- Item 9 on sustainable transport should include an aspiration to reduce reliance on personal cars and reiterate the council's priorities for transport
- Addition of commitment for "regular communication with the people of Cumberland to appraise them of how well these objectives are being met"?
- Objective 8: would suggest amending the objective to include text around improving rural mobility and reducing car dependency in isolated communities.
- Not just jobs, but high paid jobs.
- Sustainable and affordable transport
- Extra consideration should be given to designing healthy environments as this objective allows the council to have improved and healthy infrastructure in which most objectives will grow out of.
- Objective 7, housing needs, requires a dimension of drive towards housing with a near zero carbon footprint and a focus on self-reliance and sustainability with energy usage.
- The statement on natural environment could be extended to include protection of wildlife.
- Welcome focus on designing healthy environments and how this will inform the approach to transport planning through active transport / public transport.
- Welcome recognition of the dependence many local rural communities have to a reliance on private cars and the importance of the road network.
- Local Plan needs to protect and enhance culture and heritage of Carlisle and North Cumbria. Greater enforcement in conservation areas and a presumption in favour of adaptation of all relevant buildings rather than demolition.
- Support the alignment of the plan with net zero. Planning Policy should encourage the development of flood ready buildings and discourage building on the flood plan.

- Minerals and Waste policy needs to make clear where waste disposal is most appropriately located and provide residents an opportunity to influence local waste management zones.
- Local Plan should seek best practice in designing ant social behaviour and crime policies.

Q.3 What is special about the area you live in that the Local Plan should protect and enhance?

- Current open spaces used by dog walkers, runners etc.
- Protecting and maintaining woodland.
- Landscape, trees and wildlife. Rivers. Close-knit communities.
- Rural Mobility almost needs to be established further rather than 'enhanced'. It's often overlooked but is critical for access to services, employment and reducing emissions.
- The sustainability of village/rural life, enabling the continued existence of the pub, school and community hall.
- The historic nature of our treasured buildings should be under constant review and maintenance so as not to let them deteriorate at an exorbitant cost.

Q.4 Is there anything you think that needs to change in your area? If so, please tell us about it.

- I'd like the planning process to take constituent views into account. We the constituents know the area better than planners sitting in an office or from another area of the country.
- Ensure that small hamlets are not cut off from transport.
- Improved traffic, sewage and other infrastructure to accommodate the large number of new properties being built.
- Support for the reuse of vacant or underused buildings, particularly in villages and smaller communities.
- To include providing funding, advice, or policy support to help communities take ownership of local assets such as village halls, pubs, or shops, and bring them back into active use.
- Drop kerbs are still an issue in places for disabled access.
- Derelict buildings - social enterprise / apprenticeships to turn old buildings into affordable housing options for single people or two bed properties for small families.

Q.5 What do you think the Council should take into account when deciding where new development should go?

- Develop on brownfield only. There's plenty of it rotting away in various areas.
- Infrastructure - do it properly and don't just build any of the above without first committing to (or even better delivering the infrastructure first) infrastructure improvements.
- Existing and potential new health and school provision.

- Protection of villages from heavy through traffic for both public safety and to preserve the character of villages.
- Access to good, well paid jobs.
- Access to infrastructure such a medical facilities, schools, shops.
- Access to a good reliable transport network.
- The long term sustainability of a community - where a town has become a village and where local 'basics' such as the school, pub, shop and public transport are under threat or no longer exist.
- The overarching need of the local economy, the population profile that the building is for, housing to be a wide mix in smaller conurbations noting reflecting the aging profile of the county.
- Whether it will benefit the existing local people and area (whether it provides jobs, green space, affordable homes etc)
- Whether the development will meet the needs of the demographic of the area,
- When deciding where new developments should go, the council should consider the settlement's status, size, role, and character. Developments should match the local capacity, respect rural or urban landscapes, and maintain the character of historic areas.
- From a Sport England and Active Cumbria perspective, when planning new developments the Council should integrate Active Design principles to promote healthier, more active communities.
- Housing for older people close to the town centre.

Q.6 What can we do to encourage existing young residents to stay and to encourage younger people and families to move here?

- Increase work possibilities and ensure provision of affordable accommodation within a short distance of those work opportunities.
- Appropriate higher education opportunities to encourage young people to stay and then work within the area.
- all the new builds I am seeing in the area will be priced well out of young people's budgets unless they are lucky enough to secure employment at Sellafield.
- Improvements to public transport will significantly impact on younger people who are unable to drive.
- Standardise local occupancy rules to make them less restrictive
- Encourage and promote inward investment from larger employers to bring good jobs with good wages into the county.
- You won't until you provide a good infrastructure for them to be able to maximise the mobility and mix within their peer group.
- Increased provision of Social Housing
- improve the ability to operate and support hybrid jobs from Cumbria, eg good and low cost comms, much better cell phone coverage.
- Embedding Active Design principles, developed by Sport England, into spatial planning.
- More accessible green space.
- Accessibility to services and facilities and educational options is critical to sustainable development.

Q.7 Do you think the Council should use settlement boundaries in the Local Plan? Please explain why.

- Cumbria is all the better for having boundaries around its built spaces it maintains communities and community feeling.
- Yes. It adds clarification.
- It is essential that limits are placed to prevent Carlisle sprawling outwards and villages then becoming appended to that sprawl.
- We need to act as far as possible to preserve our green spaces for the benefit of the environment and for future generation.
- Yes - subject to periodic reviews to ensure the extent of the boundaries remain relevant.
- They should be open to the enlargement of existing boundaries where there is no risk of merging onto another community.
- Always best to utilise space within the edges of a village or town before building outwards.

Q.8 Are there any other housing issues that you want to tell us about?

- Just to emphasise sustainability and appropriateness of infrastructure.
- Lack of affordable housing in the Keswick Area.
- Builders should be required to include photo-voltaic roof tiles at the time of building along with other energy saving measures. They should be required to design and build houses with an outward appearance in keeping with the pre-existing housing in rural communities.
- Builders should be compelled to complete the building of affordable housing before being allowed to build high-cost housing approved as part of the planning permission.
- There are lots of empty buildings and boarded up properties in our towns. With public transport limitations, it makes sense to use these properties (may need to reduce red tape around compulsory purchase) to get these properties converted to flats, 1 bed flats and 2 bed properties for single people and young families.
- There is a shortage of bungalows for older adults in community.
- housing should embrace electric vehicles better
- Problems such as mould and poor insulation is detrimental to the health of the occupants. This will mainly impact minorities or low-income households.
- We need transparency on affordable housing delivery. It is not easy to obtain figures for those on the housing register for specific locations. Councils need to lobby for legislation which either gives Councils greater powers to insist on affordable quotas and scrutinise viability, or to decouple market and affordable housing and deliver the affordable homes required separately.
- A lack of access to safe outdoor spaces, including parks and green areas, or living in neighbourhoods perceived as unsafe due to crime or traffic, can discourage outdoor exercise.
- Poor walkability, limited cycling infrastructure, and disconnected urban layouts further reduce opportunities for active travel. Inadequate public transport can make it difficult to reach recreational facilities or community programmes, while long commutes from affordable housing areas can leave little time or energy for physical activity.

- Developments should be built to higher densities. Efficient use of land should be encouraged in all developments.
- Self-build and custom-build projects should be strongly encouraged. Does Cumberland maintain a register of individuals interested in self-building?
- Be aspirational about design quality. Introduce a 'Cumberland Design Awards Scheme' & adopt an aspiration for local projects to achieve recognition for their quality at regional & national level.
- We think ribbon development should be avoided as it makes everywhere look much the same and hides the countryside.
- Planning conditions which seek to mitigate the impact of second homes and holiday lets (e.g. conditions which prioritise/stipulate "local" occupancy) can have a negative impact on the availability of residential accommodation for students.

Q.9 What do you think the Local Plan could do to address all of the identified housing issues?

- Link the plan to the known increase in our older population
- prioritise bringing empty buildings in population centres back into use rather than focusing on new developments.
- Encourage the delivery of a mix of housing types (including accessible housing for people with mobility issues) supported with the evidence base of new housing needs surveys
- Encourage community-led housing and consider new housing development in areas where there is anticipated employment growth.
- How will the Local Plan intend to manage those?
- It should identify those areas where a fast track planning approval process is in place, linked in with building safety regulators. Money saved on planning appeals can be used by builders to enhance the quality of housing and by the authority on other services.
- Restrict second home ownership and holiday lets in areas that do not have sufficient housing provision for current residents.
- Make the area more attractive so people want to stay here and bring employment. Make the houses here like the mews cottages in London, desirable.
- Using Active Design principles as part of the Local Plan can overcome housing issues by creating healthier, more inclusive and better-connected communities.
- Address specialist & supported housing provision (e.g. sheltered & homeless initiatives).
- Improve the condition, energy efficiency and adaption of the existing housing stock
- Support adaptable housing designs for older people & people with disabilities.
- Cumberland Council must be prepared to seize the opportunity and take advantage of these
- Changes to increase social housing supply. By using a combination of direct investment, settlement boundaries and exception site policy, the provision of social housing can then focus upon where it is needed; rather than waiting for developers to provide small pockets of affordable housing, on sites where infrastructure may be unable to adequately support financially disadvantaged residents.

Q.10 Are there any other economic issues that you want to tell us about?

- We need more designated cycle routes in the central lakes that allow circular routes (most now run East-West direction).
- Limit motorised traffic access on some roads to obviate access issues for emergency vehicles, local residents and public transport.
- Consider partially converting roadways into cycle tracks.
- Measures to promote the connectivity of Cumbria by land sea and air (depending on the airport at Carlisle and the rail links to it) and the adjacent location to Scotland.
- Developing Cumbria's reputation as a centre of excellence for the nuclear power generation industry.
- Shopping facilities that are being provided away from the town and city centres provide free parking and close proximity. This is disadvantageous for towns and cities who are already struggling.
- Ensure that the economic viability is built on a mix of industries/commerce at the moment it is Tourism heavy
- Whitehaven - invest in the town centre, hotels, bus connections etc
- More support for high street development and use.
- Economic issues for people in low skill jobs should be included in the local plans. This means better development of employment land; for example, better transport links, more opportunities for businesses to open or expand, better active and public transport links to education centres such as colleges and universities in order to increase the opportunities of work for low skill workers.
- Supporting people who work from home by creating office hubs.
- it is important to encourage tourism in a way that benefits the local economy without pricing local residents out of the property market. Supporting tourism should go hand-in-hand with protecting affordable housing, local services, and community life.
- Cockermouth has become a dormitory town with relatively few employment opportunities in the town.
- Local retail businesses need support in order to preserve and enhance village facilities
- It is therefore in the interests of both the local and national economy to protect and improve
- productive agricultural land to increase production, while reducing the environmental impacts generated by imports.

Q.11 What do you think the Local Plan could do to address all of the identified economic issues?

- Support business start-ups/growth, apprenticeships
- Rethinking the town centre offer - focusing on the evening or leisure economy too
- Mobility: making it easier and more affordable for people to move around and for sustainable transport to become the preferred choice ahead of the private vehicle.
- Adopt a coordinated approach and actively promote Cumbria as a great place to live in with well-paid employment and good connectivity.
- Interconnectivity both physically and economically is essential.
- Making sure all planning applications are identified as necessary without harming the local environment

- The Local Plan should support community wellbeing by prioritising local jobs, training, and affordable housing, while also seeking investment from outside Cumbria to strengthen manufacturing and create sustainable employment opportunities for residents.
- Prioritise projects that will generate significant social and economic benefit to existing communities
- Promote internet services and speeds and promote business hub facilities
- Carlisle requires a Local Plan to encourage leisure and cultural uses for its tourism offer.
- Must build on Carlisle's strengths as the evening and night-time economy.

**Q.12 Are there any other town centre issues that you want to tell us about?
What kind of improvements would you like to see in your local town?**

- Free parking and improving public facilities, such as toilets.
- Encourage small traders e.g. vegetable shop, bakery.
- Vacant buildings being brought back into use either with housing, retail or leisure.
- A more legible/clear sustainable transport corridor/route
- Activities for young people such as creative hubs or cyber cafes
- Give the town centres and inner areas a good clean up, be far more specific on the shops, businesses, that are allowed we seem to and the display signs that we allow we are rapidly developing
- An issue that should be talked about within the town centre is the retention of businesses and facilities within premises. Around the country, many high street premises are left abandoned due to businesses not being able to get a real footing on the high street or wider community, larger businesses are also finding it more lucrative to go online rather than stay on the high street.
- Other town issues are that Seaton should be reconnected to the rail network, with a railway station link with trains coming from Carlisle, arrow in Furness and Whitehaven call at the new Seaton railway station on the Cumbrian Coastal railway line.
- Incentivise high quality attractive social pedestrianisation
- More and better facilities for young people like, for example, youth clubs.
- More incentives for local businesses to set up shops and companies to rent offices.
- Opens spaces and seating areas.
- Encouragement of Electric vehicle charging facilities
- More pedestrianisation of street areas and encouragement of the cafe culture and small arts and crafts businesses
- There would appear to be opportunity to deliberately support the shaping of the nighttime economy. Current patterns of café and restaurant opening are unusually curtailed in the early evening shifting the emphasis onto bars and clubs.
- Local Plan must support the development of town centre accommodation.
- Policies must encourage city centre and town centre development, particularly food and retail.

Q.13 What do you think the Local Plan could do to address all of the identified issues and make town centres more attractive to encourage you to visit them?

- Convert large empty retail units into high quality accommodation for individuals or young professionals at an affordable rate and rent to attract people to the centres thus making them more vibrant
- Lower rate so businesses can fill the existing places
- Empty shop windows - quick win to replace with heritage information vinyls, temp pop-up shops or community art spaces.
- Safe nighttime economy - a move to encourage cafes to open later and host events such as live music or book clubs, art class.
- improving transport links into town centres from the surrounding areas or Improving the infrastructure within the town centres, both of which will attract businesses and more young people into these areas.
- With having the Cumbrian Coastal railway line upgraded, will help both freight and passenger trains travel faster. With having the upgrade of the Tyne Valley railway line between Carlisle and Newcastle, with the reopening of Gilsland railway station, so that people can reach Hadrian Wall and Birdoswald along the historical route
- Car-free areas are crucial.
- More green areas in the town centres to encourage better mental and emotional health.

Q.14 Are there any other health issues that you want to tell us about?

- Provide good quality social spaces for our older population - so important for mental health. Make them modern, warm and well supported - not just in an old cold village hall.
- Support local GP surgeries in their struggle to accommodate and serve the needs mentioned above.
- many bus stops are not accessible for people with disabilities, particularly those along the A595 where they are not accompanied by crossing facilities and lowered kerbs. This is also a particular concern for towns and villages that are not located on the coastal rail line.
- On the matter of those with disabilities, provision of public toilets is essential in Cumberland.
- Rural isolation and the impact on mental health. All of the above are exacerbated in those communities with no public services, public transport, shops or pubs.
- Develop local Healthcare facilities in the communities
- The Council also needs to consider the current infrastructure and housing developments already in place which could cause health problems to the public, such as poor-quality housing or poor-quality roads and footpaths, and the council should focus on improving these developments.
- is important to support healthy lifestyles through access to nutritious food and cooking education, helping residents reduce reliance on processed foods. Encouraging outdoor activities and use of green spaces can improve physical and mental wellbeing for all ages.
- New development should provide safe, welcoming environments that promote exercise, social interaction, and access to community facilities, while protecting air,

water, and soil quality. Supporting opportunities to grow local food and connect with nature will benefit both individual health and community wellbeing.

- We have too much obesity and poor public health related to bad diet and sedentary lifestyle. This needs to be tackled by public bodies acting together with a single strategy, engaged with the voluntary sector to provide community based innovative solutions based on hope and aspiration.
- Perhaps Carlisle could follow the recent national suggestion and have a health centre in the middle of town, thus increasing footfall in the central shops.

Q.15 What do you think the Local Plan could do to address all of the identified issues and make your area healthier?

- I would suggest that investment in active travel networks would be one method of addressing the provision of attractive and welcoming environments which encourage all to be more physically active.
- Introduce measure to promote the sustainability of community life, enabling those over 65 to remain in the community. Promoting the building of quality smaller housing may incentivise older folk to downsize.
- Benches, drop kerbs and crossings for older adults.
Bins.
- Encourage professions supporting older adults, free courses and training, subsidised transport (as this is often a barrier to employment as home carers require their own car and to pay extra insurance).
- The local plan could include the public on decisions towards their health, having or improving the places that the public can report issues or provide suggestions would be beneficial.
- Housing to be built of good quality/sustainability
- make it easier to cycle to and through towns
- Have more local purchasing and encourage a local circular economy as per doughnut economy.
- The Local Plan could make the area healthier by creating safe, welcoming spaces that encourage outdoor activity, exercise, and social interaction. It should support initiatives that teach the value of healthy, home-cooked food, reduce reliance on processed foods, and promote local growing opportunities.
- Encouraging residents to spend more time outdoors and less on screens will improve both physical and mental wellbeing for all ages.
- Strategic support is needed encourage regenerative agriculture and community led food projects, as well as the creation of imaginative verdant town environments
- Cumbria roads desperately need to be made safe for users - fixing potholes and widening narrow lanes should be prioritised.
- Ensure that there are plenty of play areas for children.
- Preserve existing allotments and create new ones.

Q.16 Are there any other built environment issues that you want to tell us about?

- Bringing vacant buildings back into use

- With reference to high quality design or inclusive places, the Local Plan should acknowledge designing for mental health and wellbeing too.
- Designing for public conveniences.
- Designing for digital infrastructure.
- A recent conservation report highlighted the detrimental impact of properties within the city centre detracting from the historic significance. The council should insist that this is rectified by the business owners.
- Ensure all new builds have water collection facilities where appropriate. Give new house buyers the option of having solar panels with battery storage installed
- In addition to the issues identified, it is important to protect the heritage that already exists in Carlisle and ensure that new development respects the scale, character, and historic fabric of the city.
- Consider building-dependent biodiversity such as birds.
- As previous comments, more green spaces in urban areas, needn't be big. Incorporate into every development and protect existing.
- Flooding from inadequate surface water systems, inadequate or ineffective surface water control and direction or flooding as a result of inadequate lack of maintenance of surface water systems.
- Access routes between parts of our towns can be challenging for those with mobility or disability issues. This is particularly the case around our older housing stock and historic buildings (cobble lanes and pavements disturbed by tree roots).
- Supporting safe/accessible routes between key locations and new developments would be appropriate.

Q.17 What do you think the Local Plan could do to address all of the identified built environment issues and make our places look and function better?

- Prioritising the use or repurpose of existing buildings in keeping with local character rather than having new developments being the go-to solution.
- Ensure all new builds include Solar Power facilities.
- We need to retain as much of our historical buildings as possible and ensure that they are well maintained by owners.
- The Local Plan could address built environment issues by ensuring that new development respects the character, history, and heritage of local areas, particularly in Carlisle, and avoids high-rise buildings that do not fit the scale of existing streetscapes. Development should be well-designed, sustainable, and inclusive, making the best use of land while providing open spaces, safe streets, and attractive public areas.
- Statement that existing nest sites should be protected and require swift bricks in new developments as a minimum in accordance with NPPG Natural Environment 2025 paragraph 017 (plus any advice from local groups e.g. Keswick Swifts).
- plant pollinator flowers in baskets and flower beds. Cut back on traffic to help clean air.
- Whenever possible policies should seek to be mutually supportive, enabling as far as is practicable a fully integrated transport infrastructure linking communities, places of work, educational establishments and leisure facilities.

Q.18 Are there any other climate change issues that you want to tell us about?

- Allowing heritage double-glazing for listed buildings.
- Reducing the reliance on cars. Electric cars might save on emissions, but do nothing to address the resultant increase in demand for electricity off the national grid or address the safety concern regarding the number of casualties associated with collisions, etc.
- Encourage farming practice which more sustainable
- Another issue that the local plan could address is ensuring the AONB's and National Parks are kept safe from climate change.
- Surface water management for new developments. Flooding is not restricted to EA flood plain map areas.
- We need to support the impulse to rewild areas of natural beauty and changes in farming practice and funding that facilitate this.
- More investment in renewable energy production through offshore and onshore wind farms and solar panel farms in suitable areas.
- Protecting the sea front from erosion effects and damage will be key to maintaining the vibrancy and tourist and business benefit and potential of the local area long into the future.

Q.19 What do you think the Local Plan could do to address all of the identified issues and make us better prepared to address climate change?

- Give local people local facilities so that travel is unnecessary
- Climate action should be embedded across all policies to make it clear commitment for Cumberland and create a golden thread throughout the LP.
- The LP should mention encouraging low-carbon construction methods and materials.
- Creating policies that address the issues raised in response to question 19
- The local plan could include a higher amount of active travel routes and the switch to electric public transport into the local plan to help combat carbon emissions.
- The Local Plan could address climate change by protecting farmland, which helps with natural flood management, and planting more trees in urban areas to reduce surface water flooding and improve air quality.
- Ensuring drains and waterways are regularly cleared will reduce flood risk in built-up areas. Development should minimise carbon emissions, incorporate renewable energy where appropriate, and promote local shopping and reduced reliance on imported goods. Sensitive adaptation of historic buildings, creation of green spaces, and careful planning for flooding and coastal change will help communities become more resilient to climate impacts.
- Promote nature-based flood mitigation (e.g. wetland, riparian planting, river corridor restoration).
- Support flood resilient building design (e.g. raised floor levels, flood resistant materials).
- Require developments to meet sustainable construction standards (e.g. BREEAM, Passivhaus).
- Seek energy efficiency improvements for old buildings (balancing heritage with sustainability).

- Support installation of solar panels, heat pumps, & energy storage in new & existing properties.
- Promote walking, cycling & public transport over car dependency, & safe, active travel routes in planning decisions & new developments.
- Ensure EV charging infrastructure in all new developments & public car parks.
- Protect & enhance green & blue infrastructure networks, especially along the river corridors.
- Integrate urban greening (trees, green roofs/walls, pocket parks) in town centre & new housing.
- Encourage climate adaptive design buildings and spaces to cope with weather extremes.
- Promote local food production (i.e. allotments, community gardens) to improve local resilience.
- Support decentralised renewable energy & community energy projects.
- Encourage water efficiency & rain water harvesting in new developments.
- Support community engagement & education initiatives to build awareness.
- Integrate biodiversity net gain & tree planting requirements into development proposals.
- Manage the interface between built areas & surrounding countryside to prevent landscape intrusion.
- Promote nature-based flood mitigation (e.g. wetland, riparian planting, beavers).

Q.20 Are there any other environment issues that you want to tell us about?

- Promoting more environmentally sustainable farming: reducing run off into waterways through to promoting hedges.
- The Local Plan could also include schemes to protect the water sources around the area, whether that's reservoirs, natural springs or water habitats in which animals live.
- Protecting high quality agricultural land and the environment is more than stopping development, its paying attention to the soil and to pesticide use. There should be more emphasis on this in the plan.
- Local landowners stop the right to roam for people but are perfectly happy letting their imported pheasants roam all over the place, competing with native birds for food and causing car accidents. Local bylaws are needed to stop this
- The Local Plan should support farmers by encouraging greater diversity on farmland, including mixed crops and agroforestry, and plant more trees to improve biodiversity and help manage flooding.
- In urban areas, it should promote recycling on the go through public awareness and provide dedicated recycling facilities to make it easier for residents and visitors to reduce waste.
- For climate and health reasons we need much greener urban environments achieved by lower densities of development
- Bullet point 2 this gain should be as close to the development as possible and certainly in the area, not carbon credits or tree planting miles away.
- BP 4 especially IN new developments.
- BP 5 thumbs up to these especially swift bricks, please do it. Developers can afford it.
- BP 6 add "whilst protecting trees hedgerows etc"

- In relation to green wedges - these should be identified and protected for people and nature.
- The Local Plan should ensure that there are specific requirements for tree planting, particularly in relation to NPPF and BNG. Where translocation is proposed on site mitigation should always be preferred, and enforced, if at all possible to avoid possible loss through failure of translocation. Offsite habitat mitigation should provide an area and conditions comparable with, or superior to, the original location.

Q.21 What do you think the Local Plan could do to address all of the identified environment issues?

- More support for local conservation groups who are actively defending and improving the environment (Example - the very proactive activities of West Cumbria Rivers Trust).
- The Local Plan could include more protection for wild areas against unnecessary development. Where developments are made, they should be well thought out, considering wild environment and habitats in the area.
- The Local Plan could address environmental issues by investing in support for farmers to encourage land diversity and sustainable practices.
- In urban areas, it should improve street cleaning, provide recycling on the go, and work with businesses to reduce waste. Protecting farmland, green spaces, and waterways, alongside promoting local food and sustainable development, will help improve environmental quality and resilience across Cumberland.
- Statement that existing nest sites should be protected and require swift bricks in new developments as a minimum in accordance with NPPG Natural Environment 2025 paragraph 017 (plus any advice from local groups e.g. Keswick Swifts).
- By embedding Active Design principles that support both physical activity and ecological sustainability the Local Plan can help address issues relating to the environment.
- If the green and blue infrastructure already in place is protected and enhanced by encouraging accessibility to green and blue spaces as well as connecting them up via green corridors and active travel networks this would help encourage everyday use.
- Advocating biodiverse landscapes will help preserve natural assets whilst making them usable for wider recreation (including walking and cycling).
- Involving and engaging communities wherever possible through co-design of spaces and co-production of programmes/projects will help to build a sense of ownership and then in turn lead to better care for the environment.
- Trees have a natural lifespan. Preservation is not always a sensible option. It is sometimes better to fell large woodland trees in urban gardens and replant with small varieties.

Q.22 Are there any other energy issues that you want to tell us about?

- It is distressing to think about the potential loss of countryside on Dent Fell due to the proposed solar farm. If local residents are expected to suffer these sorts of losses, there should be clear benefit to those people who lose out in the form of

lower energy bills for local residents who have to put up with the eyesore and loss of green space.

- Bringing vacant buildings back into use.
- Retrofitting existing buildings to improve energy efficiency.
- Align transport initiatives with housing development and encourage developers to think about how to encourage behavioural change from private vehicle to sustainable modes of travel.
- Ensuring that power cable from any green energy production sites are undergrounded where possible.
- Moving to smaller nuclear power energy production and shared systems in new build estates
- Yes, drive local resilience in some areas and rapidly increase the availability of vehicle chargers
- Avoid the term natural resources as this includes coal! Encourage local community energy projects.
- It is so very important that old railway stations are reopened, so that people in Cumwhinton, Scotby, Wetheral and St Cuthbert Without garden village can travel into Carlisle city centre and go for a shopping trip to Leeds for a day out on the Settle to Carlisle railway line.
- Prioritise insulation of all homes.
- Copy the Scottish model where communities receive grants for community infrastructure from wind farms etc
- BP 4 - do we really want/need data centres? They are very heavy in the use of energy and water and don't provide many jobs post construction.
- There is insufficient focus on new homes being self-sustaining water energy usage. This should be an integral part of any new build proposal - i.e. PV and heat pumps.

Q.23 What do you think the Local Plan could do to address all of the identified energy issues?

- Ensure local people are appropriately compensated for green developments that impact on their local environment.
- More help to source and install alternative energy sources - particularly with some of the older building stock.
- Provide low-cost energy solutions for residents such as solar panels.
- To address the issues, the local plan could insist that new developments allow for local energy to be used on the developments. This should be during and after the development process.
- Develop a wind farm near the Solway, so we have our own energy supply and do not have to have pylons marching across the land from Scotland.
- Encourage the considerations of opportunities for combined heat & power units in new residential developments for their energy efficiency & carbon reduction benefits, particularly in larger schemes. Micro hydro power plant might also be considered.
- Retrofitting of existing homes to meet higher standards of insulation and heating.
- Energy taxes to encourage prudent use of energy.
- Better public transport.
- Community loan car schemes.

- Community energy schemes initiatives.
- Energy security is vital to sustain a vibrant and prosperous economy and support communities. As new and improved technologies emerge serious consideration should be given to all forms of energy production, including those previously though unviable or intrusive. An open gantry tidal fence (tidal stream array) using individual turbines suspended from a bridge-like gantry structure spanning the Solway estuary. These turbines would generate electricity from the ebb flow of tidal currents 24 hours a day, while the open nature of the gantry would allow water and sediment to continue moving naturally through the estuary. This design would mitigate many of the impacts associated with solid barrages.

Q.24 Are there any other connectivity and infrastructure issues that you want to tell us about? What improvements does your area need?

- Limit the amount of motorised transport in the Central lakes during peak season. Barrier some roads off (possibly the Borrowdale Valley?) allow access via ANPR systems for local residents, public transport, deliveries and prebooked parking spaces only.
- Digital connectivity.
- Rural Transport/Mobility.
- Public conveniences.
- Community buildings - places for people to meet.
- Infrastructure delivery and phasing.
- Rail service is ok, parking is not enough. We should have more trunk roads as dual carriageway and Carlisle Airport should do better with proper service.
- An issue concerning connectivity and infrastructure in Carlisle would be that vehicle congestion is commonplace. Improved traffic measures including traffic calming and decongestion measures could be put in place.
- Cumbria attracts large numbers of cycle tourists, yet the roads are very dangerous through lack of separation and dangerous potholes. Increase the network of safe cycle routes
- Our bus service is now so infrequent that it is seriously underused and very inconvenient. The last bus for us leaves Carlisle at 13:00. There is a total of three buses, only Monday to Friday, into Carlisle and only two back so the choice is to spend one hour or three in the town. Absolutely nothing at weekends. No wonder the city's roads are choked up with cars.
- Access to super-fast/hyper fast broadband direct to the home is proceeding very slowly
- Addressing the barriers to employment and skills development which results from limitations of the transport infrastructure is a wicked issue. There is however a risk that disadvantaged communities face increasingly higher barriers if this is not addressed directly, impacting on participation, productivity and community cohesion.

Q.25 What do you think the Local Plan could do to address all of the identified connectivity and infrastructure issues?

- Truly and sincerely prioritise active travel and public transport.

- Enhance tourism with better connections. Make Cumbria the healthiest place for people to live in the UK.
- To address all the identified issues, the local plan could use policies within the local plan to ensure that contactors and developers include these improvements alongside their original plans.
- Make sure all new plans for new builds include sustainable infrastructure.
- Ensure the widespread provision of electric vehicle charging facilities including provision for buses as more environmentally friendly fleets of vehicles are introduced.
- Manage traffic flow through the historic town centre to reduce congestion, noise, & damage to heritage buildings.
- Expand & improve walking & cycling routes.
- Encourage 'active first' design in new developments - layouts that prioritise walking & cycling over cars - & 'safe routes' to key town destinations / facilities for pedestrians & cyclists.
- Support better bus connectivity between Cockermouth & key destinations, for instance Carlisle Station.

Q.26 Are there any other minerals issues that you want to tell us about?

- Consider impact on residents of large-scale transportation of minerals through villages and along country roads.
- Explore more innovative approaches to reduce mineral extraction.

Q.27 What do you think the Local Plan could do to address all of the identified minerals issues?

- Transport impacts: consider how to minimise HGV traffic used to transport minerals across Cumberland.
- Carbon impact: encourage low-carbon practices
- Plan for restoration at the planning stage.
- Mineral extraction undoubtedly contributes to Cumberland's economy; it is, however, inherently intrusive and destructive of its immediate physical environment, while transport of the extracted material frequently creates its own environmental, social and highway impacts.
- Local Plan Policies should certainly encourage developers to use of locally sourced mineral products whenever possible.
- Whenever an extraction site closed the priority of all remediation should be to return the site to as near a natural state as possible, with landscaping facilitating natural recolonisation.
- Whenever re-purposing is proposed for uses that would generate noise and or light pollution, or would generate significant increases traffic, should be resisted.

Q.28 Are there any other waste issues that you want to tell us about?

- Promote recycling: e.g., Community repair cafes
- Composting awareness raising/education
- Design development to support waste reduction
- Improve NOT reduce the facilities for the disposal waste. Get rid of the charges for residents to dispose of unwanted large household goods.
- Improve the containers for kerb side waste. Improve amnesties for house waste. We make it easier and less costly for businesses to dispose of waste. this will reduce Fly Tipping.
- Food waste.
- More emphasis on making local companies generate less waste rather than putting it all on the local communities to reduce etc. If companies were obliged to produce less plastic packaging it would go a long way. The council should take the lead through its procurement policy.
- The UK should process all of its own waste. It currently exports 60% of its plastic waste. Waste policy does not seem consistent i.e. householders are asked to segregate their waste whereas shops seem to be allowed to dump mixed waste for collection.
- Promote design that supports waste minimisation, including internal recycling storage & spaces for bins. Consider whether to require new developments to provide 'Community Refuse / Community Collection Systems' modelled on schemes that are common in European countries such as Germany.
- Work with charities to establish strategically located 'Upcycling Projects' within Cumberland and Westmorland, drawing on best practice nationally such as 'The Forest Upcycling Project' in Chepstow, Cwmbran and Cinderford.
- Plan to improve the waste & recycling infrastructure, ensuring easy access for all residents.
- Encourage community composting schemes & waste education initiatives.
- Support sustainable local food networks, allotments & local markets to reduce transport related emissions.

Q.29 What do you think the Local Plan could do to address all of the identified waste issues?

- Offer larger recycle bins (or additional bins) to households with more people.
- The Local Plan could address waste issues by investing in public education to raise awareness about reducing, reusing, and recycling, including safe disposal of batteries, vapes, and other hazardous materials.
- The council should immediately ban the import of any more low-level, intermediate-level and high-level nuclear waste into the county. If such a ban proves impossible, then a prohibitive level of tax should be placed on the importing authority/country.
- The council should place a moratorium on any proposed plan to construct a GDF in Cumbria until we are more certain of the potential for the geology of the planned implant to remain stable over thousands of years. Whilst GDF's are being constructed in some other countries, it is in areas where the geology is more stable and certainly not sub-sea. Meanwhile, alternatives to GDF where materials are retractable, such as boreholes and transmutation continue to be explored.
- The plan needs to be explicit about the intentions regarding near surface disposal with a transparent consideration of options and associated risk.

- Cumbria should immediately stop shipping in nuclear waste from other areas/countries given the catastrophic risk it presents to the Cumbrian population.
- Waste recycling points should have facilities for people to take items for others to have
- Recycling of non-food waste best encouraged through kerbside collection schemes and convenient access to amenity disposal sites. Under no circumstances should material collected for recycling ever be sent to landfill or shipped overseas.

Appendix C: Summary of Representations made to the Main Document

This section outlines a detailed question by question summary of the comments received to the Issues and Options Consultation Main Document. (Please note where responses were made in respect to questions containing tables the data recorded has been noted but not summarised below)

Q.1 Do you agree with the proposed Vision for the Cumberland Local Plan?
7 – Yes 4 – No [Suggestions, including answers to Q2 below]
• Include reference to nuclear safety issues. • Highlight the importance of resilience. • Emphasise the importance of avoiding impacts prior to mitigation and the importance of developing resilience infrastructure. . More emphasis on the water environment should be incorporated into both the spatial portrait and as a result, the spatial vision (<i>Environment Agency</i>) • Emphasise that “sustainable rural settlements” contribute to achieving the housing requirement. • Provide greater specificity in relation to the spatial hierarchy, named growth areas, housing numbers, and the housing trajectory. • Highlight the link between environmental quality, cultural identity and public/social wellbeing. • Include reference to nuclear safety concerns regarding the GDF. • Acknowledge the growth of nuclear licenced sites beyond the Sellafield site. • Clearly state support for current and emerging nuclear programmes and projects. • Address impacts on and opportunities for the natural environment and set out the environmental ambition of the plan area (<i>Natural England</i>) • Include specific reference to active and sustainable transport infrastructure • Seek to reduce commercial transport and industrial activity. • Show how these aspirations translate to actions that challenge the societal influences on health and prosperity. • Expand focus to other forms of renewable energy. • Include the word “avoid” i.e. “we will <i>avoid</i> or mitigated development impacts” to emphasise that measures to avoid adverse effects should be taken first where possible. • Include reference to green infrastructure i.e. “... which have equal access to services, facilities, and green infrastructure. • Rather than simply aim to recruit working age people from outside the plan area, the vision should aim to attract such people to reduce the amount of commuting in and out of Cumberland. • go beyond only seeking to ‘respect heritage’ and instead ‘conserve and enhance’. This is a requirement of national policy. The vision should also reference good design, character, and identity. (<i>Historic England</i>) • include more reference to planning for open market and affordable housing to meet the housing needs.

- Include a defined settlement hierarchy, key allocations, and committed infrastructure projects for the Plan's period.
- Include reference to the legal duty on the local authority under Section 40 of the Natural Environment and Rural Communities Act to promote and enhance biodiversity i.e.
"We will support high quality housing, education and healthcare for all and promote biodiversity and access to nature within our high quality rural, coastal and urban environments"
- Be clear in supporting and enabling the nuclear development.
- Further emphasise housing growth.

Q.3 Do you agree with the proposed Cumberland Local Plan objectives?

3 – Yes
3 – No

- The Commissioners emphasise that smaller and medium sized deliverable sites, such as the Site, must form part of the strategy. This ensures flexibility and resilience of supply over the plan period, consistent with paragraph 73 of the NPPF which outlines how "small and medium sized sites can make an important contribution to meeting the housing requirement of an area" and "are often built-out relatively quickly".
- We feel the objectives could be strengthened further.
- We do not agree with the proposed Cumberland Local Plan Objectives.
- HBF would suggest that the Council should identify the maintenance of the five-year supply an important objective for the Cumberland Local Plan.
- At present, they are quite broad and generalised, so could be strengthened by adding some more measurable targets and reference to delivery tools (e.g. the IDP).
- Objective 12 needs amending recognise that minerals support wider manufacturing and potentially energy (non-hydrocarbon).
- Objectives should explicitly include equitable access to nature, culture, and healthy food as determinants of wellbeing. Integration of environmental, social and health objectives will help deliver inclusive and sustainable places.
- The Woodland Trust supports the objectives as outlined here. In particular, we are pleased to see point 10 around minimising environmental impact, as well as point 4 around protecting and enhancing Cumberland's natural environment.
- Whilst we are supportive of Objective 7, we recommend that the wording should be strengthened to better align with the NPPF and the Government's ambitions more widely. As such, we propose the following changes:
7. Meeting future housing needs in full – to provide housing to meet our residents' needs, including affordable housing, which meets a range of needs over people's lifetime.
- The minerals and waste policy needs to make clear where Cumberland believes waste disposal, in particular incineration and gasification, is most appropriately located and provide local residents with an opportunity to influence those decisions in relation to local waste management zones.

- The Local Plan should also seek best practice in designing anti-social behaviour and crime policies for our neighbourhoods.

Q.5 What is special about the area you live in that the Local Plan should protect and enhance?

- Outstanding natural landscapes and biodiversity, including lakes, fells, coastlines, and protected habitats.
- Historic towns, villages, and cultural heritage, which contribute to strong local identity and sense of place.
- Community cohesion and rural character, with tight-knit towns and villages supported by local services.
- Tourism and visitor economy, which underpins local employment while relying on the conservation of natural and cultural assets.
- Local economic diversity, including small businesses, agriculture, and niche industries that sustain communities outside urban centres.
- The Cumberland Plan should include the “Separation Distance” policy from the Allerdale Local Plan.
- The green space between the east of Brigham and Cockermouth from Ellerbeck Brow is an important ‘settlement edge’ and is at risk because of a series of inappropriate development applications and revisions, for example 2/2015/0318.
- The visual amenity, the dry stone walls and the Great Broughton Bridge along with the wildlife.
- More high-quality wild greenspace close to where people live as part of connected nature recovery network both for nature and climate adaptation
- More space for children’s wildplay (as wild play improves mental health and personal development / resilience) and where self-directed outdoor activity can happen
- More wild space around public facilities and assets e.g. NHS sites (because nature improves health and recovery from illness), schools and educational premises (as nature improves learning)
- Need to achieve the Government’s 30x30 targets.
- The historic environment, heritage assets and their settings should be conserved and enhanced. (*Historic England*)
- Many places in Cumberland have buildings - often older buildings - which provide nest site spaces for the Common Swift, which visits the UK to breed, between May and August. But they need more and better protection for their nest sites, and more replacements, in the form of Swift bricks, for lost nest sites.
- The Cumberland Local Plan should protect and enhance Raise: Cumbria Community Forest.
- The Sellafield site is one of the most complex nuclear licensed sites in the world.

Q.6 Is there anything you think that needs to change in your area? If so, please tell us about it.

- More diverse housing types are needed, including affordable homes, smaller units for first-time buyers, and flexible, accessible housing for an ageing population.
- Improvements in transport, digital connectivity, utilities, and health and education services to support growth.

- Ensure new development respects the landscape, heritage, and local character while delivering modern, energy-efficient homes.
- Protect and enhance local schools, healthcare, shops, and recreational facilities to maintain vibrant communities.
- Prevent tourism pressures from negatively affecting housing supply, local services, and community life.
- Consider implementing Visitor Tax and other policies such as levies on second homes and barely occupied holiday homes.
- Consider implementing congestion charges for non-ratepayers, with more use of ANPR technology and Park and Ride at key choke points
- Demolish inefficient properties and build new, energy efficient buildings
- The Council must give full notice of adjacent planning applications.
- The A66 roundabout at St. Bridget's is needed.
- There remains no safe island crossing at Brigham Road at the end of the potholed C2007 (to match what seems to be easily input at Threlkeld).
- Traffic increases on planning applications need to stop being reviewed individually as 'no consequence' – there's an obvious cumulative effect.
- The Council must make developers honour their section 106 or Community Infrastructure Levy (CIL) agreements to benefit the community.
- The aggregation of developer contributions needs to be facilitated.
- 'The Dump' (Derwent Forest) should be in Part Two of the Brownfield Register.
- A 'warning, narrow road' sign input to the top of Hotchberry to try and stop the long lorries following their SatNavs that have caused road surface scarring and domestic wall damage.
- The Bridge in Great Broughton has far too many massive lorries going over it. The bridge, which is a heritage asset should be better looked after, rather than overloading the structure.
- Cumbria's current infrastructure should be considered when large numbers of houses are put forward to be built.
- Smaller infill and small numbers of homes for rural areas instead of 50-70 houses at a time as this changes the character and culture of villages.
- We need greater and more effective protection for existing nest sites of the Common Swift (*Apus apus*), throughout Cumberland; along with the greatest possible number of Swift bricks incorporated into new builds, renovations and conversions, to compensate for historic and ongoing loss of such nest sites.

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

- Provide homes that are financially accessible for first-time buyers and young families.
- Promote local job creation and support sectors that appeal to younger residents, including tech, green industries, and tourism.
- Invest in schools, training, and apprenticeship opportunities to retain young people locally.
- Ensure access to sports, arts, cultural, and social spaces that make towns and villages attractive for families.
- Enhance public transport and digital connectivity to link communities with employment centres and wider opportunities.
- Create mixed housing, vibrant town centres, and attractive neighbourhoods that foster long-term settlement and social cohesion.

- Demolish the unattractive looking slum-like terraced old housing stock and replace it with more detached residences
- Be different than the cities. You can't bring a city centre nightlife quickly to most settlements across Cumberland (nor police it after 11pm) – that's perhaps not why people come here anyway - but you can put opportunities to live near the countryside and with a short commute to their jobs as well.
- Nurturing pride in place, through fostering a community sense of ownership of their locality and green spaces and empowering communities to manage them
- Ensure that developers are required to deliver the type of homes to meet identified needs, including affordable homes and those restricted to local (or in some cases principal) occupancy.
- Strategies which bring empty properties back onto the market as affordable homes.
- Improving connectivity so young residents can easily access places of work and the natural environment by public transport
- Create nature -based pathways into employment, supporting community - led projects such as Raise: Cumbria Community Forest – and other initiatives such as the Land and Nature Skills Service (LANSS).
- Create neurodivergent programmes, to support neurodivergent families and young people through Raise

Q.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.

- Planning for cross-boundary traffic management, including congestion, freight movement, and access to employment centres.
- Aligning housing targets with neighbouring authorities to ensure balanced provision of market and affordable homes.
- Avoiding displacement pressures where shortages in one area push demand into neighbouring districts.
- Collaboration on river catchment flood management schemes, including the Eden and Derwent catchments, to protect multiple local authority areas.
- Joint planning for drainage, sustainable water management, and climate resilience measures.
- Coordinated delivery of biodiversity net gain and nature recovery schemes that cross administrative boundaries, ensuring connectivity of habitats and protection of species.
- Ensuring Cumberland's waste management and mineral supply aligns with regional provision, avoiding shortfalls or duplication of infrastructure across boundaries.
- Collaboration with neighbouring authorities on employment hubs, industrial estates, and tourism infrastructure, particularly where labour markets and supply chains operate across boundaries.
- Supporting cross-boundary skills and training initiatives to ensure local populations benefit from employment opportunities.
- Provision of improved access to health and emergency services
- Iconic views such as Surprise View above Derwentwater. It is important such landscapes are protected.
- Light pollution caused by planning applications, such as considered by the LDNPA.
- Flicker and other issues which can be caused by major windfarm development.
- Cumberland does not have to be ugly to show that it is industrial.
- Excessive numbers of AirBNBs and holiday homes.

- Carlisle Integrated Water Management Plan will cross boundaries with LDNP and St Cuthberts Local Plan. Flood management issues such as: Cockermouth flooding issues are cross boundary with LDNP; Carlisle flooding is cross boundary with LDNP & Westmorland & Furness. Water quality and Invasive alien species affecting shared catchments with the Lake District National Park, Westmorland & Furness, and Scotland. (*Environment Agency*)
- The setting of National Landscapes, including the Lake District National Park. The Local Plan policies should ensure the purposes of the Protected Landscapes are furthered.
- Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site. (*Historic England*)
- Rural service hubs and affordable housing delivery - particularly in communities split by the National Park, affecting settlements across Allerdale and Copeland
- Strategic road network capacity and safety (M6, A66, A69, A595) – affecting links to Northumberland, County Durham and Tees Valley (A66 and A69), links to Westmorland and Furness (A66 and A590 connections, and the Irish Sea ports at Workington and Whitehaven.
- Rail resilience and capacity – Cumbrian Coast Line, West Coast Main Line, and Tyne Valley Line.
- BNG and Nature Recovery Network – spanning whole administrative boundary, but particularly affects Lake District National Park, Solway Coast AONB, North Pennines AONB (Carlisle/Brampton), and the river corridors of Eden and Derwent
- Raise: CCF operates Forest boundary runs through Cumberland Council, Westmorland and Furness areas and the LNDPA areas within this.
- Raise: CCF can contribute to cross -boundary issues across natural environment, public health, skills/ employment and economy.
- The Cumberland Local Plan must embed mechanisms for ongoing engagement with neighbouring authorities in line with Paragraph 24 of the NPPF. This may include provisions to support housing delivery across boundaries, especially where unmet needs may arise in Westmorland and Furness.
- The NDA Strategy (2021)¹ is a national strategy including such matters as the Government position for nuclear fuel and waste to be transported across the country to the Sellafield and LLWR sites. As a result, the new Local Plan will need to take account such operations.

Q.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?

- Beyond net-zero carbon targets, the Plan should address adaptation to climate change, including heat resilience, sustainable drainage, and management of extreme weather events across urban and rural areas.
- High-quality broadband and mobile connectivity is essential for homes, businesses, education, and remote working, particularly in rural and peripheral areas.
- Strategic planning for GP surgeries, hospitals, schools, and community facilities to support projected population growth and changing demographics.
- Ensuring that small villages and hamlets maintain access to essential services, transport links, and local employment opportunities to prevent rural decline.
- Coordination of renewable energy projects, grid capacity, and utility provision to support housing and employment growth while balancing environmental impact.

- Strategic alignment of housing, employment, and skills/training provision to ensure local residents can access emerging employment opportunities, reducing outmigration of young people.
- Ensuring sufficient long-term delivery of affordable, accessible, and flexible homes to meet the needs of first-time buyers, families, and an ageing population.
- Ensuring tourism growth does not compromise housing affordability, community cohesion, or sensitive landscapes.
- Access to larger 'social' homes for those who are fostering.
- To recognise our unique villages and not clump them together.
- Recognise the importance of safe places to walk and much more use of brownfield sites for building
- For agricultural hamlets, make it easier for an extra family home with conditions that it is for agricultural/family use.
- Landscape is a strategic issue which needs to be addressed, particularly as several landscape character types within Cumberland cross the boundary into other areas, including the Lake District National Park. As stated above, parts of Cumberland also form part of the setting to National Landscapes.
- The historic environment, heritage assets and their setting. Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site. (*Historic England*)
- More information on how the Plan will interact and relate to the Local Nature Recovery Strategy (LNRS). The LNRS should be a key piece of evidence that underpins the Local Plan identifying opportunities for nature recovery. The LNRS is not intended to be a block to development but to help identify where development can support nature recovery.
- Military sites must be considered to ensure the sites can deliver on their defence requirements and outputs. (*Ministry of Defence*)
- Priorities listed in Q7 should directly refer to green infrastructure. Delivery of the Cumbria Community Forest Plan – adopted by Cumberland Council Executive in July 2025 – and Raise's priorities around neurodiversity and biodiversity can contribute to improved public and environmental health.
- Recognition should be provided for the role the nuclear sector plays in the wider clean energy agenda, both from energy generation and enabling generation (by supporting the fuel lifecycle).
- The need to address challenges that residents living along the border with Scotland face when they are registered with a Scottish primary healthcare provider, but seeking treatment delivered by NHS England.
- Partnership with Carlisle College and the University of Cumbria to develop an attractive portfolio of courses which both encourage local young people to study here and attract other students from across the UK to choose our area as their study destination.

Q.11 Would Option 1 [Urban Focused Development] be an appropriate approach to promote sustainable development?

Yes x 2

- Yes, because the infrastructure has been considered by experts (planners) with local input and is not a free for all for developers picking any green field that would be most profitable.
- Settlement boundaries give people a sense of relief.
- It would be nice to have a plan that was NOT developer led.

- Carlisle has a significantly outdated 5-year housing land supply and was the authority which was struggling the most in terms of supply. As such, a strategy that concentrates nearly all new growth within the urban core of Carlisle risks exacerbating existing delivery constraints, because the city has fewer unconstrained, deliverable sites and greater infrastructure dependencies.
- Purely urban concentration would under-serve rural communities, contrary to paragraphs 73 and 83 of the NPPF, which demonstrate the benefits of the sustainable growth and expansion of all types of rural areas especially from sites found adjacent to or beyond existing settlements.
- Option 1 isn't an appropriate approach as some growth may be required in other larger settlements to maintain services and balanced communities.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. (*Historic England*)
- This approach supports efficient use of land and generally focuses development where there is higher provision of services and infrastructure.
- The main weakness of this strategy is that many of Cumberland communities live in rural areas, which are largely excluded from growth in this approach since extremely limited development would take place in villages and rural areas. These areas should also have the opportunity for growth, housing and investments in service provisions.
- Such a heavily urban focused approach could miss rural needs and slow down housing delivery should brownfield land sites be stalled. It could also add strain to the local highways network at its busiest locations. To make this approach more supportive of sustainable development, a criteria balance approach should be taken to allow for some development in villages and more rural locations, to ensure their needs are met.
- No. It would unfairly disadvantage people who already live in less accessible and poorly serviced villages and communities. It would reduce the resilience of those communities, making them less lucrative for full-time residents, and more likely to be used as short-term lets and holiday homes.
- Sellafield Ltd has a significant future construction programme which will require development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.
- Directing the largest proportion of growth towards urban areas with existing infrastructure and services, it should not be at the expense of other settlements.
- The NDA will invest significantly in decommissioning construction programmes which will require significant development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.

Q.12 Which settlements in Cumberland should be considered for inclusion within the 'Key Settlements' tier?

- Key settlements should be major service and employment hubs with good infrastructure, transport links, and capacity for growth.
- Egremont
- Longtown, Brampton, Aspatria, Wigton, Dalston, Maryport, Workington, Whitehaven, Egremont and Millom.

- Cockermouth, Cleator Moor, Silloth and Dearham would be excluded as they have no railway.
- Service provision in rural areas has already reduced and building houses there will not return pubs or shops to the communities.
- We'd like to avoid a nuanced approach in the Local Plan in favour of one with clarity. 'Nuance' brings the risk of undue developer influence in the countryside.
- The Local Plan should be to build up the coastal communities for their financial, service and resilience benefit.
- Since St. Cuthbert's Village near Carlisle will deliver ~667 homes per year of the NPPF target of 1,104 per year, we can see 437-or-so homes are left to build per year in Cumberland, assuming the workforce skills and numbers exist to deliver this given there will be demand for them across the whole country. We have 14 settlements to share that demand (Longtown, Brampton, Aspatria, Wigton, Dalston, Maryport, Workington, Whitehaven, Egremont, Millom, Cockermouth, Cleator Moor, Silloth and Dearham). 48 houses each per year for these settlements.
- Concentrating development along the coastal/railway settlements for this upcoming Plan.
- The past concentration (under Allerdale at least) of overloading Stainburn, Seaton, Cockermouth and Dearham can't be unsustainable.
- Fatalities are rising on the A66. Enough is enough in and around Cockermouth and we don't think it should be a key service centre or a sustainable settlement.
- The over-development of Dearham has caused the coastal towns, like Maryport to become denuded and for wealth to drift eastwards. Seaton and Stainburn's developments have affected Workington too. Settlement boundaries need to be respected.
- New large houses must accord with the actual Housing Needs Analysis.
- This tier should contain Carlisle and the towns.
- There are opportunities along the West Coast corridor, including Whitehaven, Workington, Maryport, Cockermouth and the villages surrounding these towns.
- The northern and rural market towns also have good growth potential, such as Brampton which has access to the A69, secondary school provision and provision of services to a wide rural catchment. Large well-connected villages could also be considered, such as Dalston which given its location on the railway line between Carlisle and Wigton, local job base, and key services such as schools, medical services, shops, and bus links, would make a viable service village.
- Houghton is strategically located in proximity to Carlisle and demonstrates the characteristics of a sustainable and well-connected settlement.

Q.13 How should development be distributed across the 'City' and 'Key Settlements' development tiers?

- City (Carlisle): 40–50% of new development, reflecting its role as the main employment, education, and service hub. Key Settlements (larger towns): 40–45% of new development, supporting local services, jobs, and housing in multiple centres to avoid overburdening Carlisle. Rural / Smaller Settlements: 5–10% of growth should still be allocated here to maintain village communities, support first-time buyers, and protect rural vitality.
- There is a need for more individualistic opportunity, instead of being herded into densely concentrated urban zones

- City 20% Key settlements 80% (i.e. 8% each)
- Village Halls don't remain as amenities as they struggle financially. Energy costs are also affecting Village and Memorial Halls with many operating at a loss because of the high price of energy, particularly those with gas heating and market rates for hiring being below the costs of heating they're not actually viable/sustainable by inputting more housing to say bring more class sizes, they're only viable if they can achieve grants for funding of the running costs.
- There is an ageing and slightly declining population in Cumberland (which you recognise) so there is a case for saying that this population needs to be where the services are, or they'll be lost too.
- Thus, we might suggest a town-focussed mix of 2-bed (so-called 'starter and finisher') affordable housing mixed in with the inevitable 4 and 5-bed developer-preferred-money-spinner homes would be a required tactic.
- Key infrastructure, especially a Railway Station within the Town or village must also be considered as a more favourable place for building than those with little or no public transport.
- Consideration should be given to the settlements capacity for growth taking into account the landscape, environmental constraints, existing infrastructure (and opportunities to improve connectivity) and the number of deliverable and developable sites.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP. (*Historic England*)
- NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated.
- Due to constraints, such as flooding and topography, Carlisle can only accommodate so much growth. Key Settlements with a sustainable level of infrastructure should also receive a meaningful share of development, reflecting their ability to support housing, employment, and services in a way that reinforces their role within the wider settlement hierarchy.

Q.14 Would Option 2 [Urban Focused with Sustainable Windfall Criteria] be an appropriate approach to promote sustainable development?

- There's not enough protection or acknowledgement of highways issues, SAC, AONB and other sites.
- Obviously developers are pushing this option to reduce protection against inappropriately sized and placed building.
- While concentrating growth in urban areas can make use of existing infrastructure, the approach underplays the positive and necessary role of sustainable villages in maintaining supply, choice and delivery across the plan period.

- No, this option provides uncertainty.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.
- We support Option 2. We agree that this provides flexibility and the ability to respond to local needs and demands, which is especially important given the large size of the Council's administrative boundary and rural nature. However, the Council must avoid the 'tick box approach' of hitting a minimum number of specific boxes against provisions being the determining factor.
- As highlighted at question 5, Sellafield Ltd has a significant future construction programme which will require development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.
- This approach appears similar to Policy HO2 of the legacy Carlisle Local Plan. Taylor Wimpey is therefore supportive in principle of Option 2, provided the proposed windfall policy wording is positively prepared, in line with Paragraph 36 of the NPPF. We consider that Option 2's approach would deliver sustainable development across the whole authority by permitting proportionate development covering all settlements.
- The NDA will invest significantly in decommissioning construction programmes which will require significant development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.

Q.15 Should the criteria policy have any specific provisions? If so, what should they be?

- Development should be proportionate to the size, facilities, and character of the village or rural settlement.
- Proposals should demonstrate adequate access to schools, healthcare, transport, utilities, and other local services.
- Development must not harm landscapes, heritage assets, biodiversity, or flood risk areas.
- Schemes should contribute to meeting identified local housing requirements, including affordable homes and smaller units for first-time buyers.
- Sites should be within walking or cycling distance of key services or have reasonable public transport connections.
- Demonstrate local support or consultation, particularly for windfall sites in smaller settlements.
- High-quality, context-sensitive design that integrates with the existing settlement pattern.
- Not everyone wants to live in a 'standard micro-box' - some people want to live in a modern, energy efficient, and unique residence
- Public Transport needs to be specified as going through the settlement, not 'nearby' such as along the A595 past Bridekirk where access to the bus stop is along un-paved roads.

- Access to a Railway Station is much better than access to a Bus – make them separate – you seem to recognise this is para’ 5.18.
- Having a Petrol Station is another useful criterion.
- What it would do is bring Silecroft, Braystone, Nethertown, St Bees, Parton and Flimby, for example into a “sustainable” category.
- The difficulty with anything other than Option 1 is that 'judgement decisions' have been misused in the past with so-called 'honeypot' settlements being turned into dormitory villages.
- Cumberland Council needs a new approach – it’s partly doing that with St. Cuthbert's to the south of Carlisle, to be fair - and to move away from the idea that creating estates in rural villages where people have to drive to access services brings anything but ‘traffic’ to the dormer communities they’re pushing onto them.
- When the Brownfield is used up, we can return to the idea of development in smaller communities but until then we need to make sure no more major services drift eastwards from the coast, which includes those drifting as far as Northumbria.
- Don't use a criteria lead plan. We could end up with our beautiful Towns looking like the outskirts of Penrith. The developers love it but it is sad that the entrances are massive edge/out of town retail outlets that have killed a lot of the small independent shops.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP (*Historic England*).
- The success of Option 2 will rely on clear, mapped sustainability criteria. Specific provisions could include size/scale requirements (village capes, cumulative impact tests etc), locational requirements (within or directly adjoining the settlement edge), and minimum/specific services within safe walking and cycling stance or supported by accessible public transport (preferably with links the centre and schools).
- There should be specific provisions enabling development in close proximity to the Sellafield site to support the Sellafield mission
- Taylor Wimpeny suggest that Cumberland adopt a similar approach to that utilised by Durham County Council. As an authority, Durham County Council shares similar characteristics to those of Cumberland in terms of a principal city with a mix of towns, villages and smaller settlements. Durham County Council opted not to define settlement boundaries and instead chose to assess development proposals on non-allocated sites, depending on their physical and visual relationship to the built-up area

Q.18 Would Option 3 [All towns plus additional tier comprising villages containing essential services] be an appropriate approach to promote sustainable development?

2x No
1x Yes

- Option 3 is developer led.
- Yes, in principle. Recognising all settlements with essential services better reflects the NPPF's expectation to plan positively for rural communities, identifying opportunities for villages to grow and thrive, especially where that will support local services (paragraph 83). However, "essential services" alone is a blunt tool. Accessibility (rail/bus), deliverability, and capacity must also inform settlement selection.
- It is clearer than option 2 as it identifies the services the village must contain.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. (Historic England)
- Compared to Option 2, the essential services factor does provide clearer signals for investment and development than a pure windfall approach, so would reduce the risk of scattered sites. Having said that, we do not think it is necessary to define which villages are sustainable, and that this should be considered on a site-specific basis.
- Support for Option 3 would be appropriate insofar as Gilsland is shown as a sustainable settlement under the option, which would match our categorisation of Gilsland as a Service Village
- Sellafield Ltd has a significant future construction programme which will require development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.
- Whilst our client welcomes Option 3's aspiration to deliver more housing in rural Submission Plan which incorporates both Option 2 and Option 3. Our client would therefore welcome the inclusion of a windfall policy, as referenced in Option 2. This would ensure that the strategy remains responsive to changing circumstances and does not inadvertently constrain growth in areas capable of supporting development.
- The NDA will invest significantly in decommissioning construction programmes which will require significant development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.

Q.19 Is using three services an appropriate number to determine a sustainable settlement?

- Relying on a fixed number of services is overly simplistic. Some smaller settlements could support development sustainably with fewer than three services if they have access to nearby towns or transport links.
- Sustainability should consider proximity to services, transport, infrastructure, and community resilience, rather than just counting physical facilities.
- A flexible, criteria-based approach (like Option 2) is preferable to allow sustainable development in a wider range of villages without being constrained by an arbitrary number of services.
- Public Transport needs to be split into 'Railway Station' (3rd) and 'Bus Service' (4th) This would make 'Post Office' needing to be the 5th and 'Petrol Station' the 6th. The need to reach the Main Service Centres like Workington and Whitehaven and the city of Carlisle, without a car, is important for sustainability.

- Option 3 brings too much pressure on greenfield and risks losing space between settlements. You need to support the communities that want to see boundaries retained. The idea that a greater spread of development across Cumberland is good for sustainability isn't right. Services are under pressure in the Towns and the villages need the Towns to be developed to keep them.
- You're not focussing Planning 'weight' on what actually constitutes a service providing 'sustainability' to a settlement these days. You don't consider Railway or Petrol Stations which bring associated services with them, from loos to coffee.
- You need to bear in mind where your key economic sites are.
- Sensitive development of a village brings sustainability to the local school, not the other way round. We suggest building affordable 1–2-bedroom houses close by will more likely bring 'sustainability' in settlements with primary schools, especially those close to economic key sites. They're also more likely to change hands on the market more frequently compared to large homes and so the numbers of primary school age children are replenished.
- This "3 services" still allows pristine countryside being built upon without consideration of public transport. For example using the outdated figure from Census 2021: Car or Van Availability in Broughton Parish (Allerdale) 61.7% of households need 2 or more vehicles because of the dire public transport. (It is much higher now with North Ridge and extra linear buildings along the Moor Road, these all have a minimum of 2 vehicles.)
- Four would be preferable, as well as the three selected above, some element of public open space should also be a requirement.
- The robust and fair assessment of sustainable settlements is more complicated than a tick-box exercise against a few essential services. Three services would risk misclassifying places.
- The scoring approach proposed in Option 4 would be more suitable, with points scored against different services such as a school, food shops GP access, bus service, utilities capacity, flood risk etc, and a pass mark and the allowance of clusters to combine scores. This approach would avoid ridged and quick 'yes' or 'no' judgements based on an arbitrary choice of three services.
- No. A sustainable settlement is one that is mainly made of full-time owners, living in their homes. It has less to do with services, and more to do with the make up of the village. Villages constituted mainly of holiday homes and AirBnBs are unsustainable.
- Our client considers that whilst selecting a fixed number of services to determine the sustainability of a settlement may offer a clear and consistent framework for decision-making, it risks oversimplifying the complex and varied nature of rural communities. Many factors contribute to a settlement's sustainability beyond the presence of a primary school, shop, and village hall. For example, access to public transport, proximity to employment opportunities, healthcare provision and digital connectivity are all relevant considerations.

Q.20 Would Option 4 [All towns plus additional tier(s) comprising villages that have a range of services] be an appropriate approach to promote sustainable development?

- No because vehicle requirement for transport to work isn't considered . To be greener again railway stations and the city should carry greater weight. Bus transport is erratic from the villages.
- The Commissioners broadly support the approach outlined in Option 4. It matches the NPPF's requirement to promote a sustainable pattern of development that meets needs, aligns growth and infrastructure, and mitigates climate change (paragraph 11), while also delivering a sufficient supply and mix, including small and medium-sized sites, across different locations (paragraphs 72– 73.
- No, a village may have a high number of non-essential services, which aren't as integral to community resilience, which would result in it having a high score.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.
- This approach would disperse development across Cumberland. It risks spreading development too thinly, and making infrastructure planning difficult, and diluting housing numbers in the key settlements. Therefore, we do not support this option.
- We strongly encourage the Council to identify growth corridors around strategic transport routes/local employment, which would be a more suitable approach to promoting sustainable development (I.e. Options 1, 2, and 5).
- Sellafield Ltd has a significant future construction programme which will require development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.
- Taylor Wimpey is generally supportive of Option 4, particularly the identification of Houghton as a sustainable location which could accommodate growth. Our client is also supportive of the creation of multiple tiers within the settlement hierarchy, which could help distribute growth more evenly across the authority area and reflect the diversity of rural communities.
- Whilst our client is broadly supportive of Option 4, we request that the proximity of settlements to larger settlements also be taken into consideration when identifying potential growth locations and finalising the Settlement Hierarchy for Cumberland
- The NDA will invest significantly in decommissioning construction programmes which will require significant development in close proximity to the Sellafield site in a rural location. The Local Plan should recognise and support this requirement.

Q.21 Which services should be included within the scoring system?

[Many respondents referred to the services used in underpinning document]

- Assumes Option 4 is sustainable but it's not, for similar reasons to Option 3. Developing villages won't bring the shop back or re-open the pubs, you will just create traffic.
- A member of the planning team confirmed that Brigham and (Little and Great) Broughton are the settlements identified to the west of Cockermouth with red dots. Brigham has no convenience shop nor a public house, so we're surprised to see it included. We understand there's a Social Club (membership) but even the input of

~40 houses at St. Bridget's Close (2/2012/0784 and many amendments including 2/2016/0311) virtually opposite The Club hasn't changed its financial viability.

- Please check with the parish councils what the actual state of a settlements' services are, especially ones like Brigham where they're 'dormitory'.
- Primary schools in small villages can be burdensome from a peak time traffic point of view since walking to school became less fashionable. We have already made the point that large houses don't generally bring primary school children to a settlement.
- Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.
- High weight services - main food shop / convenience store.
- Medium weight services – safe, lit walking and cycling
- Infrastructure capacity checks – water and wastewater, electricity grid, gigabit capable broadband.
- Exclusions – Flood Zone 3b (functional floodplain), coastal change management areas, national nature designations (where impacts can't be mitigated)
- Our client, however, questions the inclusion of a pub in the proposed scoring system over access to public transport, which arguably would facilitate sustainable development through enabling access to a wider range of services in larger settlements.

Q.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?

- No, services should not be weighted equally. Some services are more critical for sustainable development:
- Weighting ensures that development is directed towards settlements that can genuinely support growth, rather than overemphasising villages with non-essential amenities.
- An importance weighting should be used
- School, Petrol Station, Convenience Store, Post Office, Railway Station and Bus Service all 2pts Village Hall, Pub, Playground/playing field, Church and Restaurant all 1pt because they all have viability problems with modern communities.
- The Commissioners strongly advocate for a weighted scoring system. Assigning equal weight to all services would be a "blunt tool" (as noted in our response to Question 18) and would fail to differentiate between services that are fundamental to sustainability and those that are desirable but less impactful on daily travel patterns and community resilience.
- As set out above HBF support a evidence based assessment of rural sustainability informed by local understanding of how settlements work together, not simply a methodology that counts facilities and services.
- Hard exclusions should also be considered, such as high flood risk areas or coastal change areas, or where there are severe landscape/habitat constraints, which would rule the site out regardless of its service access score. It would also be beneficial to include service capacity checks, such as water and wastewater supply, schools and primary care capacity.
- The use of clusters for nearby villages would be beneficial, since these locations often share social infrastructure and cumulative capacity issues would need to be

accounted for. Another benefit would be that any caps or thresholds to development could be combined within clusters.

Q.23 Would Option 5 be an appropriate approach to promote sustainable development?

- Yes, with settlement boundaries for the smaller towns and villages
- Option 5 correctly recognises that sustainability is not solely determined by the breadth of services within a settlement, but by the ability of its residents to access a wider range of services and opportunities in larger centres via sustainable modes of transport.
- This is not an appropriate approach as there are issues with the reliability of the train service as shown by recent closures to the train line. Also, the bus/train stop may be poorly located on the edge of the settlement away from residential areas, for example at the Green. This would mean people have to walk some distance before reaching the station.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which assesses any allocation for their impact on the historic environment through screening and heritage impact assessments. This will then inform any proposed site policy and be tied into the plan. Thus, ensuring that the local plan meets the tests of soundness during EIP.
- We support this option as a logical approach to focusing growth on key settlements and large (sustainable) villages located alongside the main transport network. It is important that satellite villages within close proximity to main settlements should be viewed as part of the main settlement. For example, High Harrington and Seaton should be considered part of Workington, as is the case in the current adopted Allerdale Local Plan
- There is a risk that Option 5, if applied too rigidly, could exclude settlements that are otherwise well placed to accommodate growth but do not meet the specific transport criteria. This could particularly affect smaller villages that function as part of a wider network of communities, where services and facilities are shared across short distances. In such cases, development may help sustain or improve transport links and contribute to the long-term sustainability of the area.

Q.24 Are the current criteria robust in terms of considering a settlement as “connected” through the public transport network with regard to frequency and usability?

- The criteria of at least one bus service every two hours, six days a week, or a railway station is a reasonable starting point. However: Some areas may have seasonal or infrequent services that meet this threshold but are not practical for daily commuting or accessing key services.
- Connectivity should also consider evening and weekend services, particularly for access to employment, education, and healthcare.
- Strengthen the criteria to require services that are frequent enough to realistically support daily travel needs, not just minimum thresholds.

- No, because it relies upon the current existence of public transport. Whereas, in reality, new public transport is likely to be necessary
- The service needs to be shown to go 'through' the settlement and there needs to be a pavement to the bus stop.
- Option 5 is slightly better than just defining 'school, shop, Hall' etc. but just picking on bus routes isn't sufficient, you do need to consider railways more. If we look at the bus usage in Broughton and Brigham it is small numbers and probably only sustained because people want to go from Cockermouth to Workington and vice versa.
- The additional requirement for the provision of "at least a school, village hall, or convenience shop" needs careful refinement to ensure it does not inadvertently exclude genuinely sustainable settlements or create an overly rigid framework, where sustainable travel to a nearby larger settlement is readily achievable.
- No, the approach doesn't consider the frequency of the train service, only the frequency of the bus service. It also doesn't consider the distance from the station to the main settlement, with some stations being on the edge of the village some distance from residential areas.
- Cycling an increasingly popular alternative to car travel, particularly for trips up to 5km however, for some, this distance is frequently exceeded. Furthermore, following the pandemic, more people may opt to walk to work and to access other services via footways and Public Rights of Ways. As such, cycling and walking can play a key role in connecting settlements.

Q.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)?

- Connections should prioritise larger key settlements (e.g., Carlisle, Workington, Whitehaven, Penrith) where major services, employment, and transport hubs are located.
- Smaller key settlements can also be included if they offer significant local services, but connections should be to larger settlements to ensure sustainability and access to essential facilities.
- It could be any of the settlements that have onward Railway connections.
- Regular bus and rail connections are a key priority for anything labelled "key".
- The Commissioners contend that for a settlement to be considered "connected" and warrant inclusion into the Development Strategy under Option 5, its public transport links should primarily provide access to the main urban centres (Carlisle, Workington, Whitehaven) and/or designated Key Settlements within Cumberland.
- Considering which hubs the service must meet, the primary locations would be Carlisle, Workington and Whitehaven. Secondary hubs would also be acceptable where they provide key services, such as Brampton, Cockermouth, Maryport, and Dalston, or Whitehaven's and Workington's immediate 'satellite' villages, including Harrington and Seaton.
- The minimum public transport standard should be a frequency of at least an hourly daytime bus Monday to Saturday, plus peak time journeys. The journey time to a primary hub should ideally be within 45 minutes, and to a secondary hub 30 minutes.

Q.27 Would settlement clustering be an appropriate approach to promote sustainable development?

- No, there are no safe walking routes between village settlements with few exceptions like Seaton and Workington.
- It is removing the identity of the village by making up a new cluster clump and calling it something different.
- Merging settlements (this is what clustering is, merging for mergings sake) and is akin to removing their cultural identity and is bad planning practice.
- Words such as clustering are very dangerous in terms of good planning practices. There are generally no connection between villages, that is no pavements, street lighting and little useable public transport.
- Children need exercise, with few SAFE cycle or walking routes between "clusters" vehicles will be used. Eg. A playground in one village is little use to another in most cases.
- This principle reflects the reality of how many communities, particularly in rural areas, access services and opportunities, and it offers a flexible and robust framework for the Local Plan.
- It can promote sustainable development by treating nearby villages as one functional place, tying growth to the shared services. However, it does require safe walking, cycling or reliable public transport between the villages.

Q.28 How close should settlements be to each other to be considered as a settlement cluster for the usage of services?

- Settlements within 1–3 km walking distance or 2–10 km cycling distance could be considered a cluster for everyday services.
- For motorised sustainable transport or infrequent public transport: Distances could extend up to 5–15km, depending on service type and frequency.
- They would have to be virtually joined, such as Stainburn or Seaton is to Workington.
- This assumes that clustering is a good thing. It is removing the identity of the villages by clumping them together is not a good thing.
- Walking Distance: For frequently used, essential local services (e.g., convenience shops, pubs, village halls, nurseries), settlements should ideally be within a 15-20 minute walk of each other. This ensures that residents can comfortably access these amenities on foot.
- Cycling Distance: For services that might be accessed slightly less frequently or require a slightly longer journey (e.g., primary schools, local healthcare facilities, larger local shops), settlements should be within a 20-30 minute cycle ride. This expands the effective catchment area for services.
- Short Public Transport Journey: For access to a broader range of services in a slightly larger, but still local, settlement within the cluster, a short public transport journey (e.g., 10-15 minutes by bus or train) should be considered acceptable. This allows for efficient travel between clustered settlements, particularly where active travel might be less feasible due to topography or infrastructure.
- It shouldn't necessarily depend on distance alone but more ease of connection and travel time by sustainable modes of travel.

- Ideally settlements should be within 2km – 3km of each other or have a direct public transport link to the same town, to form a cluster. Moreover, for clusters to work, growth should be allocated to the most accessible nodes in the cluster not to the least connected edge of the settlement. It may be beneficial to consider settlement clusters through the lens of the 20-minute neighbourhood concept.

Q.30 Should clustering only be considered when considering transportation through certain modes of sustainable transport?

- Yes, but with flexibility:
- Settlement clustering should prioritise walking, cycling, and public transport to align with sustainable development objectives.
- In rural areas where active travel is less feasible, limited car travel could be acceptable, particularly for essential services like schools or healthcare, as long as overall environmental impact is minimised.
- The policy should aim to promote sustainable travel modes first, but recognise practical realities in rural Cumberland.
- Perhaps Railway or Bus but cycle lane provision is poor and only a small percentage of the community are able to or feel safe on Cumberland's current level of provision and, unfortunately, driver behaviour.
- Crossing the A66 or travelling along the A595 or A596 is not for the faint hearted.
- I feel that it is a very dangerous concept. From a spatial planning perspective, a single-minded focus on a cluster can lead to poor land-use decisions.
- The Commissioners strongly advocate that clustering should primarily, if not exclusively, be considered when transportation is facilitated through sustainable modes of transport. The very purpose of a clustering approach, particularly in the context of promoting sustainable
- development, is to reduce reliance on private car travel and foster communities where daily needs
- Clustering should only be considered if the settlement is connected by a frequent bus service and/or safe walking/cycling route.

Q.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?

- Brownfield-first is welcome where sites are viable, but overly rigid sequential tests can delay delivery and add cost. There should be flexibility to allow greenfield development where brownfield options are unavailable, uneconomic, or unsuitable for housing.
- Yes, but not exclusively - people should have the opportunity for individual expression of the residence in which, and where, they live
- Yes, and you should consider 'grey field' too.
- No building of housing within 5 miles of a Brownfield site – the Brownfield and associated infrastructure, such as roads, needs to be developed first. This should include the former Armaments Dump at Broughton Moor.
- Yes, with the proviso that the brownfield really is brown and NOT now considered a nature reserve.

- The criteria should aim to demonstrate that a less-preferred greenfield site is only allocated or permitted if there are no available, suitable, and deliverable brownfield sites to meet the identified need.
- Yes, but there is the need recognise that some brownfield sites are of outstanding interest for rare species and there is a need for survey and assessment before redevelopment. Individual site assessment/surveying and baselining needs to be undertaken prior to any development being permitted and BNG applied to ensure no net loss as a minimum.
- EA supports a 'Brownfield First' approach. This approach should integrate or mirror the Local Authority priority within the 'Contaminated Land Strategy' - a requirement for the LA under Environmental Protection Act 1990, Part 2A. Criteria based on risk assessment with highest potential impact prioritised based on harm to health, water quality, conservation. The more development of brownfield sites, that meet similar criteria in the Contaminated Land Strategy enables the LPA to effectively manage and comply with their Contaminated Land Strategy. (*Environment Agency*)
- In developing brownfield sites, the strategy should endorse NPPF paragraph 187.
- The Commissioners strongly caution against adopting a rigid or inflexible "Brownfield First" approach that would unduly restrict the supply of other sustainable and deliverable sites.
- Yes, developers (particularly those applying for major development) should be required to demonstrate that the development cannot be accommodated on a brownfield site within the settlement before a greenfield site is accepted.
- A recent CPRE report has looked at the opportunities that previously developed sites can provide.
- Historic England supports a brownfield first approach. It is important that this includes reference to and is assessed for its impact on the historic environment, heritage assets and their setting. (*Historic England*)
- Some greenfield sites which may be better suited to the delivery of family housing, when compared against brownfield and/or town centre sites which may be better suited to a certain type of housing type, often apartments which appeal to a particular kind of buyer.
- We have observed particular challenges facing some sites and locations, notably brownfield sites with open mosaic habitats and those needing to purchase off-site water units.
- If the authority does adopt a 'Brownfield First' policy it should have a policy of excluding sites with an actual or potential habitat classification of being Open Mosaic Habitat on Previously Developed Land ensuring that there is an appropriate ecological assessment before development is considered.
- A sequential test to prioritise the use of brownfield land will not be applicable for Sellafield as the nature and location of the Nuclear Licensed Site would be the primary driver.
- The Woodland Trust supports the adoption of a 'Brownfield First' approach. Prioritising previously developed land for new development helps to reduce pressure on sites not previously used for development.
- A sequential test should include clear criteria including:
 - Demonstrating that suitable brownfield land has been identified, assessed and exhausted before any other non-brownfield sites are considered.
 - Ensuring brownfield sites are deliverable, well connected to existing services and can contribute to regeneration and biodiversity enhancement.

- Protecting sites of high environmental value from development, including ancient woodland, veteran trees and priority habitats, regardless of whether they are brownfield or non-brownfield land.

Q.33 Should developers building on Brownfield land be required to engage with relevant Brownfield development funds?

- Fund engagement should be encouraged rather than compulsory, to ensure housing delivery is not unnecessarily delayed.
- There is a strong case for Cumberland to mandate engagement with these funds as a condition of granting planning permission, particularly for schemes that rely on viability arguments to reduce their contributions (e.g., affordable housing).
- Yes, developers should be required to demonstrate that they have sought funding from, and actively engaged with, funding bodies such as Homes England. This evidence should be provided by the applicant before a reduced affordable housing provision is accepted. Such funding can help overcome viability issues which are often quoted by developers as reasons for putting forward a non-policy compliant housing mix. It should also be provided when undertaking the sequential test referred to above.
- Engagement with brownfield development funds could be encouraged, but should not be mandatory since this could cause uncertainty, delay delivery or distort viability. We do not support this suggestion nor see the need for a brownfield specific local policy in Cumberland.
- No. I would have thought it was up to them to decide whether to access any relevant funds available.

Q.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?

- Rigidly applying a 70% figure could misrepresent the true deliverable housing capacity and affect viability assumptions for developers.
- The Coal Authority is of the opinion that building over the top of, or in close proximity to mine entries should be avoided wherever possible, even after they have been capped, in line with their adopted policy. In these cases ensuring that not all of the site is calculated as developable is very important so as to manage developer expectations.
- 70% seems reasonable
- It depends entirely on the site's characteristics and size, and the Council must be able to justify the 70% figure as part of its evidence base.
- 70% seems reasonable taking into account the requirement for on site BNG (where possible), public open space etc.
- An indicative standardised net developable area is an acceptable suggestion, and useful for early capacity testing work. In time it should be overridden with the site-specific testing of the allocation.
- The Council may want to consider different figures for different types/scales of development. For example, small urban infill sites typically have a 60 -70% net developable area. Whereas strategic sites such as school and centres typically have a 45%-60% net.
- No. More reasonable would be to assume that most new homes require green spaces of at least the size of the footprint of the property. This could be gardens

attached to the homes, nearby green communal spaces, allotments and so on. This means a net developable area of 50%.

- Whilst indicative developable areas are a useful starting point for the assessment of a site's capacity, site-specific circumstances should also be considered (eg. BNG provision and site levels). Indeed, typically in larger sites, the proportion of developable land is lower as there is a greater need for land for uses such as landscape buffers and schools.

Q.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?

- Cumberland roads are pot-holed and Highways England roads lack roundabouts and safe crossing places.
- You need a section 106 / CIL commitment to deliver infrastructure change that might in turn bring more employment hubs (e.g. those offices supporting Sellafield such as Albion Square) to continue reducing the amount of rush-hour traffic and to make travelling in general safer.
- Option 1 – Urban focussed. How would CC ensure that people's access to nature is not negatively impacted in key settlement tiers?
- The need to deliver 30x30. Protect natural heritage assets, e.g. designated wildlife sites and those green spaces identified by the community – protect these as community assets?
- It is likely that a higher housing need figure will be identified if the Government's latest standard methodology is used as a baseline. It is important that the Local Plan does not over-allocate housing sites, particularly greenfield sites, and that consideration is given to the contribution that empty homes, holiday lets, second homes and brownfield sites could contribute in terms of supply.
- Whilst the St Cuthbert's Garden Village sits outside of the scope of the Local Plan, the Plan will need to set out how the proposed 10,000 homes already planned on the site will contribute to meeting identified needs.
- The introduction of mandatory Biodiversity Net Gain is impacting on density. HBF request that Local Plan allocations fully consider the issue of delivering against the new BNG requirements. This should include undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations.
- The Development Strategy should demonstrate clear, upfront support and promotion of the role of nuclear development in West Cumbria. Furthermore, the Local Plan should support the nationally significant mission at Sellafield, in line with UK Government Policy and NDA Strategy.
- Brampton should not be seen as a 'key settlement for further 'development' due to its unique character as a market town and the fact that four sizeable developments in the pipeline (between 2026 and 2030) include a total of 470 additional homes. This will mean an additional population increase of at least 1000 (existing population of 4186) - representing a 24% increase. The expanses of fells and woodland, together with a diverse variety of habitats should not be seen as fair game for covering Cumbria in concrete and bricks.
- The draft plan seems to confine it's definition of the word 'sustainable' in terms of infrastructure, yet the response form asks us to prioritise a list of facilities that does not include doctor's surgeries, dentists, pharmacies or care homes. These vital public services are the number one reason that residents in Brampton cite in terms of them already being overstretched. When this objection is raised in planning meetings we are told that lack of provision in these areas is not a 'material

planning consideration.' Developers need to be making a contribution to them, by commitments to 106 agreements or otherwise. Also, the 'get out' clause of not requiring to do this below a certain build number (I think it's 250) should be removed.

- Longtown is identified as a place for more new houses to be built. But we must stress that the capacity to do this should be limited by the lack of 'facilities'.
- All of these facilities have gone to the detriment of residents of the town and surrounding parish. Add to this that if the Waverley Railway is reinstated and extended to Carlisle, it is likely to miss the town, with at best, possibly a station at Smalmstown.
- Don't build more houses or only a limited number with some social housing.
- Provide this community with an academy whereby children can go straight through school and on to sixth form without the need to be transported to another town
- Could we request the following information:
- What is to be the future of the land on Moor Road left there as a legacy of the closure of Lochinvar School?
- Is the land left vacant on Burn Street by the closure and demolition of the Catholic Church and the large area of land behind owned by Cumberland Council and if so what is planned for it?
- All of that low lying land below Arthuret Church to Esk Street acts as a natural flood plain and protects other areas higher up in the town, particularly at Lochinvar Close which has flooded in the past, and therefore we would not wish to see it developed. Likewise any land along the River Esk for the same reason.
- The Parish Field between Lochinvar Close and the Old Road should be retained as an important green space for community use i.e., recreation, play areas and health and wellbeing use by the community and should not be developed.
- The auction is very important to Longtown and good that the MOD Site is once again considered to be a strategic asset, and features prominently in the Defence of the Country with its recent new storage facility, guaranteeing at least some local jobs for the future.
- We strongly support giving priority to the regeneration of Carlisle, Workington, Whitehaven, and Maryport. These settlements already benefit from good public transport links (particularly Carlisle) and offer significant potential for higher-density housing close to existing services. Increasing residential development within our urban centres would help revitalise them as retail, leisure, and cultural destinations while also providing opportunities for more mixed and affordable housing.
- Development should be directed towards locations with strong public transport connections, particularly rail. Evidence consistently shows that rail links are more effective than bus services in reducing car dependency. We therefore suggest that rail-connected communities such as Carlisle, Brampton, Wetheral, Dalston, Wigton, Aspatria, Workington, Whitehaven, and Millom should receive higher priority for sustainable development than those served only by bus.
- The availability of education provision should be a key factor in determining the scale of growth in different communities. There is an important distinction between settlements with both primary and secondary schools and those with only primary provision. Significant housebuilding in settlements without secondary schools (for example Longtown, where the nearest is over 10 miles away) would increase car dependency and travel distances for families.
- We also propose that the Local Plan considers identifying a second garden village elsewhere in Cumberland, enabling the Council to plan new housing alongside new infrastructure, services, employment opportunities, and community facilities. A second planned settlement would provide for long-term sustainable growth while reducing piecemeal development pressure on existing smaller settlements.
- The main issue we have at this stage is that the Council intends to move straight to Regulation 19 consultation following the close of this current consultation. In the

absence of being able to provide meaningful feedback on the housing requirement and the spatial strategy through this very high level, thematic consultation on 'approaches', the Council will be moving to Regulation 19 consultation having only revealed the spatial strategy for the first time at that stage. As such, the Council risks the publication and submission of a local plan that has not been fully considered prior to this point, significantly increasing the potential for the plan to be found unsound.

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

- Not in Maryport as we have streets of affordable terraced small 2 & 3 bed homes
- Overly rigid affordable housing requirements, particularly on smaller or marginal sites, risk making schemes unviable and therefore undeliverable.
- Yes, there's no excuse. And developers should not be able to back out of commitments made in outline planning permission studies for their 'secret' financial profitability excuse. Get another developer if the original proposer can't deliver.
- Where affordable housing provision is undeliverable due to viability, occupancy restrictions could be used as a middle ground between affordable and open market housing.
- A rigid on-site requirement can also slow down housing delivery due to the negotiation times and admin involved. Considering known viability constraints on much larger sites across Cumberland, we do not think it is realistically achievable to require affordable housing on smaller development sites and therefore do not support this suggestion.
- I would have thought that the council should be seeking a proportion of affordable homes in all developments including those under 10 dwellings.

Q.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?

- Absolutely - Maryport has had no new housing developments since circa 2000 (The Beaches estate) and desperately requires new housing, whether these are modern low-rise flats or a mix of housing and flats, the harbour area is ideal to build and develop a marina village as that's the only area of any size which currently has no housing and is within walking distance of the town centre
- Yes, it is important that affordable housing policy reflects local market conditions. A "one-size-fits-all" policy risks stalling development in lower-value areas, particularly where house prices and build costs are out of alignment. A zoned or differential approach – with higher affordable targets in higher-value market areas and lower expectations in more marginal locations – would better balance need with deliverability. This ensures that affordable housing is delivered where viable, while not undermining overall housing delivery across Cumberland.
- No, there should be affordable housing everywhere
- No. If the Plan is to focus on the towns and bringing the west coast up to the standards of the east (Brampton, Thursby, Cockermouth – and outside the area at Keswick) then better affordable housing is needed there as a short and medium-term Plan.
- Yes, in order to maximise provision and reflect different needs but also acknowledge that there are areas where there may be greater viability constraints.

- Yes, given the size of Cumberland's administrative boundary, affordable housing requirements should vary by sub-market and need in different areas. Though the overall need is high, the values and build costs will differ by place. Having a single requirement could mean delays to delivery on sites in weaker markets.
- Yes. There appears to be a certain amount of social housing still available in areas such as Maryport but very little in places such as Penrith and possible Keswick. Consequently, people who become homeless in areas like Penrith are forced to move to social housing on the coast in places like Workington or Barrow.

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

- Broad support
- Specifying an expected tenure split offers significant benefits by guiding the type of affordable housing that is most needed, aligning with the NPPF's requirement for plans to assess the needs for different types of housing, including affordable housing (paragraph 62), and to plan for a mix of housing tenures (paragraph 71). This proactive approach helps to ensure that new developments contribute meaningfully to the identified housing challenges. However, it is equally important that the policy incorporates a crucial degree of flexibility to account for site-specific circumstances and evolving market conditions.
- Yes, it should based on evidence of need.
- Flexibility is needed to ensure sites remain viable and deliverable. HBF would therefore request that flexibility should be included within any affordable housing, because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or vales of a specific site fall outside the parameters used of a typology that was tested.
- Some site will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. HBF therefore requests that any affordable housing policies include policy wording that allows for the opportunity for negotiation around policy requirements for site specific reasons, as any sites whose circumstances fall outside the parameters of the typologies tested could already be unviable under the proposed Local Plan policies.
- Our client supports the delivery of a range of affordable housing tenures to meet the diverse needs of local people. However, as acknowledged in Paragraph 4.14 of the Cumberland Housing Strategy, the tenure split of affordable housing 'needs to be considered on a site-by-site basis'. Rigidly applying a fixed percentage between affordable housing tenures within policy risks reducing the flexibility needed to respond to site-specific viability, market conditions, and evolving local needs. We therefore request that if the tenure split is prescribed in the emerging Cumberland Local Plan, it allows for flexibility through negotiation at the planning application stage. This approach would ensure the emerging Local Plan is justified and effective in the delivery of affordable housing.

Q.40 Do you consider short-term letting an issue? If so, please provide evidence as to why and where it is an issue.

- Not so much in Maryport at present, but the town is on the up so could be an issue in future. the block of flats opposite the Maryport Activity centre does not allow short term lets, but Ritson Wharf has no such restrictions.

- Yes, short-term letting has become an issue in parts of Cumberland, particularly in high-demand tourist areas such as the Lake District fringe, market towns, and popular villages. While platforms such as Airbnb provide flexibility for visitors and additional income streams for homeowners, the scale of conversion of residential properties into holiday lets has had noticeable impacts on the housing market.
- Evidence from local agents and market appraisals indicates that in some settlements, a disproportionate share of smaller and more affordable homes are being absorbed into the short-term letting market. This reduces the supply of properties available for long-term rent or purchase by local households, inflates rents, and contributes to affordability pressures. It also risks creating “seasonal communities” with lower levels of permanent occupation, weakening the social fabric, school rolls, and year-round trade for local services.
- Yes, it is an issue. Houses that were being let to family’s are now being used for short term high gain, through companies like Airbnb.
- Areas all around west Cumbria have this issue.
- Not so much in Cumberland
- Keswick is outside the scope here, but people are increasingly coming to Cockermouth, for example for the parkrun and for Stag Weekends.
- Yes, the little starter homes are nearly all AirBNBs or second homes now and they do not contribute very much to the economy, for example they often bring food with them.
- Evidence shows that short term holiday letting is an issue in certain parts of Cumberland, particularly in settlements close to the Lake District National Park boundary.
- Our Who Pays for the Lake District report states that “In the Copeland area of the Lake District there were 426 new homes created in the last three years. Over the same period, 407 existing homes were converted to commercial holiday lets or second homes”.
- Short-term lets have swallowed up multiple villages across Cumbria. For example, places like Gawthwaite (near Grizebeck), and Askam (near Shap) where a huge proportion of dwellings are either holiday homes or AirBnBs. Entire communities have been eroded, with no possibility for local long-term lets or home purchases.
- It will necessary to have short term lets in most areas but the council does need to develop a policy to address the issue of holiday lets and second home ownership. This is a massive issue in Keswick and to a lesser extent in Cockermouth.

Q.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?

- Limit the number per development within the build contract
- A balanced approach is needed. Short-term lets have a valid role within the visitor economy and should not be unduly restricted across Cumberland as a whole. However, in areas of acute housing pressure, a more managed approach could help protect local housing supply and community resilience.
- Targeted control in high-pressure areas – e.g., designated localities where the concentration of short-term lets is demonstrably reducing permanent housing availability.
- Requirement for planning permission/change of use where a property is to be converted from permanent residential use into a short-term let. This ensures proposals can be assessed against local housing need and community impact.
- Monitoring and evidence-led thresholds – e.g., review mechanisms where the proportion of short-term lets in a locality exceeds a certain percentage of stock.

- Exemptions for owner-occupied homes where short-term letting forms a small part of use (e.g., occasional Airbnb), so as not to penalise households supplementing income.
- New build, affordable housing should only be available to local people.
- Make AirBnB's pay a high Council Tax premium and require planning permission including neighbour consultation. Make it retrospective
- Planning policy with a presumption of refusal of change of use unless there are extenuating circumstances.
- Create an Article 4 Direction?
- The monitoring of short term holiday lets through business rates and council tax records (and other data) is important as there is currently no national register and many changes of use to short term lets (i.e. from a standard dwelling) are permitted development.
- The Council could consider lobbying Government for a change to the General Permitted Development Order to create a Use Class for Holiday Lets. This would enable monitoring of the amount and impact of short term holiday lets, for example on housing availability. It would also enable the Council to put Article 4 Directions in place to limit numbers where there is evidence to do so.
- Whilst at present it is impossible to implement Council should consider a policy that prevents large extensions or replacement homes becoming short term holiday lets i.e. through the use of condition in areas where there is significant demand. The existing Copeland Local Plan policy which restricts the size of extensions in order to ensure a supply of smaller homes is retained is also useful.
- The use of local/principal occupancy clauses could also help retain properties as homes to meet housing need.
- The Council should maintain an updated register of all short-term lets in the authority area. It should also require planning permission to turn residential properties into second homes or holiday lets, and charge from 150–300% council tax premium on such properties. If this isn't already allowable in law, government should be pressured to enable it.

Q.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?

Yes, 3 votes for M4(3)
Yes, 4 votes for M4(2)

- We would urge the Council to recognise the guidance from the PPG when considering whether to go beyond the current Building Regulations.

Q.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?)

3 votes for all housing developments with 10 or more dwellings
3 votes for all housing developments

- We would like to highlight that each site has its own constraints and in some instances, it is not always possible to deliver the optional M4(2) standard dwellings. Not only do we request that the M4(2) requirement be informed by

robust evidence, but we also recommend that a future policy allow an element of flexibility if standards are deviated.

Q.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?

4 votes for all housing developments with 30 or more dwellings
1 vote for all housing developments with 50 or more dwellings
1 vote for all housing developments with 100 or more dwellings

- If there was robust evidence that justified a need for M4(3) standard dwellings, our client would not object in principle. However, as an experienced housebuilder, Taylor Wimpey recognises that each site has its own constraints and as such, the provision of M4(3) standard dwellings may not be feasible from a physical or viability point of view. We therefore request that the Council recognise the PPG when considering whether to apply any such standards to the delivery of M4(3) standards.

Q.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?

- *Broad Disagreement*
- Higher standards should be targeted, evidence-based, and flexible, with a stronger emphasis on affordable housing provision, and lighter, viability-tested application for market housing. This way, Cumberland can meet genuine specialist housing needs without choking off the wider housing pipeline.
- The need for and potential to benefit from access features is not restricted to the occupants of one type of tenure. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population which drives an increasing incidence of age-related disability.

Q.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.

- They have a place, but we should be carefully of allowing too many HMO's and limit the number of conversions as they can destroy town centres as we have seen in many cities and towns
- For Cumberland, the issue is not HMOs in themselves but their scale, location, and management. In smaller market towns and villages, HMO demand is limited and unlikely to become problematic. In urban centres such as Carlisle, Workington, and Whitehaven, targeted policy controls may be required to prevent over-concentration in particular neighbourhoods and to safeguard community balance.
- HMO's can be an issue. Salford Council have already identified areas where no HMO's are allowed and they have a rule where a private house cannot be

sandwiched between two HMOs for noise reasons. See, for example, Salford City Council's Local Plan Policy H10, section 1.

- Noise, public health issues around waste disposal adequacy and loss of amenity are often issues. The potential loss of good family-sized houses in Service Centres that we're trying to improve would be regrettable. Building properly sized alternatives with infrastructure facilities is better and less strain on busy roads and on-street parking spaces. The inevitable extra vehicles that these out-of-character developments might bring should be avoided in Towns.
- High concentration and poor management of HMOs is viewed as detrimental in parts of the Cumberland area, particularly in relation to community and housing stability.
- LAs & community groups such as Barrow and areas near the Lake District National Park have raised concerns that with rapidly increasing HMO numbers
- Due to the demand for HMO accommodation in the Furness area, Westmorland and Furness Council is considering the use of Article 4 Directions to limit them in certain areas and give them control over the smaller HMOs which are currently permitted development.
- HMOs can have adverse impacts on neighbouring residents through noise and disturbance and increased demand for parking, which can in turn, have negative landscape impacts. They can also reduce the stock of larger homes in an area. Any future economic growth in Cumberland, particularly around the "Energy Coast" area could see a demand in HMOs in places such as Whitehaven.

Q.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? – 1 respondent agreed
- Should the Local Plan require housing developments to provide a proportion of self-build and custom-build homes within their schemes? - 1 respondent agreed
- 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? - 5 respondents agreed

- Applications for self-build and custom build housing should be dealt with on a case-by-case basis.
- Paragraph ID: 67-003-20190722 of the PPG confirms that 'to obtain a robust assessment of demand for this type of housing in their area, local planning authorities should assess and review the data held on registers. This assessment can be supplemented with use of existing secondary data sources such as building plot search websites, 'Need-a-Plot' information available from the Self Build Portal and enquiries for building plots from local estate agents'. Therefore, if the Council were to include a self-build and custom build policy, robust evidence would be required to ensure that the policy is justified, in line with Paragraph 36b of the NPPF.

Q.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%

- 10%
- We would not support a blanket requirement on all sites, as this could undermine deliverability. Many SME schemes are fewer than 30 homes and already face challenges around viability and land assembly.
- 5%
- It might be useful to designate 'The Dump' area at Broughton Moor as the preferred location for self-build in the County but we don't think a development should contain a proportion of self-builds. These should be for infill sites only or Broughton Moor only.
- 1 + 2

Q.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? - 3 respondents agreed
- Developments of five or more relevant dwellings? -3 respondents agreed
- Developments of ten or more relevant dwellings? -1 respondent agreed

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

- 10%
- We would recommend a target of at least 20%, with flexibility for local context. This would provide a more balanced supply of land, reduce reliance on a small number of large sites, and support resilience in housing delivery over the plan period.
- 40%
- 20
- No, 10% is sufficient unless you're going to use up small Brownfield sites as a priority in which case 'brownfield' trumps the '10%'.

Q.52 Are there any other factors that need to be considered in order to support smaller house builders deliver homes in Cumberland?

- Local authorities to ensure when disposing of their land that a mix of affordable housing is included in any development
- Increasing the proportion of small site allocations and reducing disproportionate burdens will allow SMEs to continue playing a crucial role in delivering much-needed housing across Cumberland.
- Make some land available, with large boundaries between residences
- Smaller developments should be preferred.
- The developers should be dissuaded from creating hamlets in the countryside and supported to provide infill in settlements without suffering back-building.
2/2017/0208 at Lawson Garth in Brigham would be a good example of desirable self-build that the Parish Council finds easy to support

- Must demonstrate incorporation of reasonable crime prevention measures to benefit future occupiers.
- The Local Plan should support community-led housing.
- Is important that sites are allocated and deliverable and the policy requirements do not become unduly burdensome.
- No, whilst a significant proportion of housing in Cumbria is delivered on small sites, 10% would align with the National Planning Policy Framework, paragraph 73.
- SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market and be of a scale that can come for-ward and make a contribution to housing numbers earlier in the plan period.

Q.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?

- No, the development should be driven by demand and the local market.
- We would support a policy that provides clear parameters but also allows for flexibility. Replacement dwellings offer an important opportunity to deliver modern, energy-efficient, and accessible homes that can sustain rural communities. However, a rigid size restriction could unduly limit design quality and discourage investment in renewal.
- A proportionate approach would be more effective — for example, allowing a reasonable increase in size (e.g. up to 30–40% larger than the original dwelling), provided the design respects the rural character and landscape. This ensures that homes are future-proofed without creating a pattern of disproportionate suburbanisation.
- Should the Local Plan require that the replacement dwelling be sited on the original footprint?
- Not necessarily. Requiring a dwelling to be built on the exact original footprint would be too restrictive. In many cases, relocation within the curtilage may improve design outcomes, reduce visual impact, and better respond to site constraints such as flood risk, orientation for energy efficiency, or access. Policy should therefore allow relocation within the existing plot where this delivers an overall planning benefit.
- Yes. To avoid creating loopholes for new dwellings in the countryside contrary to policy, replacement dwelling policies should apply only where the building has an established lawful residential use. This ensures that replacement policies genuinely renew existing homes rather than enabling new sporadic development in the open countryside.
- Yes. The original footprint should be used.
- Yes, within a small margin, the replacement dwelling should reflect the original footprint (and height) to avoid loss of visual amenity and to protect the countryside.
- Be careful with commercial premises - the new Cafe on Maryport Prom did not have to be so small (footprint of old toilet block?) and it feels quite cramped now as it was fairly obvious it was going to be popular.

- Should this policy be taken forward, then it should be made clear that this does not apply to developments which affect heritage assets and their setting. The appropriate consent will be required

Q.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?

- More consultation with local people to get a better understanding of each area as they also have different demands.
- Yes. In addition to the matters already raised, the Local Plan should consider the following issues to support sustainable housing delivery across Cumberland:
- Many smaller sites and SME-led schemes are particularly sensitive to costs. Overly rigid policies around affordable housing, accessibility standards, design codes, or infrastructure contributions can make marginal sites undeliverable. Policies should be evidence-based, flexible, and viability-tested.
- Infrastructure and servicing constraints.
- Rural and edge-of-settlement sites often face practical constraints such as utilities, drainage, and road access. The Plan should identify how these issues will be supported or de-risked to avoid delivery bottlenecks.
- Long-term housing mix and adaptability.
- The Local Plan should promote homes that are adaptable for changing household needs over time, not just meeting immediate demand. This includes flexible layouts, energy efficiency, and provision for an ageing population.
- Beyond housing numbers, the Plan should consider the impacts of development on community cohesion, local services, and long-term affordability. Policies should balance the provision of new homes with sustaining vibrant, resilient local communities.
- Opportunities for self-build, custom-build, and modular construction should be actively encouraged, as they can deliver homes quickly, increase choice, and support SME participation.
- The local plan should contain statements which protect the environment and wildlife. Special attention should be made to those species which are protected in law to prevent any developments destroying them or their habitat.
- We need to cater for smaller families (single parents and single people) more than bigger families.
- Local building materials should be prioritised.
- This chapter also needs to consider empty homes and refer to measures to bring them back into use. This could be through Empty Homes Strategies or affordable housing contributions where the developer is unable to provide affordable housing on the development site.
- Developers should be required to demonstrate that the mix of housing on their site addresses the needs identified in the evidence and advised by the Council's Housing Team.
- HBF does not consider that requiring major developments to provide for self-builders is appropriate. Instead, HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites

specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners.

- Specific mention of requirement to integrate green infrastructure as part of new housing developments over a certain size – using similar principle to St Cuthbert's Garden Village.
- The Cumberland Council (and therefore this plan) need to resist notions from central government to further water down democratic rights of Cumbria's residents to voice objections.
- Cumulative impact of separate developments.
- Each planning application should be considered alongside current applications already approved and likely to be granted.
- The general assumption that only private developers can bid for land should be reconsidered. Scope and encouragement for community land trusts and co-operatives should be rolled out, and buying of land for development by the council itself to build council homes should be given priority.
- The new local plan should be prepared over a minimum 15-year period from adoption in accordance with paragraph 22 of the Framework. The Cumberland LDS 2025 anticipates adoption in March 2028, although this allows for no flexibility. The plan-period should be a minimum 15 years from adoption, and we consider at this stage that a plan period of 2045 is appropriate. Based on an end date of 2045 the minimum housing requirement for 2025 to 2045 would be a minimum of 22,240 dwellings.
- The Standard Method sets out a minimum need for 1,112 dwellings per annum for Cumberland. This should be the starting point for the Local Plan although further work is required regarding the needs for the National Park. However, there is no reference in the consultation document to this figure of a proposed requirement for the plan period. This should be addressed. not normally have to be thoroughly justified at examination."
- Paragraph 40 states that authorities, once they have made an assessment of need, then need to consider land availability, constraints on development and any other relevant matters. The only meaningful policy restraint in Cumberland is National Landscapes and Heritage Coast. With the potential exception of the National Landscapes and Heritage Coast, we do not consider that there are any constraints that would result in a conclusion that the standard method cannot be met once the HELAA review has been undertaken given the availability of land around the range of settlements in the plan area.
- We consider that there should be a buffer of at least 10% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning where a 20% buffer was recommended. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.

Q.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)?

- Yes, in principle, but only for very large developments where there is a genuine opportunity to create measurable local employment and skills benefits. For most SME and medium-sized schemes, even those over 50–100 homes, requiring an ESS would be an unnecessary administrative burden because these sites are often delivered in stages and workforce numbers fluctuate.
- For smaller or medium schemes, guidance and encouragement rather than a mandatory ESS would be proportionate and practical.
- There should be a limit because you don't want this for infill ones-and-twos, self-builds etc. but for skills to benefit it'd need to be a big company, not reinventing itself for tax avoidance reasons every 2 years etc. and so might only be applicable to the National Companies or large local ones like Story.
- Yes, a Local Plan should ask for an Employment and Skills Statement to accompany the submission of major planning applications.
- This is a key way to ensure that major development projects deliver Social Value and tangible benefits to the local community.
- To avoid unduly burdening smaller developers, thresholds could be Residential: 10 or more new dwelling units and Commercial/Non-Residential: Over 1000m² of new floorspace.
- Yes, this would be useful when carrying out the planning balance when determining planning applications for major developments.
- No. The "the use of a local workforce" is unenforceable during the planning process or post consent. It would add further unnecessary burden to the planning process and to what end, especially in these days when more people work from home.
- If an Employment and Skills Statement is incorporated into the Local Plan, alignment should be made with the requirements of the Local Validation List to ensure clarity for developers.
- It should be clear what the intention of this document would be and how this will be implemented, for example whether the Council would facilitate developers working together on joint employment schemes to realise a wider benefit for the local community. Consideration should be given to the benefit of an Employment and Skills Statement in the context of the impact that this could have on development costs.

Q.56 What information/criteria should an Employment and Skills Statement contain?

- Estimated number of local jobs created during construction and post-completion.
- Opportunities for apprenticeships, traineeships, or work placements.
- Use of local suppliers and contractors where feasible.
- Monitoring arrangements, proportionate to the scale of the development.
- The ESS should remain a planning consideration, not a prescriptive or bureaucratic requirement that could delay delivery.
- Apprentices to be used and support given to local colleges etc. for trade apprenticeships.

- The ESS policy should be clear that it is a live document. The Construction Phase: Focused on on-site employment, apprenticeships, and supply chain opportunities. AND: The Operational/End-Use Phase: Relevant for developments that create significant permanent jobs, such as large offices, retail centres, or hotels, ensuring that the tenants also commit to local employment initiatives.
- It should contain:
Project Context and Management
Quantifiable Targets
Delivery and Monitoring Plan
- None.
- It should contain information about relevant organisations which can support a Developer to deliver their Employment and Skills Statement. For example, Raise: Cumbria Community Forest could be referenced in respect of any green infrastructure (including trees and woodland) to be incorporated into the development.
- Any aspirations toward community wealth building will need to be cognisant of the requirements placed on public authorities such as achieving value for money for the taxpayer and the requirements of the Procurement Act 2023.
- Sellafield Ltd is required to comply with the provisions of the Procurement Act 2023. The Local Plan should not place developers in conflict with the relevant regimes as this is likely to undermine economic growth in the area.

Q.57 Are there any other approaches or requirements the Local Plan could include to support community wealth building?

- Yes, if you cannot allow aggregation of section 106 agreements for larger local area projects including sports facilities, road safety and school building adjacent (or close to) separate developments, then make better use of the Community Infrastructure Levy (CIL) instead to fund broader infrastructure investment.
- Make sure that the Local Plan does not allow 'backing out' of outline 106/CIL commitments by developers.
- Progressive Procurement and Local Supply Chains (The 'Spending' Pillar).
- This pillar focuses on leveraging the economic power of public and private sector expenditure to ensure money circulates locally.
- Local Plan Policy Requirement Mechanism.
- Local Procurement Targets Require major developers to submit a Local Sourcing/Supply Chain Plan alongside the ESS, setting out measurable targets (e.g., a percentage of goods, services, and construction materials) to be procured from local businesses, SMEs, and social enterprises.
- Early Market Engagement Require developers to host "meet the buyer" events in the local area before awarding contracts to enable local businesses to bid for packages of work.
- There needs to be consideration of the inclusion of business centres, industrial estates etc in close proximity to communities as well.
- We support the use of an Employment and Skills Statement and other mechanisms that help deliver the maximum added value for communities. The nuclear sector in Cumberland employs many thousands and spends considerable sums through the supply chain, all of which contributes significantly to the local

economy. We therefore believe it would be useful to recognise these mechanisms and support their continuation and enhancement.

- Encourage Developers to build relationships with relevant local organisations – such as Raise: CCF – to inform their proposals & delivery.

Q.58 What can the Local Plan to do encourage and support sustainable tourism, especially in sensitive locations, with regard to tourism accommodation and tourist attraction development?

- Promoting development in appropriate, non-sensitive locations to avoid landscape and ecological harm.
- Encouraging high-quality design and environmentally sensitive construction techniques that respect local heritage and natural assets.
- Supporting adaptive reuse of existing buildings for tourist accommodation rather than encouraging new builds in open countryside or greenfield sites.
- Embedding low-carbon and sustainable infrastructure into tourism schemes (e.g., energy efficiency, waste management, sustainable transport links).
- Balancing local housing needs with tourism: ensuring that short-term accommodation does not reduce the stock available for permanent residents.
- The Local Plan could include provision for a permanent annual festival site to improve 'Solfest', say at Broughton Moor and develop the Promenades at Maryport and Silloth to draw visitors away from Keswick, westwards.
- A £1 levy per person per night could be added as a local tax to hotels to provide a 'CIL-type' fund for projects to provide more inclement weather attractions.
- Whitehaven and Barrow might be developed for a route to the Isle of Man
- The Local Plan could encourage and support sustainable tourism, especially in sensitive locations, by encouraging rail and bus usage along with electric chargers.
- Re-use of Redundant Buildings: Encouraging the sympathetic conversion of disused farm buildings.
- Temporary or Seasonal Structures: Supporting high-quality glamping, yurts, or specialized low-impact cabins in appropriate, reversible locations as long as they have appropriate infrastructure, no more sewage into our rivers and the sea.
- Restricting Unsuitable Accommodation: Specifically resist proposals for large-scale, high-density caravan or holiday park developments in sensitive landscapes where they would visually intrude or require extensive, damaging hard-standing infrastructure
- Tourism policies should clearly recognise the need to protect the most environmentally sensitive habitats, including SPAs, SACs, Ramsar sites and SSSIs, and establish appropriate limits to safeguard these areas from potential adverse impacts.
- Disturbance and sewage discharges can cause significant environmental harm, particularly in locations where such effects cannot be fully mitigated. These risks should be carefully considered through the Habitats Regulations Assessment (HRA) of site allocations. For example, fun fairs and large campsites are unlikely to be compatible with Special Protection Areas and Ramsar sites, and may also affect certain parts of Special Areas of Conservation through disturbance of internationally important populations of breeding and overwintering birds. (Natural England)

- Water resource availability should also be considered, especially to avoid water-intensive using located near rivers with river low-flow problems. Peak tourism demand often coincides with periods of summer low flows, which could exacerbate water stress and increase risks to both water quality and ecological health.

Q.59 In which locations should the Local Plan support the location of new tourist accommodation and attractions?

- Existing settlements and towns where infrastructure, services, and transport links already exist.
- Brownfield or previously developed sites that can be sustainably repurposed.
- Areas outside nationally and locally designated sensitive landscapes, with appropriate mitigation where small-scale development in sensitive areas is unavoidable.
- The area has excellent birdwatching sites that would benefit from having better accommodation near, such as Geltsdale, Brampton and Hodbarrow, Millom.
- Silloth and the West Coast and possibly Derwent Forest IF ACCESS is sorted.
- Within Carlisle and the towns and locations which are well connected by public transport. Where an open countryside location is justified (in exceptional circumstances), provision should be made to incorporate sustainable travel to and from the facility where it doesn't already exist.

Q.60 Is there a need for the Local Plan to consider provision for motorhomes and campervans?

- Encourage dedicated, well-serviced parking areas close to existing tourism hubs and transport infrastructure.
- Avoid ad-hoc parking in sensitive landscapes or residential streets.
- Include supporting facilities such as waste disposal, water refill points, and appropriate access routes to reduce pressure on local communities.
- Consider integration with wider tourism strategies, including eco-tourism and active travel initiatives.
- Yes, the pursuit of camping is becoming more popular and so having facilities like Lochside in Castle Douglas, run by Dumfries and Galloway Council, will pull tourists in and relieve the pressure on parking, especially if connected with rail and bus services.
- This would make more use of Talkin Tarn and Hodbarrow, say, and may support growth in businesses near Maryport's Marina.
- There should be a blanket ban unless on approved sites with toilets.
- The people fly camping do not use the proper sites even when available so there must be legal leverage.
- Policies should support the use of management controls and traffic orders to prevent illegal overnight parking or "wild camping" in sensitive areas (e.g., key viewpoints, nature reserves, or small coastal car parks) where the activity causes visual intrusion and environmental damage.
- A policy would be useful to ensure motorhome and campervan sites have adequate access, don't increase flood risk (through new areas of hard surfacing) and don't result in adverse impacts on the landscape (including tranquillity).

Reference should be included in the policy to external lighting ensuring it accords with the Cumbria Good Lighting Technical Advice Note.

Q.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?

- Yes, but protection should be proportionate and focused on strategically important sites. Not all employment land is of equal value — some small or underused sites could be repurposed to meet other local needs without harming economic objectives.
- The Council should consider protecting established employment estates in towns such as Carlisle, Workington, Whitehaven, and key industrial clusters where relocation or loss would negatively impact the local economy.
- Sites of Strategic significance should be protected such as Lillyhall at Workington.
- 'Losing' the old shoe factory at Cockermouth to flats has more than likely benefitted the town with resident footfall rather than trying to hang onto it as an employment hub but Lillyhall is 'out-of-town'.
- Derwent Forest for technological employment to encourage youngsters to stay in Cumbria.
- Yes, all employment sites should be protected where there is sufficient evidence that they are still deliverable/developable and there is current demand for sites in that particular settlement and of that type. This will ensure there is an adequate supply throughout the Local Plan period to avoid the need for less appropriate
- The previous Copeland Local Plan recognised the importance of nuclear within the local economy. Given the strong nuclear presence in West Cumbria it is recommended that the Local Plan contains a Sellafield specific policy section. Sellafield Ltd would welcome the opportunity for further conversations with the Local Plan team to help develop this.

Q.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.

- Yes, but tests should be practical, proportionate, and evidence-based, particularly for SMEs and medium-sized businesses. Recommended approach:
- If a business site (like a pub) is applied to be turned into a private home say, it should not be possible without first marketing it for sale as a pub (as Allerdale disappointingly allowed with 2/2009/0384). But asking the Council to run business analyses, like break-even assessments isn't practical. If, however, the Council knows there's a shortfall in child-care provision in an area or a local Cheerleading Academy needs a facility with a high roof etc. (FUL/2025/0096) then the Council should be empowered to direct the change-of-use towards a potential new-user.
- Perhaps the only appropriate test is to advise on the size of building and an alternative use.
- No, I have seen lacklustre marketing that was put forward to change an employment site to an out of town retail.

- Cockermouth should be protected as the gateway to the Lakes rather than having more out of town businesses that really do affect the town centre shops.
- Yes, where the business provides an important community facility, such as a retail unit, public house etc. Evidence submitted to support any change of use applications should include details of why the business is no longer viable, where the business was advertised, at what price and for how long. Details of any offers received should also be provided and reasons for declining them. The business should be advertised for at least 6 months at a reasonable asking price, in appropriate, use specific publications at national and local level. All opportunities for co-locating (i.e. moving the business to another property that is shared) should also be considered.

Q.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?

- Support for SMEs and microbusinesses — small local businesses are critical for Cumberland's economy and need access to flexible, affordable workspace. Policies should encourage delivery of small units and co-working spaces without excessive planning burdens.
- Infrastructure and connectivity — including broadband, transport links, and utilities, which are essential for modern businesses to thrive, particularly in rural and peripheral areas.
- Sector-specific support — for tourism, renewable energy, logistics, and advanced manufacturing, which are key growth areas for the local economy.
- Flexible policy for underused sites — allowing redevelopment or mixed-use where sites are vacant or surplus, while protecting strategic employment locations.
- Skills and training alignment — ensuring local workforce development matches employment opportunities, without imposing excessive obligations on developers.
- Expansion of the University's facilities, Westlakes or medical facilities should be assumed to be approved and determinable by the Council. We struggle to attract and retain professional young people from outside the area, so growing their capabilities, when we can, would be a useful tactic.
- A robust defence against out of town, edge of town large retail outlets.
- The chapter should contain a section on agriculture given the contribution it makes to the economy. There should be policies relating to agricultural diversification etc.
- Historic environment, heritage assets and their setting. Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site.
- The Local Plan should support development in accordance with the NDA Strategy which in turn will bring environmental benefits and economic investment to Cumberland.
- The majority of Cumberland's rural area is productive farmland, although perhaps not classed as BMV Grades 1&2, it is an important resource for food production, farm diversification & environmental good. As climate change impacts at a global level, food security is likely to become of increasing importance. Planning policies need to strike a balance between the environment, tackling climate change and producing food.
- The concept of the circular economy has huge potential in the agri-food sector: E.g. circularity in nutrient recovery, processing and redistribution will deliver better water quality and reduce reliance on artificial fertilisers.

Q.64 What types of uses should be promoted within town and city centres?

- Services, shopping
- Arts, Entertainment, Sports/Fitness and inputting housing/accommodation above shops.
- Independent coffee shops, eateries, housing, wine bars, arts and craft, gymnasiums and health and fitness centres and housing.
- Basically a diverse, mixed-use environment plus green spaces.
- Community led initiatives and family-friendly third spaces where people can meet and volunteer together, be these indoor community hubs or green spaces.
- A mix of uses should be promoted including retail, leisure, night time uses and housing to reduce the need to travel.

Q.65 What can the Local Plan do to make town/city centres more attractive to encourage you to visit them?

- Demolish old building stock and replace with new. More public transport to outlying areas. More shops instead of out-of-town super-malls
- Pedestrianising, public toilet provision, low-cost or free parking and assuming approval for flats above shops/businesses in centres.
- Huddersfield Council have recently decided not to create a National Rugby League Museum from the current Heritage Centre there. This strikes us as an opportunity to explore for the area in the same way that the National Football Museum benefitted Preston and now Manchester.
- Provide opportunities for people to get involved so that they feel a sense of ownership.
- As well as the uses above, town centres should include attractive and safe green and open spaces for people to meet and socialise. Such spaces can also double up as spaces for events and activities and help maintain community cohesion.
- Town/City centres are often of heritage value and this uniqueness contributes to their attractiveness as a place to visit, work and live.
- Encourage/support the creation and maintenance of street trees & green infrastructure, combined with sheltered spaces e.g. awnings that allow people to spend time outside in all weather conditions.
- Accessible facilities e.g. public toilets, library – in smaller places, support existing infrastructure such as village halls and / or churches where these facilities are available.
- The Local Plan should support community and social initiatives (such as Raise: CCF) which create spaces where people can spend time and connect with nature and other people
- The Woodland Trust believes that greener, more tree-rich town and city centres play a key role in making them more attractive, vibrant and welcoming places to visit. Well planned urban trees and green spaces can improve air quality, provide shade and cooling, enhance biodiversity and create more pleasant streets and public spaces that encourage people to spend time outdoors.
- Prioritising the planting and long-term care and management of street trees and green infrastructure, requiring new urban development to include high-quality green

space and tree planting, protecting existing mature and veteran urban trees, and promoting nature-friendly designs.

Q.66 What sort of uses should be resisted within town and city centres?

- Pubs, gambling, major sports (football, rugby)
- Fast food outlets, tanning salons and vape shops.
- Keep the entrances to towns nice to visit. Think how awful Penrith is to drive into compared to other towns of the same size. From the M6 and A66 it has Americanised massive retail outlets, built to a standard ugly tin shack formula plus an awful multi-storey car park. Please don't repeat this mistake in Cumberland.
- The idea of signage and window style controls is great.
- Have you noticed just how every town co-op is ugly?
- Blank windows not allowed for advertising.
- Development which discourages wildlife.

Q.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)?

- Events, festivals, food and drink outlets – Lillyhall.
- Cycle repair shop – Maryport Prom or Whitehaven for the C2C link.
- Kayaking and coastal swimming – St Bees
- Healthy eating fast food – Workington, Maryport and Whitehaven
- Art or Craft work made locally.
- Yes, pop up uses such as temporary shops, cafes, art galleries etc can enhance a city/town centre and help avoid the negative impacts associated with vacant premises.

Q.68 What kind of leisure and cultural uses would you like to see more of to develop the evening/night-time economy?

- None. I would like to see a reduction in the night time economy
- Dark Skies, as you note in Para' 9.3 of the consultation
- Tapas bars, gyms, dance clubs, independent craft breweries with restaurant. Wine bars.
- Recognition of Council's responsibilities under S141 Policing and Crime Act 2017 (Cumulative Impact Assessments)

Q.69 In which locations should the evening/night-time economy be developed?

- None. I would like to see a reduction in the night-time economy
- People travel to Newcastle, Glasgow and Manchester for nights/weekend out and shopping. It's going, as you note, to take a long time to develop that locally so maybe don't try too hard too soon. Concentrate on small-scale nighttime activities like walking, mountain-biking and stargazing which require locations outside the towns.

- Towns and Carlisle.

Q.70 Are there any areas in which the evening/night-time economy should not be developed?

- Everywhere
- No – just make sure it's appropriate development. Tallentire doesn't need a nightclub, etc. Cogra Moss near Cleator Moor might be ok for star gazing.
- Primarily residential areas.
- Policies promoting the night-time economy should include safeguards for nearby designated sites (SPAs, Ramsars) where lighting or noise could affect wildlife. Consideration should also be given to the safety of people near watercourses and lakes.

Q.71 How should the Local Plan address the retail hierarchy in its policy?

- The retail hierarchy should only focus on the city and town centres, with an additional policy to support retail development in the smaller settlements – 2 respondents voted.
- The retail hierarchy should follow the more traditional pattern and include all levels of settlements.

Q.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?

- There is a need for more seating and for more bus shelters
- No
- Out of town and edge of town retail shops should be stopped, Aldi has had an effect on Cockermouth. Asda, Tesco, Aldi and Morrisons have affected Workington Town centre.
- Historic environment, heritage assets and their setting.

Q.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?

- Yes
- The NPPF is sufficient. The levels of obesity and health-related issues in Cumberland are not wholly affected by take-aways and vape shops. People make choices, even on low-pay and benefit incomes and will shop, sometime necessarily because of shortness of free time, at places offering poor-quality ready-made meals. It's a complex issue with complex solutions from education to social pressures and Planning isn't going to solve it.
- The school route should be identified and avoided for fast food takeaways. Two reasons, the litter and obesity epidemic.

- National restrictions on hot food takeaways are insufficient. The Local Plan should include a stronger policy that manages both proximity and clustering near schools and in areas of high disadvantage. Evidence could draw on local health data (e.g. obesity prevalence, deprivation indices) to justify spatial restrictions.

Q.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?

- Yes
- Gyms
- Ensure wildlife stepping stones / corridors through developments- nature connectivity. Access to nature improves people's health and wellbeing.
- A specific policy relating to external lighting should be included given the adverse impacts inappropriate lighting can have on health and wellbeing. The policy should require developers to follow the guidance in the Cumbria Good Lighting Technical Advice Note.
- Yes. The Plan should also manage other uses that influence unhealthy consumption and marketing environments, such as outlets selling alcohol or ultra-processed foods, and large-format food advertising near schools and residential areas.
- The Sellafield site is highly regulated and has a clear purpose and mission, which differs from the requirement to provide health benefits. In most cases, it is not considered appropriate for a Health Impact Assessment to be required to support planning applications in the context of the Sellafield mission.

Q.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?

- Yes
- It should be obvious to the Planning Team but any food or fitness shop/centre/gym should have one but for residential development you'll already be assessing proximity to factories and distances to bus stops, etc.
- Health Impact Assessments should be carried out before planning consent is awarded to any developments encouraging people to engage in water sports or water based activities on the coast near Sellafield - this should be reassessed routinely and operations should be conditional. If it comes to light that health impacts are likely after consent is given and development is completed there should be a moratorium on continued operations.
- Case study: The Edge, Whitehaven awarded planning consent without a Health Impact Assessment. Whitehaven Harbour is the scene of an ongoing pollution event with acid mine pollution continuing to pour into the harbour (since 2022). This metals pollution then combines with and enhances the impact of the existing radioactive burden including AM-241 in the harbour silt. The cumulative impacts on public health have not been assessed. Thresholds should include cumulative impacts over a period of time rather than a "snapshot."
- Include public health benefits of natural infrastructure? (trees cooling/ air quality etc)

- Any requirement should be proportionate.
- It is important to fully consider the health impacts of proposed development at the earliest opportunity, and to ensure improvements are well-planned and of high-quality design. A clear HIA related policy would give developers certainty and help front-load design decisions. To avoid duplication, the HIA should be able to be integrated with other related assessments, such as EIA, Transport Assessments, Air Quality Assessments etc.
- In terms of appropriate thresholds, a screening process could be acceptable for all development, but full HIAs should only be required for larger (i.e. 200+ homes) or more sensitive schemes (e.g. adjacent to AQMAs or strategic roads, major rail, significant industrial uses etc.).

Q.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.

- Noise - there should be no opportunity for consumption of alcohol outside of premises.
- Land instability, arising from past coal mining activity, is an issue in Cumberland which should be addressed by the inclusion of a relevant policy within the Local Plan. This could include links through to guidance on the need for a CMRA in the defined Development High Risk Area. (Coal Board)
- Water quality and waterflow need to be reflected strongly, especially in the Minerals sections because downstream shedding of water is problematic from new developments and mining can cause water flows to be diverted if the water table is affected.
- The section on Pollution makes no mention of the ongoing radioactive and chemical pollution from the nuclear industry. It is conspicuous by its absence. Sellafield can currently be found on multiple lists online of one of the top ten most radioactive zones in the world) with several commenting on the wisdom of visiting such an area.
- With decommissioning, pollution is increasing, rather than decreasing. New nuclear sites and waste streams are increasingly handled away from the Sellafield site despite opposition from local businesses and campaigners in areas of conurbation such as Workington (e.g. Cyclife at Lillyhall, Energy Coast Laundry, Cyclife at Port of Workington).
- "A total of 42 particles and 9 larger objects were detected and recovered" in 2024 (EM/2025/11)
- Sellafield Particles in the Environment Update (End of Year 2024). These included a rock pool "stone" from Sellafield beach on 11/06/24 which at nearly one million becquerels (0.84MBq) was the "second-highest Cesium-137 activity measured in any find since the programme began".
- Increasing storm surges mean that historic (and new) radioactive particles in the seabed silts will continue to wash up on the beaches. This could however be mitigated by a ban on subsidence causing or earthquake inducing developments near, on or under the seabed in the vicinity of Sellafield.
- All - Cement/concrete crushing should not be carried out without proper constraints on nuisance. Not in rural areas where there is an expectation of tranquility and better suited to established industrial sites.
- The SAC and SSI sites should not have sewage dumped at all, therefore the hierarchy for drainage should be addressed and no more buildings with the water run-off going into the sewage system or septic tanks. Nearly 10,000

- hours of sewage went into the River Derwent in 2024 legally. The Environment Agency is not doing it's job, so the Local Plan should address this.
- Yes to all of these – each can have demonstrable and evidence-based negative impacts on humans, species survival and their behaviour and natural environment. Cumberland Council should promote and seek to adopt highest possible standards to minimise impacts on people and wildlife at every opportunity – and apply higher thresholds to sites within a certain radius of protected sites and / or species. Could be addressed in design guidance and policies and place a requirement on developers / operators to commit to s106 requirements as conditions of development. Cumberland Council needs to demonstrate that it listens and responds to local views and take account of relevant evidence.
 - Water quality is already an issue and Cumberland Council should avoid adding to the severity of the issues affecting the River Eden and Solway estuaries e.g. ensuring new proposals are not making the problems worse e.g. new housing waste is properly treated as part of the developments to very high standards.
 - Cumberland Council should adopt a dark skies approach in design of lighting to all development proposals
 - We would support policies (or a single policy) that addresses all the issues listed as they would help guide more sustainable development.
 - Whilst odours and noise are also dealt with under Environmental legislation a policy would direct residential development away from, for example, known existing noisy or odour emitting uses, such as wastewater treatment works, unless adequate mitigation can be provided.
 - It is bizarre to read this document and discover that radioactive contamination around Sellafield is not included as a possible area of concern for pollution. It requires cognitive dissonance to continue to pretend that Sellafield is safe, when it is well publicised as one of the most contaminated areas on earth.
 - Trees can positively contribute to addressing all suggested issues, as below. Information gathered from Forest Research evidence review commissioned by England's Community Forests:
 - Raise: CCF Opportunity Mapping uses Indices of Multiple Deprivation (IMD) data on air pollution (see under heading 'Opportunity heatmap and its use). Attached Evidence 1 show an inset map of the underlying data contributing to the opportunity score for Carlisle – the area highlighted by red diagonal lines show IMD air pollution.
 - Raise: CCF Opportunity Mapping uses EA Flood Zone data to map areas where trees could help as part of a Natural Flood Management (NFM) approach – which includes improving water quality by reducing agricultural surface water run-off.
 - Noise, Light Pollution, Odours – and heat in the summer – town centres all over, rural housing developments.
 - Act as a barrier to the visual and noise impacts of the built environment, with the complexity and diversity of woodland promoting fascination and distraction from mental discomfort.
 - Mitigates the urban heat island effect
 - Reduce energy consumption for heating and cooling buildings by providing shade, reducing wind exposure and through the cooling effects of water evaporation programme began”.
 - Cumberland Council recently consulted on their local validation list, which includes the requirement for air quality assessments. If an Air Quality Assessment policy is included within the Local Plan, consistency should be ensured between the two documents to ensure clarity for the developer

Q.77 Should the Local Plan include a policy which sets out when Air Quality Assessments and mitigation plans will be required?

- Yes, particularly with eg rendering plants, biomass, dust from construction.
- Yes for industrial development and others which involve significant emissions
- The Eden Valley and Carlisle Basin Permo-Triassic sandstone aquifer, which partly lies within Cumberland, has a poor overall status for the Water Framework Directive. This is due to diffuse agricultural pollution. Further details are available here: [Eden Valley and Carlisle Basin Permo-Triassic sandstone aquifers | Catchment Data Explorer | Catchment Data Explorer](#). It would be beneficial for the Local Plan to include clear policies requiring land managers and developers to demonstrate how pollution risks to watercourses and waterbodies will be prevented and mitigated. This could include measures such as nutrient management planning, soil testing, and appropriate management of water margins. Such requirements would be particularly relevant to new large-scale developments. (Environment Agency)
- We also advise that the Council works closely with United Utilities through their Drainage and Wastewater Management Plans to ensure that proposed developments do not give rise to adverse impacts from surface water or wastewater discharges.
- The Environment Agency are currently reviewing the River Basin Management Plans (RBMP). The relevant plans are the North West RBMP and Solway Tweed RBMP. We would encourage Cumberland Council to engage with the consultation on these plans to ensure that there is compatibility with the Local Plan.
- Additional comments to Para.9.11:
The first sentence of this paragraph could be made clearer and more internally consistent. It currently refers to 'protected nature conservation sites' in relation to terrestrial environments but then shifts to specific designations (SACs and SPAs) when discussing the coast. For consistency, it would be preferable to either use the general term 'protected nature conservation sites' for both terrestrial and coastal areas, or to refer to the relevant statutory designations throughout. There are numerous designated sites within Cumberland outside the National Park (including SSSIs, SACs, SPAs and Ramsar sites), which could be used as appropriate examples instead.
- Nitrates Vulnerable Zones (NVZs) - In addition to Groundwater Source Protection Zones, Drinking Water Protected Areas and Safeguarding Zones, there are also several Nitrates Vulnerable Zones (NVZs) for surface and groundwater. These areas indicate catchments where water quality is at risk of being deteriorated by additional loads of nitrate, mainly from the agriculture. Landowners in NVZs must comply with specific regulations, such as those regarding the use of nitrogen fertilisers and the storage of organic manure.
- Bathing Waters - There are 6 designated Bathing Waters in Cumberland: Haverigg, Silecroft, Seascale, St Bees, Allonby, and Derwentwater Crow Park. The quality of these Bathing Waters is affected by discharges of treated effluent (water company and private), intermittent discharges (water company storm overflows), wildlife (such as birds), and agricultural and land management practices.
- Cumberland Council recently consulted on their local validation list, which includes the requirement for Noise Assessments. If a Noise Assessment policy is included within the Local Plan, consistency should be ensured between the two documents to ensure clarity for the developer.

Q. 78 Should the Local Plan set out when noise assessments and mitigation plans will be required and what they should include?

- Yes. There should be an expectation that people sleep with the window open unlike the g ETSU-R-97 guidance document, where it is assumed that turbines can be noisier at night.
- Complaints regarding excessive noise are frequently directed to Police, for which we have no legal powers to address.
- Yes, for industrial / commercial development and others which involve significant emissions
- Yes, we would support such a policy.
- Yes. I live in Dovenby and we have been affected by the development of a so-called 'test track' at the adjacent M Sport site. This was assessed as having a potential impact on at least 400 homes in this area. The fact that noise assessment assessments and mitigation plans were eventually incorporated as a condition of approval has at least reduced the potential impact of the development, Assessment and mitigation should be included in all developments which will create noise pollution.
- Cumberland Council recently consulted on their local validation list, which made reference to light pollution. Consistency should be ensured between the two documents to ensure clarity for the developer.

Q. 79 How best can the Local Plan address light pollution and its effect on amenity and the natural environment?

- Restrict 'up-shine' and 'out-shine'
- Downlighter streetlamps as standard for any development – put it in your Design Code (question 50 on the original consultation)
- Planning permission required for bright lighting with decisions based upon need for safety v night sky plus carefully considered light up timings etc. Include a dedicated Light Pollution Policy with objectives such as: Protecting dark skies, particularly in rural or sensitive areas (e.g., AONBs).
- Require new developments to:
- Demonstrate lighting need: Only install external lighting where necessary.
- Submit a Lighting Impact Assessment: For developments especially in sensitive locations.
- Full cut-off fixtures (to direct light downward).
- Low colour temperature (to reduce blue light, which disrupts wildlife). Timers and motion sensors to limit operating hours. No lighting near habitats, especially for nocturnal species (e.g., bats, birds, insects).
- Flexibility in the adoption of innovative street lighting, e.g. "NightTune", demonstrating protection of wildlife and 'Dark Skies' attributes.
- Include best practice advice and policy in favour of low light, low energy, less intrusive approaches for planning applications and in design guidance and statements – could adopt approaches identified by the Lake District Dark Skies project in their design guide as developed by Friends of the Lake District
- Reference to the Cumbria Good Lighting Technical Advice Note is vital, as is ensuring that policies don't set out a position whereby light pollution only matters in areas where light pollution is not already a problem. The aim of any Local Plan lighting policy should be to reduce existing, and prevent further, light pollution.
- It is suggested that, as well as light pollution, a wider approach could be taken to retaining tranquillity. There is little or no mention of the North Pennines National landscape, where tranquillity is a particular priority. While recognising

that this National Landscape only encroaches slightly into the Cumberland area, there could be merit in having a special policy to cover this area, which would align with the Northumberland Local Plan approach • Where appropriate encourage green infrastructure (including trees) to be integrated into development to prevent light from spreading further than immediate vicinity where it is required.

Q.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?

• Absolutely, otherwise you get tradesmen working 24/7 to get the job done. • The beck pollution where there are otters was very naughty. Another bad example was the Pollution at Gilcrux where the treasured stream ran white during the Tallentire windfarm construction. • Yes, the Local Plan should set out clear, proportionate requirements for Construction Environment Management Plans, and these should be appropriate to the scale and location of the works. This would help to control pollution from all the listed sources, such as dust, noise, vibration, lighting, odour, traffic, land contamination, and risks to waterbodies, and give certainty to both applicants and local residents by demonstrating actions taken to minimise development impacts and waste by responsible developers. • The policy should be specific to the local circumstance and sensitivities in Cumberland, such as the AQMAs in Carlisle, smoke control areas, dark skies, protected costs and upland sites, groundwater/source protection zones.

Q.81 Should a specific policy be developed for controlling smells/odours from new commercial kitchen ventilation and extraction systems?

• This could be very innovative and welcome if residential use of Town Centre buildings is also considered good for the economy. Proposals for new food and drink uses or the installation of commercial kitchen extraction and ventilation systems must demonstrate that odour emissions will be effectively controlled to prevent adverse impact on residential amenity and the local environment. • All applications must include an Odour Impact Assessment and detailed specification of the proposed extraction system, including mitigation measures and maintenance arrangements. Extraction systems must be designed and located to minimise visual harm, particularly in sensitive or designated areas.
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Q.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?

• No • The management of food growing spaces (allotments, for example) is a burden that can fall to the volunteers on Parish and Town Councils. This can be troublesome, for example when bird flu' restrictions came in and Parish Councils had to enforce netting regulations on unwilling owners. Maybe just ensure that developers have to allow decent-sized gardens with their estate lay-outs. This would ensure flexibility for future homeowners to do what they like and maintain a healthy separation of houses to ensure decent amenity between neighbours. This might help you achieve sociable designs and support the figures in your question on housing density.
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- Yes. Development should ensure that each individual household has access to space for growing their own food – e.g. own gardens or allotment sites, but threshold for new developments could be five households.
- Yes, we would support such a policy. This could be in the form of allotments or community orchards/shared growing spaces. The threshold should be determined by the Local Plan Viability Assessment.
- The Council needs to ensure the total policy ask is not unduly burdensome, resulting in development being unviable. Site specific viability negotiation can create delays and uncertainty, this is why robust viability testing at the plan-making stage is so important, and flexibility is needed for any site-specific issues to be addressed.
- Food growing spaces should be only encouraged, not required, by policy. Therefore, we do not support this suggestion. Dedicated plots for food growing space would reduce the net developable area on site, which will result in a lower yield of housing numbers, which consequently undermines affordable housing targets and other planning obligations. The requirement would also directly compete with other provisions, such as play space, SuDS, biodiversity net gain, parking and access etc., which are all arguably a higher priority and already compress usable space on site.
- Provisions of allotments and community gardens would also increase the upfront costs of development (e.g. soil imports) or be constrained by site suitability in the case of brownfield sites which may have contamination risks and additional remediation costs. Mandatory provision could risk delivery and is an unfair burden to put on developers.
- Yes. Developments over a modest size (e.g. 10 dwellings or more, or major commercial developments) should be required to provide communal or private food-growing space.

Q.83 If provision cannot be made onsite, should a financial contribution be sought to deliver offsite community food growing projects?

- Offsite doesn't work. Make gardens larger.
- Yes
- Yes, particularly given the long waiting lists for allotment spaces and the benefits such projects bring.
- The Council needs to ensure the total policy ask is not unduly burdensome.
- As outlined in our answer to Q82 above, we do not agree that food growing space should be a mandatory requirement for development. However, should the Council wish to encourage and improve food growing spaces, they could allow for off-site financial contributions to expanding existing allotments, orchards and other related community projects.
- Yes. Where onsite provision is not feasible, financial contributions should support community food-growing or edible landscape projects elsewhere within the local area.

Q.84 Should the Local Plan safeguard existing allotments?

- Yes
- Yes, we would strongly support such a policy.
- Yes. Existing allotments should be safeguarded as part of local food resilience, biodiversity and wellbeing infrastructure.

Q.85 In what other ways could the Local Plan support access to healthier food/food growing spaces?

- Allow bigger gardens around residential properties
- Refer to Question 67 in your original consultation on 'meanwhile uses' – support pop-up fruit and veg' outlets.
- If there is Brownfield Sites with no planning application on them after 1 year of commencement of the Local Plan, allocate them for growing spaces and utilise the Grounds & Maintenance Service team to prepare them for community use.
- We had a lot of trouble with dust, un-sheeted lorries and dumper trucks plus wrong routes being driven during 2/2016/0311 at Kirkcross in Brigham which affected gardens and businesses alike. Complaints were raised but no action taken by Allerdale, so try to do better please.
- All. If sale is the only option, can community facilities be protected by permitted use?
- Through raising awareness of the Community right to buy process in the supporting text within the Local Plan.
- Promoting community gardens and orchards in housing and public developments.
- Encouraging local markets and food co-operatives.
- Integrating food access into planning for green infrastructure and active travel routes.

Q.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?

- We recommend a period of 18-24 months, at a suitable asking price for existing use and condition without development potential. Marketing must take place through relevant local and national channels appropriate for the facility, which might include specialist publications/websites. A prolonged period of marketing would also enable local groups to come together and fundraise.
- One year. Evidence of newspaper/website advertising and consultation of local (town or Parish Council).
- At least 12 months of continuous and active marketing

Q.88 How else could the Cumberland Local Plan protect these facilities?

- A suggested, in addition to marketing the policy should also seek demonstration that a facility could not be utilised for an alternative community/cultural/social use, and that there is no need for the facility amongst the community.
- Offer low-cost Rates
- There should be a presumption to refuse loss of any community facility if there are credible objections to the loss of the facility.
- Through promotion of the Asset of Community Value process and register to raise awareness. Whilst a call for sites is being undertaken already, the Council could do a specific consultation where it asks for people to nominate facilities for the ACV register.

Q.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?

- No, design codes come later in the survey.
- There should be minimum distance to the nearest property so as not to be overbearing. Taking into account houses built on a hill looking down, across a lane looking into windows. Overbearing ought to be quantified.
- Pavements built to the village school for new builds.
- Housing should be sustainable and efficient, so that they are cost efficient to heat and run. New developments should be nature-friendly, providing habitats for species – e.g. swift bricks, bat boxes and space for planting for pollinators. Interaction with wildlife benefits people's health and wellbeing.
- The Local Plan could also consider the importance of sports and play, e.g. play facilities in new developments, protection of playing fields and sports facilities and designing out crime (e.g. reference to the importance of natural surveillance and appropriate lighting etc). Reference could also be made to tranquillity as this also aids health and well-being, and the Local Plan could set out how development impacts on tranquillity will be assessed, particularly as part of a wider landscape character assessment. We have recently commissioned consultants to carry out an assessment of tranquillity in the Lake District National Park, the methodology used could be replicated elsewhere.
- Yes. Additional issues include:
 - Everyday access to nearby green and blue spaces.
 - The role of cultural participation in wellbeing.
 - Planning for inclusive, psychologically restorative environments.
 - Contributions to health and quality of life are supported by both the physical environment and the activity of individuals and communities within the environment.
- For example, Raise: CCF delivers treescapes with local communities and our priority groups – supporting access and encouraging community stewardship of these treescapes. A Health Impact Assessment could also assess the positive impacts of involving relevant organisations in the development process – such as Raise in the development of green infrastructure at appropriate sites.
- The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.
- Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.
- we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable

proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

- Specific policy requirements to promote healthy developments should include:
- Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment.
- Design of schemes should encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.
- Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space).
- Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.
- Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.
- Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.
- Ensure development embraces and respects the context and heritage of the surrounding area.
- Provide the necessary mix of housing types and affordable housing, reflecting local needs.
- Provide sufficient and high quality green and blue spaces within developments.
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.
- In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.
- Health infrastructure should be clearly identified in the Local Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan.
- We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development.
- NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure
- that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.
- Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.
- To ensure the principle of alternative uses for NHS land and property is supported, NHSPS request the following wording is included within relevant policies in the Local Plan:

- Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.
- Sport England will challenge the soundness of Local Plan which is not justified by:
an up to date playing pitch strategy
an up to date built sports facilities strategy
- For a playing pitch strategy to be considered “up to date”, it should have been undertaken within the last three years. For a built facilities strategy to be considered “up to date” it should have been carried out within the last five years. The documents also need to be refreshed to ensure they are relevant and up to date and incorporate any changes that may have happened since they were first written.
- Sport should be mentioned and clearly categorised as a subject area, with its own policies to protect and promote sport facilities.

Q.90 From the design characteristics listed above, please choose the three principles which you consider to be the most important.

- 10, 9, 8
- National Design Guidance identifies ten characteristics – why are we choosing 3?
- Your ambition should be to achieve all ten.
- They’re not ‘in order’ they’re all attributes of good design.
- 1, 2, and 3
- Public Spaces - perceived to be safe and supervised
- Uses - mixed developments that encourage continued occupancy throughout the day
- Homes and buildings - Resistant to criminal activity
- All principles listed are equally important.
- 5: Nature – enhanced and optimised
- Keswick Swifts strongly endorse Building With Nature’s emphasis on Nature being integral to placemaking, especially in the built environment.
- The built environment on the Sellafield site is guided by the safety and security requirements set by our regulators, with safety being the overriding priority. The nature of the site does not allow for some of these suggested principles, for example, recreational spaces. When incorporating these principles into policy, there should be consideration made to the requirement for exemptions.
- If the intention is to apply this to only housing the Local Plan should ensure the requirement is not applied to all development.
- The new Local Plan should recognise the unique characteristics and requirements of development associated with the nuclear sector. The built environment of nuclear sites is guided by the safety and security requirements set by regulators such as the Environment Agency and the Office for Nuclear Responsibility (ONR) with safety being the overriding design priority. Given this exemption from design policies should be allowed for in the drafting of policies.
- All new houses should be required to have solar panels, battery storage, heat pumps, EV charging points (one per house), hedgehog holes and swift bricks. This would help reach the council’s sustainability targets and the draft plan’s aims in section 10.10 Building with Nature. The proposals are too broad, however, and should be tightened

- We support the adoption of design toolkits and frameworks (including the three outlined in the consultation) to ensure high-quality and consistent standards of development across Cumberland.
- We encourage the Local Plan to go further by embedding strong environmental sustainability standards in all new development, including:
- Provision for renewable energy generation (for example solar panels on new homes);
- Active or passive provision for future electric vehicle charging infrastructure; and
- Measures to protect and enhance biodiversity, such as the inclusion of bird nesting features (e.g. swift bricks) and other habitat enhancements in new developments.
- We would support a policy requiring a minimum Net Biodiversity Gain of 20% on all new developments.
- The Local Plan should adopt the wildlife-friendly design principles, including:
 - The protection and enhancement of existing habitats within and around developments;
 - Integration of wildlife corridors and green infrastructure linking open spaces;
 - Incorporation of bird boxes, bat roosts, hedgehog highways, and pollinator-friendly planting in all suitable developments; and
 - Design measures that reduce light pollution and support nocturnal species.
- In addition, we recommend the following specific standards be adopted:
 - A 20 mph limit for all new developments, improving safety and promoting walkable neighbourhoods;
 - Linked measures for active travel, including safe and well-designed crossing points to encourage walking and cycling;
 - A minimum height standard for letterboxes to ensure accessibility for all residents, particularly those with mobility impairments.

Q.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?

- You need to pay much more attention to parking provision, road junction design and suitable places to input housing in the road networks.
- You should add Pre-planning information to Officer's Reports as Dorset Council do so that the evolution of an applicant's design can be examined by the public.
- There are some really cheap and nasty builds.
- Advertising better controlled! Banners litter Towns.
- Pavements brought back for estates so it is safe for children to walk.
- Commissioners urge caution against overly prescriptive design codes, particularly if applied uniformly across the entire authority area. Cumberland is a highly varied area, encompassing urban, rural, coastal, and National Park fringe environments, each with its own unique character and development context. A single, rigid design code risks stifling innovation, being inappropriate for certain locations, and potentially hindering the deliverability of much needed housing.
- A more flexible approach is recommended, where a Cumberland-wide design guide sets out general principles, with more detailed design codes or briefs developed for specific areas or larger strategic sites where a particular character needs to be established or protected.
- Design codes may be particularly useful in Conservation Areas and areas that fall within the setting of National Landscapes.
- Historic environment, heritage assets and their setting.

- Requirements need to be proportionate and no clash with, or undermine, Building Regulations.
- Endorsement of, and guidance on, the provision of Swift bricks in all (appropriate) new builds, renovations and conversions, in accordance with British Standard BS 42021.
- Yes. The use of locally sourced materials, where appropriate to help maintain the local character and vernacular of Cumberland. Major developments should require resource assessment and supply chain audits to ensure materials are sourced sustainable and locally. In particular, public procurement should be open, transparent and support local enterprise.
- Sellafeld Ltd has an existing Design Guide which has been agreed and approved by Cumberland Council. Consideration needs to be given to how a Cumberland wide design guide incorporates and works with existing design guides and should ensure that there are no conflicting requirements which undermine existing arrangements.

Q.92 Are there any new developments (either a new building or a new housing development) in Cumberland that you like? Please explain why.

- No. They all seem to be densely packed, uniform, micro-boxes, with small gardens and little privacy
- The offer, in Maryport, to paint the businesses in bright colours has been worthwhile.
- The café on the Maryport Promenade looks very modern and appealing although quite why it's so small isn't clear.
- There is no need to cram houses in together in Cumberland. So North Ridge in Derwent Forest.

Q.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?)

- From an Active Cumbria perspective we strive for the Local Plan to adopt Active Design standards as that would be a strategic move which supports healthier, more inclusive, and more sustainable communities.
- It would be important to look to adopt the Healthy Streets framework also which has been developed to design streets that support health, wellbeing and sustainability.
- Landscape Character Guidance and Toolkit - perhaps tweaked to update turbine sizes?
- Combined Impact Assessment Toolkit
- Adoption of Secured by Design
- Yes – dark skies as above
- Building with Nature Guidance
- Any policy must be made in the Local Plan and subject to public engagement and scrutiny through the plan-making process, including the Examination in Public. Any policy needs to be supported by evidence.
- We recognise that the seven identified in the consultation documents are all examples of best practice. For example, Building for a Healthy Life 2020 is widely used as a street and neighbourhood tool and aligns with Homes England. However, we suggest that the Local Plan limits additional policy requirements on design in order to retain flexibility.

- At Sellafield, our overriding priority is ensuring that development promotes nuclear safety and/ or security and that regulatory requirements are met. Therefore, there may be instances where it is not possible for development to comply in full with the requirements of an existing toolkit. It is recommended that the Local Plan reflects the potential for exemptions to this policy.
- If the intention is to apply this to only housing, the Local Plan should ensure the requirement is not applied to all development.

Q.94 Is there another design toolkit that the Local Planning Authority should consider?

- Any of the retrofit Estate toolkits to avoid demolition of Social Housing would be worth considering plus those on Empty Homes.
- Brief introduction to Healthy Streets is captured in the response above to Qu93.
- Cumbria Wildlife Trust could do some research on this with/for Cumberland Council. There – are nature positive design toolkits in circulation. It would be possible to work on this together to design a toolkit appropriate for the Cumberland Council/ Cumbria area.
- Please see the Lake District National Park Authority's Design Guide, adopted September 2023, this includes the following guidance in the Nature / Biodiversity Net Gain section of each of its chapters on New Homes, Extensions & Alterations, and Conversions:
- See CCF
- Plan The Green Infrastructure Framework 2023 (Natural England) supports urban greening and connection with the surrounding landscape to bring benefits for nature, climate, health and prosperity. It sets out principles, standards (including S5: Urban Tree Canopy Cover), guides and 'process journeys' to help embed Green Infrastructure-informed decision-making into and between organisations.
- Community Forests provide green infrastructure, which supports regional growth. Their Forest plans support planning and regeneration strategies of local authorities, by targeting activities in areas of socio-economic disadvantage and low woodland cover

Q.95 How should the Local Plan apply design toolkit standards to development?

- All development
- The Commissioners contend that design toolkit standards should be applied proportionately and strategically across different types and scales of development, rather than as a blanket requirement for all schemes. A nuanced approach is essential to ensure that design quality is consistently high without imposing undue burdens on developments or inadvertently stifling the delivery of much-needed housing.
- For larger, strategic allocations, typically those exceeding 50 homes, the comprehensive application of design toolkit standards, potentially through detailed design codes or masterplans, is entirely appropriate.
- For medium-sized developments, such as the Commissioners' Site which proposes approximately 45 dwellings, a more flexible approach is warranted. For sites of this scale, design quality can be effectively managed through the planning application submission through a combination of masterplans, the DAS, and parameter plans.

- For smaller developments, while good design remains paramount, a streamlined approach to design standards would be most appropriate. These schemes should still be expected to meet fundamental design principles, particularly those related to context and the functional quality of homes, but with minimal formal toolkit application.
- Standards should be applied to all development.
- The Local Plan should limit additional policy requirements in order to allow for flexibility in the design of new development. The policy should be flexible, allowing for reasonable alternative routes when conflicts arise, which as with flood, heritage or viability constraints.
- At Sellafield, our overriding priority is ensuring that development promotes nuclear safety and/ or security and that regulatory requirements are met. Therefore, there may be instances where it is not possible for development to comply in full with the requirements of an existing toolkit. It is recommended that the Local Plan reflects the potential for exemptions to this policy. If the intention is to apply this to only housing, the Local Plan should ensure the requirement is not applied to all development.
- Taylor Wimpey acknowledges the importance of embedding these principles into the Local Plan where appropriate. However, our client considers that the application of design toolkits must be proportionate, flexible, and responsive to site-specific circumstances. A blanket requirement for all developments to comply with every aspect of these toolkits risks creating unnecessary, complexity and could constrain delivery.
- Our client would welcome clarification from the Council regarding the proposed thresholds for applying the design toolkit stands (eg.10 or more, 30 or more or 50 or more dwellings).
- As the Council will be aware, Active Travel England is a statutory consultee on developments equal to or exceeding 150 dwellings or on sites greater than 5ha. As such, we would welcome clarification as to why a higher threshold (eg.150 dwelling or more or sites greater than 5ha) was not included as an option, when larger-scale developments are arguably better equipped to incorporate the full range of design principles, including those relating to active travel, green infrastructure, and crime prevention through environmental design.

Q.96 Are there any types of development that should be exempt from being subject to a design toolkit standard? If yes, please provide details.

- Individual, self-build properties need flexibility to make best use of the rarely available plots
- No
- No
- No, a toolkit would apply to all types of development including householder developments.
- Those that affect the historic environment, heritage assets and their setting might require a separate toolkit e.g. conservation areas, that relates to its context rather than a standard one.
- Any requirements must be proportionate
- For nuclear sites the key priority is ensuring that development promotes nuclear safety and/ or security and that regulatory requirements are met. Therefore, there may be instances where it is not possible for development to comply in full with the requirements of an existing design toolkit. It is

recommended that the Local Plan, therefore, reflects the potential for exemptions to this policy.

Q.97 Should the Local Plan include design codes, development briefs or masterplans for land allocations within the Local Plan?

- Yes, on all allocations.
- No, there should not be a standard threshold, and it should be considered on a site-by-site basis
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which includes assessment of any allocation for their impact on the historic environment through screening and heritage impact assessments., where appropriate.
- No, there should not be a standard threshold, and it should be considered on a site-by-site basis.
- Development briefs, masterplans and design codes are particularly useful for 'larger sites that may be developed over a number of years and phases'. As such, we request that design codes, development briefs or masterplans only be requested on larger strategic allocations likely to be delivered over a number of years (e.g. greater than 200 homes or 8 hectares).

Q.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

- 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.
- Having a Policy is the starting point. If you can do better than the Policy for a particular site, it doesn't have to be a 'minimum' that the developer 'gets away with'. You have the final say on approvals. If the developer can show that, for example, on a steeply sloping site (perhaps opposite Netherhall School) it's not going to be possible to achieve 30 dph then you have to be practical and the Officer's report can say that and publish how, in pre-planning, you arrived at the final figures.
- Low density is better for our health and well-being.
- "efficient use" should not be narrowly interpreted as simply maximising density, but rather as optimising the potential of land by locating development in the most sustainable and deliverable places, ensuring high-quality outcomes and effectively meeting identified housing needs.
- While density is a factor in efficient land use, it should be considered an outcome of good design and contextual responsiveness, rather than a prescriptive target. An overarching design policy should require the efficient use of land in all new development but allow densities to be determined on a site-by-site basis. This ensures that the proposed density is justified by the

site's characteristics, its relationship to surrounding development, its accessibility to services and sustainable transport, and its contribution to creating high-quality, locally distinctive places. • Imposing overly high or inappropriate densities could, in some contexts, compromise viability, detract from local character, and ultimately hinder the delivery of sustainable development. • Other • Both of the above, an average, minimum expected density should be identified in a policy to ensure an efficient use of land. This should be at least 30dph. There should be flexibility within the policy so that lower densities would be accepted where there was robust evidence to justify an alternative. • Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. It is important that the impact of such proposals, has a positive relationship between any new development, the existing character of a place and the historic environment. The NPPF requires that providing homes is more about just proving a greater quantity of homes, it is also about quality and the need to understand and reflect local conditions. • All • 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.
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Q. 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?

• The county needs a better data base of heritage assets. It is difficult to have a policy relating to the loss of heritage assets if one does not know how many such assets there are. • There is a systematic and constant degradation of low key, small heritage assets within the county as they become the casualty of progressive 'improvements' to farms, fields and highways. Loss of stone field gates and hedgerows are particularly vulnerable thus depleting visual assets of the landscape and environmental elements associated with them that have knock on effects for bio-diversity, flora and fauna. • The applicant and his agent had no incentive to actually undertake research that might indicate that the age or value of potential heritage • Heritage is not important - there is little value in 'living in the past' • Make this part of your Policy. Yes, statements to be made please. • No development should negatively impinge on a Heritage Asset • Consider including the need to ensure no loss of habitat (e.g. bat roosts, barn owl nest sites) if developing heritage buildings etc • Yes, we would support such policies. Whilst the government have discussed producing a set of national DM policies which could cover such issues, this has not been advanced. • Again to retain local vernacular, materials should be locally sourced. The provenance of materials should be properly researched, particularly in areas where maintaining local character is critical. Too many developments are ruined by imported building materials which weather differently to locally sourced materials.
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- Alongside built heritage, the Plan should recognise the importance of natural heritage assets which contribute to local character, sense of place and cultural history. These include ancient woodland, ancient and veteran trees, historic parkland and long-established landscapes.
- The Local Plan should explicitly include natural heritage assets within the definition of heritage assets, recognising their historic and cultural value. It should also include a policy that resists the loss or deterioration of both built and natural heritage assets. By recognising natural heritage alongside built heritage, the Local Plan can safeguard Cumberland's unique environmental and cultural legacy for future generations.

Q.102 How can historic buildings be sensitively adapted in light of climate change?

- An energy efficiency assessment should be undertaken - demolish and replace if it is not energy efficient
- Improved insulation, flood-proofing, discrete (or remote) solar panels, restoration of brick/stonework, improving disabled accessibility and improving ventilation.
- Ground source heat pumps rather than air source.
- Hidden solar on external buildings.
- Be reversible where possible and minimise visual and physical impact.
- Adopt specialist generic advice from Historic England
- By encouraging early pre-application engagement between the developer and the authority and Historic England in the supporting text around the heritage policies.
- Historic England recognises that the UK is facing a climate emergency and we welcome Local Plan policies which promote opportunities to reducing greenhouse gas emissions to net zero by 2050 (as recommended by the Committee on Climate Change (CCC)).
- Any policies should consider their impact on the historic environment (where appropriate). It should also recognise that standard approaches to renewable energy and carbon reduction might not always be appropriate and therefore, should respond positively to the site's constraints, context and any other matter that needs to be taken into account. It is recognised that building stock is probably the largest single user of energy and therefore can make a significant contribution to cutting greenhouse gas emissions.
- Two principal areas of risk when upgrading older buildings is that such measures can cause damage through technical conflicts between the existing construction and changes to improve energy efficiency. This is reflected in Part L of The Building Regulations (2010), which contains some exemptions for historic buildings as well as circumstances where special considerations should apply. Historic England has produced advice which provides further information on this.

Q.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?

- Please stop assessing individual developments as adding 'no material change' to the road traffic system. They really do add up.
- Advertising and signage that detracts from our towns.
- There is no max housing density, we are not inner London our rurality should be embraced.

- Making new development more wildlife-friendly in low cost ways e.g. design features for birds (eg swifts), bats and hedgehogs – and inclusion of new integrated habitat
- As mentioned elsewhere, the Local Plan needs to contain policies that relate to World Heritage sites and their setting and the St Bees to Whitehaven Heritage Coast.
- Planners and architects should ensure that where local vernacular and character is critical, sourcing the right materials is critical.

Q.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?

- Broad Support for all developments
- No, it's too complicated, do you even know the baseline you're at now?
- Recognition that crime has a negative influence on carbon emissions:
- Secured by Design research paper "Estimating the carbon footprint of crime"
- Yes, EA supports requirements for all developments to contribute to achieving net zero carbon.
- The Commissioners contend that planning policy should actively seek to reduce carbon emissions across the whole life cycle of a development. This commitment is central to the Commissioners' own sustainability strategy, which includes a target for a net-zero portfolio by 2050 and an interim 25% decarbonisation target by 2025. Aligning with the NPPF, which tasks the planning system with supporting "the transition to net-zero by 2050" (paragraph 161), addressing both embodied and operational carbon is crucial for achieving genuine sustainability.
- The Commissioners recommend that a formal requirement for detailed whole life-cycle carbon reduction strategies and assessments should be applied to all major developments, specifically those with 50 or more dwellings. For developments below this threshold, the policy should still encourage best practice in reducing embodied and operational carbon through design guidance and the use of sustainable materials, without mandating a full, complex assessment.
- Yes, it should be required for all developments. Guidance should be provided to help developers do this.
- Yes, but the limitations and restrictions must be applied sensibly and logically. Access to grid is not always as easy as perceived. In addition, whilst there is a place for the use of timber in construction, the "con" that it is a more sustainable than other materials such as concrete, when it comes to full life cycle analysis and the consideration of embodied carbon.
- Yes, planning policy should seek to reduce carbon emissions across a whole life cycle of a development. It should be required for all applications, even smaller developments.
- For ventures that are likely to use greater amounts of energy, water, and produce larger amounts of emissions, heavy incentives should be used in tandem with inspections, to ensure a balance in resources. E.g. financial incentives.
- AI data centres should be avoided as the draw on resources cannot be predicted as processing power is likely to increase vastly as the technology is taken up. There are also strong indicators that the AI bubble may pop at sometime in the next 2-3 years.

- More to the point, planning policy needs to relate to the world we live in, rather than to the 20th century ideals of industrial and domestic development. The world we currently inhabit has suffered from human industrial activity. By continuing to greenlight industrial and commercial large-scale development, we continue to exacerbate the problem.
- The council planning policy should reflect a change in paradigm, not just lip service to ideas of 'emissions reduction'. Economy must roll with the resources. If there are limited resources, there can only be limited growth. And there are only limited resources.
- the Local Plan should not impose a higher objective than the relevant government standard where there is a risk that this could divert resource away from efficient and effective radioactive waste management
- The Local Plan should also recognise that it may not always be possible, beneficial or appropriate to retrofit climate change measures to existing buildings (Question 108) or to include on-site renewable energy infrastructure on a radioactive waste management site (Question 107).
- Sellafield Ltd believes the Local Plan can promote use of PAS2080 (or similar) but feels the Local Plan should not impose a higher burden on developers than the relevant government standard and acknowledge that not all parts of all standards can always be applied.
- Whilst it may be appropriate for the Local Plan to seek to promote best practice in some cases, development within the nuclear sector is heavily influenced by a highly regulated environment to safely manage and dispose of radioactive waste.
- The NDA's overriding priority is ensuring that development meets safety, security and other regulatory requirements. The new Local Plan should recognise that there may therefore need to be exemptions from such policies.

Q.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?

- Yes, all developments
- No
- The Commissioners' own commitment to responsible investment and environmental stewardship underscores the importance of understanding and mitigating carbon impacts. However, the practicalities of land promotion and development delivery necessitate a pragmatic approach. Therefore, a requirement for a full whole life-cycle carbon reduction assessment should be implemented for strategic allocations and larger major developments, specifically those with 50 or more dwellings. This threshold aligns with the scale at which comprehensive masterplanning and detailed design codes are typically required, where the benefits of such an assessment are most significant and the resources for undertaking it are more readily available.
- Yes, development proposals of all sizes should be required to submit a whole lifecycle carbon reduction assessment as part of its planning application.
- This should be made easier for people to complete, by being a well-designed form that can be submitted in both digital and paper format. This is necessary to make it clear to businesses and developers, plus individuals seeking to improve their homes, that the environment must come first.
- Following applications, developments should be inspected against the claims made in the assessment.

- If this is implemented, it should be subject to a transition period for in flight projects.
- Local planning policy should not mandate carbon reduction or energy standards beyond national requirements. Whilst it may be appropriate for the Local Plan to seek to promote best practice in some cases, development within the nuclear sector is heavily influenced by a highly regulated environment to safely manage and dispose of radioactive waste.
- The NDA's overriding priority is ensuring that development meets safety, security and other regulatory requirements. The new Local Plan should recognise that there may therefore need to be exemptions from such policies.

Q.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?

- No
- 100% renewable
- Yes, this should be requirement for at least 50% of the energy need.
- Yes, this would be possible with industrial buildings. 25%
- On rooves, solar panels.
- Recognition that an emerging national crime trend is the theft of Renewable Energy equipment, as this technology becomes more widespread. Offences invariably occur at construction stage for theft of photovoltaic panels (complete units and components), air and ground source heat pump equipment and Electric Vehicle charging items.
- Both techniques can be used to improve water quality and should be required for this purpose as well as for flood risk, biodiversity etc.
- It is recognised that NFM can also perform secondary functions to provide co - benefits such as habitat creation and biodiversity enhancement, soil improvement and retention, water quality improvements and carbon storage, and can create more valuable landscapes leading to recreation or tourism opportunities for the local and wider community.
- Equally, other initiatives, which have their primary objectives outside of flood risk management, can also provide a secondary co-benefit (e.g. biodiversity-driven projects can help reduce flood risk), the Commissioners support its inclusion where it is technically feasible and economically viable. On-site renewable energy generation, such as solar PV, can play a significant role in achieving net-zero operational carbon and reducing reliance on fossil fuels. This aligns with the Church Commissioners' commitment to supporting renewable and low-carbon energy solutions.
- 36.1.3. However, a blanket requirement for all developments to include on-site renewable energy, regardless of site-specific conditions, may not always be the most efficient or effective solution.
- Factors such as site orientation, shading, roof space availability, and grid connection capacity can influence the feasibility and cost-effectiveness of on-site generation.
- In some cases, off-site renewable energy provision or contributions to local renewable energy projects may offer a more impactful and viable solution.
- If on-site renewable energy is required, the proportion of energy needs met by it should be determined by the overall Net Zero Carbon Energy Standard for operational use (as discussed in Question 106).
- The policy should aim for 100% of the remaining energy needs (after energy efficiency measures) to be met by renewable energy sources, whether on-site

or through credible off-site solutions. This approach ensures that the focus remains on achieving the net-zero target, allowing developers the flexibility to implement the most appropriate and viable renewable energy solutions for their specific development.

- The policy should encourage a hierarchy of solutions, prioritising on-site generation where feasible, followed by local off-site solutions, and then broader off-site contributions. This pragmatic approach will drive significant carbon reductions while supporting the deliverability of development.
- All developments, excluding householder developments, should be required to include solar panels, unless there is robust justification (for example heritage impacts).
- The provision of on-site renewable energy as well as meeting energy efficiency standards might harm the significance of heritage assets and their settings. Therefore, such a requirement may not always be appropriate
- Yes, all commercial and industrial developments should be required to include on-site renewable energy as well as meeting energy efficiency standards.
- Renewable energy comes with its own carbon cost, too, and parts/equipment have to be replaced periodically. This should be acknowledged and referred to within any zero carbon assessment.
- The presence of AI data centres as developments in Cumbria will create an unacceptable demand for power and water.
- The problem will not be solved with new nuclear development, as current plans involve incomplete and untested designs, such as the PWR-20 microreactors being planned in Wales at the present time. (It is notable that the PWR-20 produces waste materials that may not be compatible with UK nuclear waste repositories, which may delay their use further).
- nuclear energy is not renewable – it involves the mining, shipping, and trading of uranium, which is mired in controversy, not least the problem of trade with Russian companies, and child and slave labour in Less Economically Developed Nations (LEDNs).
- This would be desirable although I presume this would require central government policy support. It would be important to look at the installation of solar panels on new builds as well as the possibility of ground source heat pumps as part of the construction process.
- At Sellafield, our overriding priority is ensuring that development promotes safety, security and other regulatory requirements. In most instances, the installation of building specific renewable energy on the Nuclear Licensed site is not considered appropriate.
- The NDA Group is considering its energy strategy and Sellafield Ltd will be considered within that work.
- With regards to the safety of site, surety of supply is essential.
- The Local Plan should recognise that there may be exemptions to this policy.
- The NDA's overriding priority is ensuring that development meets safety, security and other regulatory requirements. The new Local Plan should recognise that there may therefore need to be exemptions from such policies.

Q. 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?

- Yes, but only if an energy efficiency assessment shows that it is better to convert rather than demolish and replace
- All buildings, all conversions that require planning permission
- Yes, it should be compulsory
- You can only encourage; you cannot know the financial capabilities of the applicant.
- Requiring such upgrades would be good but it will prevent the upgrading if the additional cost is too great. Perhaps only require with major renovation projects and all new builds.
- No, the noise from air source heat pumps and the expense of running them is a worry. Geothermal and solar on roofs should be encouraged.
- The policy should encourage retrofitting and provide further guidance as to how it can be achieved.
- Such a requirement might harm the significance of heritage assets and their setting
- Ideally, the requirement of retrofit of renewable energy equipment for all future building development proposals would be preferable – but it would be more helpful if it was both required and subsidised. Or, subsidised for individual householder residential applications.
- As the owner of a building over 200 years old I am acutely aware of the practical difficulties and costs of getting buildings to modern standards and so I feel this should be encouraged rather than be a condition of planning permission.
- At Sellafield, our overriding priority is ensuring development promotes safety and/ or security requirements. Subsequently, in most instances, the installation of climate change measures such as solar panels are not considered appropriate for buildings on the Nuclear Licensed site. This is particularly relevant in relation to emergency preparedness and safety on site.
- The Local Plan should recognise that this may not always be possible or beneficial and therefore 'encourage' rather than 'require' the above.
- Local planning policy should not mandate carbon reduction or energy standards beyond national requirements. Whilst it may be appropriate for the Local Plan to seek to promote best practice in some cases, development within the nuclear sector is heavily influenced by a highly regulated environment to safely manage and dispose of radioactive waste.
- The NDA's overriding priority is ensuring that development meets safety, security and other regulatory requirements. The new Local Plan should recognise that there may therefore need to be exemptions from such policies.

Q. 109 How can the Local Plan support natural flood management techniques and green infrastructure provision to reduce flood risk?

- Go 100% renewable as fast as possible.
- reintroduce beavers where appropriate
- BNG should be aimed at these, developers should be encouraged (or made compulsory) that they do this mainly.
- Take a tougher line on inputting hard standings, for example, and having housing with permeable driveways and larger gardens will help soakaway processes. Input reed beds to all estate developments.
- No
- Prevent new development in vulnerable areas using 2100 flood and extreme event projections

- Allocate areas in the Plan for upstream nature-based and natural flood management schemes e.g. temporary water holding areas that are multifunctional e.g. look at Thacka Beck and adopt similar approaches for the 'at risk' communities across Cumberland like Carlisle – take a proactive approach to acquiring these for the public good.
- The Local Plan can effectively support NFM and GI to reduce flood risk by embedding these principles throughout its policies, moving beyond mere mitigation to proactive enhancement.
- Firstly, the Plan should establish a clear policy framework that mandates the integration of NFM and GI as a primary consideration in the design and layout of all new developments, particularly major schemes. This means requiring developers to demonstrate how their proposals contribute to reducing surface water run-off, enhancing infiltration, and creating new water storage capacity within the development site and its immediate surroundings.
- the Local Plan should identify and protect existing natural assets that contribute to flood risk reduction, such as woodlands, wetlands, and natural floodplains, and actively seek opportunities for their restoration and expansion. This could involve mapping key NFM opportunity areas within river catchments and establishing policies that incentivise landowners and developers to implement NFM measures in these locations. For example, policies could encourage the creation of new multi-functional green corridors that serve as both wildlife habitats and flood attenuation areas
- the Plan should promote collaborative, catchment-scale approaches to flood risk management. This involves working with neighbouring authorities, environmental agencies, and local communities to identify and deliver NFM and GI solutions that address flood risk across entire river systems, rather than just at a site-specific level. The Local Plan could facilitate this by establishing a framework for developer contributions to strategic NFM projects, where on-site solutions are insufficient or less effective.
- the Local Plan should provide clear guidance and support for the implementation of Sustainable Drainage Systems (SuDS), ensuring they are designed to mimic natural drainage patterns and deliver multiple benefits beyond just flood attenuation, such as water quality improvements, biodiversity net gain, and enhanced amenity value. By integrating these approaches, the Local Plan can foster a more resilient Cumberland that effectively manages flood risk while delivering wider environmental and social benefits.
- The Plan could include a policy that requires developers to consider natural flood management techniques first. They should give robust reasons why such measures aren't deliverable before a hard engineered solution would be accepted.
- Encourage tree planting in appropriate parts of river catchments, including hedgerows (slow the flow and increase soil infiltration) and riparian planting (stabilise riverbanks, increase water infiltration into soil, increase evapotranspiration). Support Eden Rivers Trust and West Cumbria Rivers Trust in their work on reducing flood risk, including through establishing riparian trees and woodland. See Evidence of Tree & Woodland Benefits under heading 'Flood Alleviation'
- The Woodland Trust believes the Local Plan can play an important role in promoting natural flood management and green infrastructure as effective, nature-based solutions to reducing flood risk. Well planned tree planting and woodland creation are proven to slow the flow of water, stabilise soils and improve catchment resilience. The Local Plan should encourage woodland creation and tree planting in upland areas to increase water infiltration, reduce surface runoff and improve soil stability. It should also support the planting and restoration of riparian woodland to help intercept rainfall and improve bank

stability. Thirdly, it should promote partnership working with landowners, communities and environmental organisations to deliver natural flood management schemes that enhance biodiversity, store carbon and improve landscape resilience.

Q.110 Should SuDS be required to achieve net gains for nature or other multifunctional benefits?

- Broad support
- We support the requirement for SuDS to be incorporated into all new developments, wherever feasible. This is also supported by The SuDS Manual -Ciria C697
- The new National standards for sustainable drainage systems (SuDS), updated 30 July 2025, sets out 11 key principles, which has been strengthened for the benefit of net gains for nature or other multifunctional benefits as described.
- 1-3. Natural approach to managing water
- 4-8. Early and integrated design
- 9-11. Links with development planning
- The Emerging Plan should establish a clear policy requirement for SuDS to be designed.
- and implemented to achieve measurable net gains for nature, consistent with the BNG metric, and to actively pursue other multifunctional benefits. This will ensure that SuDS are not merely engineering solutions but integral components of high-quality, sustainable placemaking that contribute positively to Cumberland's natural environment and the quality of life for its communities.
- Yes, where deliverable and ground conditions allow.
- Yes. SuDS should incorporate trees and other native species in rain gardens as this can play a key part in increasing the matrices of habitat corridors across the landscape, especially in built up areas.
- SuDS are generally recognised as a method for reducing pollution of watercourses. In most cases, if they were used on the Sellafield site, they would accelerate the mobilisation of existing radiological and chemical ground contamination, resulting in greater transport of potential pollutants into water courses. Furthermore, given the scarcity of available land on the Sellafield site, mandating on site SuDS would cause an additional demand on available space, reducing the land available for high hazard reduction. It should be recognised within the Local Plan that development on the Sellafield site should not be required to deliver SuDS.
- We support the requirement for Sustainable Drainage Systems (SuDs) to deliver net gains for nature and provide wider multifunctional benefits. The Local Plan should ensure that SuDs are designed as natural features that support biodiversity, contribute to nature recovery by linking with existing green corridors and habitats, provide multiple benefits including climate resilience, improved water quality and enhanced amenity space, and are maintained in the long-term to ensure they provide lasting environmental gains.

Q. 111 The Council would welcome any comments on approaches it should take in relation to addressing flood risk issues arising in Cumberland.

- Should not all new houses with a garden at least plant one tree and make it impossible to put down impermeable drives/front gardens.

- Promote upstream NFM schemes (e.g. leaky dams, wetland restoration, tree planting).
- Support partnerships with landowners, farmers, to slow the flow and reduce downstream flood peaks.
- Encourage multi-benefit green infrastructure that stores and filters water (e.g. wet woodlands, riparian buffer zones).
- Catchment-scale thinking is critical in Cumberland, where upstream interventions (e.g. in the Lake District) can protect downstream communities.
- Development in Cumberland must be directed away from areas at highest risk of flooding, unless it can be demonstrated to be safe, sustainable, and resilient for its lifetime.
- This needs the development of an integrated, joined up and multifunctional and collaborative strategy across the landscape and catchments – with a lead agency / authority / green finance / natural flood management approach – Cumbria Wildlife Trust is very keen to be involved in future discussions on this; and more effort needs to be invested in this. There is the opportunity to develop a land-use change strategy with Defra agencies e.g. soil management - storage and capacity, land acquisitions or payments aligned with flood risk etc lots of creative approaches are possible.
- Also need to take drought and wildfire risk seriously as management issues in the Plan
- the Environment Agency welcomes input and consultation on an up-to-date Cumberland Council Strategic Flood Risk Assessment (SFRA). An SFRA L1 as described in 11.9 is a starting point for presenting the flood risk issues requiring consideration in the Local Plan area and across boundaries study areas.
- Your L1 SFRA should assess all forms of flood risk and present the conclusions in an accessible manner. As well as other flood risk constraints the 'functional flood plain'- Flood Zone 3b should be mapped as accurately as possible with the methodologies agreed. The deliverables of your SFRA should seek to provide interactive mapping that can be hosted on Local Plan Evidence pages on your website. Several other councils have successfully developed this approach, sometime in tandem with interactive PDF and a master index map.
- In addition, to address frequent requests from Local Planning Authorities, the public and those involved in producing basic FRA's, but who are not flood risk professionals, we have worked with the TCPA to produce a Flood Risk Assessment Template (v1).
- We hope by providing access to a template that is consistent with the requirements of the PPG and NPPF, that this will help reduce the number of potentially unnecessary planning objections that are based on inadequate FRAs.
- As well as changes of use that propose a change to 'more vulnerable' residential usage in flood risk areas and in single story buildings with no safe refuge, we also see a number applications that involve the subdivision of existing residential buildings (HMO's but not exclusively) with sleeping accommodate on ground floor, where the raising of floor levels is not possible and where a meaningful water exclusion policy is similarly not possible. Such proposals clearly do not meet NFFP criteria and are best avoided.
- Major developments located in Flood Zone 1 can cause significant concerns from the public in relation to the perception of increasing flood risk elsewhere, and in some instances these concerns have been seen to be justified because of increased base and peak pass on flows which puts small watercourse and especially culverted systems under significant development pressures.
- WE would direct our strategic advice to the adoption of the standards and principles of the new National standards for sustainable drainage systems (SuDS) Updated 30 July 2025, sets out 11 key principles, which has been

strengthened for the benefit of net gains for nature or other multifunctional benefits as described.

- Changes to the management of the water environment can affect the historic environment in a number of ways. The construction and operation of new infrastructure and sustainable drainage systems (SUDS) and changes in land management, have the potential to impact on the significance of heritage assets and their settings; this includes impacts on water-related or water-dependent heritage assets. The abstraction of water resources and the impact on changes in groundwater flows and chemistry can have an impact on buried, waterlogged archaeological and paleo-environmental remains of significant interest and fragility. In addition, the alteration of physical characteristics of a water system (hydromorphological alterations) comprising: the modification/removal of weirs or other in-channel structures which may be significant heritage assets; and other physical changes to rivers such as decanalisation or re-cutting old meanders that have the potential to destroy or harm archaeological and palaeo-environmental remains.
- It is important that in the management and reduction of flood risk and in the management of the water environment, it is done in a manner that ensure the conservation and enhancement of the historic environment, heritage assets and their setting. This includes sustaining and enhancing local character and distinctiveness of historic townscapes and landscapes.
- In developing flood risk policies and if seeking to define a “Developed” and/or “Undeveloped” coast or seeking to allocate Coastal Change Management Areas, the Councils should be cognisant of LLWR’s nationally important role in the management and disposal of radioactive waste, and should ensure that any such designation, allocation, or policy does not impact the ongoing operation of the LLWR and seeks to maintain the sites’ long term future.
- Support relevant organisations delivering on these issues – Raise: CCF, Eden Rivers Trust and West Cumbria Rivers Trust are currently working in partnership to deliver tree planting and woodland creation around these catchment areas.
- UU project in South Cumbria involved giving out water butts for people to have in their gardens to collect heavy rainfall, with plants in the top to look nice - Cumbrian village receives 150 water butts.

Q.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’?

- Yes
- keep children away from the radioactive beaches in Cumbria. you have an appalling record of failing to warn parents of radiation in the sands
- Yes. Housing could be part of developed coast
- Yes. Windsurfing, canoeing centres – anything to bring focus on our water sport natural facilities, perhaps with a boost for campervan and motorhome tourism facilities alongside the existing holiday camps.
- It’s Important to define what is meant by an “Undeveloped Coast” as it is probably easier to define what developments you do not want. If consultees are answering ‘Yes’, then developments are likely to be related to the promotion of tourism along the West Coast.
- Answer: Besides the problems inherent with the idea that we can continue to develop sensitive, damaged coastlines with some ‘sensitively designed’

development, the Office for Nuclear Regulation (ONR) already places limits on developments within the vicinity of nuclear installations.

This should be reinforced in the Local Plan with a dedicated buffer zone of at least 6.1 km from the centre of the Sellafield site in the coastal area and coastal plain around Sellafield. This effectively bans any new developments (including nuclear developments) to afford some protection and peace of mind for those living within the vicinity of Europe's (possibly the world's) most dangerous nuclear waste site.

- Tourist attractions like walkways, restaurants, small manufacturing.
- Should be informed by the Shoreline Management Plan following its review – and recent work on the likely impacts of sea level rise, increased storminess and coastal change. The revised Shoreline Management Plan should be adopted. On the low-lying parts of the coast – Cumberland Council needs to take a radically new approach to managed realignment that minimises coastal squeeze – and enables habitats and natural processes to adjust to change. The impacts are likely to be significant in some areas and the Council needs to develop a strategy for the social impacts i.e. face up to the realities and that not all property on the coast can be protected or defended on our future coasts – lots needs to be put in place to assist people in getting prepared for further permanent flooding of especially the low-lying areas of Solway and Duddon – and other crunch points where erosion will affect infrastructure. Some / much of this cannot be defended and will need to move.
- Not sure how the concept of developed and undeveloped coast will help with this or whether its relevant? All and any new development on the exposed coastal areas should be resisted by the Council – it's irresponsible to allow this unless its recognised that these are temporary occupations in at risk areas and they have plans in place for evacuation / roll-back etc
- Significant areas of low-lying coast and hinterland are at risk and Cumberland Council shouldn't shy away from the issues whilst not provoking any panic reactions.
- Your Council area clearly already exhibits the landscape typographies of 'Developed Coast' and 'Undeveloped Coast'. This is a concept that already exists. Your Council should seek to better enhance both for their respective socio- socio economic and conservation and recreational values.
- Yes, we would strongly support this approach. Sensitively designed development, such as that which provides small scale community or visitor facilities, which accords with the Cumbria Landscape Character Guidance and Toolkit in such areas would be supported.
- Uncertainty of a sea-level rise has given way to full confidence that this will happen.
- While possible developments created on the coast might be made and decay before the maximum predicted rise in water levels, the national guidance for design principles referred to in paragraph 10.5 mentions Lifespan – made to last. Industrial or commercial developments on the coast that are not designed to last could add to the waste and detritus, rather than improving the condition of the coast. The Council should seek to reduce development on the coast on the grounds that it may not survive in the short term; and it may create more need for clean up in the long term.
- Further, the Office for Nuclear Regulations requires limits on development near nuclear facilities. This involves a buffer zone of 6.1-8km from the centre of nuclear sites (e.g. Sellafield), where new developments are banned. This protects and provides some peace of mind for people living nearby. Sellafield is not just a nuclear plant – it holds a huge amount of nuclear waste.
- Besides the problems inherent with the idea that we can continue to develop sensitive, damaged coastlines with some 'sensitively designed' development,

the Office for Nuclear Regulation (ONR) already places limits on developments within the vicinity of nuclear installations. This should be reinforced in the Local Plan with a dedicated buffer zone of at least 6.1 km from the centre of the Sellafield site in the coastal area and coastal plain around Sellafield. This effectively bans any new developments (including nuclear developments) to afford some protection and peace of mind for those living within the vicinity of Europe's (possibly the world's) most dangerous nuclear waste site. Both the Sellafield and LLWR sites are established sites in close proximity to the coast which requires them to operate the site with robust environmental controls in place. If the Council proceed to define a "Developed" and/or "Undeveloped" coastal areas or allocate "Coastal Change Management Areas", the Councils should ensure that such allocations and designations do not impact the ongoing operation of the sites.
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Q.113 Should the Council seek to allocate further Coastal Change Management Areas?

- Yes - Yes, Cumberland Council should consider the allocation of further Coastal Change Management Areas (CCMAs). - Your Council is invested in the Northwest Regional Coastal Monitoring Programme. The programme provides a consistent regional approach to coastal process monitoring, providing information of the development of strategic shoreline management plans, coastal defence strategies and operational management of coastal protection and flood defence. - The programme is managed on behalf of the Northwest and North Wales Coastal Groups and is funded by The Environment Agency, in partnership with the maritime Local Authorities. - This work along with the Shoreline Management Plans are the first decision fork. SMP Explorer is a foundation piece to considering CCMAs - You should use SMPs and CCMAs to help understand coastal change issues, including for infrastructure planning. CCMAs can be used to help transitional and adaptation ideas, including for exiting communities and infrastructure. - Sellafield Ltd plays a vital role in the nuclear fuel cycle (clean energy), allowing nuclear power generation to continue in the UK by receiving spent fuel from generating stations for consolidation and interim storage. - The Local Plan should not focus solely on carbon reduction from new development, particularly at Sellafield where a significant role is played at national level, to allow generation to continue.
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Q. 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 minimum site size)? What evidence can be provided in support of such an approach?

Substantial Public Support

- Requiring more than 10% BNG would significantly increase site costs, particularly for remediation, habitat creation, and long-term management.
- Many residential developments, especially small and medium-scale schemes, would become unviable, reducing the number of homes that can be delivered.
- Developer perspective: Housing delivery must remain realistic; mandatory increases in BNG could stall or prevent schemes, undermining the Local Plan's housing objectives.
- The Government's own Impact Assessment, highlights that 10% represents only the minimum needed to maintain the status quo
- Kent Local Nature Partnership did a study exploring +10% scenarios and also have justification for 20%
- Yes, we should be ambitious but setting too high a level is hard because all developments will have particular circumstances. 20% perhaps. It should be required for all – including non-housing applications too, for example stabling, as in FUL/2025/0008.
- The evidence is that developers and inspectors were not respecting section 40 of the Natural Environment and Rural Communities Act 2006 and so BNG was needed. But still, in 2023, only 14% of the United Kingdom's habitats for wildlife were found in a good ecological state by Natural England. Mandatory BNG is 'key' in clarifying targets and direction in environmental legislation for nature recovery as climate change begins to affect us all.
- In our Parish's Community Plan, Issue F under the heading of Nature Recovery states "A new Local Plan for Cumberland should include strong policies for the protection of wildlife." The related Actions for this Issue F1 and F2 state "...ensure (the Local Plan) includes ambitious nature and biodiversity enhancement and has adequate protection for wildlife in our locality" and "Seek to ensure that major developments have built in strategies for the creation of new wildlife habitats..."
- Also, our Issue G (Action G1) concerns supporting new areas created for wildlife and objecting also to applications which damage wildlife habitats.
- There should be a universal adoption of a required minimum 20% biodiversity net gain within relevant policy by all of Cumbria's planning authorities. In relation to scale of development this should be adopted as a required minimum within all relevant policy by all of Cumbria's planning authorities.
- Yes - As high as possible as soon as possible. The evidence is in our collapsing ecosystems and biodiversity and species loss which is entirely due to human action. This is a crisis which needs immediate and very significant attention and action.
- Yes, Cumberland should be implementing a policy that requires development to deliver more than 10% BNG
- There should be a universal adoption of a required minimum 20% biodiversity net gain within relevant policy by all of Cumbria's planning authorities.
- All development should deliver biodiversity net gain (irrespective of scale).
- 20% BNG can deliver broader benefits for both the environment and for people. These multi-functional benefits include increased flood resilience (and therefore risk of landslide), improved water and air quality, reduced drought, better place-making and better access to the natural environment leading to improved health and wellbeing (along with enhancing the reputation of the local authority plus the developer).

- A requirement for a higher level of BNG contributes to and aligns with delivery of the Local Nature Recovery Strategy and delivering greater nature-gains in areas of higher strategic benefit
- The Government's own Impact Assessment highlights that 10% represents only the minimum needed to maintain the status quo.
- Surrey Nature Partnership produced a document to justify going above 10% in their local plan.
- Wirral Council requires 20% BNG on council owned land
- South Oxfordshire and Vale of White Horse Joint Local Plan Topic Paper – Justification for Higher Biodiversity Net Gain
- Yes We support more ambitious BNG targets where feasible. The concept of securing net gains for the environment will link to other key parts of the vision and objectives of this Local Plan. Biodiversity net gain will contribute to wider environmental net gains in the area over the plan period which links to climate change adaption and mitigation, the creation of healthy communities and the high-quality design of new developments. (Environment Agency)
- BNG uplift (Strategic Significance Multiplier) opportunities identified in the emerging Cumbria Local Nature Recovery Strategy (LNRS), could be used to guide and leverage additional net gains from development. The provision of clear guidance, along with potential funding mechanisms to support LNRS delivery, will help ensure that targets are achievable and result in measurable environmental benefits. (Environment Agency)
- We also suggest a reference to the BNG delivery hierarchy in this section to secure the priority of on-site BNG wherever possible to support place-making and ecological connectivity.
- The Commissioners strongly support the Council's intention to include a policy requirement for Biodiversity Net Gain ("BNG") in the new Cumberland Local Plan. Given the statistics from the State of Nature Report 2023, which highlight the severe decline in UK wildlife and the urgent need for nature recovery, the Commissioners suggest that the Council should indeed be considering a policy that aligns with the mandatory 10% BNG. This proactive approach aligns with the Commissioners' own commitment to addressing biodiversity loss and fostering environmental enhancement.
- Yes, the maximum amount that is viable should be requested through the Local Plan, as informed by a Local Plan viability Study. Certain developments should only be required to provide the minimum amount set by national legislation (currently 10%) however such as developments which are for the purposes of improving the natural environment or providing/improving access to it.
- The scale of development it applies to is set in the national BNG regulations (which may be amended as a result of the Governments recent BNG consultation).
- There is no evidence put forward in the Issues and Options to support a requirement delivering more than the mandatory 10%
- Biodiversity Net Gain (BNG) should remain at the nationally mandated 10%, and should continue to not apply to development that is exempt under national policies or regulations
- Any policy looking to deliver more than 10% Biodiversity Net Gain should seek to 'encourage' rather than 'require' developers to deliver this. Mandating that BNG should delivered via a sequential approach is not necessary in order to

secure the desired benefits of the national policy and should therefore be avoided.

- NWS employs an on-site ecologist to manage and protect species and habitats, and that NDA's Nature Recovery Plan commits to finding opportunities through delivery of its core mission to use land for nature recovery. NWS' work delivers environmental benefits. Any additional requirements which would divert resource from delivery of its work could be detrimental to the achievement of such benefits.
- No. I think that central government should prescribe the upper limit for BNG. It would be very challenging for developers to incorporate higher BNG in developments and I think it would be unwise for the authority to prescribe a higher level. It is important to consider that the government has recently consulted on this issue and may exempt some developments from BNG requirements.
- Generally, in order to prevent additional viability impacts on developers, the approach to delivering Biodiversity Net Gain should maintain consistency with national legislation and guidance. Any policy looking to deliver more than 10% Biodiversity Net Gain should seek to 'encourage' rather than 'require' developers to deliver this. The nature of work on the Sellafield site is to support the Sellafield mission (including the largest environmental restoration project in Europe) and deliver overall environmental benefit. Any additional requirements which would divert resource from achieving those aims would be detrimental to overall environmental benefit (e.g. slowing the pace of high hazard risk reduction).
- The Woodland Trust supports the Council adopting a policy that requires development to deliver more than the statutory minimum of 10% Biodiversity Net Gain. A 10% requirement is widely recognised as the level needed to avoid a net loss rather than deliver a meaningful gain. To secure genuine nature recovery, Cumberland should set a higher local target of 20% BNG.
- A 20% requirement is achievable and can be cost-effective. Evidence from Swale Borough Council indicates that the increase in cost per unit when moving from 10% to 20% BNG is significantly smaller than the cost of moving from 0% to 10%. This shows that higher BNG targets do not result in disproportionate cost burdens and can provide better value for nature and communities.
- This enhanced requirement should apply to all developments in Cumberland that are required to deliver statutory BNG. A consistent approach will ensure that nature recovery is embedded across the full range of development and will help create a joined-up network of habitats. Setting a 20% target will position Cumberland as an ambitious, nature positive authority and support the delivery of resilient ecosystems, improved green space for communities and long-term environmental benefits.
- Extending BNG to exempt developments, increasing thresholds and/or mandating a sequential approach to the delivery of BNG would create unnecessary burdens on developers, and could potentially negatively impact its ability to efficiently deliver NDA's mission of making radioactive waste permanently safe, sooner.
- Natural England welcomes Section 12.7 - 12.10, including the commitment to 10% net gain and the reference to the Local Nature Recovery Strategy. The Plan should identify and pursue opportunities for securing measurable net

gains for biodiversity. This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence. The BNG policy should set out the approach to delivery in terms of geographical location, with on site net gains being assessed as a priority (Question 117). This could include specifying whether and what BNG should be delivered on-site given the scale of development anticipated, or if off-site provision will be required. Site allocations should be supported by a baseline assessment of biodiversity value for example using the latest version of Defra's Biodiversity Metric. (*Natural England*)

Q.116 Do you agree that BNG should apply to development that is currently exempt, for example custom and self-build housing?

- Opposed. Extending BNG obligations to self-build or custom-build plots would disproportionately burden individual builders and reduce housing delivery. Incentivised, optional approaches may be considered, but mandatory application is not appropriate.
- Yes as long as it's only one house.
- Yes, let's not have 'special' cases and 'waives' anymore. The environment needs help. Cumberland should look at the self-build development ("Millionaire's Row") at Broughton on the edge of Broughton Moor. Each plot should have had space for house and garden, but they have built so that the house fully fills the plot. The houses are massive and incongruous.
- As small-scale developments, such as custom or self-build housing, are less likely to have significant environmental impacts individually, instead of requiring a mandatory 10% net gain, the Council could consider providing clear guidance or appropriate incentive-based policies for them. Such as using the BNG market to encourage developers or landowners to undertake ecological surveys and deliver any feasible biodiversity enhancements. This flexible approach ensures that opportunities for ecological enhancement are not missed. (*Environment Agency*)
- Meanwhile, encouraging greater BNG ambitions above the standard 10% target for larger scale developments. This can help achieve a balanced approach that maximises environmental benefits across the overall plan area. (*Environment Agency*)
- No. On what grounds is this justified?
- The exemptions to the requirements help to reduce these costs for smaller scale developments, those which can be carried out under permitted development rights and those which have very little impact on biodiversity.
- Removing these exemptions is likely to act as a significant barrier to delivery and therefore Sellafeld Ltd disagrees with this proposal. Any policy on Biodiversity Net Gain should maintain consistency with national legislation and guidance.
- The Local Plan should not conflict with the regime for permitted development rights.

Q.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)?

- Opposed to any prescriptive sequential requirements. Mandating on-site, local, or wider-area sequential delivery adds complexity and cost, particularly on smaller sites. Developers should retain flexibility to decide the most practical way to meet obligations where required
- Yes, it really should benefit local areas as much as possible. The council should actively encourage these sites to be registered with the BNG bank.
- Make it simple, delivery on site. It should be easily justified if your focus is on brownfield and the Towns (Option 1 in spatial hierarchy) but where there is conversion of a house, far from an adjacent settlement and there is no owned land around it, for example, you may have to set a level of 10% for this category.
- Any on-site BNG needs to be monitored to ensure delivery over the 30year term.
- Yes, the sequential approach needs to include sites within the LNRS for example, 1) on site, 2) elsewhere in settlement/or a certain distance away 3) within LNRS area
- For the purchase of off-site biodiversity units there should be no preference given to where the units are within Cumberland planning jurisdiction, it should be based on whether they are in Cumberland, (i.e. units can be within LDNPA boundary but will not be penalised if those units are within Cumberland).
- Sellafield Ltd and Cumberland Council have previously agreed that it is inappropriate to deliver BNG on the Nuclear Licensed site. This is supported by Sellafield's work underpinning prioritisation of space on the Nuclear Licensed Site.
- Yes, the Woodland Trust agrees that a clear sequential approach should be taken to the delivery of BNG to ensure biodiversity improvements are meaningful and locally relevant. BNG should be delivered as close as possible to where impacts occur so that nature and communities benefit directly. The sequence should be: a) firstly, on site; b) if on-site delivery is not possible, or cannot achieve the required gains, then within that settlement or immediate locality; then c) elsewhere within the Cumberland local authority area.
- Out-of-locality BNG delivery should be avoided wherever possible. Delivering BNG far from the site of impact risks weakening the ecological value of the gain and reduces benefits for local wildlife and communities. A strong local focus will help ensure that harm is minimised and mitigated in the place it occurs and will support a coherent network of nature rich spaces across Cumberland.

Q.118 How should the LNRS be incorporated within the Local Plan?

- Using LNRS to dictate exact mitigation or enhancement measures risks slowing delivery and increasing costs. LNRS can be advisory guidance but should not restrict development or make schemes unviable.
- Areas should be indicated as priority for BNG.
- The answer to this is with the decision makers, not us. It is such a huge item in its own right which sets out to define the actions that should be taken. It must be incorporated into the Local Plan by inputting it as a suitable policy in development design.

- It should be embedded in all development planning.
- Local Nature Recovery Strategy; Hedgehog runs, bat corridors, red squirrel protection and swift bricks part of the design requirement along with planting for butterflies and bees.
- The Cumberland Local Plan should fully reflect and be guided by the Cumbria Local Nature Recovery Strategy by directly embedding the LNRS's mapped 'Areas of Particular Importance for Biodiversity' and 'Potential Measures' as key spatial and policy components of the Local Plan. The Plan should use the LNRS to inform strategic policies on environmental protection and enhancement, ensuring that development allocations and policies proactively contribute to local nature recovery and ecological connectivity.
- There is a need to ensure consistency with the LNRS's Statement of Biodiversity Priorities to secure maximum environmental benefit, particularly in supporting the delivery of Biodiversity Net Gain (BNG) by identifying strategically significant locations for habitat creation and enhancement.
- The suggested comments above are a recommended response informed by and based on the current indicated statutory duty and policy alignment set out in the Environment Act 2021 and subsequent guidance. Further considerations should be made to the following:
- Planning authorities are required to 'take account of' the LNRS in complying with their strengthened biodiversity duty. This means the Local Plan should not conflict with the LNRS and must use it to inform its approach to protecting and enhancing biodiversity.
- The LNRS is designed to be a spatial strategy that supports development plans, providing a clear, locally-owned roadmap for nature recovery.
- The LNRS is an important consideration for BNG, as sites for off-site BNG delivery that align with the LNRS's mapped proposals will receive a higher value (the strategic significance multiplier) in the BNG metric, effectively incentivising developers to deliver in the most ecologically beneficial locations identified in the Local Plan.
- Include a dedicated LNRS policy under the Environment section of the Local Plan, or integrate LNRS references into other policies on biodiversity net gain, green infrastructure, or flood management, to emphasise the significance of the LNRS in prioritising habitats, ecological networks, and areas of high conservation value. (Environment Agency)
- Flood Risk and Water Management: Highlight opportunities for synergies between LNRS implementation, Sustainable Drainage Systems (SuDS), habitat-based flood mitigation, and water quality improvements. Encourage multi-benefit solutions that deliver both biodiversity gains and resilience to climate change and flood risk. (Environment Agency)
- BNG: Encourage developers and landowners to use the Local Habitat Map from the LNRS to inform site selection, design, and mitigation measures. Link BNG delivery to the LNRS to ensure that enhancements contribute to wider, landscape-scale ecological objectives. Provide supplementary guidance or technical advice for implementing LNRS priorities and measures, particularly for smaller-scale developments not legally required to achieve 10% BNG. (Environment Agency)
For larger developments, could require demonstration of how proposals align with LNRS priorities and submission of monitoring plans showing measurable biodiversity outcomes.

- Delivery and monitoring: Link the policy to Local Plan monitoring and the Environmental Assessment framework to ensure cumulative ecological benefits are tracked over time.
- The LNRS should be a key consideration when assessing which sites to take forward for development and which to protect.
- In the case of Swifts - referenced in the LNRS as a Key Species, and in Measures U7 (Built Environment), S29 and S30 (Species Recovery) - local Swifts groups are already working hard on the relevant issues, and would now welcome the involvement of the planning team. Our responses to Q127 and Q129 deal with this in much more detail.
- By informing design codes
- My concern is that the Allerdale Local Plan and your draft for Cumberland focus largely on existing designated sites such as SSSIs, SACs and Ramsar sites rather than the very important priority habitats outside these sites. I have undertaken detailed mapping of the Small Blue and Marsh Fritillary butterflies and the habitats on which they are found most of which are not protected by designations which makes me acutely aware of the potential risks of development of these sites (*in attachment*)
- I would hope the plan could include reference to the important post industrial and unimproved grassland sites which are not protected by designation as well as the Cumbria priority species including the Small Blue and Marsh Fritillary Butterflies.
- The Local Nature Recovery Strategy should be integrated with health and wellbeing objectives, recognising that access to biodiverse environments supports both ecological and human health.
- The Local Plan should encourage alignment to the LNRS, particularly when proposals seek to offset impacts
- Cumberland Council should seek to provide the statutory and legal mechanisms that enable the LNRS to actually be enacted and put into practice.

Q.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.

- Identifying GI assets on the policies map can help guide development away from ecologically sensitive areas and maintain connectivity.
- Ensure GI policies are flexible and allow developers to integrate new GI within site designs without making projects unviable.
- Yes, all of the above and especially promenades. The Plan should also take into account green corridors or even attempt to connect green areas, e.g. woodland. East of Brigham between Barr's Lane, High Rigg estate and the A66. Another local example for Brigham parish would be the fields around Toll Barr Rise between Broughton Cross and Brigham.
- Yes this is really important – all the above plus LNRS, county wildlife sites, designated sites
- A review of the summary and main consultation documents indicates some inconsistencies in how the water environment is addressed. While the summary document makes a few references to the water environment,

including “blue infrastructure” the main document contains very limited coverage beyond a brief mention in the Green Infrastructure section (para. 12.11) and references to flooding. This is notable given that the main document goes into specific detail on matters such as swift bricks and hedgehog highways, both important measures, yet there is little discussion of issues affecting rivers, lakes, and the sea.

- Yes, it should include all types of green and blue infrastructure (including woodlands, hedgerows etc as well as protected and designated sites) and the assets listed above.
- The requirement for Sellafield Ltd to develop offsite land adjacent to the Sellafield site has been set out previously. Sellafield Ltd requests that strategic green infrastructure corridors are not established where they may conflict with proposed development land. Further information on the specific areas proposed for future development will be submitted through the Call for Sites consultation. Generally, the Local Plan should include green infrastructure assets and corridors, including the suggestions listed.
- Yes, the Local Plan should ensure these are included on the policy map, and this should include: ancient or long-established woodland, veteran trees and woodland corridors.
- Natural England welcome Sections 12.11 – 12.14 regarding Green Infrastructure and Green Wedges, green infrastructure is a vital part of Cumberland’s ecological network and should be protected and where possible enhanced. The Plan should set out a clear vision for delivering green infrastructure, including identification of deficiencies in provision and opportunities for new and enhanced green infrastructure. The policy should support and align with other natural environment policies, such as those on sustainable drainage systems, biodiversity, access, active travel and open space protection and enhancement.
- The local plan can make use of the Natural England’s Green Infrastructure Framework (GIF) to help prepare a green infrastructure evidence base that can support policies, site allocations and local design codes. Specific guidance for plan-makers is provided in the GI Process Journeys. The Green Infrastructure Map can be used to identify inequalities in access to greenspace and plan for new green infrastructure.
- NE do agree that mapping out the current green infrastructure assets and cross assessing this with the policy maps is a good idea, and will aid in the ability to protect, enhance and create new ecological networks.

Q.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?

Areas Suggested:

- While green wedges can help maintain settlement identity and prevent coalescence, overly prescriptive protection could restrict deliverable land and reduce housing supply.
- Highmoor (the area along the B5305 should be protected from further development.

- East of Brigham between Barr's Lane, High Rigg estate and the A66. Also, the fields around Toll Barr Rise between Broughton Cross and Brigham.

Q.121 Should the Local Plan identify Local Green Spaces

Substantial public support

Q.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?

- The existing NPPF and BNG framework already account for trees and hedgerows. Additional Local Plan-specific mandates risk adding unnecessary costs and complexity, especially for smaller or medium-sized residential developments.
- It is of the utmost importance that tree planting and hedge planting is prioritised in this plan. Yes, but care needs to be taken with regard to longer-view visual amenity. There's a case for saying that communities enjoy being able to see Fells and that tree-planting just for the sake of BNG that obscures that view needs to be carefully judged.
- It is laughable that planting a hedge negates concreting and tarmacking over a field used by deer, hare and bees etc. The policy should enforce proper nature walks developed local to the build with safe routes to village centres and schools. The trees should also produce fruit to eat especially in
- Recognition that the soft landscaping scheme for a new development must not undermine security as it matures. Developers must indicate how schemes shall be maintained in the long term (Item 124)
- 20% BNG uplift requirement should be applied – should aim to achieve e.g. 25% tree and hedge cover or better including trees outside woodlands and woodlands
- Also, should aim to create new woodlands as part of new developments – and develop networks of connected corridors of trees and shade / habitat throughout urban areas
- Yes- the local plan should specify requirements for tree and hedge planting- and these should be that all new fences around developments and gardens should be planted with hedging (ideally native)- wildlife has never benefited from a fence and we should not be tarmacking over or green spaces without helping to mitigate that loss with hedges and trees.
- A new housing development can provide a haven for wildlife if done properly and that should be specified to include as many trees and hedges as possible.
- There should also be a policy regarding the retention of dry-stone walls as these can also provide important habitat for a range of plant and animal species.
- Only if the tree and hedge planting is properly managed, monitored and enforced. Too many developments, particularly in urban areas have their planting removed post 5-years and no action is taken.

- Tree and hedge planting in new developments should also proactively support the Environment Act 2021 government legislation (under heading 'Biodiversity and environmental protection') to reach 16.5% tree canopy cover in England by 2050 and consider the accessibility of this woodland.
- For the reasons set out above, the constraints of space on the Sellafield site, the need to deliver value for money to the taxpayer and the need to deliver high hazard risk reductions should not be undermined by the optional policies set out here. The risk of new green measures and the subsequent environmental regulation becoming in conflict with the need to deliver work on site would be a concern for Sellafield Ltd.
- Yes, the Local Plan should include specific requirements for tree and hedge planting in new developments as national policy and the BNG regime alone will not guarantee sufficient replacement, quality or long-term resilience of green infrastructure. This policy should include a clear requirement that where trees are lost through development, at least two or preferably three new trees are planted for everyone removed to account for attrition and ensure a long-term net gain in canopy cover. It should also require replacement trees to be of a native species and ideally the same species as those lost to maintain local character and biodiversity value.
- New developments should also be required to achieve a minimum tree canopy cover level to ensure sufficient long-term tree cover and existing mature trees should be retained on new developments wherever possible.
- Our client considers that the emerging Local Plan should not look to provide additional requirements for tree planting and hedge planting, given that this is already considered during the preparation of the BNG metric. The inclusion of additional requirements would not be justified and as such, a future policy would conflict with Paragraph 36 of the NPPF.

Q.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?

Majority public support

- Prioritise all mature trees rather than the development. The time taken for new trees to grow means replacement is welcome but wholly inadequate.
- It depends on the tree age, type and setting. But yes. See above, planting 100 little oak trees doesn't make the destruction of 50 mature oak trees acceptable.
- Yes – with the additional checks that the trees being planted are the right species and in the right place
- Yes. The ratio could be determined by the age of the tree being removed - i.e. an older tree should be replaced by a larger number of replacement trees. There also must be measures in place to ensure the survival and long-term viability of the replacement trees.
- Forestry Commission and the Woodland Trust recommend a ratio of 3:1
- No, the ratio should be 1:1 if it is a tree of a similar species and size if stipulated to be planted within the red line boundary of the development site.

Q. 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?

- Yes. It should also be required that tree planting and growing experts are consulted to ensure the best outcomes and species are used. Roadside verges have suffered huge amounts of cutting down of trees in recent years when the opposite should be happening. Old growth deciduous woodland should be protected across the county.
- Yes, it should also consider future impacts of the tree's growth (branch and root impingement on surrounding infrastructure) to ensure trees are not planted only to be removed years down the line
- Yes, it should also state that where the tree fails or needs to be removed in the future, it must be replaced.
- Yes, following the example of the A14 road improvement between Huntingdon and Cambridge when nearly a million trees were planted but they died due to drought. There needs to be a requirement for trees to be protected following planting and replaced if they die.
- Yes. This could link to the community wealth building measures proposed in chapter 7 'Economy'. Raise will be working to provide tree and woodland maintenance through our neurodivergent social programme and work with local communities. The Local Plan could require Developers to work with or contract relevant local organisations such as Raise. Through this, maintenance of trees could be sustainably delivered with community-led action, supporting the CCF Plan's 25-year goals to create healthy treescapes, support access to and community stewardship of these treescapes, and involve neurodivergent individuals – benefitting wellbeing, skills and employment and the environment.
- Yes, tree maintenance is vital to ensure trees can grow in a sustainable and well-managed way, and it should be incumbent on developers to ensure a plan for long-term management of these trees is introduced.

Q.125 Should new trees be native unless otherwise justified?

Broad Support

- Yes, though fast growing nursery species (e.g. Alaskan Spruce) may be required to protect slow growing native species
- Yes, the preference is for native trees (and ideally trees grown from seed stock sourced within the locale)
- Yes. Where otherwise justified (e.g. for timber production and/or carbon sequestration), species should be anticipated to adapt well to future climate conditions and where possible provide similar ecological function to native species.

Q.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?

- Policy can support it by presenting landowners with preferred places to plant. Be careful not to permit Brown and grey field building sites being lost. Low quality agricultural land should be the priority, such as that currently used for sheep-grazing. In this way, perhaps by prioritising riparian sites too, the water flow may be 'slowed' and flood risk reduced too.
- The Lake District, and indeed most of the rural county areas, have large tracts of empty or lightly used fields - mainly by sheep, though small cattle breeds are increasingly seen. These tracts of grass are, in effect, desertified from an ecological point of view. Where once we would have had mixed deciduous woodland providing for approximately 30X more species diversity and much greater biomass, now we have stripped bare grassland (often covered in bracken or purple moor grass) which is given over to an animal (sheep) which has little economic benefit and which further damages the environment by overgrazing and preventing the growth of anything but more grass. To try to protect this under the guise of a 'cultural landscape' is completely disingenuous when the environment and everything living in it would be massively better served by reintroducing nature (natural woodland, species diversity etc.). Encouraging hill sheep farmers in particular to reduce or remove sheep and instead become managers and protectors of the landscape would be an enormously positive move for nature, wildlife, visitors, residents and, hopefully, the current farming
- Yes, but with fruit bearing trees.
- The Local Plan should allocate areas as community woodland and identify these on the proposals map along with other elements of green infrastructure. It should also set out specific requirements as suggested here.
- I was extremely concerned to hear of this initiative to plant a 5000 acre Community Forest in Cumbria because inappropriate planting of trees can cause severe damage to priority habitats. The Cumbria Woodland website entry written about 2023 says that the plan for the Community Forest was only to develop 195 hectares of new woodland which may be achievable without damaging existing priority habitats in this area but a project of this scale has a potential to cause huge damage to existing habitats in this area. I am aware of the Community Forest in Derbyshire but this may be in an area where woodland can be planted on former coal mines of limited biodiversity value without damaging existing priority habitats.
- Policy support for the Cumbria Community Forest should include the social and health benefits of community woodland creation, volunteering, and nature-based social prescribing.
- Ensure any wording in the Local Plan which references Raise: Cumbria Community Forest is reviewed and approved by Raise.
- The Woodland Trust believes the Local Plan should actively support the development of the Cumbria Community Forest by identifying areas where community woodlands or wider tree planting could be delivered. The Local Plan should also encourage and require tree planting within new developments in the CCF area, ensuring that such planting complements wider woodland creation and contributes to the objectives of the Community Forest. By coordinating development with CCF priorities, the Local Plan can help deliver connected, resilient, and nature rich landscapes across Cumberland.

Q.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?

- Integrating habitat bricks can increase costs and complicate construction without delivering proportionate biodiversity benefit, especially on smaller sites.
- Evidence for mandatory habitat bricks in every dwelling is limited, and BNG already allows biodiversity gain through habitat creation and management.
- Habitat bricks should be installed for wildlife in all new housing developments. Specially designed bricks can be installed into new housing or retrofitted to provide homes for nesting birds, such as swifts, and roosting bats.
- Other research found "in a district where nearly all buildings had been renovated in the past 10 years, we recorded a remarkably high density of Swifts breeding in nest-boxes." (Nest-boxes for Common Swifts *Apus apus* as compensatory measures in the context of building renovation: efficacy and predictors of occupancy)
- The Red List for British Mammals shows that 4 of the 11 British mammal species which are red listed as being at risk of national extinction are bats. Swifts are in decline – 68% between 1995 – 2023
<https://www.bto.org/learn/about-birds/birdfacts/swift>
- Yes the Local Plan should require all developers and developments to install habitat bricks in all new housing developments. These should be universal swift bricks as specified in Building Standard BS42021—the standard agreed in 2022 for the insertion of Swift bricks in all new builds. The standard is aimed at building-integrated nest boxes for the following cavity nesting species (although other species may potentially use the boxes): Swift, Starling, Great Tit, Blue Tit, House Sparrow. So although they are known as swift bricks these other birds can use them to nest too.
- This article, published in British Wildlife written by Dick Newell and John Willis reviewed occupancy rates of swift nest bricks and boxes nationwide and concluded that colonies expanded where artificial nest provision was in place. (Ref Newell D, Willis J. Are nest boxes for swifts a good idea? British Wildlife vol 34 number 8 585 - 59)
- To enhance the biodiversity of the site in line with NPPG 2025 Natural Environment paragraph 017 states that local authorities should in all cases include one swift brick per dwelling in their Local Plan.
- The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Q.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?

Substantive Public Support

- Yes, the Local Plan should require developers to install 'hedgehog highways' and this should apply to all developments. Up to 335,000 hedgehogs are estimated to die on British roads annually, and with hedgehog numbers in decline, we need to do everything we can to help them.
- Research by Hedgehog Street showed "a 39% increase in hedgehog sightings after people made highways to enable hedgehogs to get into their gardens."
- Yes. Especially when the boundary between houses is thoughtless blank fence panelling. Hedgehogs can travel 2km per night in search of food and fences are barriers to this.

Q.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)

Substantive Public Support

- We think you should just consult the Red List for British species and perhaps part of your consultation on planning might involve a specific question to the parish/town (and adjacent ones) what species are known to be present. We have seen a lot of nonsense in Cockermouth over the existence of Red Squirrels being overlooked, for example. Amphibians and Newts, especially where provision for natural water management permits
- New developments should integrate wildlife-friendly features such as reptile corridors, nest cups for swallows and house martins, barn owl boxes in rural areas, and habitats like ponds and wildflower verges, while also using nature-friendly landscaping and sustainable drainage solutions. Lighting, boundaries, and building elements like green roofs should be designed to support biodiversity and minimize disturbance to local species including kingfishers and mammals.

Q.130 Should the Local Plan include a policy regarding Best and Most Versatile agricultural land? If so, what should it contain?

- Protection of BMV land is important, but a rigid "avoid at all costs" approach could unnecessarily constrain housing and infrastructure delivery, especially in areas with limited brownfield or non-BMV alternatives.
- I would like to see the plan highlight agricultural land that is most productive and ensure it works at its potential without becoming exhausted.
- Proposals must be supported by evidence of the agricultural land classification and a sequential assessment of alternative sites. Where temporary use of BMV land is proposed, the Council will require restoration plans to return the land to its original quality including removal of concrete.
- Not necessary but should have a policy to promote and favour nature-friendly farming and regenerative farming approaches – and to promote soil health, soil organic matter, avoidance of run-off, clean water and air within agricultural policies
- Yes, the policy should state that development on such land must be avoided and would only be accepted in exceptional circumstances where there is robust justification.

- Policy should refer to agroforestry and its benefits – such as diversification of farm business, complementing and enhancing existing food production, enabling nature gains and soil health improvements, increasing number of products from same area of land, etc. See Raise's recent article: Agroforestry for Economics
- Sellafield Ltd has a requirement to develop in close proximity to the Sellafield site in order to deliver its mission. The Local Plan should be clear what level of justification will need to be required to develop on BMV land, and any Local Plan policy should not undermine Government policy on high hazard risk reduction. Sellafield Ltd may need to develop on land where there are no reasonable alternatives of lower agricultural value.

Q.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?

- The policy should explicitly allow case-by-case decision-making, considering both the housing/economic benefits and the agricultural value lost, rather than applying a blanket restriction.
- Yes, it should be avoided – there is a case for some solar and battery development, but it might not be best everywhere. This may have to be a case-by-case decision, for example if you're inputting a housing estate near a key employment centre and yet you want to protect views to the Fells...input a solar farm that can feed energy to the community.
- Yes, same applies to land of nature conservation or restoration potential.
- This is covered in national policy
- Sellafield Ltd has a requirement to develop land in close proximity to the Sellafield site in order to deliver its mission. The Local Plan should be clear what level of justification will need to be required to develop on BMV land, and any Local Plan policy should not undermine Government policy on high hazard risk reduction.

Q.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?

- While soil health is important, requiring a formal Soil Resource Plan for every site, especially small and medium residential developments—would add unnecessary cost, bureaucracy, and delays, without delivering proportionate benefit.
- Yes, particularly for agricultural developments.
- Yes, 10 houses plus
- Yes, soil health is declining worldwide for a variety of reasons. All development, with the exception of householder development, should be required to submit a Soil Resource Plan.
- Note the role of trees in supporting soil health – fungal networks.

- Any policy relating to Soil Resource Plans should maintain consistency with national legislation and guidance. Consideration should be given to how soils can be restored in a sustainable manner

Q.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?

- The Local Plan should recognise environmental priorities, but policies need to be proportionate, flexible, and scalable to avoid undermining housing delivery and viability.
- The local plan should prioritise the use of brown field sites within the area over green field and agricultural land.
- It would be good if for bigger developments the incorporation of a pond would be compulsory. This would help combat the loss of wet habitats. It doesn't need to be a deep pond, only 60cm is deep enough and should be out of the way of children
- Care needs to be taken not to build on fields that might be sources of water courses. Inputting SuDs is a risk in these areas or near them.
- The environment should be put first in all things. This will provide a diverse and vibrant environment which is better for all species and humans alike. It also, critically, is an excellent way to tackle climate change and to operate as a model as to how things can be done without inconvenience to people.
- The plan should consider the use of plastic lawns in newbuild developments. The installation of plastic lawns can result in micro-plastic pollution, which than can be transferred to watercourses through surface-water run-off.
- The Plan needs to set out how the authority would deal with applications for development that would have a likely adverse effect on designated sites.
- Historic environment, heritage assets and their setting. (*Historic England*)
- The National Trust welcomes the opportunity to respond to the Cumberland Issues and Options Consultation. We would like to take this opportunity to reaffirm our strong support for the continued protection and enhancement of the St Bees and Whitehaven Heritage Coast, which represents an area of exceptional landscape, ecological, and cultural value.
- The Trust has worked in close partnership with Copeland Borough Council (now part of Cumberland Council) and Natural England over a number of years in the promotion, management and extension of the Heritage Coast designation. This collaboration has helped to strengthen the profile of this nationally important landscape, improve coastal access, and support nature recovery and community engagement initiatives.
- The Heritage Coast is a unique asset; the only area of high coastal cliff on the western coast between Wales and Scotland. In the Trusts view the previous Copeland Plan sold this area short by emphasising the Lake District and downplaying the Heritage Coast. In order to reverse this trend, it is considered that paragraph 2.3 of the Issues and Options draft plan should also reference the Heritage Coast within the list of special and historical rural and coastal landscape designations.

- In developing the new Local Plan, we encourage the Council to ensure that the policies relating to the Heritage Coast are fully aligned with the NPPF, in particular Paragraph 191, which requires that planning policies and decisions should be consistent with the special strengthens spatial and development management policies to prevent inappropriate development that could compromise the landscape character, tranquillity, or ecological integrity of the Heritage Coast;
- Integrates climate adaptation and coastal change policies that adopt a natural resilience approach and recognise the dynamic nature of the coast;
- Promotes sustainable tourism and access, ensuring that visitor management supports both local communities and the conservation of the natural environment
- Section 18 of the Allerdale Local Plan includes a special section on the former Royal Navy Armaments Depot at Broughton Moor. The plan supports the development of this huge site for a whole range of residential, employment and leisure uses but states that the site has developed 'an environmental character' and would need to be subject to ecological assessments as part of any development proposal. Despite two utopian plans prepared by the 'Derwent Forest Development Corporation', habitat assessments have only been undertaken on three small sites on the margin of the site (two for housing developments and the other for a visitor centre). This site has remained in agricultural use since acquisition by the Ministry of Defence in 1938. It has been grazed at low level by cattle and sheep and had hardly agricultural development by way of drainage, ploughing or application of fertilizer. It appears to have what is probably the largest remaining area of unimproved grassland in north west England. The developer has commissioned assessments showing the presence of Great Crested Newts, Barns Owls and a large number of bat species. There is confirmed record of Marsh Fritillary on the site and I understand Short Eared Owls are also recorded on the site in the winter. Important areas of unimproved grassland on the site have already been lost due tree planting which remains an ongoing threat to the site.
- there should be no relaxation of nutrient neutrality requirements and no 'offsetting' by developers unless it directly remediates waterway pollution further upstream of the immediate site. This is required to address point 2.18, 'Poor water and air quality (exists) in certain areas ...' Brampton is within the Eden basin and its already polluted waterways (particularly in terms of phosphate) need to be improved, not further denuded.
- Natural England welcomes the Environment section of the local plan, including the acknowledgement of the Heritage Coast, the Allonby Bay Highly Protected Marine Area and the two Marine Conversation Zones. In Section 12.3, the amount of internationally designated sites within the Cumberland boundary are listed, NE recommends that the local plan acknowledges the plethora of Sites of Special Scientific Interest (SSSI's) within its boundary and sets out a policy to enhance and protect both the national and international protected sites. Sites of Least Environmental Value
- In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes

and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

- Designated sites
- The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites
- Page 3 of 5 should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.
- The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.
- Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed. Landscape
- Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development.
- The plan area includes two National Landscapes and a Heritage Coast. We advise the LPA to take into account the relevant Management Plans for the area. For the Solway Coast and North Pennines, the LPA should seek the views of the National Landscape Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 190 of the National Planning Policy Framework (NPPF). The plan should make reference to paragraph 191 of the NPPF, which relates to areas defined as Heritage Coasts, setting out a policy that will help to determine what is appropriate in and around the Heritage Coast.
- Priority habitats, ecological networks and priority and/or legally protected species populations
- The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

- Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.
- Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.
- Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan and Environmental Improvement Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.
- Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 187 of the NPPF.
- Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice on ancient woodland, ancient and veteran trees](#).
- The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.
- The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 187.
- Natural England welcomes Section 11.11 on Coastal Change; NE expects the Plan to identify a Coastal Change Management Area and set out the type of policies and developments that would be appropriate in it. The NPPF refers to Coastal Change Management Area's in paragraphs 184 and 185.
- We would also expect the plan to consider the marine environment and apply an Integrated Coastal Zone Management approach. Where marine plans are in place, local plans should also take these into account. More detail about marine plans can be found [here](#), including details on marine plans, which have been finalised.
- The plan should refer to the relevant Shoreline Management Plan and take forward applicable actions. Local Authorities should use Shoreline Management plans as a key evidence base for shaping policy in coastal areas. The list of existing SMPs can be found [here](#).

- Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. Sustainable coastal management needs to embrace long-term change and achieve positive outcomes for both.
- Local Plans should therefore provide for coastal adaptation and work with coastal processes. Plans within coastal areas should recognise the need to respond to changes over long timescales and adopt an integrated approach across administrative and land/sea boundaries. A successful integrated approach should set levels of sustainable levels of economic and social activity whilst protecting the environment.
- Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 161-182 of the NPPF.
- The Local Plan should be based on an up-to-date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available here) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.
- The Local Plan should contain policies which protect habitats from water related impacts, including nutrient mitigation, and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.
- The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.
- Nutrient pollution is an urgent problem for freshwater habitats and estuaries which provide a vital home to birds, fish, and insects. Increased levels of nutrient pollution (nitrogen and/or phosphorus) from housing, transport, industry and farming, nitrogen and phosphorus, disrupts natural processes and can devastate wildlife.
- Natural England has advised Local Planning Authorities (LPAs) in relevant catchments that they should undertake Habitats Regulations Assessments (HRA) of all development proposals which may give rise to additional nutrients entering their catchments. This is in line with the requirements of the Conservation of Habitats and Species Regulations 2017.
- Cumberland do have two nutrient neutrality catchments within its boundary, River Eden Special Area of Conservation (SAC) as well as the River Derwent and Bassenthwaite Lake Special Area of Conservation (SAC). Cumberland will need to produce a policy to identify these catchments and provide information on the potential mitigation options for proposed developments. (*Natural England*)

Q.134 From the options listed below, which option would be the most appropriate approach to dealing with commercial renewable energy?

Mostly Option 3

- Yes, to a criteria-based policy against which all commercial renewable energy generation developments are determined – which include impacts on habitats and species
- The Local Plan should seek to use a combination of the approaches identified above.
- Identifying broad suitable areas and allocations gives the public certainty regarding where such developments will be located. It also provides an opportunity to assess impacts up front and seek public views, this should make the planning application process more streamlined. It should be noted however that local planning authorities are no longer required by the NPPF to identify suitable areas for wind energy.
- A policy may also be needed to help determine applications for windfall development.
- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which includes assessment of any allocation for their impact on the historic environment through screening and heritage impact assessments., where appropriate
- All

Q.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?

- Proximity to industrial and key economic sites
- It should work on the principle of supporting the creation of renewable energy developments to enable us to reach net zero at the earliest point.
- The Allerdale Local Plan set-back distances should be used. The low frequency noise has been an issue at Gilcrux from the Tallentire Wind Farm flicker at Bothel from the Wharrels Hill and flicker historically from the Siddick turbines.
- not in the bird migration routes.
- N/a but if adopted Impacts on habitats and species
- Follow the mitigation hierarchy
- Impacts on agriculture
- Impacts on landscape especially in relation to sensitive receptors and designated landscapes e.g. North Pennines, Solway and LDNPA
- Should oppose and rule out biomass crops
- Such developments should be directed away from Designated Sites and those within Protected Landscapes or their setting. The Cumbria Landscape Character Guidance and Toolkit and Cumulative Impacts of Vertical Infrastructure document should also be used to determine which areas would or would not, be suitable for such developments, along with the Wind Energy Supplementary Planning Document and the Lake District National Park Landscape Character Assessment.

- Proposals should not harm the significance of the historic environment, heritage assets and their setting.
- These should focus on urban areas such as car parks and large industrial building rather than rural areas
- Sellafield Ltd is aware of proposals to develop new clean energy generation in close proximity to the Sellafield site. There should be appropriate assessment mechanism for compatibility between operation of the Sellafield site (and any planned increased footprint) and any new proposals.
- The NDA are working with Cumberland Council to explore the possibility of developing clean energy projects on NDA owned land close to the Sellafield site. There should be appropriate assessment mechanisms for compatibility between operation of the Sellafield site (and any planned increased footprint) and any new proposals. This is recognised by both the NDA and Cumberland Council and will be part of consideration of the opportunities for the site but this should not remove the need for it to be considered by the Council independently.

Q.136 Do you consider that Cumberland should set targets for different types of local renewable energy generation?

- No
- No. Paragraph 164 of NPPF sets out that plans should provide a positive strategy for energy from renewable sources that maximises the potential for suitable development. Setting targets could have the effect of limiting generating potential which could impact upon reaching net zero and be contrary to NPPF requirement for plans to maximise potential for suitable renewable energy development.
- No
- No
- Yes - and set them high.
- No, solar in windows and tiles is becoming more accessible and doesn't detract from the wonderful countryside that we have here. The advances are ever changing and an open mind to geothermal and other non intrusive renewables should be considered a priority over gigantic industrial entities planted in farmland.
- Yes, following a feasibility study
- Yes, this should be informed by national targets.
- Any targets should be part of a coherent plan for generation and offtake.

Q.137 Should the Local Plan include a specific policy on battery storage development? If yes, what should it include?

- Yes. It needs to include the visual and other impacts that additional facilities would make on the local population and wider environment.
- It should be mandatory for all larger scale developments with the proviso that the relevant impacts have been taken into account at the planning stage.
- Yes. Adequate surrounding safe zone
- That the presumption shall be in favour of approval if a solar power planning application includes battery storage and is located close to a key industrial/economic site.

- Supported but the structure itself should not affect the biodiversity of the land it sits on. Unintrusive as possible.
- The Local plan should include a specific BESS policy, which includes spatial consideration of all environmental matters, and requires proposals to consider overall risks and mitigation/management measures.
- Environmental and Safety Risks
 - Fire and emissions
 - Waste Management
 - Environmental Impacts
 - Safety
- BESS do not currently fall within the Environmental Permitting Regulations, Hazardous Substances Consent or COMAH regimes. BESS developments could present pollution risks (including fire-related risk) to groundwater.
- Generally, the risks to groundwater and surface water from BESS development would be from pollution of surface water drainage from the site due to:
 - A battery container fire at a BESS site
 - Accidents or spillages from battery containers at a BESS site.
- To mitigate the risks to groundwater and surface water, as well as, proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors to reduce associated environmental risks. For example, where a BESS is part of a solar farm, can it be located elsewhere on the site to avoid vulnerable groundwater areas or being near to surface watercourses
- Historic environment, heritage assets and their setting.

Q.138 From the options listed below, which option would be the most appropriate approach to dealing with decentralised energy systems?

Mostly option 3

- Historic England would support the option which ensures that it conserves and enhances the historic environment, heritage assets and their setting. Any preferred development should be supported by a robust evidence base which includes assessment of any allocation for their impact on the historic environment through screening and heritage impact assessments., where appropriate.
- All
- None

Q.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?

- The impact of wind turbines and solar arrays on the lives of residents. It must be stressed that any potential negative impact on residential amenity needs to take precedence over all other considerations.
- The Local Plan should include a strong statement of need in relation to renewable energy development and in line with the requirements of NPPF make it clear that significant weight will be given to the benefits associated with renewable energy generation and the contribution proposals make to a net zero future.

- The principle of offshore wind farms seems established with Robin Rigg, for example, now. There's much less public opposition to them than onshore ones so perhaps discourage 'wind' inland unless you consider the area north of Brampton and Dalston to be underutilised.
- All new build development should have to have heat pumps, solar and or wind generation.
- SMRs and geothermal renewable energy should be considered rather than other total reliance on more weather dependent renewables in order to protect the grid infrastructure.
- We support a roof first approach to solar energy developments, along with approaches in action elsewhere such as requiring solar canopies to be installed over car parks in France. Policies should be included in the Local Plan that support this.
- Historic environment, heritage assets and their setting.
- There has recently been discussion about the potential use of Pioneer Park, adjacent to Sellafield, for new nuclear generation. Additionally, the soon to be published National Policy Statement on New Nuclear (EN-7) is expected to enable new nuclear development of a variety of scales in sites away from former nuclear generation sites. This raises the potential for new proposals to be put forward for Cumberland. We would therefore propose that nuclear energy is considered within the plan making process.

Q.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?

- Take control over the bus services (particularly Stagecoach) so as to provide reliable services
- Add in safe crossing points on roads and add in cycleways but modify your view that development needs to be across the area.
- Concentrate on where the infrastructure for transport is better, more easily connectable or indeed not actually needed – the Towns. Add in bus stops where estates are built.
- Ensure bus and rail services are at least maintained at current levels and that pricing is kept at rates to encourage PT use.
- Reopening the Penrith Keswick rail line would be a boon for tourism and provide an excellent means of public transport whilst reducing vehicle traffic on the A66.
- The Local Plan can achieve this through a multi-faceted approach that
- prioritises location, infrastructure, and behavioural change.
- the Local Plan must adopt a spatial strategy that directs new development to locations that are inherently sustainable and well-connected by public transport. This means prioritising sites within or immediately adjacent to existing urban areas and highly sustainable rural settlements that already benefit from frequent bus services or railway stations.
- the Local Plan should mandate the provision of high-quality active travel infrastructure within and connecting new developments to existing networks. This includes safe, well-lit, and direct pedestrian and cycle routes that link homes to local amenities, public transport hubs, schools, and employment centres. Policies should require developers to contribute to and integrate with Local Cycling and Walking Infrastructure Plans (LCWIPs) and other strategic active travel initiatives. This makes walking and cycling the most convenient and attractive options for shorter journeys.

- the Local Plan should support and facilitate improvements to public transport services and infrastructure. This could involve policies that require developer contributions towards enhancing bus frequencies, extending routes, or upgrading railway station facilities, particularly where new development will increase demand. Furthermore, the Plan should encourage the integration of public transport information and ticketing within new developments to make it easier for residents to access and use these services.
- Ensure that areas allocated for housing, employment, retail and community facilities in particular are well connected to a frequent public transport service. However, the main problem with that arrangement is that bus companies, which are profit making, have agreed to run these services.
- Small non-profit bus lines, run by local organisations at cost, using smaller sized buses or even Transit-style vans, would be better able to create a sense of reliable, comprehensive public transport.
- Ensure high-quality green infrastructure (including treescapes) incorporate active travel routes through them – e.g. pedestrian and cycle paths through the green infrastructure between buildings / between residencies and key resources such as shops, doctors, libraries etc.
- Sellafield Ltd has a travel plan for the site which has been agreed with Cumberland Council. The use of private modes of transport is an important way of accessing the site and its car parks. Alternatives are offered (e.g. park and ride schemes) as well as bus, rail and cycling options. Better rail, bus and cycle connectivity would be beneficial, although this should not restrict operation of the site on its current basis.
- provision for active travel to train stations may be beneficial e.g. more or better bike lockers to support a multi-modal use of public transport and active travel.

Q.141 How can the Local Plan ensure that new developments are designed to give priority to pedestrian and cycle movements over private vehicle movements?

- Ensure proper provision is made for off-street parking. Ensure designs include larger pathways and designated parking areas. It is possible in urban planning to separate a walking/cycling network from a road network. Connect developments with cycleways and make better use of the Community Infrastructure Levy (CIL).
- All cycling infrastructure needs to properly segregate cyclists from vehicles.
- All cycling infrastructure should be developed and installed after consulting expert cyclists (those who cycle very regularly and widely on our roads) as they will be able to highlight the best solution from a cyclists point of view.
- Speed limits should be more widely deployed to protect cyclists and pedestrians (and drivers) on
- More building in towns and Carlisle using brownfield or industrial sites rather than rural areas.
- As a blue badge holder please don't totally demonise the car. The population is growing older and we need transport removing car use before providing public transport will cut off the older generation.
- the Local Plan should mandate a 'movement hierarchy' in the design of all new developments, placing pedestrians and cyclists at the top. This means that primary routes within developments should be designed for active travel, with vehicle access and parking carefully integrated but secondary to pedestrian and cycle flows. This includes ensuring direct, legible, and attractive routes for walking and cycling that connect seamlessly with existing external networks and key destinations.

- the Local Plan should require 'permeability' as a key design principle, ensuring that developments are easily navigable on foot and by bike, with multiple connections to surrounding areas. This contrasts with layouts that create cul-de-sacs or circuitous routes for active travel, which implicitly prioritise car use. For example, the indicative concept plan for the Site demonstrates how new development can integrate with and extend existing pedestrian and cycle networks, providing direct links to the village centre and public transport.
- , the Local Plan should set clear standards for vehicle speeds and parking provision within new developments. Lower design speeds for vehicles, achieved through street design and traffic calming measures, create safer and more pleasant environments for pedestrians and cyclists. Furthermore, policies should encourage reduced car parking provision where developments are highly accessible by sustainable modes, and prioritise secure, convenient cycle parking for all new homes and facilities.
- the Local Plan should require high-quality public realm design that enhances the experience of walking and cycling. This includes well-maintained footpaths and cycleways, appropriate lighting, landscaping, and green infrastructure that contribute to a sense of safety, comfort, and visual appeal.
- Through the use of a local plan policy or design code which requires the provision of safe and well-connected pedestrian and cycle route, shared surfacing, traffic calming measures and safe cycle storage.
- The use of a clear street hierarchy - pedestrians, cycles, public transport, then cars - would be an appropriate policy test. Policy requirements for Transport Assessments and Travel Plans for major developments can also help lead to the achievement of active travel targets. Additionally, sites that are well connected to public transport and with strong provisions for direct walking and cycle links, particularly to local centres, schools, and jobs, could be favoured preferentially during the site selection process.
- As set out previously, a blanket approach to prioritising pedestrian and cycle movements should not apply to the Sellafeld site. Also note that pedestrian access and cycle access are already strong when moving around the Sellafeld site.

Q.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?

- Anywhere which does not have significant inclines - which, possibly/probably, excludes most areas
- Cockermouth to Workington – traffic free routes, for example a (broadly) riverside one. we could perhaps do something more ambitious than the new boardwalk at Maryport to connect, say Workington's Port to the Navvies Bridge area or the current slightly depressing end to the Cumbrian Way walk from Dalston to Carlisle.
- Consult the Eurovelo approach to providing infrastructure. Cumberland and Westmorland are some of the most attractive places to cyclists in the UK so having high quality Eurovelo style routes e.g. down the coast, the Sea to Sea route, Hadrian's Wall etc. would be very welcome.
- All areas. For example the A66 & A595 could do with a cycle lane.
- Villages and towns across rural Cumberland – for example around Cockermouth and Great Broughton – where proximity of villages and existing Public Rights of Way could be enhanced to support cycle routes and pathways to enable people to travel sustainably between these villages. See Evidence 4

- the inset map of Cockermouth (bottom of page) which shows the ‘Woodland Access standard’ areas in purple
- We can offer our strategic Opportunity Mapping as a resource to inform discussion – further examples can be seen on our Interactive Map | Raise: Cumbria Community Forest (instructions for use on the page) and we have access to a QGIS version of this mapping tool for specific enquiries.

Q.143 In which areas is more cycle parking required?

- Maryport and Silloth Promenades. It’s a concern that the British Transport Police have indicated they won’t investigate bike thefts if they’ve been left at a station for more than 2 hours. (BBC News 02/10/2025)
- All towns, though it needs to be in very visible and well-lit areas to defend as well as possible from thieves.

Q.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?

- Yes, to underpin the nuclear, flour, offshore and paperboard Industries. Road infrastructure and perhaps a seasonal ferry to the Isle of Man?
- Cruise Ships?
- We recommend the inclusion of a specific policy relating to ports to safeguard water quality and the environment from associated activities.
 - Dredging activities - Sediments can contain high levels of heavy metals and organic contaminants, which can be mobilised and cause detriment to water quality when disturbed.
 - Emergency pollution controls - Incorporation of a plan to mitigate the effect of pollution within enclosed waterways (i.e. oil absorbent booms).
 - Investigation and remediation of pollution - pollution within port areas can have wider impacts on port users and local tourism. The minewater contamination at Whitehaven Harbour demonstrates the need for thorough investigation and coordinated remediation. Addressing such legacy issues requires adequate funding and integrated stakeholder engagement to resolve effectively.
- The plan-making process should consider the role that ports play/could play in the sustainable transport of radioactive waste to Cumberland for treatment/storage/disposal, noting the strategic role of facilities at Sellafield and the LLWR; and also the potential use of ports to move waste in and out of Cumberland to be emplaced in a GDF. This could be addressed through policy provision for waste infrastructure safeguarding.

Q.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.

- We think we’ve missed the boat with the development there now. The population that can afford to travel is too small and goes to Newcastle, Manchester, Glasgow etc. now for holiday provision. The proportion of executive travellers is too small as well. Military use may be increasing but is likely outside of your control

Q.146 Are there particular opportunities that a policy should include to ensure a sustainable future for Carlisle Airport? If yes, please provide further details.
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| <ul style="list-style-type: none"> • Beatrix Potter and the east Asian market? |
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Q.148 How best can the identified infrastructure priorities be delivered (e.g. financial legal agreements, delivered on site by developers)?
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| <ul style="list-style-type: none"> • Legal agreements and memory on behalf of the Council – if you or the community get let down by a developer or a developer is subject to well-founded community complaints, then beware next time. • You have the chance to continue the Copeland Plan policy of assessing developer profitability before and after the development and re-appraising what's happened. We think this is a good policy to retain. • For infrastructure that directly serves a development and is integral to its function, on-site delivery by developers is often the most efficient and appropriate mechanism. This includes internal road networks, active travel routes within the site, local open spaces, playgrounds, and sustainable drainage systems (SuDS). Requiring developers to integrate these elements into their schemes ensures seamless provision and contributes directly to the sustainability and amenity of the new community. • For off-site infrastructure, or for contributions towards larger, strategic infrastructure projects that benefit multiple developments or the wider community, financial legal agreements, such as Section 106 agreements or the Community Infrastructure Levy (CIL), are the most suitable tools. These mechanisms allow for pooled contributions towards strategic infrastructure like public transport upgrades, new schools, or strategic flood defence schemes. • the Local Plan should clearly articulate the Council's strategic infrastructure plan, identifying key projects, their funding sources, and delivery timelines. This provides certainty for developers and communities and allows for the proactive leveraging of external funding sources, such as government grants or private investment. • The Council should use a clear charging schedule and have an adopted Infrastructure Delivery Plan to help to set transparent expectations which can inform development from the outset and help provide housebuilders with clarity. • It is essential to ensure neither on-site delivery nor off-site contributions are too burdensome on the viability of development schemes. • Where applicable, public grants should also be optimised, from bodies such as Active Transport England, Homes England, Department for Education, NHS, the Environment Agency and so on. • Investment should also be sort from the utility providers, backed by robust Statements of Common Ground prepared during the plan-making process. • Improvements in road and rail infrastructure connecting Sellafield to the broader network will likely lead to community benefits and ease delivery of nuclear construction in West Cumbria (by Sellafield and others). • The scale of upgrade may not be deliverable by a single developer on a single project, and a broader view should be taken on how upgrades can be funded and delivered • developers / developments can only be required to mitigate their own impact and cannot be held accountable to address pre-existing infrastructure deficiencies. This is in line with Regulation 122 of the Community Infrastructure |
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Levy (CIL) Regulation 2010. The delivery of infrastructure (and the mechanisms for deciding responsibilities and how/when it is delivered) should be considered as part of the emerging Local Plan.

Q.149 Should the Local Plan include a policy that goes beyond the requirements of Building Regulations Requirement S4 when assessing applications for developments which are not residential buildings or a mixed-use building (e.g. a ratio of charge points to the number of parking spaces)? If yes, what should be requirement?

- No, you can stick to the Building Regs.
- It should be recognised that most households have two or more cars and charging points should reflect that.
- Sellafield Ltd is subject to a Travel Plan which sets out the requirement to restrict the number of vehicles accessing the site. Therefore, any policy setting out requirements for electric vehicle charging infrastructure is likely to be unsuitable and will provide over and above that which is necessary for the number of vehicles on the site. It is recommended that the Local Plan reflects the potential for exemptions to this policy.

Q.150 Should the Local Plan include a policy that requires development to provide Electric Vehicle charge points for electric bikes?

Mostly option 1

- What a good idea. Yes.
- Yes, with the exception of householder or minor development.
- Sellafield Ltd is subject to a Travel Plan which sets out the requirement to restrict the number of vehicles accessing the site. Therefore, any policy setting out requirements for electric vehicle charging infrastructure is likely to be unsuitable and will provide over and above that which is necessary for the number of vehicles on the site. It is recommended that the Local Plan reflects the potential for exemptions to this policy.

Q151 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?

- Yes. All areas.
- All railway stations
- Lillyhall, Whitehaven (for Albion Square) and Westlakes.
- For residential, they're not required until you've established a connected cycleway network. Not requiring Planning Permission anymore for car-charging points is a step forwards but bike batteries are not difficult to charge.
- With the number of Tesla driving AirBNB travellers, perhaps a charge point required for every change of use?
- Yes, charging points would be appropriate in all the locations listed
- Yes, charging points would be appropriate in all the locations listed

Q.153 Are the lack of suitable overnight lorry parks an issue in Cumberland? If so, where is the need?

- Lillyhall and Longtown
- Cumberland is sporadically and persistently targeted by Organised Crime Groups and opportunist offenders for HGV cargos and fuel. Repeated locations are Southwaite motorway services and Exelby, Golden Fleece. (Westmorland and Furness suffer repeated offences on A66 corridor and around Penrith).
- The Carlisle Truckstop at Parkhouse Road is a member of the Secured by Design 'Safer Parking Scheme' where the occurrence of offences is negligible.
- Similarly, J38 Services at Tebay is a scheme member and offences are minimal.

Q.154 Should there be a specific policy on overnight lorry parks? Please explain your answer.

- The A66 is becoming an accident blackspot. Parking and exiting the laybys is becoming difficult. No overnight parking should be allowed between Workington and Keswick.
- Adoption of Secured by Design 'Safer Parking Scheme' Initiative
- If evidence shows that there is a high demand for overnight lorry parks, and these have the potential to have landscape impacts, then a policy would be useful. It should direct such parks away from rural areas to key urban hubs, away from residential areas, with good access to the road network, where suitable screening can be provided without resulting in adverse landscape or visual impacts.

Q.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?

- There is a huge gap in public transport south of Egremont (and onwards to southern Cumbria) - there is only the railway and that is not available to holders of NoW Bus Pass holders. Consider increasing the scope of the NoW Bus Pass to include free, or discounted, rail travel.
- Development at Derwent Forest near Broughton Moor is going to continue so you'll need to think about the A66 connecting roads at Brigham and Little Broughton otherwise the traffic, through Great and Little Broughton and over Broughton Bridge into Brigham parish at Caldron Farm, will become unbearable.
- Brigham and Broughton Cross, in particular, are rat runs and diversion routes for the A66 when there's an incident there. The connecting roads including the C2007 are inadequate (and potholed) to sustain an increase in local traffic from, say, more development in Cockermouth as well.
- They need to be improved – they're probably not even 'C' roads anymore, they're probably 'B' roads, especially by St. Bridget's church.
- Safe road crossings are missing at the east end of Brigham parish on the A66/C2007 junction.
- The A66 needs a roundabout to allow Brigham, the Broughtons and Broughton Moor to safely connect to the A66 east and westbound and Highways England have spent public money purchasing land and drawing up plans; Cumberland

Council should be supporting Highways England as much as possible and perhaps the Local Plan is an opportunity.

- The Local Plan should contain a policy relating to new or extended car parks. These should be located in sustainable hubs and gateways where there are good public transport connections. Car parks within the open countryside should be avoided as these can encourage the use of private vehicle and have adverse landscape and visual impacts. Active travel and public transport should be prioritised over new road building and car parks, which serve to induce additional traffic and undermine efforts to deliver a modal shift.
- Any proposals to improve the east-west trans-pennine links (A69 and railway) could help align a future local plan with the Northumberland Local Plan regarding the route
- National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.
- About National Grid Electricity Transmission (NGET) National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.
- National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.
- National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.
- National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.
- National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024.
- Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.
- NGET assets within the Plan area. Following a review of the above consultation document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

New Infrastructure

- Demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.
- The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.
- NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.
- The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Further Advice

- NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
- If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
- To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
- National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

Utilities Design Guidance

- The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.
- National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.

Q.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?)

Mix across options

Q.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)?

- No, we think the complex geology of the area, particularly where limestone is concerned means no one really understands where the water flows. There's a grave risk that unintended loss of streams and becks occurs as we fear is happening now in Brigham.
- No, the Plan should prioritise recycling of materials and design techniques which reduce consumption rates i.e. minimise extent of paving and sealed surfaces
- Mineral extraction has a potential to cause or increase risk to the water environment, water quality as well as water resources. This risk can be introduced by lowering groundwater levels in and around the excavation area or extraction below the water table, introduction of potentially polluting substances into the water environment, increasing flood risk downstream from the development, and other ways as well. This risk must be adequately recognised and mitigated, if necessary, throughout the Environmental Impact Assessment where relevant, or other measures for smaller scale developments. (Environment Agency)
- It is recognised that in some areas certain mineral development wouldn't be considered acceptable due to potential impact to water environment. We recommend that a policy is in place to recognise that this and provide relevant advice at the earliest stage possible. (Environment Agency)
- The question appears to focus on quantity of material rather than emphasising the need for maintaining continuity of supply and production capacity, which is critical. It is therefore not inappropriate to identify a hierarchy of site allocations (Areas of Search, Preferred Areas and Site Specific allocations). The "at least 7 years" and "at least 10 years" are not targets, they are minimum requirements. In addition, these landbank requirements are formulated on outdated assumptions and costs associated with site development. Whilst we recognise that these are the requirements of current national policy, it is evident that nationally, the government has failed in its delivery on minerals policy, in the absence of national guidelines, with ever declining landbanks and the loss of production capacity. As referenced in the document, the importance of very high specification aggregates cannot be underestimated.

Q.158 What type of energy minerals do you think the new Cumberland Local Plan should plan for?

- solar panels for all public buildings and all council properties no coal, no oil, no gas.
 - Neither coal, nor oil, nor gas. But yes to fissile material i.e. Uranium
 - None – we have to move away from coal (even coking coal) oil and hydrocarbons including shale gas. The Local Plan needs to prioritise a green economy.
 - shale gas (fracking). While the current UK Government policy generally supports a moratorium on fracking, a Local Plan still needs a robust policy stance.
- Geothermal Energy: While not a mineral, the Plan should include policies that facilitate the exploration and use of geothermal resources in appropriate locations, as this is a non-extractive, renewable energy source.

Q.159 What types of industrial or critical minerals do you think the new Cumberland Local Plan should plan for?

- Minerals for the production of Rare Earth metals.
- Reserves of water.
- Safeguard high-grade limestone resources from sterilisation by other development.
- suitable clays (historically used in brickworks), these are important for low-carbon local building materials.
- Surely this is based upon the geological resources available within the local plan area. Safeguarding a mineral resource does not represent a presumption of working, but ensures resources are available for future generations.

Q.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?

- We'd be content if the level of detail required would be proportionate to the nature of the development.
- Yes. In addition, the Mineral Resource Assessment should be prepared on the back of a site proper investigation, up front and not on the back of a drainage survey or other such survey simply to give lip service to the requirements of an MRA. It must also be properly and professionally analysed.

Q.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?)

- As you write in para 5.19 of the consultation, covering over of farmyard areas and variation of conditions relating to matters such as design or operational hours would be exempt. Perhaps Sports Halls too.

Q.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)?

- The NPPG provides guidance on Minerals Safeguarding and there are supplementary reports by the BGS and prepared by the POS/MPA which provide advice on the approach to minerals safeguarding.

Q.163 Are there any other key issues relating to planning for minerals supply that the new Cumberland Local Plan should address?

- Avoid adding anything nuclear. The Nuclear industry billionaires are bullying the government to get new nuclear modules which are not even on the drawing board and by the time they are built the planet will be dying and the human experiment will be over.
- Maybe not specifically in the Plan but you should campaign to have the so-called 'Mineral Rights' legislation removed in England. This legislation has been (since 2000) removed from Scottish Law but persists in England having been brought in under the Enclosure Acts of 1791 - 1813 whereby Lord Egremont owns the land under our houses, for example in Brigham and Cockermouth. This costs money with it going to wealthy landowners who live outside the County and the money could be better spent here.
- Historic environment, heritage assets and their setting. Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site
- Maintaining production capacity and working with Westmorland and Furness Council, the wider North West Aggregates Working Party, adjacent AWP's and wider stakeholders, particularly on nationally important, essential and critical minerals.
- It is recognised that there are movements of sand and gravel from Cumberland to Northumberland and movements of water between the two areas. There are matters that will require discussion as work to prepare both the Cumberland Local Plan and Northumberland Local Plan progresses to understand whether this raises any significant issues that need specific consideration in these plans.

Q.164 What can the Local Plan do to encourage more waste to be managed higher up the waste hierarchy?

- Ensure communities have sufficient recycling points and bring pressure on the Housing associations (for example along behind Northside in Workington where the cycleway is) to stop residents dumping items over back fences. Cameras installed here to catch fly-tippers have been shot out with air rifles, as your Enforcement Team knows, so bon courage but we do need to be a bit tougher.
- Whilst para 16.7 describes the contribution that waste planning policies can have on achieving the council's broader objectives around the circular economy, there is no reference to the Circular Economy in Section 7: Economy or any other section of the Issues and Options document. Moving to a more circular economy can support the waste hierarchy but can have more cross-

cutting impact. The plan should recognise and support this. The local plan should consider the principals of the circular economy and more sustainable resource management within the context of the over-arching principal of sustainable development and specific objectives, not just consideration in the context of waste management. It is relevant context to a number of proposed objectives (page 11):

- To support more waste being managed higher up the waste management hierarchy, the Local Plan needs to consider both the designation of waste management areas and access routes to them. For example, it needs to accept that to achieve a better outcome, greater use of the transport network may be required, or areas should be provided in close proximity to the main waste generators. This is particularly an issue when you consider the challenge that Sellafield Ltd faces when looking to consign higher volumes of waste to better outcomes.

Q.165 Should the Local Plan allocate sites for specific waste management technologies or should it allow the market to decide what facilities go where?

- Let the market decide.
- You have to take a lead in this; on the smallest scale require Vape shops to have prominently sited disposal bins but on the larger scale there is a national shortage of EV battery recycling facilities and wind turbine blade recycling. These have to be market opportunities that the Council could support with the establishment of college training, apprenticeships and support to bring a new industry to the area.
- Sellafield Ltd has shared with Cumberland Council its plans and needs for locating interim waste stores in close proximity to the current Sellafield site. A specific policy for Sellafield would be beneficial. Generally, larger facilities to support the Sellafield Ltd mission could be better located near trans modal points.

Q.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?

- A mix (to produce the optimum environmental impact).
- Smaller, more dispersed sites should be preferred so that people emit less CO2 when travelling to these sites. Bigger lorries are more efficient to take the waste to processing sites.
- fewer larger, easier to manage
- Sellafield Ltd has shared with Cumberland Council its plans and needs for locating interim waste stores (and CLESA 2) in close proximity to the current Sellafield site. A specific policy for Sellafield would be beneficial.

Q.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?

- Every town and village (to save on carbon footprint of travelling)

- On the edges of towns and villages, but within easy reach on foot, by bike or by public transport for those who don't have a car or want to use it less.
- Drigg, and the key settlements.
- The existing sites.

Q.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?

- Landfill will be banned within the plans period, so this should be planned for.
- EV batteries and turbine blade recycling,
- Sewage solutions such as the Japanese method, the Japanese utilise human faecal matter (sewage sludge and night soil) in a treated, solid form, often as pellets or dry granules, primarily for use as fertiliser or fuel.

Q.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?

- Case by case.
- Flexible criteria-based policy.
- Formal site allocations which establish the principle of certain waste management facilities being permitted on that site
- Any policy approach for the location of facilities for the management of radioactive waste should take account of the anticipated more flexible approach to nuclear waste management as discussed in our response to question 171 (see below).

Q.170 Should we be safeguarding all existing waste management facilities to ensure their continued viability for future use?

- Yes, unless they are not, or fail to remain, environmentally acceptable
- The plan making process should consider which types of waste management facilities need to be safeguarded. Waste site safeguarding is of particular significance for any site currently or proposing to manage radioactive wastes – these sites are often of high public interest. It is important that the continued/future operation of these sites are not impacted by proposals for incompatible development. We consider there is a need to safeguard waste management facilities that support nuclear decommissioning activities (civil and defence). These could be sites that treat, store, recover, recycle and dispose of conventional and radioactive wastes. Some of these sites operate as a national resource, such as the Low Level Waste Repository (LLWR). Consideration should be given not only to facilities at Sellafield and LLWR, but other waste management facilities that are part of the decommissioning supply chain. These facilities support the management of waste up the waste

hierarchy, including the diversion of suitable LLW waste from the LLWR. Consideration should also be given to landfill facilities where this is considered the appropriate waste management technique, for example the Lillyhall Landfill site near Workington which is authorised to accept LLW. This site is understood to be proximate to the Lillyhall Key Economic Site (identified in the map illustrating Cumberland in Context on page 5). This map also identifies Sellafield as a key economic site and Moorside as a new economic site. Waste transport infrastructure Paragraph 14.5 states that the Port of Silloth is currently safeguarded in the Cumbria Minerals and Waste Local Plan as having potential for the sustainable transport of minerals and waste (Section 14: connectivity and infrastructure, page 66). Consideration should be given to the need to safeguard other infrastructure associated with the transport of waste e.g. rail sidings and wharves/ports. Infrastructure safeguarding could support the continued sustainable transport of waste, including radioactive wastes.

- Sellafield Ltd operates the Sellafield Nuclear Licensed site which hosts a number of waste management facilities. Sellafield Ltd also operates waste management facilities in close proximity to the nuclear licensed site. These facilities should be retained.

Sellafield Ltd requests the allocation of CO32 within the Cumbria County Council Minerals and Waste Plan is retained in an updated form.

Q.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?

- Don't let the nuclear industry damage our area anymore.
- No new nuclear facilities.
- Find the best geological sites, not inadequate geological sites which happen to be close to Sellafield.
- It should be safe and secure.
- Support the NDA – we already have NSD sites e.g. at Drigg and they provide jobs and have little public opposition. A GDF is, politically, only going to be sited realistically in Cumbria, so extract the maximum financial benefit and infrastructure improvement from the Government for that privilege and avoid paying Mineral Rights to Lord Egremont.
- Answer: This question rolls many diverse nuclear issues together. Not only the risk of novel routes into the environment of low-level nuclear wastes, but also the Near Surface Disposal of intermediate level wastes, which is likely to co-locate mining groundworks with the proposed GDF. This might save costs in the short term, but the long term may suffer as a result.
- Disposal of nuclear wastes has been heavily promoted by the nuclear industry as if it is the only option available. However, the geological reasoning behind it reflects low lying land without large mountains, with certain types of sedimentary rock to act as one of the layers of protection. West Cumbria does not have the geology to support a GDF, and disposal is not the only option. This has not been made clear to the people nor to the Council. Rolling Stewardship, where wastes are monitored and repackaged, is safer for environment and people, and is more transparent. It should be included as an

option to guard against future contamination events and to protect future generations. This would need significant local political pressure. While I understand that the GDF plans are now considered a Nationally Significant Infrastructure Project, it seems the government will take the Local Plan into account. Therefore, Cumberland Council should carry out a full debate and vote on whether or not to continue with the GDF plans, or to suggest alternative options, so that the Local Plan can be designed with transparency.

- Onsite Disposal: Government policy (May 2024) introduced policy provision for the on-site disposal of Very Low Level Radioactive Waste (VLLW) and Low Level Waste (LLW). National policy acknowledges that it may be safer and more sustainable to dispose of and monitor contaminated waste on site, rather than to excavate it and transport it for disposal elsewhere. On-site disposal options include in-situ disposal and disposal for a purpose. Management of spent fuel and radioactive wastes from new nuclear proposals The new Local Plan should also consider government support for new nuclear as part of an energy security strategy; and the emerging national policy context for new nuclear sites, in particular provision for a more flexible siting approach to be confirmed in new National Policy Statement (EN-7). Recent announcements by government on the Atlantic Partnership for Advanced Nuclear Energy illustrate that new nuclear proposals will range significantly in scale from micro-generation proposals that could support industrial sites such as data-centres to larger facilities such as Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs)⁴. These could be progressed by government or private developers. Proposals will require planning consent, for the energy generation plant and associated infrastructure which could include the storage of spent fuel and interim storage of radioactive wastes arising from operations and decommissioning. This could be through the NSIP or TCPA regime, depending on the scale of the proposed development. The plan-making process should consider what policies may be required to support planning applications and their determination.

- This question encompasses many diverse nuclear issues. Not only the risk of novel routes into the environment of low level nuclear wastes, but also the Near Surface Disposal of intermediate level wastes, which is likely to co-locate mining groundworks with the proposed GDF. This might save costs in the short term, but the long term may suffer as a result.

The largest proposed development in the UK ever, a geological disposal facility for high level nuclear wastes appears here at the second to last question, and is given minimal and highly misleading context. The Near Surface Disposal plan is described (16.10) as being for “sites to dispose of less hazardous radioactive waste within a shorter timescale”.

The “less hazardous” components of intermediate level wastes are nuclear reactor components, e.g. graphite from reactor cores, and sludges from the treatment of radioactive liquid effluents - all of which need to be shielded from the biosphere for a minimum of many hundreds of years.

Some high level wastes need to be shielded for up to millions of years. The wastes proposed for Near Surface Disposal, tens of metres below ground, are the same as those rejected by the NIREX Inquiry in 1997 as being likely to percolate to the surface sooner than expected from deep burial and irreversibly

harm people and the environment. Near Surface Disposal is a result of negligent consideration of the hazards this poses.

“On the Level” March 2021 Newsletter for the Low Level (Nuclear) Waste Repository at Drigg says: “The NDA is exploring the benefits of developing Near Surface (NSD) – for disposing of a proportion of Intermediate Level Waste (ILW), but no decision has been taken on whether UK Government will pursue this option or whether LLWR, will in time, host a NSD facility.” The Government is now not only pursuing the option of NSD but also of co-location of NSD groundworks (mining entrances) for the transport of high level nuclear wastes to the proposed sub sea geological disposal facility.

The NIREX proposal for Intermediate Level Wastes was rejected in the 1990s because the nuclear industry had no idea how much and how fast the planned dump would leak. They still do not know.

For a shallow dump, the leaks would be even faster. In a letter to “The Guardian” of June 28, 2007 the NIREX Inquiry Inspector stated: ‘The relevant geology in west Cumbria is apparently now claimed to be “stable, although imperfect” ... [T]he imperfection consists of simply failing to meet the internationally agreed criteria on the suitability of rocks for nuclear waste deposit. The site should be in a region of low groundwater flow, and the geology should be readily characterisable and predictable, whereas the rocks there are actually of a complex volcanic nature, with significant faulting. Also, the industry was relying on an overlying layer of sedimentary strata to dilute and disperse any groundwater leakage, when the international criteria require such a layer to act instead as a barrier ... The site is not suitable and investigations should be moved elsewhere...’. And: ‘The site selection process was flawed, not treating safety as the most important factor, and irrationally affected by a strong desire to locate close to Sellafield’.

‘Disposal’ is being promoted by industry as the most expedient way to deal with nuclear waste, rather than the safer and more ethical intergenerational monitoring and repackaging (Rolling Stewardship).

It is highly likely that the nuclear industry will seek to reduce costs further by co-locating a Near Surface Disposal facility for Intermediate Level Wastes (ILW) inside or alongside a GDF for High Level Wastes (HLW).

Although the GDF proposal is now a Nationally Significant Infrastructure Project (NSIP), Cumberland Council also notes that Government will take into account the Local Plan. It is therefore beholden upon Cumberland that the Local Plan regarding the GDF should be guided by a full debate and full vote of the Council on the biggest development ever to be proposed not only in Cumberland or Cumbria but in the whole of the UK.

Q.172 Are there any other issues relating to the storage, treatment and management of waste that the new Cumberland Local Plan should address?

- We're a little unsure here but we are aware of how unpopular incinerators are for energy creation, so maybe avoid these.
- We need larger gardens, I currently have 5 bins!
- Historic environment, heritage assets and their setting. Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site.
- It is recognised that there are movements of sand and gravel from Cumberland to Northumberland and movements of waste between the two areas. There are matters that will require discussion as work to prepare both the Cumberland Local Plan and Northumberland Local Plan progresses to understand whether this raises any significant issues that need specific consideration in these plans.
- Community benefits Cumbria County Council (as the predecessor Waste Planning Authority) secured Community Benefit provision for development at the Low Level Waste Repository. Information on the Copeland Community Fund is included in the Nuleaf Policy Paper 75, published on our website. The Nuleaf policy paper also discusses provisions set out in the national policy for the GDF siting process. Two Community Partnerships established in Cumberland are currently beneficiaries of Community Investment Funding (CIF) through this mechanism. The plan-making process should explore the Council's position on Community Benefit for the management of radioactive wastes, recognising that waste management facilities in Cumberland are national facilities. The new Cumberland Local Plan should then set out what that position is, to provide developers with:
 - clarity on the Council's expectations for any future development proposals and
 - alongside other measures and activities, address the need for a social licence to operate in Cumberland. Restoration of waste sites Recent restoration works at the LLWR have involved the importation of significant quantities of aggregates by rail. It is unclear if the use of primary aggregates could have been minimised by the use of secondary or recycled aggregates – this may not have been practicable in terms of suitability of material or availability. The new local plan should consider the restoration of waste sites in the context of sustainable development, for example the source and transport of materials to/from site to enable restoration. This would support the principles of a more Circular Economy as discussed in our response to question 164.
- Any assessments of waste needs must also use up to date information. An assessment for the year 2022 is not an adequate basis for making such important future policy decisions.
- The Council has identified that there has been “re-characterisation of some lower level radioactive wastes”. The Council must consider the implications and risks arising from the processing of radioactive wastes previously considered hazardous now being managed by regular waste sites.
- The Objective to “Achieve sustainable waste management by reducing the production of waste, increasing opportunities for recycling and reducing the amount of waste being sent for final disposal to landfill” has multiple problems:
- It does not recognise the significant harms arising from waste incineration – harms which led the government to declare a “crackdown” on waste incinerators. The government's crackdown includes many forms of incineration and incineration-like technologies, such as gasification and pyrolysis. The

government is seeking to halve the residual waste sent to landfill and incineration by 2042. The Council should therefore seek to reduce both landfill and all forms of incineration including gasification and pyrolysis.

- “Achieve sustainable management” can only be met when unsustainable processes cease. Reducing the production of waste, increasing opportunities for recycling and reducing the amount of waste being sent for final disposal are not, on their own, sufficient to achieve sustainable management so the Local Plan should aim higher. The Local Plan should aim to avoid encouraging the production of non-recyclable waste. Non-recyclable waste should be considered to include some potentially recyclable materials that are generally considered to be uneconomic to recycle at the present time. The Local Plan should seek the avoidance of all non-recyclable waste, but, where waste cannot be avoided, it should seek to minimise that waste and ensure that, despite this waste, there are not better alternatives. The document should reword “increasing opportunities for recycling” or at least make it clear that such a statement does not imply the encouragement of the creation of more waste materials just so they can provide more opportunities for recycling!
- The first two sub-objective questions “Will it encourage a reduction in the amount of waste produced?” and “Will it encourage increased recycling and composting and achieve the diversion targets for waste away from landfill?” should be modified to include the expectation that residual waste that cannot be recycled must be halved by 2042 (and, as already stated, the second sub-objective should also include diverting waste from incineration). A proposal that would result in only a minor reduction in waste produced should be considered unacceptable because the Local Plan needs to be in accordance with the government goal.
- The third sub-objective “Will it result in new or enhanced waste management facilities to meet the waste management needs of the area?” is inadequately defined. There are potentially many ways to meet perceived “waste management needs” – some ways will be much better than others and result in more waste being recycled and have better environmental outcomes. We need waste management facilities that are fit for the future, in accordance with a carefully worked out strategy, that apply the best scientific understanding and that minimise environmental impacts compared to all practical alternatives. We should not be satisfied with just meeting needs. We need an approved waste strategy that has undergone public consultation.
- A report by the Environment Agency’s Chief Scientist Group said in 2023 that waste crime “costs to the English economy total £1 billion annually through evaded tax, environmental and social harm, and lost legitimate business.” (https://assets.publishing.service.gov.uk/media/67e1629d70323a45fe6a7003/National_waste_crime_survey_2023_-_report.pdf). The final question “Will it result in improvement in the management of fly tipping and reduction in the number of incidences of fly tipping?” could be helpfully be broadened to include all forms of waste crime, e.g. “Will it reduce waste crime, such as the fly tipping, and assist the management of waste crime?”

Appendix D: Summary of Representations made to the SA Scoping Report

This section outlines a detailed question by question summary of the comments received to the SA Scoping Report.

Q.1 Do you agree with the draft Objectives and Sub-Objectives for “Climate change, energy and air quality”

- Support the SA objective to protect and improve air quality but raised concerns about objectives relating to greenhouse gas reduction, renewable energy, and reduced energy consumption where these may conflict with Cumberland’s agricultural sector, rural energy needs, or local economic wellbeing. They emphasised that the Local Plan should explicitly support the agricultural industry and promote local food self-sufficiency, cautioning against prioritising certain renewable technologies where lifecycle impacts (such as disposal of turbine blades) may create environmental harm. They also highlighted that many rural households depend on oil and coal for heating and argued that energy policy should reflect actual local requirements rather than top-down national carbon targets. The respondent felt that measures which undermine community welfare should not be justified by national carbon objectives and suggested that Local Plan policies should continue to support existing local energy suppliers, such as WCF Fuels North West.
- One respondent put forward that the SA objectives relating to climate change and energy were not sufficiently precise or ambitious, referencing recent International Court of Justice statements on climate change and calling for firm, quantified commitments rather than broad aims such as “reducing emissions” or “encouraging” renewable technologies. They felt that all new development should be net-zero, that accessibility criteria need clearer definition (suggesting a 20-minute neighbourhood approach), and that objectives for reducing energy use, increasing efficiency and expanding renewables should be measurable and aligned with Cumberland’s net-zero commitments. They also recommended that the Local Plan be consistent with the Zero Carbon Cumbria Partnership plan unless justified and suggested adding SA questions requiring new development to consider mitigation for a 2°C temperature rise and risks associated with a potential 4°C rise.

Q.2 Question 2: Do you agree with the draft Objectives and Sub-Objectives for “Waste”

- Support the SA objective on achieving sustainable waste management, emphasising the importance of following the waste hierarchy by prioritising waste reduction, reuse and recycling over disposal. They suggested that legacy landfill sites may still contain recoverable materials such as metals, glass and electronics, and that opportunities for resource extraction should be explored. They also noted that refuse-derived fuel could provide a useful outlet for residual municipal and commercial waste that cannot be recycled, while potentially offering a source of income for the Council.

- One respondent put forward that they did not support the SA objective on sustainable waste management as drafted, raising multiple concerns about its scope, evidence base and alignment with updated national policy. They felt the document did not reflect recent government guidance, including the 2024 Residual Waste Infrastructure Capacity Note, and questioned why the Waste Needs Assessment was being undertaken jointly with Westmorland and Furness rather than as a Cumberland-specific assessment using up-to-date data. They highlighted risks associated with the re-characterisation of lower-level radioactive waste and argued that the SA objective should go further by addressing harms from incineration (including gasification and pyrolysis), aiming to reduce both landfill and all forms of incineration in line with national ambitions to halve residual waste by 2042. They also felt the sub-objectives were inadequately defined, lacked ambition, and should explicitly require major reductions in residual waste, clearer criteria for future waste facilities, and a publicly consulted waste strategy. Finally, they suggested broadening the reference to fly-tipping to include all forms of waste crime, reflecting national evidence on the scale and impacts of illegal waste activity.

Q.3 Do you agree with the draft Objectives and Sub-Objectives for “Land, Soil, and Mineral Resources”?

- Support the SA objectives relating to the protection of mineral resources, land and soil quality, peatlands, and contaminated land, as well as the reuse of previously developed land and buildings. Encouraged the Council to work collaboratively with Natural England on peatland restoration and emphasised the importance of safeguarding prime agricultural land from development. Noted the value of geotechnical surveys in assessing previously developed land and expressed support for protecting and enhancing Regionally Important Geological Sites (RIGS).
- One respondent put forward that the SA objective to reduce the consumption of natural resources should be quantified, as broad or unmeasured reductions may not align with net-zero ambitions. They suggested that several sub-objectives require clarification, including safeguarding minerals (which they felt should not imply maintaining current extraction levels), defining what “prudent” use of natural resources means, and ensuring secondary or recycled aggregates are preferred only as an alternative to new aggregates. They also recommended strengthening expectations around re-use by discouraging single-use developments, ensuring RIGS information is informed by specialist and public input, and recognising that waste sites can contaminate land. Additional comments included the need for references to relate specifically to Cumberland rather than Cumbria, ensuring Cumberland is not expected to allocate waste sites to meet Westmorland & Furness needs, preventing peat extraction, and adding a sub-objective to discourage greenfield development where suitable brownfield sites or existing buildings are available.

Q.4 Do you agree with the draft Objectives and Sub-Objectives for “Water and Flooding”?

- One respondent put forward that they supported the SA objectives relating to minimising flood risk, integrating sustainable drainage systems, and protecting water quality, and emphasised the importance of giving particular weight to

safeguarding UK Protected Areas such as SSSIs and Nature Reserves. They suggested the Local Plan should avoid development near protected sites where aquifers or groundwater conditions increase flood risk and should reflect the growing likelihood of 30- and 100-year flood events as a result of climate change. They highlighted the need to protect SSSI river catchments and native species such as crayfish and lamprey, citing ongoing restoration work on rivers such as the Eden, Derwent and Kent, and recommended that river restoration be made an explicit objective within the Local Plan.

- One respondent put forward that the SA objective to minimise flood risk needs clearer wording, as the current sub-objectives appear to allow development in flood-risk areas rather than preventing it. They suggested the Local Plan should explicitly state whether building in flood-risk locations would be restricted, noting concerns about increased climate-related flood events, the financial cost of recovery, and the significant impacts on health and wellbeing. They also recommended adding a sub-objective to ensure that any pollution arising from new development is detected and fully rectified without cost to the Council or the public, in addition to minimising pollution risks.

Q.5 Do you agree with the draft Objectives and Sub-Objectives for “Landscape and Cultural Heritage (including architectural and archaeological heritage)”?

- One respondent put forward that they supported the SA objective to protect, enhance and manage the Cumberland landscape and townscape, including local distinctiveness, design quality and sense of place. They highlighted that nationally important archaeological sites are highly sensitive receptors and suggested that the Local Plan should prevent development that is adjacent to, or could adversely affect, such assets, potentially through mapped buffer zones informed by GIS analysis. They referenced the importance of safeguarding Hadrian’s Wall, including recently discovered sections near Drumburgh and Burgh-by-Sands, and noted concerns that large-scale infrastructure proposals such as the Great Grid Upgrade could affect the setting of heritage assets, suggesting that the Local Plan could help ensure such impacts are mitigated or avoided.
- One respondent put forward that, while they agreed with the importance placed on landscape and townscape character, they did not consider that landscape character assessments can be entirely objective, noting that scenic and aesthetic qualities valued by residents and visitors may not always be fully captured. They emphasised that people’s subjective experience of landscape is important for wellbeing and should be recognised in decision-making. They also expressed concern that Westmorland & Furness Council is undertaking the Landscape Character Assessment for Cumberland, suggesting this work should be completed by Cumberland officers and subject to public consultation. Finally, they highlighted the risk of incremental landscape change from new development and recommended adding a sub-objective to ensure policies protect against adverse cumulative impacts on landscape quality.

Q.6 Do you agree with the draft Objectives and Sub-Objectives for “Biodiversity of Flora and Fauna and the Conservation of Natural Habitats”?

- One respondent put forward that they supported the SA objective to protect and enhance biodiversity and wildlife habitats, and felt the Local Plan should prioritise safeguarding existing species and habitats above new housing,

employment or infrastructure development. They noted that mitigation features such as bird boxes or hedgehog highways are not sufficient where development would lead to significant habitat loss, and therefore emphasised preventing inappropriate development in the first instance. They also supported objectives to maintain and expand tree cover and highlighted the particular importance of retaining mature urban trees, stating that shrubs, small trees or new planting cannot compensate for the social, environmental and biodiversity value lost when long-established trees are removed.

- One respondent put forward that they did not support the SA objective as worded, as they felt it could imply that biodiversity is only worth protecting within designated wildlife habitats. They suggested rewording the objective to make clear that all biodiversity, wherever it occurs, has value, noting that formal habitat lists are inherently incomplete. They also recommended revising the second sub-objective to focus on actively enhancing and creating habitats and supporting species conservation and climate resilience, rather than simply providing “opportunities.” Additional sub-objectives were proposed to ensure avoidance of harm to protected species (direct and indirect), establish monitoring of biodiversity outcomes over the plan period, assess whether development would fragment or connect habitats and green corridors, improve water and air quality, and promote public understanding and appreciation of biodiversity and habitats.

Q.7 Do you agree with the draft Objectives and Sub-Objectives for “Population and Housing”?

- One respondent put forward that they did not support the objective relating to “providing sufficient housing” where sufficiency is defined by top-down national housing targets, stating that Cumberland should resist any centrally imposed requirements focused solely on increasing capacity. They supported the aim of delivering high-quality, well-designed and sustainable housing tailored to local needs, but emphasised that this should not come at the expense of the environment or the local economy, particularly agriculture. They also noted concerns about housing developers failing to deliver promised infrastructure and suggested that essential amenities, such as schools, green spaces and community facilities, should be required at the outset of development, with stronger mechanisms to ensure their delivery at the planning stage.
- One respondent put forward that they did not agree with the objective as drafted, noting that good-quality housing does not have to be new and suggesting that retrofitting existing homes could play a significant role in improving housing quality and supporting economic growth. They felt the Plan should include sub-objectives to ensure housing is appropriately located and supported by sufficient infrastructure and services, including healthcare and schools. They also recommended that the Local Plan consider whether development patterns would support the creation of 20-minute neighbourhoods, helping residents access everyday services within a short walk or cycle.

Q.8 Do you agree with the draft Objectives and Sub-Objectives for “Human Health, Wellbeing, and Equality”?

- One respondent put forward that they agreed with the objective to enable environments that promote health and wellbeing, emphasising the importance

of incorporating well-designed green spaces—such as parks, playgrounds and recreation areas—into housing developments, with early involvement from landscape architects to ensure these spaces are secured at the planning stage. They also supported the objective to create safe living environments and reduce the fear of crime, noting that good urban lighting is an important part of this and suggesting that the Council consider effective lighting solutions, including high-pressure sodium options, in areas where visibility and public safety are priorities.

- One respondent put forward that, while they supported the Council's commitment to placing health and wellbeing at the centre of decision-making, the SA objectives should go further by explicitly aiming to "maximise health benefits and minimise health harms." They suggested adding sub-objectives to assess whether development would benefit the health of local people and the wider population, prevent harm to nearby residents and land users, and actively encourage proposals that improve health outcomes. They also highlighted the importance of meaningful public engagement, recommending sub-objectives to give significant weight to local views, ensure young people are consulted using the Lundy principles, and apply engagement standards used in the Cumbria Climate Assembly. Finally, they felt the objectives should include an explicit focus on air quality, noting its major impact on physical and mental health, and proposed a sub-objective asking whether development would likely bring about significant improvements in air quality.

Q.9 Do you agree with the draft Objectives and Sub-Objectives for "Economy and Employment"?

- One respondent put forward that they supported the objectives relating to promoting regeneration, particularly in deprived areas—supporting a sustainable and resilient economy, and maintaining the vitality and viability of centres. They emphasised the importance of tourism to Cumberland's economy and welcomed recent regeneration initiatives in Carlisle, such as improvements to Market Square, Greenmarket and Project Tullie, noting the hope that such projects will stimulate local trade, including markets selling local produce. They also highlighted concerns about prominent vacant buildings in Carlisle, including the former Debenhams and the former Bulloughs and Hoopers department stores, and suggested that the Council act promptly to prevent deterioration through seeking funding from bodies such as Historic England or the Architectural Heritage Fund to preserve and regenerate these key town centre assets.
- One respondent put forward that the SA objectives for Economy and Employment do not reflect the significant changes that advances in Artificial Intelligence (AI) are likely to bring. They noted government estimates that 10–30% of jobs could be automated by AI and suggested this figure may be an underestimate, with implications for inequality and community resilience. They felt the Local Plan should consider both the potential benefits and risks associated with rapid technological change, and build in flexibility so that policies can be adapted in future to respond to emerging economic and employment challenges linked to AI.

Q.10 Do you agree with the draft Objectives and Sub-Objectives for "Infrastructure"?

- One respondent put forward that they agreed with the objectives to protect and enhance community facilities and services, emphasising the need to prioritise rural schools as key anchors of local community life. They also supported the objectives relating to sustainable transport and making best use of existing infrastructure, highlighting the importance of maintaining essential rural bus services and expressing concern about recent service reductions, such as the closure of the Stagecoach 93 route from Carlisle to Kirkbampton and Kirkbride.
- One respondent put forward that they were concerned the consultation on the draft Sustainability Appraisal Scoping Report had not been clearly signposted to the public, noting that key Council web pages and a Council newsletter referenced the Issues and Options consultation but not the SA Scoping Report. They stated that they became aware of the SA consultation only shortly before the deadline and felt many residents were likely unaware of it. They requested that the Council extend the consultation period and improve communication through newsletters, the website and media channels to ensure wider public awareness.

Q.11 Should the Sustainability Appraisal consider any additional strategies, proposed works, or pieces of evidence?

- One respondent put forward that the Sustainability Appraisal should consider additional guidance and duties relating to protected landscapes, including explicit reference to the statutory duty on relevant authorities to further the purposes of Protected Landscapes such as the National Park, even where proposals lie outside the designation boundary but may affect its setting. They suggested that the SA should assess likely impacts on protected landscapes, particularly landscape character and tranquillity, and noted that emerging tranquillity-assessment methodology being developed for the Lake District National Park could be shared and potentially applied elsewhere. They also recommended that the SA reference the Cumbria Good Lighting Technical Advice Note, highlighting that inappropriate external lighting can harm biodiversity, tranquillity, health and wellbeing, as well as undermine climate objectives through unnecessary energy use.
- One respondent put forward that the Sustainability Appraisal would benefit from more ambitious and quantified objectives, noting that broad terms such as “reduce” or “enhance” may lead only to marginal improvements. They felt that, given current climate and ecological pressures, alongside wider risks such as inequality, health challenges and emerging technological change, the SA should set clearer measurable targets to demonstrate meaningful progress. They also noted that there had been insufficient time to provide a more detailed response to this question.

Q.12 Are there any other readily available sources of information that should inform the sustainability appraisal baseline?

- One respondent put forward there had been insufficient time allowed to respond to this question.

Q.13 Do you have any other comments to raise about any paragraph within the Sustainability Appraisal, if so, which numbered paragraphs and why?

- One respondent put forward that they did not have sufficient time to provide a full response but wished to highlight an inconsistency between paragraph 2.2 of the Sustainability Appraisal and paragraph 8 of the National Planning Policy Framework (NPPF). They noted that the SA refers to “balancing” social, economic and environmental needs, whereas the NPPF states these needs should be pursued in mutually supportive ways rather than traded off against one another. They suggested the document should be corrected to avoid implying that a development could be acceptable if it delivers economic benefits but harms environmental needs and emphasised the importance of a Local Plan that meets all three dimensions of sustainable development simultaneously.
- Paragraph 4.18: This should be amended to say location *and amount* in the first bullet point i.e. making sure that the amount of development is necessary to meet identified needs without over-allocating to meet demand.
- Paragraph 6.7: There seems to be maps missing
- Paragraph 8.30: An additional sustainability issue should be added which says “*ensuring development which affects the setting of National Landscapes, including the Lake District National Park, furthers the purposes of the National Landscape*”
- Paragraph 8.31: An additional question should be included in the SA objectives and sub-objectives section which asks “*will it protect or enhance the setting of National Landscapes and further their purposes*”
- Paragraph 9.10: An additional bullet should be added which says “*influencing the amount and type of lighting as part of development as inappropriate lighting can have adverse effects on biodiversity*”
- Paragraph 9.11: There should be an objective relating to hedgerows or the final bullet should be expanded to include reference to them. Thinking particularly about the pressures to remove significant lengths to create access to new developments.
- Paragraph 10.5: It could be worth mentioning here that a lower figure can be used where justified i.e. where much of the land coverage is within a National Park. I think the NPPG still allows for this.
- Paragraph 10.19: Should also include opportunities to bring empty homes back into use in the last bullet point.

Q.14 Do you have any other points to raise in regards to the Sustainability Appraisal?

- One respondent put forward that national policy targets should not override locally determined objectives, expressing concern that top-down approaches, whether through government targets, the Climate Change Act, or future National Development Management Policies (NDMPs), may conflict with the needs and priorities of Cumberland’s communities. They felt that local conservation initiatives, such as the Cumbria Local Nature Recovery Strategy, should carry greater weight than long-term predictive climate modelling, and that neighbourhood planning should be prioritised within both the SA Framework and the Local Plan. They also emphasised the importance of the Council clearly communicating with, supporting and representing local communities where major national infrastructure proposals, such as the Cross-Border Connection and its associated substation south of Carlisle, create points of concern.

- Paragraph 1.1 states that the role of the SA is to “*promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.*” The Council could consider taking a multiple capitals approach to assessing sites through the Sustainability Appraisal process. This would help identify the full value of each alternative site taking into account all components of landscape, including its social and cultural value.
- Chapter 6 policy context: It may also be worth mentioning NPPF para 161 in this chapter as it refers to the reuse of existing resources including the reuse of existing buildings. Should the number of vacant (long term empty) homes also be referred to in the baseline information section? Bringing these back into beneficial use will add to the housing stock and reduce the amount of housing that is needed on greenfield sites. This is however picked up later in the document in chapter 10 which is useful.
- Chapter 12: there needs to be more reference to agriculture in this chapter – you could refer to some of the recent changes to funding for farmers in the recent changes section as well as some of the issues/challenges farmers are facing. Appropriate farm diversification measures could be mentioned in the key sustainability issues and opportunities section as well as the importance of protecting the best and most versatile agricultural land.
- General: The baseline information refers to the two World Heritage Sites and the St Bees and Whitehaven Heritage Coast. Impacts on these features should also be assessed through the SA process.
- One respondent put forward there had been insufficient time allowed to respond to this question.