

## Preferred Options Consultation Response Form

Copeland Borough Council is currently in the process of producing the new *Copeland Local Plan 2017- 2035*. This will become the key document in shaping the planning policy for the Borough, replacing the current *Copeland Local Plan 2013- 2028*. Please use this form in conjunction with the Copeland Local Plan 2017-2035 Preferred Options Draft to indicate any comments or recommendations that you have surrounding the proposed policies and allocations.

Please use a separate form for each Policy/ Allocation you wish to comment on and return by **no later than 4.30pm on Sunday 15<sup>th</sup> November 2020** to:

Strategic Planning Copeland Borough Council Market Hall, Market Place, Whitehaven, CA28 7JG	Strategic Planning Copeland Borough Council Millom Library St George’s Road Millom LA18 4DD
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<b>For internal use:</b>	
Resp. No.	.....
Rep. No.	.....
Date Rec.	.....

Or email: [localplanconsultation@copeland.gov.uk](mailto:localplanconsultation@copeland.gov.uk)

### 1. Your Details

Please provide your details below. This information will be added into our database so we can contact you about future consultations. All information in the following table will be used solely for this purpose and no identifying information will be used in any future stages of the Local Plan process. Age and gender data will be used to monitor engagement in the Local Plan consultation process. If you are using an agent we will use those details as our primary contact.

	Your Details	Agent’s Details
<b>Name</b>	David Savage	
<b>Position</b>	Chair	
<b>Organisation</b>	Millom Without Parish Council	
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**Gender (Please circle)**

Male	Female	Prefer not to sayX
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**Age (Please circle)**

18- 25	26- 35	36-45	46-55	56-65	66-75	76+	Prefer not to sayX
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**Privacy Notice**

A copy of the Council’s privacy statement can be viewed at [https://www.copeland.gov.uk/sites/default/files/attachments/privacy\\_notice1.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/privacy_notice1.pdf). Further information is also available by contacting the council’s Data Protection Officer at [info@copland.gov.uk](mailto:info@copland.gov.uk) or by calling 01946 598300 and asking to speak to the Data Protection Officer.

## 2. Your Comments

Please indicate the Policy/Allocation to which your comment relates.

Please note highlighted red bold comments relate specifically to the Parish of Millom Without

Policy/ Allocation Reference	Policy/ Allocation Name	Support/Object/Comment (please state which)
<b>2.2.3</b>	<b>Section 2 – Using the Preferred Options Draft</b>	<p><b>Object:</b></p> <p><b>Other significant developments include the GDF announcements relating to Copeland (website <a href="https://copeland.workinginpartnership.org.uk/">https://copeland.workinginpartnership.org.uk/</a>)</b></p> <p><b>Object:</b></p> <p><b>Lack of inclusion of the 2019 submission to extend the southern boundary of the Lake District National Park to Natural England in June 2019: <a href="https://www.friendsofthelakedistrict.org.uk/southern-boundary-extension">https://www.friendsofthelakedistrict.org.uk/southern-boundary-extension</a></b></p> <p><b>Significant development for South Copeland in terms of landscape assessment and potential impact on planning and environmental protection.</b></p> <p><b>This is also supporting the potential Tourism Economy for the area.</b></p>
<b>5.1.2</b>	<b>The Approach to Nationally Significant Infrastructure Projects</b>	<p><b>Object:</b></p> <p><b>The section makes no reference to the GDF as a national infrastructure project as stated above in section 2.2.3</b></p> <p><b>Object:</b></p>

		<p><b>The Plan is silent on the current Offshore Wind Leasing Round 4 impacting on a significant portion of the Copeland Coast Line</b></p> <p><b>Object:</b></p> <p><b>The Local Plan is silent of the potential development of Small Modular Reactors development as Sellafield which can raise questions of connectivity (transmission lines) impact</b></p>
Section 10.1 Copeland Economy	Strengths, Challenges and Opportunities	<p>Comment:</p> <p>Question the need to highlight digital connectivity as an issue - particularly in rural areas which will help support work at home jobs.</p> <p><b>Object:</b></p> <p><b>The plan is silent on the role of H.M.P Haverigg which plays a significant role in supporting the South Copeland economy. This is critical to the ongoing economic development of Millom/Haverigg and the area around this for employment, housing, shops, and many other business ventures. We know discussions historically took place about closing the Prison and latterly the decision to send in lower category prisoners to keep it functioning. Any further discussions on its future needs to involve the local community and be part of Copelands local plan. It would be a significant failure of the Local Plan not to address this strategic issue which underpins much of the South Copeland economy.</b></p>
10.2 Copeland Communities	Strengths, Challenges and Opportunities	<p>Comment:</p> <p>It should be noted that a key strength should also includes Millom (our key services town) who has a strong sports culture which is worthy of noting alongside Whitehaven.</p>
<b>10.4 Copeland Connectivity</b>	<b>Strengths, Challenges and Opportunities</b>	<p><b>Comment:</b></p> <p><b>Opportunity not stated - to enhance the rail link as a key gateway of the National Park and promote the beauty of the Copeland Coast Line</b></p> <p><b>Opportunity not stated – the development of the English Coastal Path as a new tourism opportunity</b></p> <p><b>Object:</b></p> <p><b>To state that the A595 has pinch points underplays the impact on the economy particularly in South Copeland – a</b></p>

		<p>clear example that's needs the spotlight is the Duddon Bridge Area – this is the equivalent of the Dove Ford investment at Grizebeck where the roads are akin to small rural roads and not a strategic designation such as the A595</p> <p><b>Comment:</b></p> <p>The needs to set out what are the key strategic route corridors appear to be missed in the Plan</p>
12.2.9	Sustainable Development and Settlements	<p><b>Support:</b></p> <p>We welcome as part of the inclusion within our Community Plan – dated May 2019 – the following statement:</p> <p>A safe walking route is one that has street lighting and a continuous pavement that is at least 2m wide. A frequent bus or train service is one that would allow a village resident working standard office hours (9am-5pm) in a nearby town to travel there and back by public transport. When considering train links, the distance from the station to the main settlement and the safety of the route was also considered. For example, whilst The Green benefits from a regular train service to Millom, the station is over a mile away from the main settlement and the route to the station is not considered to be safe, lacking a pavement and lighting in parts.</p>
12.2.10 Settlement Boundaries	D2SPO Settlement Hierarchy	<p><b>Comment:</b></p> <p>The settlement boundaries for Millom Without Parish are a new inclusion in the Local Plan and the definition for these settlements within the Parish will be classified as other rural villages which sits below the category of sustainable rural villages.</p> <p>This classification by following the logic suggests that other rural villages are not sustainable and this can create the wrong impression for these villages which sit within this category – can we ask that more thought be given to the definition of this category?</p>
12.3.8	D3SPO – Settlement Boundaries	<p><b>Object:</b></p> <p>As stated above settlement boundaries are a new inclusion in the Local Plan and hence there is no experience to daw down as to their effectiveness in delivering the policy outcomes.</p>

		<p><b>The policy indicates that development can be granted in certain exceptions outside the settlement boundary.</b></p> <p><b>But the Policy is silent on how the potential development needs will respect and protect environmental considerations of such development –particularly where developments are expedited to meet short term targets (e.g. Housing Targets)</b></p>
13.1.8	Strategic Development Priorities	<p>Object:</p> <p>The absence of reference to the proposed extension to the National park for the South Copeland has been omitted as part of the growing Visitor Economy and adds weight to Copeland being centre stage in the tourism offering</p>
13.1.9	Strategic Development Priorities	<p>Object:</p> <p>Millom Without Parish Council fully support Millom as a key service centre and we all have a stake in Millom thriving in delivering a good range of fit for purpose services – but the swimming pool at Millom falls far short of the need.</p> <p>The improvement of the sports and leisure offering in Millom lacks ambition for the role which Millom undertakes as a key service centre for a wide footprint within the Copeland Borough</p> <p>The minimum we require in Millom is with 3 dividable lanes -</p> <p><b>Main/General</b></p> <p><b>Length</b>            25m</p> <p><b>Width</b>             11m</p> <p><b>Shallow end</b>    1m</p> <p><b>Deep end</b>         2m</p> <p><b>Area</b>                265m<sup>2</sup></p> <p>As proposed, 15m is too small to support any sporting or Adventure use or status. The long distance to other satisfactory pools - Ulverston or Barrow rather makes the point for the need for a proper all-purpose rather than "leisure" pool. None of this is consistent with the Whitehaven leisure zone</p> <p>Either the policy should not be specific or should fully support a 25m Sports pool in our remote area.</p> <p>We should also recognise that a swimming pool will play its</p>

		<p>part in the broader tourism offer for the Millom Area.</p> <p>Comment:</p> <p>The document states ‘Opportunities have been identified as part of the Connecting Cumbria’s Hidden Coast programme to create a new recreational route from Whitehaven to Millom, which largely follows the English Coastal Path’ but does not reference the positive benefits to ensuring a cycle/pedestrian link from Millom through the South East edge of Copeland at Duddon Bridge. Similarly, the benefits of extending the National Cycle Network (most southerly point in Copeland is Ravenglass) through to Barrow (the next most southerly point on the NCN, for the start of the Walney to Weir route) are not referenced.</p>
<b>13.1.10</b>	<b>Strategic Development Priorities</b>	<p><b>Object:</b></p> <p><b>Economic growth is facilitated by good connectivity and within the Parish of Millom Without the road network in the Duddon Bridge area puts a constraint on growth – particularly in supporting the “nuclear corridor” from Barrow in Furness to Sellafield via the A595.</b></p> <p><b>The Local Plan lacks inter Borough Council collaboration on the road network in driving Copelands nuclear ambitions as set out in this Local Plan – good networks will enhance the effective flow of goods and services and people in delivering on the key strategic targets.</b></p>
DS4PO	Policy DS4PO: Strategic Development Priority Projects	<p>Object:</p> <p>The policy is silent on addressing rural connectivity as an enabler for local economic growth and particularly in attracting Knowledge Workers who need fast and efficient connectivity.</p>
Policy DS6PO: Planning Obligations	Planning Obligations	<p>Object:</p> <p>The planning obligations are silent on rural planning issues such as effective drainage, sewage, septic tanks etc</p>
Policy DS7PO:	Design Standards	<p>Comment:</p> <p>The policy though addressing potential home working needs does not promote standards relating to the needs of an aging population and support housing for older age living. Due to the demographics in rural communities there is an issue of low supply and possibly dated accommodation stock to support</p>

		older people to stay within their communities.
DS9PO	Drainage	<p>Comment:</p> <p>The policy is silent on flood risk issues created by deforesting areas for development and creating water run off with systems that cannot cope with the extra flow of water.</p>
21.2.3	Challenges to Economic Growth	<p>Comment:</p> <p>There should be reference to the Cumbria coast railway as an important development opportunity both for allowing residents and workers to sustainably access Copeland but also for tourists.</p>
21.2.5	Travel to Work Area	<p>Comment:</p> <p>The plan speaks of travel to Allerdale, but in South Copeland there is significant travel to both South Lakes and Barrow in Furness. There needs to a sense of balance in the plan.</p>
21.2.6	Deprivation	<p>Comment:</p> <p>The data set is silent on the degrees of deprivation – Millom Centre data show significant levels of deprivation which impacts on the economic and well being of the South Copeland Area, which the Millom Without Parish Council have a stake in ensuring a vibrant economy for all.</p> <p>Comment:</p> <p>There is reference to opportunities in tourism addressing some problems with deprivation. This needs to be linked to providing ready public transport from Copeland communities into the centre of Cumbria. Copeland very much needs transport to other areas of employment and recreation that is sustainable and affordable.</p>
E3PO	Employment Sites and Allocations	<p>Comment:</p> <p>The Plan is silent in recognizing the Tannery Site at Haverigg contains a number of business's employing significant numbers relative to Millom's employment base.</p>
CC3PO	Wind Energy Developments	<p>Object:</p> <p>The policy does not address wind farms sited close to the Copeland Coast and needs to set out what policies are relevant in these circumstances. Please also refer to section 5.1.2</p>

		<p>Object:</p> <p>Policy is silent on addressing extensions or enhancements to existing approved operating sites.</p> <p>Object</p> <p>The policy does not take account of both the impact on the setting of the National Park and the recent extension proposal relating to the southern border of the National Park.</p>
13.1.12 And 13.1.16	Strategic Development	<p>Object:</p> <p>The Whitehaven relief road and growth corridor provides little benefit for connections into and beyond the South of Copeland. Further, the focus on providing road upgrades within Whitehaven is not consistent with sustainable transport and the acknowledged challenges of climate change.</p> <p>Comment:</p> <p>The document references improvements to the coastal route rail and connections to Whitehaven and connectivity between Whitehaven stations and the town centre but misses out improvements to public transport links between the stations and Whitehaven Hospital and West Lakes, for instance. Connectivity between transport hubs and key service and employment centres is essential if people are to easily make such journeys without a car or taxi. Also, lack of parking at the two Whitehaven stations limits the utility of these station for 'park and ride'.</p>
CC6PO	Supporting Nuclear Energy Sector Development and Infrastructure	<p>Object:</p> <p>The policy is silent on the impact on the landscape either from the building of new facilities and of equal importance are the infrastructure requirements to ensure the transmission routes and the associated technology is within the scope of a landscape assessment and / or mitigation.</p>
T2PO	Tourism Development	<p>Comment:</p> <p>The Policy needs to strengthen the impact within the Setting of The National Park so that the World Heritage Site is status is not comprised by insensitive development.</p>
<b>H4PO</b>	<b>Distribution of Housing</b>	<p><b>Object – awaiting clarification:</b></p> <p><b>There is needs to be a clearer specification of housing</b></p>



		<p>allocation to “other rural villages”.</p> <p>Taking the 2035 target:</p> <ul style="list-style-type: none"> <li>• Is it expected that The Green, The Hill and Hallthwaites be expected to create approx. 8 houses per rural village within the timeframe of this Local Plan?</li> <li>• Is it assumed these houses will be developed within the boundary settlement?</li> <li>• Are the houses open market, social housing / local use only?</li> <li>• Will the distribution consider the potential disproportionate impact on certain villages such as Hallthwaites – with the potential to undermine the character of such a Village?</li> </ul>
40.8.19	Empty Homes	<p><b>Comment:</b></p> <p>The approach set out in the Empty Homes section does not address the escalation of concerns relating to empty houses that deteriorate to such a point such homes become a drag on the local community or raise significant concerns of safety.</p> <p>We have an ambition that all empty homes should be considered as a priority for refurbishment and reintegration into a community stock of available housing.</p>
40.11.7	Special and Older Persons Housing	<p><b>Support:</b></p> <p>Cumbria County Council has prepared an Extra Care Housing and Supported Living Strategy</p>
57.4.3	Public Transport Provision	<p><b>Object:</b></p> <p>The document states that ‘The main town in south Copeland, Millom, is well connected to Barrow-in-Furness by bus’. That is not the case at present.</p> <p><b>Support+ comment:</b></p> <p>The document acknowledges that ‘the rural location of Copeland means that services between Whitehaven and Millom are limited, with infrequent stops at the villages between the two settlements. This is certainly true and there need to be more innovative transport opportunities for outlying communities to serve residents and visitors. Without such there is always going to be a heavy and unsustainable reliance on cars.</p>
H41PO	Rural Exception Sites	<p><b>Object:</b></p> <p>The policy lacks specification on how local needs are</p>

		<p><b>determined with the Rural Exceptions Sites</b></p> <p><b>The delivery of the appropriate agreed mix (Open V local affordable) needs to be fixed and not subject to change, thus opening the door to a bigger offering being made for open housing within such rural exception sites.</b></p> <p><b>The Policy lacks clarity on what is meant by affordable use in perpetuity? Is this Parish, Borough, or County wide restriction?</b></p>
H15PO	Essential Dwellings for Rural Workers	<p><b>Support:</b></p> <p>Welcome this policy as essential to rural economy and maintaining vibrant rural villages</p>
<b>H19PO</b>	<b>Removal of occupancy conditions</b>	<p><b>Object:</b></p> <p><b>This issue has a number of elements that need careful consideration when using such policy which demands evidence of 2 years.</b></p> <p><b>The unintended consequences can lead to a:</b></p> <ul style="list-style-type: none"> <li>• <b>Most lenders are unwilling to offer a mortgage on properties subject to the restriction</b></li> <li>• <b>The restriction is having a negative impact on the buying process in the local area through adding significant delays</b></li> <li>• <b>The restriction is having a significant impact on fundamental human rights (freedom of movement) and placing people's life's on hold as they seek to sell</b></li> <li>• <b>There is evidence from other councils that the original intention is no longer appropriate when addressing conditions which are not truly affordable homes noting market prices in some rural villages.</b></li> <li>• <b>The condition can vary from footprint size – Parish, Borough, County or National Park</b></li> <li>• <b>The house may become an empty house as the resident attempts to move onto their new life and location.</b></li> </ul> <p><b>The answer lies in developing affordable houses which are within the financial resources of people who live in rural communities and may often be working in industries / services where salaries cannot afford such houses.</b></p> <p><b>The Parish Council recognise the sensitivity of this issue and</b></p>

		<b>one way forward is to understand both the demand and supply side of housing needs within the smaller communities so that policies can be better targeted for each community.</b>
BE4PO	Non-Designated Heritage Assets	Support:  This requires Parish Councils to focus on setting up such a list for their area of responsibility
<b>CO2PO</b>	<b>Priorities for improving connectivity within Copeland</b>	<b>Object:</b>  <b>The Policy is silent on the priorities which impact South Copeland and specifically the strategic transport for employment and support the Nuclear Corridor from Barrow to Sellafield. The A595 at Duddon Bridge and the surrounding road network needs to be expressly stated as a priority in the Local Plan if we are to gain some momentum to improve the network.</b>  <b>The Local Plan is a key document in identifying Duddon Bridge as a priority and bring some balance in recognising the connectivity issues faced by the South of the Borough.</b>
CO3PO	Priorities for improving transport links to and from the Borough	Comment:  The Plan is silent on Bus Services within the priorities for the Borough
CO5PO	Transport Hierarchy	Support:  Welcome the hierarchy for developments placing more green modes of transport at the top of the priority process.
CO6PO	Countryside Access	Comment:  The Policy is silent on the maintenance and repair to existing routes
<b>Appendix C</b>	<b>Suggested Green Spaces</b>	<b>Comment:</b>  <b>There is a lack of clarity as to which area the plan is making reference to within this Appendix:</b> <b>Thwaites play area</b> <b>Mill House Playing Field and Playground but makes no reference to the amenity land at rear of Mill Park</b>
Appendix H	Suitable Areas for Wind Energy	Comment:  The map lacks detail to make an appropriate view of the suitable area.

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**Please outline any comments or recommendations you have surrounding this policy/ allocation**

(Please continue on separate sheets if required)

**There are a number of fundamentals to the Local Plan which need to addressed:**

- 1. South Copeland priorities regarding Connectivity (road links and effective route corridors) are not adequately addressed in the Local Plan. Particular focus needs to be addressed on the A595 Duddon Bridge network.**
- 2. Key issues relating to the GDF and development of Moorside as significant national infrastructure projects appear not to thoroughly examined and impacts on say roads and housing needs.**
- 3. The recent National Park landscape review which includes taking in a significant footprint of South Copeland are not referenced in the Local Plan and this has real potential economic impacts.**
- 4. Concerns relating to housing target's in rural communities needs both clarification and clearer transparency of what is being proposed. This Parish remains unclear and hence it is difficult to understand the impact and make comments on this aspect of the Plan.**
- 5. Green issues promoting more people to use both train and bus are not sufficient to meet the HMG ambitions for a Greener Economy and reduce the Boroughs contribution to CO2 emissions.**
- 6. The lack of strategic focus on the South Copeland economy is illustrated by no specific reference to HMP Haverigg and the steps to support a sustainable future for this major employer.**

Signature:

Date:

Please use a separate form for each site you wish to comment on and return this form **no later than 4.30pm on Sunday 15<sup>th</sup> November 2020.**

*Thank you for completing this form*