

EDEN LOCAL PLAN STATEMENT OF CONSULTATION SUBMISSION STAGE

Regulation 22(1)(c) of the Town and Country Planning Regulations 2012

December 2015.

CONTENTS

SE	ECTION	Page			
1.	Introduction	3			
2.	Compatibility with Statement of Community Involvement	4			
3.	Duty to Cooperate	8			
4.	How we have engaged	9			
5.	The Journey so far	10			
6.	Summary of the main issues expressed through consultation and how they have been taken into account	14			
7.	Proposed Submission Draft (Regulation 19) Consultation	34			
8.	Summary	82			
TA	ABLES				
Та	ble 1 – Community Engagement Methods	6			
Та	ble 2 – Consultation Stages	9			
Table 3 – Preferred Options Consultation Events					
Table 4 – Preferred Options Consultation Responses					
Table 5 – SHLAA Consultation Responses					
Table 6 – SHLAA Site Specific Consultation Responses					
Table 7 – SHMA Consultation Responses					
Та	ble 8 – Settlement Hierarchy Consultation Responses	31			
Та	ble 9 – Consultation Method Summary	82			
ΑF	PPENDICES				
Αp	pendix 1 – Preferred Options Consultation Letter	83			
Αp	pendix 2 – Preferred Options Consultee List	86			
Αp	pendix 3 – Local Plan Schedule of Changes	102			
Αp	pendix 4 – Submission Draft Consultation Letter	143			
Αp	pendix 5 – Guidance Note	146			
Appendix 6 – Submission Draft Consultation List 150					

1 Introduction

- 1.1 This document sets out how Eden District Council has involved the communities and relevant bodies in the preparation of the Eden Local Plan. It shows how the Council has complied with requirements of the Town and Country Planning (Local Development) (England) 2012 Regulations (to be referred to as '2012 Regulations') and how it has undertaken engagement in accordance with the 2012 Regulations, specifically Regulation 22 (1).
- 1.2 In accordance with the requirements of Regulation 22 of the 2012 Regulations, this document details:
 - Which bodies and persons the Council invited to make representations under Regulation 18;
 - How these bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations made pursuant to Regulation 18;
 - How many representations made pursuant to Regulation 18 have been taken into account;
 - If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - If no representations were made in Regulation 20, that no such representations were made.
- 1.3 The consultation has been carried out within the context of Paragraph 155 of the National Planning Policy Framework (NPPF) which states:

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

2 Compatibility with Statement of Community Involvement

- 2.1 The Council has an adopted Statement of Community Involvement (SCI) which sets out the Council's approach for involving people in the preparation of both the Local Plan and planning applications. It was adopted in December 2013. The SCI is available on the Council's website: www.eden.gov.uk/planning-and-development/planning-policy-for-eden/current-policy/statement-of-community-involvement
- 2.2 Eden District Council are fully committed to real and on-going engagement in the planning process to ensure that the needs and aspirations of the community and stakeholders are fully taken into account in the documents which will help shape the future of Eden District in both its built and natural environment.
- 2.3 The Council achieved the adoption of the current Core Strategy in March 2010. Since then, the Town and Country Planning (Local Planning) (England) Regulations 2012 have resulted in certain changes to the process to result in the production of a Local Plan. There has been continuous engagement regarding the production of allocations in particular since 2010. The SCI, adopted in December 2013, has been used to guide consultation and engagement. Consultation was undertaken directly by letter or email with those on the Planning Policy database.
- 2.4 The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe a number of Consultation Bodies which the Council should consult during each stage. The list below identifies the organisations and other bodies that the Council considers to have an interest in the Local Plan process:
 - Neighbouring local planning authorities;
 - The Civil Aviation Authority;
 - The Coal Authority;
 - Cumbria Constabulary;
 - Electricity North West Limited;
 - English Heritage;
 - Environment Agency;
 - Health Service Providers;
 - Highways Agency;

- Highways Authority;
- Homes and Communities Agency;
- Natural England;
- Network Rail:
- Parish Councils within the District;
- The Clinical Commissioning Group;
- United Utilities
- Other relevant gas, electric, electronic communications network providers (such as Mono).
- 2.5 In addition, general consultation bodies are identified:
 - Voluntary bodies some or all of whose activities affect the District;
 - Organisations which represent the interest of various focused groups such as disabilities or business.
- 2.6 The Planning Policy Consultation Database is maintained as a living database which is continuously updated to include those listed as required and also those who have expressed an interest in being involved in the production of the Local Plan. In addition to the above, this includes:
 - House builders, including both businesses and the Home Builders Federation;
 - Local community groups;
 - Local residents;
 - Local businesses;
 - Land and property agents;
 - Planning consultancies.
- 2.7 The Council has used various methods throughout consultation stages as follows in order to disseminate information as widely as possible and be as inclusive as possible:

Table 1 - Community Engagement Methods

Communication Method	
Consultation documents	Relevant documents were made available for inspection at Mansion House, Penrith, Town Hall Penrith, local libraries, Alston Local Links and Kirkby Stephen Local Links.
Website and email	Relevant documents were made available on the Eden District Council website for viewing and downloading.
E-consultation software	This was used to make it easier to provide information and share information.
Media/Press	Notices have been published in the Cumbria and Westmorland Gazette with details of where and when documents can be inspected and responded to.
Letters/emails (and documents) to statutory consultees	These are targeted towards organisations and individuals who can offer their professional expertise.
Social Media	Stages in the Local Plan process have been signposted on the Council's Facebook and Twitter pages.
Council produced leaflets and posters	Leaflets and posters have been produced and distributed to raise awareness of the process and invite participation and feedback.
Drop in events	EDC Officers have held meetings with local communities around the District
Meetings with key stakeholders and adjoining authorities	Meetings have been held, where necessary, with key stakeholders to discuss issues and keep bodies updated with process. Other local authorities and the Local Economic Partnership have been involved in order to discuss any potential cross boundary issues.

Overview of who we have consulted with

2.8 Those consulted include:

 Statutory Consultees including, but not limited to, the Highways Agency, 70 Parish and Town Councils, English Heritage, Natural England, United Utilities, the National Grid;

- 10 adjoining and neighbouring local authorities and in addition, the Local Economic Partnership (LEP)
- Letters to interested parties including developers, planning consultants and people who had expressed an interest in the previous consultations
- A list of those consulted can be found at Appendix 1.

3 Duty to Cooperate

- 3.1 The Duty to Co-operate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils, and certain public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. This is considered further in the Duty to Co-operate Statement. However, proactive dialogue between the Cumbrian local planning authorities is a long standing practice. Historically the local planning authorities of Cumbria have been accustomed to co-operation and joint lobbying to achieve a unified voice to secure planning provision of higher order policy on the regional agenda. Accordingly the foundation was laid for the transition into the current duty to co-operate system.
- 3.2 Quarterly meetings take place between all the local planning authorities in the County, a group known as Development Plan Officers' Group (DPOG). The aim of DPOG is to provide local planning authorities in Cumbria with a forum that can discuss and advise on implications of planning policy and guidance, help to raise awareness and share best practice on local planning issues. Consultation and discussion has also been held with Council's outwith Cumbria who may be influenced by or have influence on policies within Eden District. This has been fed into the evolution of the Local Plan.
- 3.3 A separate statement has been prepared detailing how the Council has fulfilled this requirement.

4 How we have engaged

4.1 A number of consultations have been undertaken during the process of the Local Plan to date. These are summarised in the following table:

Table 2 - Consultation Stages

Consultations	From	То
Housing - Issues and Options Consultation	13 August 2007	12 October 2007
Consultation on Alternative Housing Sites	19 May 2008	27 June 2008
Housing: Preferred Sites and Policies	22 February 2013	22 April 2013
Employment: Preferred Sites and Policies	15 July 2013	9 September 2013
Eden Local Plan: Preferred Options	21 July 2014	26 September 2014
Housing Technical Evidence and Proposed Changes to the Settlement Hierarchy Consultation	24 July 2015	24 August 2015
Eden Local Plan: Submission Draft Consultation	19 October 2015	30 November 2015

- 4.2 This consultation statement accompanies The Eden Local Plan Pre-Submission Draft, published on 19 October 2015, with the consultation period running until 30 October 2015. This stage of consultation sought comments only on the "soundness" of the Plan with regard to National Planning Policy Framework, Para 182 and any legal or procedural issues.
- 4.3 Prior to submitting, letters and emails were sent out to invite consultees to make representations on the Pre-Submission Draft Local Plan and also on the updated Sustainability Appraisal and Habitats Regulation Assessment. Hard copies of the draft Local Plan were made available in local libraries and at Council offices, Alston Local Links and Kirkby Stephen Local Links. The consultation exercise was also publicised on the Council's website and in the local press. All the relevant information was made available electronically on the Council's web site.

5 The journey so far

5.1 Outlined below is a summary of the steps the Council has taken to ensure the development of the Local Plan has been informed by the involvement of the local community.

Step 1 - Site Options

Consultation	From	То	Formal/Informal
Issues and Options Consultation	13 August 2007	12 October 2007	Formal
Consultation on Alternative Housing Sites	19 May 2008	27 June 2008	Formal
Strategic Housing Land Availability Assessment by Drivers Jonas		March 2009	Informal

- 5.2 Various exercises were undertaken to request suggestions for site options to consider collecting views and comments in respect of site selection. A 'call for sites' was undertaken which resulted in members of the public, interest groups and organisations putting forward a range of sites in a number of settlements for the Council to consider. These sites were identified in the Housing Land Availability Assessment (LAA).
- 5.3 In addition to housing land, employment land was considered and mapped using input from consultants Deloitte and Amec. Sites suggested through this consultation were consulted on in the following step.

Step 2 - Developing Land Allocations

Consultation	From	То	Formal/Informal
Employment: Preferred Sites and Policies Consultation Document	15 July 2013	9 September 2013	Formal
Housing: Preferred Sites and Policies	22 February 2013	22 April 2013	Formal

Public consultation was undertaken separately for housing and employment elements over 8 week periods. The consultations were taken in order to elicit people's opinions on the potential sites for allocation. In addition, service providers were contacted for information on 'showstoppers' or areas in which development may need to be delayed to allow for upgrading of services such

as Wastewater Treatment Plants.

- 5.5 General views were encouraged over amounts and any new sites which had not been previously considered. This was consulted upon using the local press, posters, email and letters to interested parties. Workshops were also held with local business and business representatives invited to attend. Responses to the Housing and Employment Preferred Sites and Policies documents were summarised and made available via the website to the public and the comments fed into the production of the Submission Draft Local Plan.
- 5.6 In addition to the Plan policies and maps, the Sustainability Appraisal and Habitats Regulations Assessment were made available for comment. Copies of the consultation material are available to view on the Councils website.

Step 3 - Preferred Options Consultation

Consultation	From	То	Formal/Informal
Local Plan Preferred Options	21 July 2014	26 September 2014	Formal

- 5.7 The Preferred Options paper was consulted on for an extended period of 10 weeks during 21 July 2014 to 26 September 2014. Main proposals included:
 - 3,600 new homes throughout the District;
 - Policies to encourage affordable and self-build throughout smaller villages; and
 - 26.3 ha of new employment land.
- 5.8 Several methods of communication were used to publicise the Preferred Options consultation documents:

• Deposit Copies

Hard copies of the document were placed in Council offices, public libraries and Local Links.

Letters and Emails

Approximately 712 letters and emails were sent out to statutory consultees, individuals and organisations on the Consultation Database. In addition, hard copies were sent to all Parish and Town Councils.

• Consultation Events

Nine 'drop in' sessions were held to allow residents to drop in to and discuss their issues and ideas around the policies and site proposals. The events were held throughout the District and were staffed by members of the Policy Team.

Press Notices

A press briefing was prepared and local newspapers attended a briefing session, leading to publicity in the Cumbria and Westmorland Gazette and the News and Star.

Banner Advertising

A banner was placed within Penrith town centre over the main arterial route through the shopping area.

5.9 The Preferred Options Plan was supported by a number of documents which were available on the Council's website. Consultation was informed by emails and letters from the Council's database. The general consultation letter is available to view at Appendix 1 and a full list of consultees at Appendix 2. In addition to letters and emails, a number of consultation events were held and attended by Officers to discuss areas of public interest and invite comments:

Table 3 - Preferred Options Consultation Events

Date	Location	Venue
30 July 2014	Penrith	Leisure Centre
5 August 2014	Appleby	Public Hall
7 August 2014	Kirkby Stephen	Friends Meeting House
12 August 2014	Alston	Alston Moor Partnership Shop
20 August 2014	Penrith	Rugby Club
4 September 2014	Shap	Memorial Hall
5 September 2014	Langwathby	Village Hall
9 September 2014	Temple Sowerby	Victory Hall
11 September 2014	Tebay	Primary school

- 5.10 Feedback from the above has been fed into the Local Plan Draft Submission Document.
- 5.11 Following consultation on the Preferred Options Local Plan a number of significant changes in circumstances led to the development of a revised settlement hierarchy. This was consulted upon between 24 July 2015 and 24 August 2015

Step 4 - Technical Evidence and Revised Settlement Strategy

Consultation	From	То	Formal/Informal
Proposed changes to the settlement hierarchy	24 July 2015	24 August 2015	Informal
Strategic Housing Market Assessment Land Availability Assessment			

5.12 The following methods were used to publicise and invite comments on the Technical evidence and Revised Settlement Strategy:

Deposit Copies

Hard copies of the document were placed in Council offices, public libraries and Local Links.

Letters and Emails

Approximately 1652 letters and emails were sent out to statutory consultees, individuals and organisations on the Consultation Database. In addition, hard copies were sent to all Parish and Town Councils.

SHLAA/SHMAA Workshop

A workshop was also held with developers, land agents, planning consultants and registered social landlords on 9 September 2015 to discuss and elicit feedback on the Strategic Housing Market Assessment and Land Availability Assessment documents.

6 Summary of the main issues expressed through consultation and how they have been taken into account

6.1 This section summarises the effectiveness of public engagement in the development of the Local Plan Draft Submission Document and subsequent consultation on Technical Papers and Proposed Changes to the Settlement Hierarchy. The main issues raised during each stage of consultation are highlighted and how they have been taken into account explained.

Summary of Main Issues arising from Local Plan Preferred Options Consultation

6.2 In total 799 responses were received to the Preferred Options consultation document from both members of the public and statutory consultees. 725 responses were from members of the general public and 74 made by or on behalf of companies and organisations. These responses have been used to shape the ongoing Local Plan. Summarised in the below table are the ten most commented upon policies with a brief statement on the issues which were raised.

Table 4 - Preferred Options Consultation Responses

	Top Ten Most Commented Policies			
	Policy Number	Policy Title	Number of Representations	Issues Raised
1	ENV7	Wind Energy Development	339	Most respondents wished to see a minimum separation distance introduced between any turbine and a residential property
2	PEN1	A Town Plan for Penrith	77	The main objections centred around gypsy and traveller provision and the potential site at Maidenhill (Site GT1). Other comments related to a need for more employment land to be allocated and the inclusion of the retail space at Castle Park to be shown given a town centre designation
3	COM2	Open Space, Sport, Leisure and Recreation Facilities	54	The decision not to allocate housing on the open space at Pategill was generally welcomed. In addition, comments were made on the

	Top Ten	Most Commented F	Policies	
				need for an up to date assessment of open space and the inclusion of open space requirements in any viability exercise
4	LS1	Locational Strategy	36	A number of comments were received in support of additional settlements being placed higher up the hierarchy for development, in particular Calthwaite. Comments were made in this regard the Plan has not been prepared positively and is therefore not compliant with the NPPF. A number of comments requested that Great Strickland be available for local needs housing only.
5	RUR1	Rural Settlements and the Rural Area	26	General support was received for Orton as a settlement which could facilitate some housing development, as well as some opposition. Further comments were received specific to villages being higher up or lower down the hierarchy and support for smaller villages being able to have market housing to meet needs.
6	LS2	Housing Targets and Distribution	19	The majority of comments related to housing numbers and the target being set at too low a level of promote employment in the district and the policy was considered not to be compliant with the requirements of the NPPF. Comments also made on the methodology used to calculate housing need and not addressing the shortfall and also that the SHMA and SHLAA both require updating.

	Top Ten	Most Commented F	Policies	
7	HS2	Housing to Meet Local Needs	18	Objections related to the requirement for a local connection and also the limits on the size of any potential dwelling granted under this policy.
8	DEV1	General Approach to New Development	14	There was a general support for the inclusion of this policy although questions were raised over the use of model policies in this respect.
8=	HS1	Affordable Housing	14	There were objections to the requirement of 30% on schemes over 4 units due to viability issues, and that affordable housing units should not be subject to specified space standards
9	RUR2	Re-use of Existing Buildings in Rural Area	11	There was general support for this police with two objectors indicating that they considered it to be inconsistent with paragraph 55 of the NPPF and also that it should consider the potential impacts on the historic environment
9	EC7	Town Centres	11	Concerns were raised that non-town centre uses should not impact on the businesses already in place. It was considered that national thresholds rather than locally derived standards in terms of Impact Assessments should be implemented and that Kirkby Stephen in particular should have the boundaries drawn to allow for some expansion
9	HS4	Housing Type and Mix	11	Concerns raised about the SHMA being out of date and the policy being over prescriptive

	Top Ten	Most Commented F	Policies	
10	DEV3	Transport, Accessibility and Rights of Way	9	Comments were received on the changes that might be required due to the withdrawal of County Council subsidies of bus routes and that development should be supported where it may lead to a reinstatement of public transport. Network Rail were keen that an assessment of level crossings should be undertaken where these may be affected. There were calls that potential bypass routes should be protected.
10 =	DEV5	Design of New Development	9	This was a generally supported policy with queries raised over the costs of enhanced design on viability and that farm buildings should be included in terms of design policies.

How have these issues been taken into account?

Policy ENV7

- 6.3 Following significant community concern and representations regarding Policy ENV7 and the issue of wind energy in tandem with Ministerial Statements (June 2015) and subsequent alterations to Planning Practice Guidance a number of actions have been undertaken.
- 6.4 The Council has produced the Eden Wind Energy Policy Background Paper (September 2015) providing the evidence base for amendments to policy. Wind energy is now dealt with under Policy ENV6 Renewable Energy, with explanatory text introducing minimum separation distances between residential property and wind turbines and also identifying areas where wind energy development is considered appropriate. The Policy also now refers to the need to have planning impacts that are identified by local communities fully addressed and therefore the proposals have community backing.

Policy PEN1

6.5 In line with the comments received from English Heritage, the historic environment is referenced in the vision for Penrith. The main comments related to the provision of a Gypsy and Traveller site at Maidenhill, in this regard proposals at Maidenhill have been discontinued and alternative provision made through extension of existing provision at Lakeland View.

Policy COM2

6.6 This policy was generally well received in relation to its protection for open spaces and the decision which had been taken not to allocate land at Pategill for housing purposes but to retain it as open space. Cycle tracks were recognised as an outdoor sport facility and school playing fields were removed from amenity open space. The Council has been updating its evidence base in relation to Open Space and it availability throughout the district in order to further inform this policy.

Policy LS1

- 6.7 This policy seeks to strike a balance between housing supply and sustainability. It was recognised that references to 'small scale' could be improved upon and the policy now refers to appropriate scale to support the settlement and meet local demand. It is considered important that these safeguards be put in place in order to ensure that inappropriate development does not result and that these settlements which have limited services and , in most cases, no public transport have development which is necessary to support those living there. It is considered that the policy as written strikes an appropriate balance between housing supply and sustainable principles allowing housing to meet a range of needs throughout the district.
- 6.8 Following Preferred Options consultation, changes to public transport provision and grants of planning permission in smaller settlements within the District a revised Locational Strategy under Policy LS1 has been proposed. Consultation on this was conducted between Monday 13 July 2015 and Monday 24 August 2015, consultation responses and Eden District Council reactions to this are detailed below.

Policy RUR1

- 6.9 This policy received comments both in favour of and against the provision of housing within Orton. Comments were made in regard of other specific housing allocations. In accordance with comments which were raised in general, an objectives section has been added in prior to the policy in order to better articulate the Council's vision for the future of its rural area.
- 6.10 A revised locational strategy, resulting from Preferred Options consultation, consulted upon in July and August 2015 has altered the designation of settlements and treatment of rural areas. Residential development of appropriate scale is now permitted in villages and hamlets limited to infill and rounding off. Please see consultation responses on revised Settlement Strategy below.

Policy LS2

6.11 This policy was commented on as potentially being incompatible with the requirements of the NPPF to plan positively and to significantly boost housing supply. The Council is proposing a 200 unit per year target which, it is acknowledged, is below that previously set by the Regional Spatial Strategy (RSS). The Council has undertaken an objectively assessed consideration of its housing needs and considers that the figure of 200 is appropriate. This is

- set out in the updated Strategic Housing Market Assessment (2015).
- 6.12 Comments were received that the level of existing commitments in villages meant that there was no further requirement for allocation. However, RUR1 does allow for appropriate scaled housing to be provided within villages and hamlets and it is noted that the policy is not an annualised cap.

Policy HS2

- 6.13 Comments regarding the 125 m² size restriction and requirement for local occupancy criteria have been responded to.
- 6.14 The size cap element has been amended within Policy HS2 to refer to a limit of 150 m², however, a size restriction is still considered appropriate.
- 6.15 Local occupancy restrictions will not be imposed where the housing is to come forward on previously developed land in recognition of the higher development costs of these sites.
- 6.16 It is considered that this represents an appropriate way forward for the provision of housing in smaller less sustainable settlements but which would allow those with a strong local connection to remain or return.

Policy DEV1

6.17 Comments mainly related to the use of the Planning Inspectorate's model policy in regards to the presumption in favour of sustainable development. The policy has been amended. However, the additional criteria have been retained. It is considered that the expanded criteria offer a reasonable level of local interpretation of what constitutes sustainable development by which to measure planning applications.

Policy HS1

- 6.18 There is no change to 30% affordable housing requirement. The requirement for provision of 30% affordable housing is demonstrated as viable in the majority of scenarios within the District. 2013 viability assessments are currently being updated and early indications are that the 30% requirement will remain a viable target.
- 6.19 Explanatory text to Policy HS1 at Paragraph 4.8.9 allows for individual site viability assessments to be completed where the applicant considers economic circumstances justify departure from the 30% requirement.
- 6.20 Space standards in respect of affordable housing have been removed from the Pre-submission draft of the Plan in response to comments at the Preferred Options stage.

Policy RUR2

- 6.21 The policy has been amended to refer to the conversion of redundant rural buildings only and that the historic environment is taken into consideration
- 6.22 Comments were raised on the changes brought about by the The Town and

Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 in regards to the conversion of agricultural buildings. This has been inserted into the 'Explanation' of the policy to clarify the purpose of this policy.

Policy EC7

- 6.23 In response to concerns raised over the potential impact of new development within the town centre on existing businesses, the policy has been amended to reflect that proposals should not negatively impact on existing surrounding uses.
- 6.24 The use of local rather than national thresholds for the trigger of retail impact assessments reflects the market town nature of the area and evidence contained within the Eden Retail Study (2014 update). In addition new retail development can have a major impact on the existing form of the towns subject to this policy and the nature of these impacts needs to be fully understood.

Policy HS4

6.25 The SHMA has been updated to provide a more up to date evidence base and some minor wording amendments have been made.

Policy DEV3

6.25 Policy DEV3 criteria now refers to the consideration of cyclists in addition to pedestrians. The Policy now requires consideration of potential for the creation of public transport links through development proposals. The concerns of Network Rail have been addressed with the addition of criteria requiring consideration of the impact of development on rail crossings and the nature of traffic on such crossings.

Policy DEV5

6.27 In response to issues raised, local standards have been removed and national standards have been referred to. The Council is also currently developing a Design Guide in relation to new development which is now referred to within the policy. Comments were raised in regards to the use of the phrase 'locally sought' in respect of the interpretation of local. This has been amended to allow for the use of materials which reflect and enhance the surroundings in order to better reflect the requirements of the particular site.

Proposed Allocations

- 6.28 A few comments have been received in relation to the allocation of sites. Of note was a petition in relation to the proposed allocation of an area of open space for housing at Pategill, Penrith (Site Ref: P101). This site has now been removed from the Local Plan as a housing allocation.
- 6.29 In addition, a number of representations were received in relation to the proposed allocation of a Gypsy and Traveller site at Maidenhill (Site Ref: GT1). In response to these comments alternative provision has been

proposed as an extension to existing provision at Lakeland View, North of Penrith (Site Ref: GT2).

Summary of Main Issues from the Sustainability Assessment (SA) Scoping Report and Draft Habitats Regulations Assessment (HRA)

- 6.30 Comments received from Natural England relating to the SA Scoping report and draft Habitats Regulations Assessment (HRA) were largely supportive. It was agreed that in respect of the SA Scoping report, the conclusions were appropriate but that the SA should be refined as further changes were made to policy and that further information should be brought forward to answer some uncertainties in relation to mitigation measures and impacts.
- 6.31 The HRA did not receive any particular comments, although Natural England raised some concerns over the need for mitigation measures to be identified to protect the River Eden. A comment was made by a resident in relation to Wind Energy and separation distances. This is not relevant to the HRA outcomes and representations in this regard have been considered in the formulation of the policy for wind/renewable energy generation.

Summary of Main Issues from Housing Technical Evidence and Proposed Changes to the Settlement Hierarchy Consultation

- 6.32 Further consultation regarding two pieces of technical housing evidence and a short paper on potential changes to the Local Plan settlement hierarchy took place between Monday 13 July and Monday 24 August 2015. These papers were:
 - Strategic Housing Land Availability Assessment July 2015
 - Taking Stock: A Strategic Housing Market Assessment July 2015
 - Proposed Changes to the Draft Settlement Hierarchy Update paper July 2015
- 6.33 In total 96 responses were received to the Technical Evidence and Settlement Hierarchy consultation documents from both members of the public and consultees 49 responses were from members of the general public and 47 made by or on behalf of companies and organisations. These responses have been used to shape the Publication version of the Local Plan. Summarised below are the key issues which were raised in relation to each document in turn. These summaries are followed by EDC's response to the issues raised.

Strategic Housing Land Availability Assessment

6.34 The consultation responses to this document were principally related to site specific commentary. A more limited level of responses were received in respect of the documents methodology, comments are summarised below followed by a brief indication of EDC's response:

Methodology/Findings

6.35 In respect of the methodology employed to produce the Strategic Housing Land Availability Assessment (SHLAA) the representations received and EDC's response to these are summarised in the following table:

Table 5 - SHLAA Consultation Responses

Representation	EDC Response
SHLAA base date should be 01 April 2015	No change. The base date is to align with the Plan period so supply calculations align. Base date is for numbers only; more up to date data on planning status is employed.
Site capacity assumptions should be on net developable area or derived through discussion with site developer or adjusted to locality	Agreed. Revised October 2015 SHLAA amends capacity assumptions to a net developable area and tailors these assumptions on the basis of local implementation data. The revised SHLAA can be viewed on the EDC website.
Site acceptability criteria flawed in consideration of heritage assets	No change. The consideration of site acceptability has not considered housing site matrix distance criteria. EDC Officers are meeting with Historic England to explain and refine approach to heritage assets.
Sport fields/open space should be a constraint criteria in site assessment	No change. Sports fields and open space are already considered within constraint criteria.
Use of Development Plan Policy to assess site suitability inappropriate, employ sustainability criteria instead	No change. Considered correct to assess in this way. This follows advice within Planning Practice Guidance that states "assess suitability against Development Plan, emerging Plan Policy and National Policy"
Whilst assessment of constraints reasonable it should also consider opportunities associated with site development	No change. Full site assessment tables do include consideration of site opportunities and positive aspects.

Representation	EDC Response
Some agree and some disagree that sufficient supply of housing land exists to meet Eden District Councils Objectively Assessed Need. The perceived lack of a 5 year land supply is a concern to some.	No change. EDC consider the current "Objectively Assessed Need" is robust and based upon realistic assumptions. The current assessment of residential land supply demonstrates 6.21 years available at 1 September 2015 if measured against draft plan targets.
Concern that equal numbers of housing identified in Penrith and Key Hubs	No Change. The SHLAA identifies sites suitable for development, the decision to allocate/grant planning permission or otherwise is taken with regard to the settlement strategy and distribution identified within the Development Plan.
Contributions to land supply should be included from existing stock recycling and sub-division	No change. It would be extremely difficult to predict this with any certainty. Suggestions for methodology are welcomed. Windfall allowance assumption will include contributions from this source of supply.
Include criteria in site assessment to demonstrate consideration of coal working hazards	No change. Para 2.2.15 of the SHLAA identifies Hazards/Contamination within list of site constraints. Coal hazards are included within this.
2009/2013 viability assessments out of date, discussion with development industry required to assess achievability of sites	The 2013 viability assessment is not considered materially out of date. An updated viability assessment has been commissioned to update and check assumptions prior to examination of the Local Plan.
Windfall allowance considered too high as no discount for extant planning permissions, removal of contribution from towns and proposed "local occupancy" clause will reduce annual contribution relative	No change. The windfall allowance has been calculated using past completions rather than permissions. It is considered that completions data is a better indicator for predicting future windfalls as it does intrinsically include non-implementation data.

Representation	EDC Response
Concern that too much housing land identified at Lazonby resulting in disproportionate housing provision at this location.	No Change. The SHLAA identifies sites suitable for development, the decision to allocate/grant planning permission or otherwise is taken with regard to the settlement strategy and distribution identified within the Development Plan.
LAA should phase development over the plan period	No Change. The LAA already phases development in 5 year periods to identify those "deliverable" (Years 1-5) and "developable" (Years 6 – 18) sites.

Site Specific Representations

6.36 The responses of various respondents in relation to individual sites are summarised in the table below. The table below also describes how the site specific representations have been responded to:

Table 6 - SHLAA Site Specific Consultation Responses

Site	Representation(s)	EDC Response
LYA3 – Land at Oakfields	Supports identification as developable	Noted, however Yanwath is now categorised as a smaller village/hamlet and only sites with permission in these locations are identified in the LAA.
KS4 – Land at Croglam Lane	Use as amenity/play area not residential	Site is now discounted for housing acknowledging amenity value
KS7 – Mark Johns Motors	Land in use as a garage – discount site	Site discounted as no longer available
KS8b – Field north–east of Victoria Buildings	Deliverability is queried, potentially move to developable	Site is considered deliverable in the next 5 years in line with NPPF as has permission and confirmed availability.
KS9 – Field adjacent the Crescent, Nateby Road	Concern regarding suitability resulting from visual impact	Site now discounted.

Site	Representation(s)	EDC Response
KS11 – Land adjacent Park Terrace	Concerns regarding loss of valued open space. Identify site as open/amenity space	Constraints acknowledged but not considered insurmountable at this stage. Not appropriate to discount at this stage
KS15 – Land adjacent Croglam lane	Site is deliverable not developable. Developer interest, no site constraints and larger site are available Parish council wish to see site area and capacity reduced to 40 dwellings	No planning application to date and no known firm specific developer interest at present. Site remains categorised as developable.
KS26 – Land at Christian Head		
KS18 – Land adjacent Croglam Park	Site assessment should refer to problems with site access. Capacity should be 13 not 35. No impact on listed railway bridge.	Noted but a capacity of 13 would only represent 11 dwellings per hectare. Capacity has been calculated according to assumptions in methodology.
LGR4 – Land at Blencow Road	Land unsuitable for development due to access and flooding issues - Discount	Site has now been discounted as a whole due to inappropriate scale but considered some smaller scale development could be suitable and constraints could be overcome.
LGR5 – Land east of Howard Park	Supports developable status subject to retention of mature trees and footpath	Site has now been discounted as a whole due to inappropriate scale but considered some smaller scale development could be suitable and constraints could be overcome.

Site	Representation(s)	EDC Response	
P111 – Land at Supports sites discount and recognition of the sites amenity value		Noted	
AP21a – Land adjacent Rose Cottage, Bongate	Site capacity considered too high at 10 units	Amended based on a developable area of 0.14 (excluding Rose Cottage) at 43dph.	
AP21b – Land adjacent Rose Cottage, Bongate	adjacent Rose		
LTE1 - Highfield Ensure site capacity assessment considers constraint from ethylene pipeline		Site now discounted for other reasons however ethylene pipeline constraint factored into assessment and run through HSE planning advice web app.	
LTE2 - Woodend	Ensure site capacity assessment considers constraint from ethylene pipeline	Site now discounted for other reasons however ethylene pipeline constraint factored into assessment and run through HSE planning advice web app.	
AP8 – Old Dairy Site	Site should be identified for housing	No change. Site is currently in use for employment and is a preferred employment site.	
LBR1 – Rowan House	Development cap imposed by Upper Eden Neighbourhood Development Plan should be acknowledged	Noted, comment added in achievability column of schedule.	
LBR2 – Castle View	Unsuitable - Development cap imposed by Upper Eden Neighbourhood Development Plan means only 6 dwellings at end of plan period	Noted, comment added in achievability column of schedule. Not considered unsuitable, situation of permitted and constructed dwellings in UENP area will be monitored on ongoing basis.	

Site	Representations(s)	EDC Response
LCBR1 – Land opposite Four Winds	Developable not discount	Remains discounted, ownership details are unknown.
LBR6 – Former George Hotel	Believes site is developed	Noted. Already discounted on size.
LLZ1 – Depot opposite Pine Grove	Neighbourhood Plan will allocate for Mixed Use this should be reflected in the Local Plan PC support deliverable status	Aspirations within the Neighbourhood Plan are noted, however, the site has extant planning permission for residential development
LLZ2 – Cattle Market, Fiddlers Lane	Not a developable site. Neighbourhood Plan will allocate for employment and site not available. Availability uncertain.	Potential for mixed use is acknowledged. Information provided by agent advises that whilst most of the land is not available at present it may be in the future, and a small area surrounding the traditional buildings is available at shorter notice.,
LLZ3 – Rosebank Farm	Discount – not available in plan period	Discounted based upon Parish Council information and recent farm related planning application.
LLZ4 – Scaur Lane	Discount – visually intrusive and access constraints PC support LAA status, with concerns regarding access to High Street	No change – access and visual impact constraints already acknowledged and considered that they can be mitigated.
LLZ14 – Land to the rear of the Lilacs	Discount – poor access and inappropriate development in countryside	No change. Officer recommendation for approval 5 units but Committee refusal. Appeal underway and status will be revised if necessary following appeal decision.

Site	Representations(s)	EDC Response
E3 – Carleton, land at Long Acres	Refer to archaeological constraints	Noted, comment on archaeological potential added. SAM and roman road were already referenced in draft.
E4 – Land at Carleton Hall Farm	Refer to archaeological constraints	Noted, comment on archaeological potential added.
LKT9 – Land adjacent Bridle cottage	Archaeological constraints. Suggest discount as design and layout requirements cannot be met whilst maintaining SHLAA capacity requirements. Access poor.	Archaeological potential already acknowledged but not considered to be an insurmountable constraint. Considered LAA capacity can be met with modest sized houses.
LCU6 – Land adjacent Loaning Head Courtyard	Deliverable not developable, anticipate delivery 2016/17	Accepted could potentially be deliverable before 2019 but only sites with permission have been categorised as deliverable and no application has yet been submitted. This position can be revised in the next review of the LAA.
LMO2 – Land behind Mothercroft, High Street	Land owners consider drainage issues resolved, subject to United Utilities approval. Resubmission imminent.	Comments noted. Given issues and that no current permission, developable status considered appropriate.
AL8 – Tyne Café and garage buildings	No marketing of site at present but could be available in future.	Noted.

Taking Stock: A Strategic Housing Market Assessment

6.37 The number of responses to this document was relatively limited, perhaps reflecting its detailed and technical nature. The majority of responses to this document were received from statutory consultees, house builders, planning consultancies and land agents. The table below provides a summary of representations and the response of EDC to these comments:

Table 7 - SHMA Consultation Responses

Representation Summary	EDC Response
Consultation timing poor leading to insufficient resource to assess document.	Noted. The council has accepted late comments on this consultation.
Inadequate consideration of PPG Para 2a-011 criteria for defining Housing Market Area	No change. SHMA methodology takes full account of PPG in establishing Housing Market Areas.
Objectively Assessed Need (OAN) has flaws in calculation resulting in an underassessment of annualised need. Population/housing growth pays insufficient attention to historic suppression of inward migration, affordability ratios and economic growth. With these factors considered OAN should be set between 290 and 339 DPA	No change. OAN figure is considered robust and calculated using realistic assumptions. Historic suppression in migration trends, affordability ratios and economic growth has been considered and some respondents believe over compensated for.
OAN appears calculated at highest plausible figure rather than "objective need"	No change. OAN figure is considered robust and calculated using realistic assumptions.
Concern over variations from DCLG 2015 projection figures	No change. Planning Practice Guidance contained at Para 2a–015 clearly states that DCLG figures are the starting point to be adjusted for local demographic factors.
SHMA assumption that DCLG 2015 figures contain an element of "suppression" is not justified	No Change. Suppression adjustments reflect judgement exercised from analysis of past delivery trends as required by PPG Para 2a-015.
Disaggregation of Affordable Housing need resulting from overcrowding is incorrect	Noted. Whilst data is limited it is reasonable to assume that those living in overcrowded accommodation are not doing so through choice. Increased affordable housing provision will assist those in need from this source.

Representation Summary	EDC Response
Site acceptability criteria flawed in consideration of heritage assets	No change. The consideration of site acceptability has not considered housing site matrix distance criteria. EDC Officers meeting with Historic England to explain and refine approach to heritage assets.
Lazonby housing requirement considered fully addressed in the period to 2035.	Noted. It is acknowledged that there are extant permissions in Lazonby. Revised settlement strategy does not allocate land to Lazonby. Future development will be guided by Neighbourhood Planning and market forces.
Housing growth only supported if tied to employment	No change. OAN calculation has considered the need to balance local employment and housing provision.
Concern over lack of affordable units	Noted. EDC is seeking to provide affordable units to meet identified need. Consideration of this need has resulted in increases to DCLG household projection figures.
Affordable units should be 3 bedroom and not 2 bedroom. Too many 4 bedroom houses currently	Noted. Provision of affordable units will be determined through assessment of need at the planning application stage.

Proposed Changes to the Draft Settlement Hierarchy

6.38 A high proportion of the responses to this document related to individual settlements and either their inclusion or exclusion from Key Hub status within the proposed changes. The key comments are summarised in the table below:

 Table 8 - Settlement Hierarchy Consultation Responses

Representation Summary	EDC Response
The following settlements should not be identified as a Key Hub 1. Sockbridge and Tirril 2. Bolton 3. Kirkoswald 4. Great Salkeld 5. Orton	 No change. Sockbridge and Tirril satisfies all relevant criteria for identification as a Key Hub. The Parish Council at the time supported this designation. We have since received further objections to the designation from residents. No Change. Bolton satisfies all criteria for identification as a Key Hub. No Change. Kirkoswald satisfies all criteria for identification as a Key Hub. No change. Great Salkeld satisfies all criteria for identification as a Key Hub. No change. Orton satisfies all criteria for identification as a Key Hub.
The following settlements should be designated/remain as Key Hubs: 1. Culgaith 2. Calthwaite 3. Yanwath 4. Ravenstonedale 5. Sockbridge and Tirril 6. Nenthead	 Agreed. Culgaith is identified as a Key Hub in the revised settlement strategy and Pre-submission Local Plan No Change. The settlement does not meet criteria for identification as a Key Hub. No change. Yanwath is well below the 100 properties required for identification as Key Hub No Change. School closure means Ravenstonedale no longer meets essential criteria for Key Hub status. Agreed. Settlement is identified as a Key Hub in the revised settlement strategy and Presubmission Local Plan

Representation Summary	EDC Response
	Agreed. Following comments from the Parish Council Nenthead has been reintroduced as a Key Hub.
Plan should incorporate a review mechanism to allow introduction of settlements to Key Hub status should development in the plan period increase settlement size to 100+ properties	No change. The ad hoc review of plan content in response to individual settlement circumstances is considered inappropriate, difficult to implement and resource inefficient. The Plan will be reviewed in its entirety at the appropriate point in time.
Object to entire settlement hierarchy change. Retain preferred options approach. Revised Key Hub criteria fundamentally flawed and should at least continue to recognise Public Transport as a relevant factor	Noted. Preferred options approach is no longer considered workable. The revised approach The existence of public transport is still considered as a relevant factor, if not a determining factor.
Support for the removal of public transport as qualifying criteria for Key Hub Status, revised criteria considered appropriate	Noted. The support is welcomed.
M6 Junction 40 capacity to accommodate 1,800 dwellings at Penrith queried	Cumbria County Council has produced traffic modelling that demonstrates Junction 40 is capable of accommodating the 1,800 dwellings within the Plan period
Employment should be distributed throughout the District and not entirely focused at Penrith.	Agreed. The Plan proposes employment be distributed throughout the District in accordance with Policy LS1 criteria and employment allocations at main towns.
Non – allocation to Key Hubs and villages is not supported. Considered this will lead to planning by appeal and disenfranchises the community due to ignoring previous work on site allocations. Certainty for developers reduced through this approach. Removes the ability to properly plan for infrastructure provision	Noted. The approach proposed is considered to be pragmatic and allow sufficient flexibility to Town and Parish Councils to effectively implement Neighbourhood Plan proposals. Previous consultations on site allocations can be used to inform Neighbourhood Plans and have informed allocations within the Local Plan at Penrith and the Market Towns

Representation Summary	EDC Response
Restriction to infill/rounding off in villages/smaller settlements may lead to undesirable impacts on settlement character	The impact on a settlements character can be considered at application stage. The restriction is intended to prevent inappropriate intrusion into the open countryside in the absence of settlement boundaries.

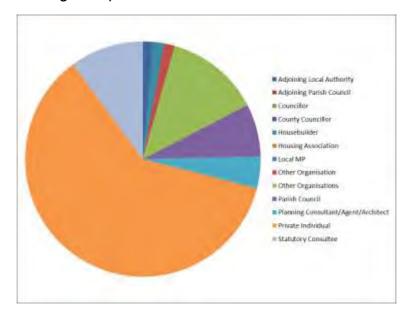
6.39 In order to aid understanding of how these consultations, in conjunction with internal comments and national policy changes, have altered the Plan content from the Preferred Options to Pre-Submission Draft a schedule of changes is incorporated at Appendix 3.

7 Proposed Submission Draft (Regulation 19) Consultation

- 7.1 This consultation was undertaken in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 7.2 The consultation commenced on Monday 19 October 2015 and ran for a period of six weeks, closing at 5pm on Monday 30 November 2015.
- 7.3 At this stage representations were sought as to whether the Plan is legally compliant (how the Plan was prepared in relation to the Duty to Cooperate, or other legal and procedural requirements), and whether the Plan is sound (is the Plan positively prepared, justified, effective and consistent with national policy).

Summary of Responses Received

- 7.4 In total, 334 responses were duly made by 69 organisations and individuals; this represents a significant reduction from the number of responses received at Preferred Options stage. One late representation has also been received.
- 7.5 The majority of responses were submitted by individuals, with only 5 Parish Councils submitting a response to the consultation.



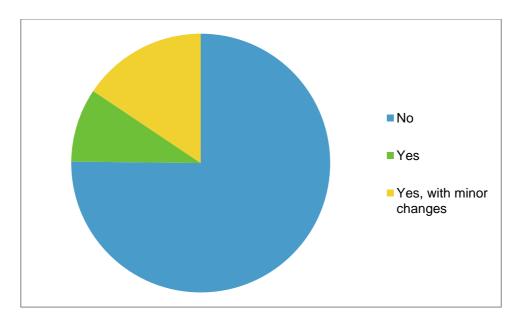
Legal Compliance

- 7.6 The consultation asked respondents to comment on whether the Submission Draft Eden Local Plan was Legally Compliant, and a guidance note (Appendix 5) was produced to offer guidance on how to answer this question.
- 7.7 Of the 334 comments which were duly made, only 120 commented on the legal compliance of the Plan.
- 7.8 69 of the responses consider the plan to be legally complaint, with the remaining 51 not considering the plan to be legally compliant.

- 7.9 One person commented that they did not "consider the Local Plan to be legally compliant because the process for community involvement in the Local Plan should be in general accordance with the Council's Statement of Community Involvement".
- 7.10 A further comment received stated that "Eden District Council have failed to adhere to their Statement of Community Involvement. Sites for housing have been included in the Land Availability Assessment document without any community knowledge or involvement".
- 7.11 The HBF submitted comments in relation to the Duty to Cooperate, which states that "there is insufficient evidence to indicate that the Council has fully discharged its requirements under the Duty to Cooperate. The August 2015 'Duty to Cooperate Statement of Compliance' clearly identifies that the Council has engaged with the relevant prescribed bodies. The statement does, however, lack any real substance in relation to how the issues identified have fed into the production of the plan and the decisions made".
- 7.12 However, they do acknowledge that the "SEP growth is undoubtedly ambitious, but it is clear that local plans are significantly short of achieving the suggested housing growth identified. Whilst the HBF is not suggesting that Eden should meet all of this shortfall it remains unclear how the SEP target has influenced the plan and what if any agreements have been made in relation to the housing targets set out within the SEP".
- 7.13 Story Homes also do not consider the Plan to be legally compliant but have not provided any specific comments in this regard, instead commenting on specific aspects of the plan, details of which can be found summarised in the later sections of this statement.

Soundness

- 7.14 The consultation asked respondents to comment on whether the Submission Draft Eden Local Plan was 'Sound', and a guidance note (Appendix 5) was produced to offer guidance on how to answer this question.
- 7.15 Of the 333 comments which were duly made, only 141 commented on the soundness of the Plan.
- 7.16 The majority of respondents, who commented on the soundness of the Plan, consider the Plan to be unsound. The figure below indicates the proportion of comments which considered the plan to be unsound.



General Comments on the Plan

- 7.17 In this section we will summarise comments made on the plan which don't directly relate to a specific policy or site allocation, typically this includes comments on the vision and objectives of the plan.
- 7.18 We received 17 general comments, with the remaining 44 relating to a specific Paragraph, page number or to the vision and objectives.
- 7.19 The **Environment Agency** considers that the Plan "is 'sound' and been prepared in accordance with the legal and procedural requirements as set out in Paragraph 182 of the National Planning Policy Framework and the Duty to Cooperate requirement introduced by the Localism Act 2011".
- 7.20 **Friends of the Lake District** submitted a general comment confirming they consider the plan to be sound and legally compliant.
- 7.21 **Penrith Ramblers Society** confirmed they have no comments to make on the plan.
- 7.22 **Natural England** made the following comment:

"Thank you for providing additional clarification by email (dated 2th November 2015) detailing how Eden Council addressed Natural England's comments made at the preferred options consultation stage (response dated 25 September 2014, reference 130581). It is recommended that this is appended to the Statement of consultation that is included of part of this Proposed Submission Consultation in order to provide a clear audit trail as to how our comments have been addressed". Main modifications will be requested to make sure Natural England's concerns are addressed.

7.23 **Penrith Chamber of Trade** commented that:

"The Local Plan clearly fails in that some new shop fronts in Penrith do fail to contribute to the preservation and enhancement of the area's character, appearance and setting, particularly so in conservation areas. EDC are failing in applying their shopfront and design policy of 2006.

7.24 **Cumbria County Council** made a number of general comments on the plan relating to Adult Social Care, Education, Council Owned Land and their role as Lead Local Flood Authority. A summary of their more detailed comments can be found, alongside a summary of other comments, within the table below:

Policy/Policies/Paragraphs	Number of	Summary of Comments
3 1,000	respondents	
1.2	1	One comment received from an agent asked whether the re-drawing of boundaries of the Yorkshire Dales National Park will have implications for the plan and this should be addressed at examination.
Pg. 10 – The Area of the Plan	1	The LDNPA and YDNPA extensions are not shown.
Vision & Objectives	1	The HBF support the vision and objectives in the Plan.
2.2.1 – SWOT Analysis	1	Historic England commented that:
		The NPPF requires that the Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment.
		The SWOT analysis fails to make reference to the historic environment. The plan needs to recognise the opportunities the historic environment can offer the district and the threats posed by various elements outlined in the table.
		This then should be carried through to the plans policies and town plans, which the submission draft fails to do.
2.3.1	3	One comment from Story homes stating that the vision set out needs to better emphasise housing development, not just focus on younger and older people. The part of the vision which mentions retaining the character and charm of Eden's towns should be deleted as it is inconsistent with the NPPF and too restrictive.
		Historic England commented that:
		The NPPF requires that a Local Plan should contain a positive strategy for the conservation and enhancement of

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	the blots in a little to the second
		the historic environment.
		The NPPF requires that Plans should contain strategic policies to deliver conservation and enhancement of the historic environment and a guide to how the presumption in favour of sustainable development should be applied locally (Para 15).
		Whilst we welcome the inclusion of a reference to the natural and built environment and the need to recognise their potential for investment and regeneration over the plan period. The Plan needs to be expanded to ensure that this is reflected through the whole plan and that there is a positive strategy for the historic environment to reinforce the vision.
		Therefore, the plan does not accord with the requirements of the NPPF, in that it fails to make reference to the historic environment.
		A further comment was received:
		2.3.1 (pg. 16) 'By 2032 Eden will have created a more diverse and sustainable populationThe provision of housing, jobsto encourage younger people to stay in the district or relocate from elsewhere'.
		The rationale that providing high wage jobs will result in young professionals moving into the area is flawed. It is an assumption. We have a hospital in Carlisle and another at Whitehaven that have a great many highly paid medical jobs which cannot be filled. Please do not assume that it is because of the poor reputation of these hospitals. There are a great many hospitals up and down the country in a similar situation to ours that do not have our severe problems with recruitment.

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		From this it must be deducted that there must be other factors at play. For instance, young people often find long term/life partner whilst away at university. It is not uncommon that the partner is from a different part of the country, possibly a different country. This factor will then affect where they choose to settle. Young people with small children may which to stay close to the support network provided by grandparents etc. and those will affect decisions to relocate to a different area.
2.4.1	1	I would like the Council to consider how realistic it is that 'young professionals' are going to come and populate the new houses being built. I would like them to examine the evidence base for this premise. I would like them to consider what will happen if they do not have a plan in place if the presumed influx of 'young professionals' fails to materialise. I would like them to formulate a strategy to deal with this eventuality. Various comments from Story Homes
		on the objectives: Objective 1 should mention the main towns and key hubs. Objectives 2-5 are largely in alignment with the NPPF. Objective 6 - The word 'local' should be removed. Objective 7 is inconsistent with the NPPF and should mention meeting all objectively assessed housing need. Objective 8 does not mention locations and is therefore inconsistent with the plan strategy, It should also mention transport links and Newton Rigg Campus Objectives 11-14 - largely in support of these Objectives and the need to take into account the rich natural environment, landscape and historic environment of Eden.

Policy/Policies/Paragraphs I	Number of	Summary of Comments
	respondents	•
		Objective 17 should recognise that the weight given in decision-making should be tested through the relevant mechanisms to make sure they align with local plan policies and objectives.
		Natural England recommends as outlined you request a change to refer to Green Infrastructure in Objective 10 and widen it to policies ENV1-4.
		Penrith Town Council – Objective 3 & 7, 8 We would suggest that the following should have been reflected in the Plan: (i)
		 the need for town centre regeneration and pedestrianisation, empty shops in the town centre and the threat from approved retails developments on the edge of the town, concern over reduction in rail and bus services which means that few would see transport as a strength. development and enhancement of key cycle routes the potential to develop a railway from Penrith to the West Coast using the route of the old Penrith to Keswick Railway. This would provide a valuable addition to the local infrastructure as well as having wider economic benefits (employment/skills development). ii. The Local Plan clearly fails in that some new shop fronts in Penrith do fail to contribute to the preservation and enhancement of the area's character, appearance and setting, particularly so in conservation areas. EDC are failing in applying their shopfront

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		iii. The Local plan fails to mention any potential economic links to the West Coast (the Nuclear coast) and the clear opportunities that present themselves in providing quality, higher paid jobs
		National Trust – Objective 11
		Concern has been raised about the approach which seeks to "balance the provision of development and maintaining the amenity of settlements and the countryside". They consider that such an approach is in conflict with the approach to sustainable development as set out in the NPPF.
		Historic England – Objective 11:
		Whilst Historic England welcomes this objective, this is not delivered within the plan.
		The NPPF requires that a Local Plan should contain a positive strategy for the conservation and enhancement of the historic environment.
		The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and a guide how the presumption in favour of sustainable development should be applied locally (para 15).
		In view of this the plan is considered unsound.
Pg. 21 – Key Diagram	1	The LDNPA and YDNPA extensions are not shown.
3.15 to 3.17	1	Kirkby Stephen Town Council would like to see their 'Town Plan' acknowledged in the Local Plan text. They also point out that recent amendments to the National Park boundaries need to be reflected in the text.
3.3 to 3.5.3	1	Historic England:

respondents	The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.
	contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning
	•
	The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and as a guide how the presumption in favour of sustainable development should be applied locally (Para 15).
	The Local Plan is considered to be unsound as it fails to meet the requirements of the NPPF and primary legislation regarding these issues.
	Penrith is an important market town and a long-lived historic settlement. First mentioned in 1100 but with significant earlier activity (including Roman period remains), it was also granted a market charter in 1223.
	The urban heart of the town retains much early fabric including the late 14th Century castle and overlies of the Roman Road from Brougham to Carlisle. In some areas surrounding the town there are early field patterns that still exist.
	Given the significant number of designated and undesignated heritage assets in this area, the potential for archaeological remains is considered quite high in this location.
	The historic environment in Penrith (and Eden as a whole) makes a significant contribution to its unique character and identity and also its attractiveness as a place to live work and visit. This needs to be reinforced through strategic policies in the Plan. This section/the Plan lacks and

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		strategy/strategic policy for the historic environment in Penrith, with most of the Town Plan policies putting forward a preference for development without any strategy (polices) for its conservation and enhancement of its historic environment.
		It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and neighbourhood plans are only required to be in general conformity with the strategic policies of the Plan.
		The Plan should be amended to ensure that there is a positive strategy to demonstrate how the Plan will conserve and enhance the historic environment, heritage assets and their setting and ensure that development has regard to local character, identity and distinctiveness. In this section, in relation to Penrith.
3.8 to 3.11.1	1	Historic England: The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives. The NPPF requires that Plans should contain strategic policies to deliver the
		contain strategic policies to deliver the conservation and enhancement of the historic environment and as a guide how the presumption in favour of sustainable development should be applied locally (Para 15).
		The Local Plan is considered to be unsound as it fails to meet the requirements of the NPPF and primary legislation regarding these issues.
		Alston is an important market centre

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		with origins in the medieval period. The density and distribution of heritage assets within the town, both designated and undesignated, underscore the significance of the historic environment and the surrounding landscape. A recent programme of investigation undertaken by English Heritage (part published as booklet in the 'Informed Conservation' series - Alston Moor) underscores the significance of a range of assets within the town, and on its periphery: these places are very sensitive to change.
		There are a significant number of designated and undesignated heritage assets in the town and the potential for archaeological remains that may potentially meet the criteria for national designation is considered quite high in this location.
		The Plan lacks any strategy/strategic policy for the historic environment in Alston, with the Town Plan Policies putting forward a preference for development without any strategy (policies) for its conservation and enhancement of its historic environment.
		It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and neighbourhood plans are only required to be in general conformity with the strategic policies if the Plan.
		The Plan should be amended to ensure that there is a positive strategy to demonstrate how the Plan will conserve and enhance the historic environment, heritage assets and their setting and ensure that development ha regard to local character, identity and distinctiveness.

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	TI NEEDS III III II
3.12 to 3.14	1	The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.
		The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and as a guide how the presumption in favour of sustainable development should be applied locally (Para 15).
		The Local Plan is considered to be unsound as it fails to meet the requirements of the NPPF and primary legislation regarding these issues.
		The Plan as a whole does not contain a positive strategy for the historic environment.
		Appleby is a historic settlement, first mentioned in 1130 as a castle site. The historic core of the town, to the north of the castle, retains its medieval morphology despite the expansion to the west, and east across the river. The area surrounding the town has a medieval field system.
		There are a number of designated and undesignated heritage assets in the town and potential for archaeological remains that may potentially meet the criteria for national designation is considered quite high in this location.
		This section lacks any strategy/strategic policy for the historic environment in Appleby, with Town Plan Policies putting forward a preference for development without any strategy (policies) to conserve and enhance its historic environment.
		It is vital to include strategic policies

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and neighbourhood plans are only requited to be in general conformity with the strategic policies of the Plan.
		The Plan should be amended to ensure that there is a positive strategy to demonstrate how the Plan will conserve and enhance the historic environment, heritage assets and their setting and ensure that development ha regard to local character, identity and distinctiveness.
2.42.2	4	In this section, in relation to Appleby.
3.12.2	1	Cumbria County Council:
		Replace "Cumbria Cycleway "with "Lakes and Dales Loop Cycle Route" The revised route/name was opened in October 2015. Replace anywhere else Cumbria Cycleway appears in document
3.15 to 3.17	1	Kirkby Stephen Town Council:
		Section 3.15. Town Plan for Kirkby Stephen. Although the Town Council accepts that its 'Town Plan' has no statutory force it would have been a courtesy, and in keeping with the principle of localism, for Eden District Council to have acknowledged that Kirkby Stephen Town Council had consulted widely and drawn up proposals which had been helpful to the compilers of the Local Plan.
		Paragraph 3.15.3 will need adjustment following confirmation of the National Park extensions. From 1 August 2016 Kirkby Stephen will have designated Protected Landscapes all around it to east, south and west and parts of the town will be within the YDNP.
		Paragraph 3.16.1 needs re-wording to make it clear that the Park "is to be

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	extended towards the town."
		Paragraph 3.17 New Homes - Policy KS1 mentions 188 new homes whereas 198 unallocated to site are mentioned on page 24. This needs clarification.
		Historic England:
		The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.
		The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and as a guide how the presumption in favour of sustainable development should be applied locally (Para 15).
		The Local Plan is considered to be unsound as it fails to meet the requirements of the NPPF and primary legislation regarding these issues.
		The Plan as a whole does not contain a positive strategy for the historic environment.
		Kirkby Stephen is a historic market town, first mentioned in 1094, possibly in association with an early ecclesiastical centre. The town still retains its medieval character dominated by a wide, and now (largely) infilled market, and the church is set within a well-defined enclosure. The medieval urban morphology can still be seen and an earlier landscape of fields is evident too. These comprise strip-like enclosures extending away from the 'urban' area - these may well be of a medieval date.

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		There are a number of designated and undesignated heritage assets in the town and potential for archaeological remains that may potentially meet the criteria for national designation is considered quite high in this location.
		The Plan lacks any strategy/strategic policy for the historic environment with the Town Plan Policies putting forward a preference for development without any strategy (policies) to conserve and enhance its historic environment.
		It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and neighbourhood plans are only requited to be in general conformity with the strategic policies of the Plan.
		The Plan should be amended to ensure that there is a positive strategy to demonstrate how the Plan will conserve and enhance the historic environment, heritage assets and their setting and ensure that development has regard to local character, identity and distinctiveness.
3.18 to 3.22.2	1	In this section, in relation to Kirkby Stephen. Historic England:
		The NPPF requires that Plan policies contain a positive strategy for the conservation and enhancement of the historic environment. The historic environment should be considered in delivering a number of other planning objectives.
		The NPPF requires that Plans should contain strategic policies to deliver the conservation and enhancement of the historic environment and as a guide how the presumption in favour of

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	
		sustainable development should be applied locally (Para 15).
		The Local Plan is considered to be unsound as it fails to meet the requirements of the NPPF and primary legislation regarding these issues.
		The Plan as a whole does not contain a positive strategy for the historic environment.
		This section lacks any strategy/strategic policy for the historic environment in the rural areas, with the policies relating to individual buildings only, without any strategy (policies) for conservation and enhancement of its historic environment.
		It is vital to include strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and neighbourhood plans are only requited to be in general conformity with the strategic policies of the Plan.
		The plan should be amended to ensure that there is a positive strategy to demonstrate how the plan will conserve and enhance the historic environment, heritage assets and their setting and ensure that development has regard to local character, identity and distinctiveness. In this section, in relation to the significant rural environment in Eden.
3.2.5	1	Story Homes do not support the approach to the 'Contingency Mechanisms', namely the inclusion of a reserve site which they feel should be allocated.
3.2.6	1	Story Homes consider this to be "ambiguous as there is discrepancy about what may be considered to be small and larger scale".

Policy/Policies/Paragraphs	Number of	Summary of Comments
4.2.2	respondents	Completic County County
4.3.2	1	Cumbria County Council:
4.3.4	1	Schedule 3 of Flood and Water Management Act 2010 was not enacted. In April 2015 regulations were put in place that requires the Lead Local Flood Authority (CCC) to be a statutory consultee for major applications. At the current time the County Council are not required to act as a SAB. Cumbria County Council:
7.5.7	'	
		Amend to read "This policy aims to put in place safeguards to ensure new development will not compromise existing water supply or flood defences, and avoid development which would be at risk from flooding or increase flood risk outside the site.
4.4.1	1	Cumbria County Council:
		Delete sentences "Area Transport Plans (ATPs) are developed and maintained for each district. The ATP's identify improvements needed to meet strategic and local needs. They will be updated to incorporate transport improvements identified as necessary to enable development and developments will be required to contribute to delivering those improvements". The proposal for ATP's was dropped.
4.4.4	1	Cumbria County Council:
		Delete the paragraphs the guidelines set out in Appendix 4 are no longer used and the replacement ones are too detailed to include.
4.5.1	1	Suggestion - that the following should have been reflected in the Plan:
		 the need for town centre regeneration and pedestrianisation, empty shops in the town centre and the threat from approved retail developments on the edge of the town, concern over reduction in rail and bus services which means that

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	face would go to transcrate
		 few would see transport as a strength. development and enhancement of key cycle routes, the potential to develop a railway from Penrith to the West Coast using the route of the old Penrith to Keswick Railway. This would provide a valuable addition to the local infrastructure as well as having wider economic benefits (employment/skills development).
		Comment from Penrith Town Council that the Local Plan fails to record that it would incorporate the findings of the current consultation with the business, resident and visitor communities via the Community Plan. To date the consultation has identified the communities priorities are town centre re-generation and pedestrianisation, empty shops, concern over bus links reduction, development of key cycle routes, reinstatement of the Penrith to Keswick Railway, development of youth facilities, employment/skills development and opportunities for youth sport.
4.5.3	1	 Suggestion - that the following should have been reflected in the Plan: the need for town centre regeneration and pedestrianisation, empty shops in the town centre and the threat from approved retail developments on the edge of the town, concern over reduction in rail and bus services which means that few would see transport as a strength, development and enhancement of key cycle routes, the potential to develop a railway from Penrith to the West Coast using the route of the old Penrith to Keswick Railway. This would provide a valuable addition to the

Policy/Policies/Paragraphs	Number of	Summary of Comments
	respondents	local infrastructure as well as having wider economic benefits (employment/skills development).
		Comment from Penrith Town Council that the Local Plan fails to record that it would incorporate the findings of the current consultation with the business, resident and visitor communities via the Community Plan. To date the consultation has identified the communities priorities are town centre re-generation and pedestrianisation, empty shops, concern over bus links reduction, development of key cycle routes, reinstatement of the Penrith to Keswick Railway, development of youth facilities, employment/skills development and opportunities for youth sport.
4.5.4	2	There are serious problems with medical recruitment, not only to GP surgeries but also to medical posts within our hospitals.
		I would like the council to liaise with the appropriate NHS representatives to determine how the additional burden on the health service the proposed expansion of the population will undoubtedly cause, is to be absorbed, especially given that there appears to be no solution to the recruitment problems within key hospital departments at this current time.
		How does the council propose to ensure that the best interests of both the current population and the expected incomers are protected, with respect to access to health care?
		National Trust has raised concern that there is no mention of the historic environment or the public realm.
4.29.5	1	The National Trust support the principle adopted, but consider that there are some significant matters that need to be addressed. They

Policy/Policies/Paragraphs	Number of respondents	Summary of Comments
		suggest that the wording of the policy is unclear and suggest some amendments to the policy wording.
Appendix 4	1	Cumbria County Council: Delete Appendix 4 as the guidelines set out are no longer used and the replacement ones are too detailed to include. Attach DfT Threshold

Specific Comments on the Plan - Policies

- 7.1 This section will consider the responses received which relate to a specific policies or policies.
- 7.2 Undoubtedly, the policy which received the most responses (43) was Policy LS1 Locational Strategy. Of these responses, 31 comments were received on the inclusion of Sockbridge and Tirril as a Key Hub.
- 7.3 The table below provides a detailed summary of the comments received on each policy:

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
Policy LS1	43	The main source of comments (28) was objections to the inclusion of Sockbridge and Tirril being classed as a 'key hub' and as such being possibly suitable for new housing appropriate to the scale of the village. Various reasons were put forward with the three main areas covered being:
		 The village shop does not contain sufficient good or services to be classified as a shop (this is one of the services that we have used to help define hubs)
		 Sockbridge and Tirril should be classed as two villages rather than one, and this would remove justification for inclusion.
		 Inclusion would be against the wishes of local residents. An informal referendum was undertaken across Sockbridge and Tirril by the local Member, this yielded a result of 208 people opposing key hub status with 56 for, on the basis of a 75% turn out.
		Two representations supported the inclusion of Sockbridge and Tirril as a key hub.
		One comment was received objecting the

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	induction of Dallace and Kenthalia
		inclusion of Bolton as a Key Hub.
		One comment was received supporting the inclusion of Great Salkeld as a key hub.
		Four comments were made objecting to the inclusion of a 10% limit on new development on individual sites in the Key hubs. Two were from the Home Builders Federation and Story Homes. Two comments was made objecting to the inclusion of a 10% limit on the basis that this would lead to excessive development in villages, and that Penrith should take 60% of new development rather than the suggested 50%.
		One comment was made by Story Homes suggesting that there should be 13 rather than 28 key hubs based on villages having six services or more. This method would mean the following areas being designated as hubs Alston, Armathwaite, Brough/Church Brough, Greystoke, Kirkby Thore, Langwathby, Lazonby, Kirkoswald, Orton, Shap, Skelton, Stainton and Tebay.
		One comment was received requesting clarification on whether one or both bullet points in the policy needed to apply.
		One comment was received suggesting that some market-led housing should be permitted in smaller villages.
		One comment, attributed to Policy LS1 covers issues relating to information to be included about Penrith, so is included under Policy PEN1.
		One comment was made by the County Council stating that the spatial strategy adheres to the Cumbria sub-regional spatial strategy. The County Council also raised concern about the lack of allocations within Key Hubs as they consider that this approach to the delivery of development could create uncertainty about where development may emerge and how the infrastructure implications of this can be accounted for. They do not consider this to be in line with the principle of the 'Plan-Led' system and does not provide certainty to landowners, developers, local communities and service and infrastructure providers.
Policy LS2	13	Six substantive objections were received arguing the housing target of 200 homes per year is too low and needs to be recalculated (Home Builders

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	Fodoroffor Dorlor Million and L. L. C. C.
		Federation, Barton Willmore on behalf of Story Homes, North Associates, North Associates on behalf of Messrs Buckle and Associates, Taylor Hardy and the Church Commissioners).
		The main points of contention are:
		 The Plan is contrary to the NPPF as it does not seek to significantly boost housing supply
		 A 'buffer' of sites should be included over and above the plan requirement to counteract under-delivery
		 Further allocations need to be made as existing allocations may receive permission and be built out before the plan is adopted.
		The target is insufficient to meet projected employment growth
		 Housing land supply does not take into account sufficient backlog i.e. under delivery.
		 New household projections are suppressed due to lessened household formation due to effects of recession and the plan does not make an allowance for a fall in migration rates to the district. Dependent children may also increasingly stay in the area.
		 The 2012 population projections should be run through the POPGROUP model and in particular the longer term ten year migration trend scenario.
		 Market signals indicate there should be an uplift in numbers, in particular in terms of past under delivery and affordability. An uplift of 20% should be applied above current household projections.
		The amount of market housing planned will not allow 30% of houses to be affordable – past performance is 21%
		 There is no accounting for demolitions in the table at LS2, nor for non-delivery, a buffer should therefore be included.
		The housing target should take more

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
		account of the POPGROUP jobs based figure, because those attracted to work in the area are more likely to be younger and have children who may then need housing in the future
		One comment was received objecting to the lack of housing allocation in key hubs, that the numbers envisaged for key hubs is inadequate and that a site in Great Salkeld should be allocated.
		One comment (on behalf of the Church Commissioners) states that development should not be restricted to Penrith or the market towns only and that some market housing should be allowed in smaller villages.
		One comment was received from Taylor and Hardy objecting the low level of housing suggested for Key Hubs, the lack of allocations and asking for a site at the location of the former Ostrich Farm in Langwathby to be allocated.
		One comment was received that the housing target should formulated on a bottom up approach rather than a top down one, in consultation with individual communities and that the figure bears no relation to past achievements.
		One comment was received objecting to the quantum of development envisaged for Penrith and the impact this may have on the cultural identity of the town.
Policy PEN1	3	One comments from Messrs Buckle supports the inclusion of site N3 (Raiselands) but objects to the non-allocation of land to the north.
		Cumbria County Council supports the inclusion of the Policy.
		Story Homes support the allocation of Sites N1 and N3, however they raised a number of objections:
		 The number of units to be delivered on sites E1 and E3 – they consider these to be overestimated.
		 The inclusion of Site P61 which is located in Flood Zone 2.
		 The phasing included within the

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
		policy/table.
		 The exclusion of N1a, and its associated release mechanism.
Policy PEN2	3	United Utilities comment that the delivery of large site will need to be subject to conditions to ensure it is built in phases and suggest alternative text.
		Schemes within Source Protection zones will also need to demonstrate how it can dispose of foul and surface water in a way that mitigates any potential risk.
		Story Homes do not consider it to be positively prepared, and suggest that it will prevent planning applications advancing and can significantly delay proposed allocated sites.
		Natural England have suggested the following modification:
		"The Habitats Regulation Assessment work underpinning this plan has identified that housing sites E1-E4 together with employment site MPC have the potential to cause adverse impacts on the quality of the River Eden, which has European status as both a Site of Special Scientific Interest and a Special Area of Conservation. Adequate policy safeguards exist in this plan to avoid or mitigate impacts (principally through Policy ENV1). It is imperative that these safeguards are properly implemented at the design and construction stage. Any applications for development will therefore be expected to incorporate measures to ensure there is no impact. In particular this will include the inclusion of sustainable drainage systems to avoid run off of surface water into the river."
Policy PEN3	1	Cumbria County Council comment that employment development at Newton Rigg is supported, however transport impact will need to be carefully considered.
Policy AL1	1	Story Homes object to the inclusion of Alston as a Market Town. They also question the deliverability of the housing sites, namely AL1 which was allocated in the 1996 Eden Local Plan.
Policy AL2	0	No comments have been made on this policy.
Policy AP1	1	Story Homes support the policy approach, and conclude that development should be supported in this Market Town.

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
Policy KS1	3	The Town Council comment that the housing allocations have changed since the last draft, causing some concern. KS13 is better served in terms of accessibility, KS18 is difficult in terms of access and could aggravate existing traffic problems. 15 dwellings would be more appropriate, with 90 going on KS13. There is concern that phasing leads to greater density of housing in the second phase. There is a discrepancy between figures in Policy LS2 and as part of KS1.
		One comment from a agent saying that sites KS11, 9 and part of 22 represent a better housing allocation strategy for the town.
		Story Homes support the policy approach, and conclude that development should be supported in this Market Town.
Policy RUR1	0	
Policy RUR2	1	The Church Commissioners have commented that this policy is considered to be too onerous in parts. Whilst we do support the reuse of existing buildings in rural areas to alternative viable uses, as this recognises paragraph 55 of the NPPF, it is considered that criterion 6 and 7 are overly onerous and therefore amendments should be made to the policy prior to it being found sound. They have also highlighted a discrepancy between the policy title and other references to the policy.
Policy RUR3	0	No comments have been made on this policy.
Policy DEV1	3	Story Homes supports in general the principle of sustainable development, but object to the wording of this policy.
		A further comment received considers the text to be too onerous and should entirely reflect the model wording suggested by the Planning Inspectorate.
		A suggestion has been received from the Coal Authority which suggests that its responsibilities as a consultee should be mentioned in supporting text.
Policy DEV2	3	A comment was requesting that the policy should not allow discharge to a public combined sewer. This response referred to specific local circumstances - there is flooding at Thorpe near Sockbridge, further development will exacerbate

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	Ale: a
		this. United Utilities recommend that the text is clarified to avoid confusion and reflect the requirements set out in the explanation within the policy itself. Story Homes have commented, supporting the
		inclusion of a policy, but suggests the wording of the policy requires further clarification.
Policy DEV3	3	One objection was lodged by the Church Commissioners on the grounds that in a rural district such as Eden it is too onerous to require that new development should be close to public transport, and new development can support or create demand for public transport in rural areas.
		One comment was made by the County Council asking that the policy advises that major transport schemes will need to be accompanied by a Transport Assessment or Statement. Consideration should also be given to rights of way when planning new development, including appropriate diversions.
		A further comment was received from Story Homes who do not consider the policy to be NPPF compliant, particularly in relation to the need to ensure that developments which will generate significant amounts of travel will be minimised (Para. 34).
DEV4	7	A similar transport assessment to the one for Penrith should be done for the rest of Eden and in particular Kirkby Stephen. New development should incorporate off road parking. The highway authority has not provided new infrastructure and section 106 agreements are unlikely to generate sufficient funds for necessary infrastructure.
		One comment was received regarding the existing access to the villages of Sockbridge and Tirril - "there is a narrow chicane at the eastern entrance to Tirril village, construction of housing estates will worsen the problem".
		United Utilities comment that the delivery of large site will need to be subject to conditions to ensure it is built in phases.
		The Penrith Partnership and Penrith Town Council both comment that plans are not co-ordinated and the proposal is that housing will be built in advance of infrastructure being in place which will

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	ware on everlity of life for eviction registers
		worsen quality of life for existing residents.
		Cumbria County Council comment that the list of possible requirements in supporting text should be within the policy itself, that policy should state that the list is not exhaustive and that work on a Community Infrastructure Levy should commence.
		Story Homes object to the policy in its current form on the basis that the policy is unclear what level of contribution may be required. They consider the policy to be unjust. They also comment that there is ambiguity between EDC's planning obligations, CCC planning obligation and their future relationship between CIL and the Infrastructure Delivery Plan
DEV5	4	The Church Commissioners comment that the use of 'Building for Life' is unnecessary as Building Regulations cover such issues. Suggesting that the use of such wording could quickly make the policy out of date.
		The Home Builders Federation is supportive of Building for Life but consider that it should not be a mandatory requirement and that the requirement to score above average is unhelpful. The scheme should be used in discussion but not as a target.
		Story Homes consider the inclusion of the 'Building for Life' traffic light system as being contrary to the NPPF which seeks to ensure that design policies avoid unnecessary prescription and detail.
		Historic England suggest the inclusion of an additional bullet point which would read:
		"Conserve and enhance the historic environment, heritage assets and their setting".
HS1	5	Garner Planning Associates commented that the threshold for contributions should be 11 or more units. Delivery not good, small builders reluctant to contribute – evidence from South Lakeland shows small sites do not deliver. EDC should round down contributions where it does not equate precisely to the whole number of units.
		The Church Commissioners consider that methods of calculation should be included within the policy. Discounted housing should be

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	II
		discounted at 20%, and affordable housing should not be kept affordable in perpetuity. The locality 'cascade' should be included in the policy.
		The Home Builders Federation is considered unsound as it is not based on evidence. Evidence is incomplete and out of date. There are concerns over viability and cumulative impact of contributions. Affordable housing development at Alston is unviable. The policy should reflect national policy changes on starter homes.
		Cumbria County Council considers that the need to secure extra care housing should be included in the policy.
		Story Homes accepts the need for affordable housing provision, and supports the inclusion of a degree of flexibility over the amount of provision when supported by an appropriate financial viability assessment. They add that the target of 30% should be based on the most up to date evidence to ensure conformity with the NPPF.
HS2	3	Garner Planning Associates comment that smaller schemes which may be expected to make a contribution for affordable housing plus the imposition of local occupancy clauses will render schemes unviable. South Lakeland unsuccessfully tried to introduce a local occupancy requirement.
		The Home Builders Federation comment that the policy is unsound as it is not justified or consistent with national policy. The policy identifies an arbitrary size threshold for dwellings. The lack of local occupancy criteria should be extended to other sites.
		Story Homes object to this policy; they do not consider it to be practically possible through Policy HS2 to deliver 10% of the growth required to be met through small villages and hamlets as it is restrictive and limited to infilling and rounding off the current village settlement pattern and floorspace.
HS3	1	Historic England commented on this policy recommending and amendment to bullet point 6:
		" on local landscape, heritage assets and their setting or"
HS4	3	The Home Builders Federation considers the policy ineffective and inconsistent with paragraph

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	FO CH NEET A CHI WALLE OF THE COLUMN AND A CHI WALLE OF THE CHI WALLE OF T
		50 of the NPPF. A further criterion should added covering 'current market conditions and viability'
		Story Homes supports the need for a mix of dwelling types and sizes to be provided, and supports the evidence based approach which informs this including the need to utilise up to date housing needs surveys.
		Durham County Council supports this policy and the SHMA – agreeing that our housing market area is self-contained within Eden.
HS5	3	The Home Builders Federation considers the policy unsound as it is not supported by evidence. The viability of additional standards has not been proven.
		Cumbria County Council considers that the need to secure extra care housing should be included in policy.
		Story Homes commented on the policy stating that:
		"All of Story Homes RSL house types are compliant with M4 (2) Category 2 implemented in October 2015. Whilst it is their future intention to do so for all house types, compliance with M4 (2) Category 2 is not required in building regulation terms, only in planning terms. Therefore any requirement to provide more than 20% would be onerous and create discrepancies between planning policy and building standards"
HS6	0	No comments have been made on this policy.
HS7	2	Durham County Council have no objection to the policy.
		Historic England commented that The plan needs to be amended to ensure that it reflects the wording of the NPPF to ensure that development does not harm heritage assets and their settings.
		Bullet 5 of the policy should be amended to read:
		"the development would not harm the natural or historic assets and their setting of the district"
EC1	4	PFK Planning comment that the plan should identify the Auction Mart site at Skirsgill and land at Stoneybeck for employment development.
		Cumbria County Council comment that employment development at Newton Rigg is supported, however transport impact will need to

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	be carefully canadarad
		be carefully considered. Story Homes do not object to the policy, but have commented that the allocated figure of 24.38ha is substantially less than the 50ha required under Core Strategy Policy CS13. They suggest that this appears to be contrary to Objective 9 of the Submission Draft Local plan.
		Durham County Council has confirmed that from a locational perspective the key strategic development areas in County Durham for industrial/business development are the A1 and A19 corridors and Durham City. Given the geographical extent of the areas indicated in the Eden LP Durham County Council therefore sees no potential conflict with regards to in this aspect of the document.
EC2	1	Story Homes consider this policy to be inconsistent with the NPPF and unjust in its current form as paragraph 22 of the NPPF seeks to ensure that:
		"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose".
EC3 EC4	1	No comments have been made on this policy. Historic England have commented on the policy stating that the policy does not consider the impact on the historic environment and local character only landscape setting. They have requested an additional bullet point which would read: • "Development should not cause harm to local amenity, landscape, ecology, the historic environment or other environmental considerations".
EC5	2	Natural England comment that Areas of Special Control (for advertising) should be mentioned. Cumbria County Council recommend that 'of road
		safety' should be added to the end of the first paragraph.
EC6	1	Cumbria County Council recommend that a fourth bullet point reading 'not detrimental to road safety' should be added.
EC7	0	No comments have been made on this policy.
ENV1	1	The National Trust support the policy.

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	The Netternal Tweet are asset 10 to 10
ENV2	3	The National Trust recommends that the policy is reworded: "Development should contribute to {REMOVE - the creation} landscape enhancement including the provision of new trees and hedgerows of appropriate species in suitable locations {REMOVE - where possible}."
ENV3	3	The National Trust support the policy.
		The North Pennines AONB partnership state that the policy needs to refer to development affecting the AONB as well as within and that at point 3 (part a) there needs to be a reference to the North Pennines AONB Planning and Building Design Guidelines. At part b, the points should sensibly reflect the more detailed wording of the NPPF.
ENV4	2	A further comment expressed concern over the potential loos of open spaces in Tirril. The National Trust support the policy.
ENV5	3	One further comment that a greenfield site will be lost behind Tirril Village hall if filled with houses, the impact of housing estates needs to be discussed with the National Park in this area.
ENV5	3	The National Trust support the policy.
		The Home Builder's Federation comment that point 4 (integrating renewable energy into schemes) is now unsound as this is now done through national standards.
		Story Homes object to the inclusion of SUDs as part of this policy, including this as a policy requirement can impact on the viability of the development, in terms of market and affordable housing.
ENV6	9	One comment from the North Pennines AONB Partnership states that the suitable areas map is redrawn to take account of the impact of turbines on the AONB where they do not lie within the AONB itself.
		One comment states that little or no consultation has been carried out in respect of the suitable areas designation and that identification of an area will place pressure on that area. There is a difference between dynamic and static structures. The use of an 800m 'buffer' contradicts the suitable areas map. A larger area covering everything between the National park and AONB boundaries would be a preferable option.

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
		Kirkby Thore Parish Council considers that the suitable areas map has not been subject to sufficient consultation and identifies suitable areas within the AONB.
		The National Trust consider that the criteria as set out are not clear on which refer to wind energy and which to other forms of development and suggest amendments. Greater care is also needed round the wording of 'suitable areas' as it does not take account of, for example heritage assets or the historic environment or other criteria listed in the policy.
		A further comment receives quotes policy ENV6; however the text alongside it would appear to refer to a different policy.
		Durham County Council commented that:
		"The identification of suitable areas for wind energy development would be unlikely to have any significant effects in County Durham. However as a partner in the North Pennines AONB partnership the County Council would observe that development in the areas identified as suitable could in some cases lead to significant effects on views of or from the AONB".
		Historic England recommend that bullet point 2 be amended to read:
		 "Proposals should reflect the form of the built environment, including settlement character. Proposals should not harm heritage assets and their setting".
		A further comment on this policy is that it identifies an area suitable for medium/small development. "Whilst this is better than the continual threats of local large scale developments we are very vocal locally in our majority opposition to the siting of even smaller developments locally. The fact that a number of single turbine applications have been approved locally is disturbing as we are suffering "death by a thousand cuts" rather than from one enormous development. My understanding is that these developments should not go ahead without community involvement and agreement, which is certainly not the case in our area".
ENV7	0	No comments have been made on this policy.
ENV8	1	The Coal Authority are disappointed that a

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
		previous comment was not acted on in respect of this policy, however changes to Policy DEV1 addresses these concerns.
ENV9	2	North Pennines AONB Partnership state that dark skies should be referenced in policy, and suggest amendments.
		One comment is made in relation to the possible dumping of sewage into the Lady Beck at Tirril should new development take place.
ENV10	4	One comment that the plan does not adequately address conservation issues – Kirkby Stephen has not had an updated character appraisal. The plan should provide a framework for this to be done.
		One comment made that Roman sites around the Sockbridge and Tirril area are a serious threat to the stability of properties built over them and that building over functioning Roman aqueducts has caused problems to existing properties.
		The National Trust support the policy.
		English Heritage object to the proposed policy stating that it provides little protection to the District's historic environment, suggesting that "the plan needs to be rewritten to provide sufficient detailed guidance to enable those proposing schemes to determine the level of success where it is likely to affect the different elements of the historic environment, heritage assets and their setting".
COM1	1	The Theatres Trust has commented that policy COM1 should also refer to cultural facilities.
COM2	2	The Theatres Trust has commented that policy COM2 should also refer to cultural facilities.
		One comment received that the criteria in Policy COM2 are less stringent than those in Policy CS24 of the Core Strategy.
COM3	0	No comments have been made on this policy.
COM4	0	No comments have been made on this policy.

Specific Comments on the Plan - Allocated Sites

Sites	Number of	Comments
	Respondents	
Penrith		
E1 – Carleton	2	United Utilities state that the site lies within a Source Protection Zone. The preference of UU and the Environment Agency is that alternative sites are strongly preferable. However if schemes are progressed they will need to incorporate the highest quality pipework and sewerage systems.
E3 – Carleton (Longacres)	2	The County Council point out the existence of a footpath adjacent to the site. The County Council point out the existence of a footpath within the site.
		Story Homes support the allocation of this site, it is considered that circa 280 - 300 dwellings could be achieved on the Site overall due to the topography constraints and need for sensitive loose landform towards the southern eastern edge. They consider the site to be suitable, available and deliverable in the short term and should be included as a deliverable, allocated Site within the proposed plan in 0 - 5 years.
E4 – Land at Carleton Hall Farm	1	Cumbria County Council confirmed that there are no recorded public rights of way exist within the vicinity of E4.
N1 – Salkeld Road/Fairhill	3	United Utilities state that the site lies within a Source Protection Zone (see comment on site E1)
		Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of N1.
		Story Homes support the allocation of this site, commenting that "in terms of delivery, it is envisaged that following the grant of planning permission, first on-site completions will take place in January 2017, and the Site will be developed at a rate of 30 - 35 dpa, and completed in 3 years. This differs from the table which accompanies Policy PEN1 on the basis that it is envisaged that the Site will not be completed until end of 2024, with 50 dwellings delivered in the plan period 2018 - 2020. As such, we continue to support the proposed allocation, on the basis the Site is suitable, available and deliverable in the short term and capable of development".

Sites	Number of	Comments
	Respondents	
N2 – White Ox Farm	•	United Utilities state that the site lies within a Source Protection Zone (see comment on site E1).
		Cumbria County Council has confirmed that there are no recorded public rights of way within the vicinity of N2.
N3 - Raiselands	2	United Utilities state that the site lies within a Source Protection Zone (see comment on site E1)
		The County Council point out the existence of a footpath within the site and a bridleway within its vicinity.
Site P2 – Gilwilly Road	1	Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P2.
Site P8 – Myers Lane	1	The County Council point out the existence of a footpath adjacent to the site.
Site P61 – Garages at Roper Street	2	Story Homes also commented that the site has been discounted from the LAA on the basis that it is in Flood Zone 2. They therefore query why this is still included in the supply.
		Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P71.
P71 – Brent Road Garages	1	Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P71.
P93 – Barn and Yard, Brunswick Road	1	Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P93.
Site P94 – QEGS annex	2	One objection from Historic England on possible impact on the built environment, and requested that the site be deleted from the Plan.
		Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P94.
Site P115 – Car Park off Brentfield Way	1	Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of P115.
Site TC1 – Old London Road	1	Cumbria County Council has confirmed that there are no recorded public rights of way exist within the vicinity of TC1.
Site 2a – Gilwilly Industrial	1	Cumbria County Council have advised that public footpath Nos 358013 and 358029 exist within the site and public footpath No.258014 and public

Sites	Number of Respondents	Comments
Estate		bridleway No.358017 exist adjacent to it,
Site MPC -	0	No comments have been made on this site.
Skirsgill		
Appleby		
AP10 – Land to	1	Cumbria County Council has advised that there
South of		are no recorded public rights of way in the vicinity
Station Road		of the site.
AP11 – Fields	2	Cumbria County Council has advised that there
adj to the Coal Yard		are no recorded public rights of way in the vicinity of the site.
		Story Homes supports the inclusion of this site within the Local Plan. They consider the site to be suitable, available and deliverable in the short term (0 -5 years), and capable of delivering 90 dwellings.
Site 19 – Cross Croft Industrial Estate	1	Cumbria County Council has advised that there are no recorded public rights of way in the vicinity of the site.
Site 21 – The Old Creamery	1	Cumbria County Council has advised that public footpath No.303028 exists adjacent to the site.
Site 23 – Shire Hall	1	Cumbria County Council has advised that there are no recorded public rights of way in the vicinity of the site.
Alston		
AL1 – Jollybeard	2	Cumbria County Council has advised that public footpath No 302042 exists within the site.
Lane		Story Homes has commented that Site AL1 was included as a housing site within the 1996 Local Plan and has been retained as part of this proposed plan. However, if the site has not forward come to date, in nearly 20 years, they question its deliverability, considering as it is acknowledged within the site assessments as requiring traffic management issues. They also question the ability of the other sites being deliverable, particularly due to the landscape impact on the AONB and lack of developer appetite in this location.
AL11 – Land South of the Primary School	1	The County Council advised that public footpath No 302048 exists immediately adjacent to the site.
AL12 – High Mill	2	Historic England objects to the proposed allocation due to the failure of the Council to "identify the significance of the asset and the level of harm on the significance of the asset and if there is harm, how that can be mitigated". The recommend that the reference to the provision of

Sites	Number of Respondents	Comments
		6 dwellings be deleted from the Plan.
		The County Council has advised that public footpath Nos 302058 exists within the site and 302039 exists immediately adjacent to it.
AL13 – Land at Clitheroe		Cumbria County Council has advised that there are no recorded public rights of way in the vicinity of the site.
AL16 – Land adj to Primary School	1	Cumbria County Council has advised that public footpath Nos 302047 and 302048 exist immediately adjacent to the site.
24 – Skellgillside Workshops	1	Cumbria County Council has advised that there are no recorded public rights of way in the vicinity of the site.
26 – High Mill	0	No specific comments made on this site allocation, but please see comments for site AL12.
Kirkby Stephen		
KS13 – Land West of Faraday Road.	2	The Town Council comment that the housing allocations have changed since the last draft, causing some concern. KS13 is better served in terms of accessibility, KS18 is difficult in terms of access and could aggravate existing traffic problems. 15 dwellings would be more appropriate, with 90 going on KS13. There is concern that phasing leads to greater density of housing in the second phase.
KS15 – Land	1	Cumbria County Council has advised that public Footpath No.335016 exists adjacent to the site. Cumbria County Council has advised that public
adjacent to Croglam Lane		Footpath No.335008 exists adjacent to the site.
KS17 – Land behind Park Terrace	2	Cumbria County Council has advised that public Footpath No.335008 exists adjacent to the site. Story Homes has commented that they support its inclusion as an allocation within the emerging Local Plan. We consider that the Site is deliverable in 0-5 years.
KS18 – Land adjacent to Croglam Lane	3	The Town Council comment that the housing allocations have changed since the last draft, causing some concern. KS13 is better served in terms of accessibility, KS18 is difficult in terms of access and could aggravate existing traffic problems. 15 dwellings would be more appropriate, with 90 going on KS13. There is concern that phasing leads to greater density of housing in the second phase.

Sites	Number of Respondents	Comments
		Cumbria County Council has advised that there are no recorded public rights of way in the vicinity of the site.
		One objection from Historic England on possible impact on the Built Environment. They have raised concerns about the suggested mitigation methods and whether they are achievable and also whether the proposed density of development - 35 dwellings can be achieved on site.

Specific Comments on the Plan - Other Sites (Non-Allocated)

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
Penrith		
13 – PFK Auction Mart	1	PFK Planning has submitted a detailed representation with the suggestion that the site should be allocated and earmarked for potential inward investment employment site. They consider that this amendment would "reflect the positive approach advocated in the NPPF and make more likely the realisation of the Vision for Penrith set out in the Submission Draft of the Local Plan".
42 – Land at Kemplay Bank	1	Cumbria County Council has questioned the decision not to allocate this site, commenting that "the sites have suitable access and are in one ownership ensuring that they can be easily delivered within the initial phase of the plan period. Kemplay Way, land to the south west of Penrith Fire Station. The site offers a suitable opportunity to provide an up to 2 acres of deliverable employment land".
No Ref – Land at Stoneybeck	1	PFK Planning has submitted a detailed representation with the suggestion that the site should be reserved as a future Auction Mart and rural business hub site. They consider that this amendment would "reflect the positive approach advocated in the NPPF and make more likely the realisation of the Vision for Penrith set out in the Submission Draft of the Local Plan".
N1a – Reserve Site	3	Story Homes have commented that Site N1a should be included as an allocated site, rather than as a "Reserve/Contingency Site" as it is deliverable within the plan period, and is required to help achieve EDC's housing land

Policy/Policies	Number of	Summary of Comments	
/Paragraphs	respondents		
		requirements in the plan period.	
		United Utilities state that the site lies within a Source Protection Zone. The preference of UU and the Environment Agency is that alternative sites are strongly preferable. However if schemes are progressed they will need to incorporate the highest quality pipework and sewerage systems.	
		Cumbria County Council has confirmed that no recorded public rights of way exist in the vicinity.	
N4 – Field adj Raiselands Greenfield Extension	1	One comment has been received objecting to the exclusion of the land to the north of Site N3. They confirm that the site is available and deliverable, and consider that it should be included as an allocated site.	
E2 – Carleton Hill Farm/Vets	1	Cumbria County Council has confirmed that no recorded public rights of way exist within the vicinity of E2.	
P101 – Land at Pategill	1	Cumbria County Council has confirmed that no recorded public rights of way exist within the vicinity of P101.	
P118 – Land at Tynefield Drive	1	Cumbria County Council has questioned the decision not to allocate Site P118, commenting that the site is an infill site with the potential to accommodate between 10 and 12 dwellings.	
Alston		go.	
AL4 – Bruntley Meadows	1	Cumbria County Council has advised that public footpath Nos 302045 and 302047 exist immediately adjacent to the site.	
AL5 – Raise Bank	1	Cumbria County Council has advised that public footpath Nos 302045 and 302046 exist immediately adjacent to the site.	
29 – Bonds Factory	1	Cumbria County Council has confirmed that no recorded public rights of way exist within the vicinity of the site.	
Appleby	Ι.		
No Ref – Appleby Cemetery Extension	1	Cumbria County Council has confirmed that no recorded public rights of way exist within the vicinity of the site.	
Kirkby Stephen			
KS3 – South Road/ Whitehouse Farm	1	Cumbria County Council has confirmed that no recorded public rights of way exist within the vicinity of the site.	
KS7 – Mark John Motors	1	Cumbria County Council has advised that public Footpath No.335020 exists adjacent to the site.	

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
KS9 – Field ad to the Crescent	1	One comment has been received which suggests the inclusion of KS9, they consider that it would be would be a more sensible arrangement for development in the town. They also add that these sites have all been accepted as developable within the various Local Plan assessments that have been undertaken and it is considered they would provide a suitable range of sites for the future development of the town.
KS11 – Land adj to Park Terrace	1	One comment has been received which suggests the inclusion of KS11, they consider that it would be would be a more sensible arrangement for development in the town. They also add that these sites have all been accepted as developable within the various Local Plan assessments that have been undertaken and it is considered they would provide a suitable range of sites for the future development of the town.
KS22 – Land at Mellbecks	1	One comment has been received which suggests the inclusion of KS22, they consider that it would be would be a more sensible arrangement for development in the town. They also add that these sites have all been accepted as developable within the various Local Plan assessments that have been undertaken and it is considered they would provide a suitable range of sites for the future development of the town.
KS26 – Land at Christian Head Centre	1	Cumbria County Council has questioned the decision not to allocate Site P118, commenting that the land to the rear Kirby Stephen Fire Station, Christian Head, could provide 5-10 units make an important contribution to housing target should the other allocation be unable to meet the requirement.
Key Hubs		The County Council reises concern chart the
No Ref – Brough Trading Estate	1	The County Council raises concern about the lack of allocations in the Key Hubs or Rural Areas (see comments on Policy LS1). They commented that this site could provide the opportunity to extend the existing employment site.
No Ref – Lazonby Highways Depot	1	The County Council raises concern about the lack of allocations in the Key Hubs or Rural Areas (see comments on Policy LS1). They commented that this site could provide suitable land for either residential or employment uses.
LCF4 – Land adj Cumberland	1	Story Homes submitted the following comments: "Outline planning permission for 61 dwellings

Policy/Policies	Number of	Summary of Comments
/Paragraphs	respondents	
Way (Clifton)		was obtained in April 2015. It is therefore considered that the site is suitable, available and achievable and should be included as an allocated site within Clifton as a Key Hub. The Site is therefore considered to be suitable, available and deliverable within 0 – 5 years."
LGSA10 –	1	One Comment received:
Townhead Farm (Great Salkeld)		"In order to address the failure of policy LS2 to allocate any land for new housing within Great Salkeld, the Council is requested to allocate the land at Townhead Farm, which is marked as parcels A and B on the accompanying plan. Parcel A is the subject of an outline planning application (14/1079) for 9no. dwellings. At the time of writing this representation, the requisite s106 agreement is being finalised. For the avoidance of doubt, both parcels A and B are within the ownership of our client and are deliverable within a 5-year period. Together, and without prejudice to the current application, the yield for A and B could be circa 15no. dwellings".
LGR5 – Land	1	Story Homes commented on this site, they
east of Howard Park (Greystoke)		consider that the site is suitable, available and deliverable in the short term as it is likely to come forward within the next 5 years. It should therefore be included as an allocated Key Hub site.
LKT9 – Land at Bridle Cottage (Kirkby Thore)	1	Kirkby Thore Parish Council raised objections to this site, stating that "the inclusion of LKT9 as a proposed development site is contrary to the stated objective of Eden District Council for the Rural Areas of Eden – 3.19.1 of the Eden Local Plan (Submission Version) states one of the objectives to be: "To protect and enhance their landscape setting and historic environment". LKT9 is immediately adjacent to a Scheduled Ancient Monument Site. Eden District Council have deemed this site as 'developable'".
LLG7 – Land adj Eden View (Langwathby)	1	Story Homes consider this site to be suitable for the delivery of between 15-20 homes. They believe that the issues identified in the Land Availability Assessment can be overcome.
LLG9 – Langwathby Hall Farm (Langwathby)	1	One comment has been received requesting that the Council allocate this site for development.

Policy/Policies /Paragraphs	Number of respondents	Summary of Comments
LTI1 – Field behind Old Post Office (Tirril)	•	One response received comments on flooding and water issues within the site. It also makes reference to the potential for archaeology on site (Roman Fort/Granary/Temple Site).
LTI2 – Land adj to Lady Beck (Tirril)	1	One response received comments on the potential landscape impacts of developing this site, it also comments on flooding and its archaeological potential.
LTI3 – Land South of Village Hall (Tirril)	1	One response received comments on the existing use of the site, as ancillary outside space for the adjacent village hall. It also comments on the historical origins of the site (Roman).

Comments on Supporting and Evidence Base Documents *Infrastructure Delivery Plan*

- 7.63 A total of 32 responses have been received in relation to the Infrastructure Delivery Plan.
- 7.64 The majority (25) of the comments received were submitted by Cumbria County Council. In their response they requested a number of specific changes to paragraphs and sections within the document. We have worked closely with Cumbria County Council on the production of the Infrastructure Delivery Plan.
- 7.65 United Utilities also submitted a request for changes to the wording of Paragraphs 86 and 90.
- 7.66 We received three responses from Penrith Town Council, The Penrith Partnership and Penrith Chamber for Trade and Commence. These organisations commented on a range of issues, mainly focussed around infrastructure provision in Penrith.
- 7.67 Penrith Town Council commented did not make any specific comments on the content of the IDP, but do consider the evidence base to be flawed. They also commented that the Council have failed to consider the current Community plan consultation, which considers amongst other thing, cycle routes, pedestrianisation, concern over bus reductions and the reinstatement of the Penrith to Keswick railway.
- 7.68 The Penrith Partnership raise concern that the 'Penrith Transport Improvements Study', which was completed in October 2015, has not been available for public consultation. They also raise the concern that the Plan is "front-loading housing development when the infrastructure is not yet in place to support it".
- 7.69 Penrith Chamber of Trade and Commerce raise concern that there is no mention of a possible rail link to the West Coast. It mentions recent growth in passenger numbers using Penrith Station and considers that a quicker low carbon transport link could bring many economic benefits.

- 7.70 One comment raises concern over the withdrawal (by Cumbria County Council) of bus subsidies in the area, and considers that the effects of these changes should be examined.
- 7.71 Historic England confirmed that they had no comments to make on the content of the document.

Sustainability Appraisal Report

- 7.72 A total of 9 representations were submitted, 8 of which were submitted by Historic England. The remaining response was submitted by The Coal Authority.
- 7.73 The Coal Authority commented that they welcome "the acknowledgement made within the Sustainability Appraisal to The Coal Authority's comments made at the Preferred Options stage and the subsequent amendment made to Policy DEV1. We therefore assume that all the site allocations for both housing and employment development have now been assessed against the defined Development High Risk Area".
- 7.74 Historic England made the following comments:

Policy/Site Allocation	Comments
Policy PEN1	We disagree with the SA score (neutral impact) that the sites proposed have considered the impacts on historical, archaeological and cultural issues. The Plan does not contain any strategic policies for the conservation and enhancement of the historic environment. The proposed allocations have not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at development stage.
Site P94	We disagree with the SA score (+/-). The proposed allocation has not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at development stage. Therefore, the Plan has not demonstrated that the site can be developed without harm to the historic environment.
Policy AL1	We disagree with the SA score (neutral impact). The Plan does not contain any strategic policies for the conservation and enhancement of the historic environment. The proposed allocations

Policy/Site Allocation	Comments
	have not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at the development stage.
Site AL12	We disagree with the SA score (+/+). The proposed allocation has not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay, puts forward detailed proposals for the site and the heritage assets and also assumes that any potential effects can be dealt with at development stage. Therefore, the Plan has not demonstrated that the site can be developed without harm to the historic environment.
Policy AP1	We disagree with the SA score (neutral impact). The Plan does not contain any strategic policies for the conservation and enhancement of the historic environment. The proposed allocations have not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at development stage.
Policy KS1	We disagree with the SA score (neutral impact). The Plan does not contain any strategic policies for the conservation and enhancement of the historic environment. The proposed allocations have not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at development stage.
Site KS18	We disagree with the SA score (N/-). The proposed allocation has not been accompanied by an adequate assessment of the impact the

Policy/Site Allocation	Comments
	allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and also assumes that any potential effects can be dealt with at development stage. Therefore, the Plan has not demonstrated that the site can be developed without harm to the historic environment.
Policy ENV10	We disagree with the SA score (neutral impact). The Plan does not contain any strategic policies for the conservation and enhancement of the historic environment. The proposed allocations have not been accompanied by an adequate assessment of the impact the allocation of the site will have on the historic environment, heritage assets and their significance and the impact that the proposed yield will have on its significance. It assumes that the principle is okay and that any potential effects can be dealt with at development stage.

Open Space Audit

- 7.75 Four representations were received in relation to the Open Space Audit.
- 7.76 The first response received highlights an error (a site in Greystoke) within the document which will be corrected.
- 7.77 One respondent provided additional information in relation to identified or missed sites within Kirkby Stephen. The Town Council also submitted a response drawing attention to errors contained within the document.
- 7.78 Cumbria County Council submitted a response which queried the inclusion of County Council owned sites within the Open Space Audit. They raised particular concern about the allocation of School Playing Fields commenting that "the County Council raises an objection to the allocation school playing fields as Public Open Space. School playing fields are integral to the school and could present an opportunity for a school to be extended to meet changing curriculum needs. A designation of public open space on school playing fields will restrict such development and hamper the operational use of a school".

Duty to Cooperate

- 7.79 Only 1 representation was received on the Duty to Cooperate Statement, this was submitted by the Home Builders Federation.
- 7.80 The HBF commented that there is "insufficient evidence to indicate that the Council has fully discharged its requirements under the Duty to Cooperate".

Land Availability Assessment

7.81 Two representations were received on the Land Availability Assessment.

- 7.82 One of the responses related to sites located within the village of Tirril, and provided additional information in respect of their history, current usage and risk of flooding.
- 7.83 A further response, submitted by Kirkby Thore Parish Council, commented on a specific site (LKT9) in Kirby Thore. The objected to the inclusion of this site and requested that it be removed from the list of sites deemed 'developable'. One of their other concerns relates to the level of community involvement in the inclusion of sites within the Land availability Assessment.

Proposed Changes to the Settlement Hierarchy Paper (July 2015)

- 7.84 Three representations were received in relation to this document which was initially published for consultation in July 2015.
- 7.85 One of the respondents comments that the "key hub criteria adopted is not robustly linked to sustainability".
- 7.86 One of the respondents also commented that "the revised key hub classification criteria is unjustified and not sufficiently evidenced. Furthermore the bluntness of the qualification criteria is likely to result in unsustainable development conflicting with the local plans intent".
- 7.87 A further comment was received objecting to the exclusion of Yanwath as a Key Hub.

Housing Distribution Options Paper (July 2014)

7.88 One representation was received on the Housing Distributions Options Paper (July 2014), which commented that the Local Plan is "underpinned by flawed assumptions and conflicted data".

Strategic Housing Market Assessment Parts 1-4

7.89 One representation was received on the Strategic Housing Market Assessment – Parts 1-4, which commented that the Local Plan is "underpinned by flawed assumptions and conflicted data".

Statement of Community Involvement

7.90 One representation was received commenting that "Eden District Council have failed to adhere to their Statement of Community Involvement".

Penrith Traffic Modelling Report

- 7.91 One representation received, comments that "Cumbria County Council has identified and announced that the commissioned highways infrastructure reports that support the Local Plan have failed to provide long-term strategic solutions to mitigate against increased traffic flow".
- 7.92 They also commented that the "Local Plan has failed to take a considered and holistic approach to infrastructure planning. The approach is reactive rather than proactive, managing issues on a site by site basis and reliant on developer's contributions".
- 7.93 Cumbria County Council also submitted a representation which states that "the transport impact of the proposed housing and employment sites in Penrith have been assessed in the Penrith Local Plan Transport Modelling

- report (April 2015), which considered the strategic impact of development during the Local Plan period (2014 to 2032)".
- 7.94 They also commented on the need to "to ensure commitment in the delivery of identified schemes which will help to deliver the aspirations of the Local Plan, it is strongly advocated that the Local Plan and the Infrastructure Delivery Plan clearly articulate that Eden District Council will work with the County Council to seek the necessary funding to deliver the improvements and will be a partner in the delivery of the schemes".

Penrith Transport Improvements Study

- 7.95 Cumbria County Council together with Eden District Council commissioned The Penrith Transport Improvements Study (final report September 2015). The Study considered where the impacts of the proposed allocations (housing and employment) would occur and how they could be mitigated through specific measures.
- 7.96 Cumbria County Council submitted a representation on this evidence base document, commenting that "it is important to note that the list of improvement schemes is not exclusive or exhaustive and further study work may be undertaken to identify other potential Highways and Transport improvements that would support additional sustainable economic growth and quality of life".
- 7.97 They also commented on the need to "to ensure commitment in the delivery of identified schemes which will help to deliver the aspirations of the Local Plan, it is strongly advocated that the Local Plan and the Infrastructure Delivery Plan clearly articulate that Eden District Council will work with the County Council to seek the necessary funding to deliver the improvements and will be a partner in the delivery of the schemes".

Policies Map - Wind Energy Suitable Area (Amendment) & Wind Energy Background Paper

- 7.98 One respondent submitted comments which raised concern over that lack of public consultation and the current approach and are identified. They have made the suggestion that the 'suitable area' should include all land between the boundaries of the AONB and the National Park.
- 7.99 The North Pennines AONB Partnership recommends that the 'suitable area be re-drawn to take account of the potential negative impacts that medium-large wind turbine developments would have on views into and out of the AONB.

Housing Land Supply Local Plan Review Statement

- 7.100 One representation was submitted by Story Homes, which raises concern that some of the identified sites are not deliverable, the target of 200 homes per year is too low and that the Council's undersupply has not been fully addressed.
- 7.101 Alongside their comments, they have submitted their own analysis of the Housing Land Supply which can be found in the representation, available on the Council's website.

Late Representations

- 7.102 Persimmon Homes submitted a late representation which was received by the Council on 3 December 2015. This will be passed directly to the Inspector for their consideration. A copy of their representation can be viewed on the Council's website.
- 7.103 Cumbria County Council also supplied some amended comments which were received after the deadline of 30 November 2015; again these can be viewed on the Council's website.

8 Summary

8.1 The following table provides a quick reference summary of the consultation processes which were undertaken at each stage of preparation of the Local Plan:

Table 9 - Consultation Method Summary

	Issues and Options	Alternative Housing Sites	Preferred Housing Sites	Employment Preferred Sites and Policies	Preferred Options	Technical Evidence & settlement strategy
Documents at Council Offices/ local libraries/ Local Links	✓	✓	√	✓	√	✓
Website	✓	✓	√	✓	√	√
E- consultation software					√	
Media/Press	✓	✓	√	✓	√	
Letters/Email	✓	√	√	√	√	√
Social Media					√	
Leaflets/ Posters	✓	√	√	√	√	
Drop in events					√	
Meetings						√

8.2 At all stages of consultation whether formal or informal the provisions of EDC's Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012 have been adhered too.

APPENDIX 1 PREFERRED OPTIONS CONSULTATION LETTER

Your Reference: Our Reference:

Enquiries to: Planning Policy Team Direct Dial: (01768) 817817

Email: loc.plan2014@eden.gov.uk

Date: 18 July 2014

Dear Sir/Madam

Eden Local Plan Consultation

Eden District Council is consulting on a new Local Plan. The consultation document and supporting technical information is available to download from our website at: www.eden.gov.uk/planning-and-development/planning-policy-for-eden

The consultation period is from 21 July 2014 to 26 September 2014.

The document is a draft of a full Local Plan which will cover Eden District for the years 2014 to 2032. It is known as the 'Preferred Options' version as it is the strategy which we currently see as the best fit for the future of Eden.

Work on the plan was informed by various evidence and feedback given so far. This is included in key supporting documents underpinning this draft plan which are available on our website.

The main proposals are:

- 3,600 new homes over the next 18 years, around half of which will be in Penrith
- New policies to encourage affordable and self-build properties in Eden's smaller villages
- 26.3 hectares of new employment land, plus support for longer term growth at Newton Rigg college and Eden Business Park Phase 2 at Penrith

The Plan includes maps which show where new development is anticipated.

We will consider all comments we receive, and publish details of how we have taken them into account. The next steps will depend on the results of the consultation. If no changes or only minor changes are required, they will be incorporated into a 'Submission Version' of a Local Plan. If major changes are required or new sites submitted and selected, we are likely to consult on these.

Have your say

Comments can be submitted to us by various means:

 By using the online form available at: www.eden.gov.uk/planning-anddevelopment/planning-policy-for-eden

- In writing/ using the paper form:
 Planning Policy
 Eden District Council
 Mansion House
 Penrith
 CA11 7YG
- By email: loc.plan2014@eden.gov.uk

Putte MAttern

Comments must be submitted by 5pm on 26 September 2014.

Yours sincerely

Ruth Atkinson

Communities Director

APPENDIX 2 PREFERRED OPTIONS CONSULTEE LIST

ID	Title	Initial/Name	Surname	Authority/Organisation
2	Mrs	Α	Ward	Caldbeck Parish Council
3	Mrs	SM	Bickerdyke	St Johns Parish Council
4	Ms	PL	Gauntlett	Sebergham Parish Council
5		Becx	Carter	Underskiddaw Parish Council
6	Mrs	M J	Crozier	Carlatton & Cumrew Parish Council
7	Ms	Т	Meynell	Castle Carrock Parish Council
8	Mrs	L	Hutchinson	Cumwhitton Parish Council
9	Mrs	Α	McCallum	Dalston Parish Council
10	Mr	DE	Johnson	St Cuthbert Without Parish Council
11	Mrs	S	Tarrant	Wetheral Parish Council
12	Mr	Т	Roberts	Garsdale Parish Council
13	Mr	M	Johnson	Lakes Parish Council
14	Mr	С	Robertshaw	Sedbergh Parish Council
15	Mrs	L	Knowles	Fawcett Forest Parish Meeting
16	Mrs	Α	Eastwood	Grayrigg Parish Meeting
17	Mr	1	Johnston	Kentmere Parish Meeting
18	Mr	J	Farmer	Longsleddale Parish Meeting
19	Mr	Т	Barnes	Whinfell Parish Meeting
20	Mrs	В	Ingman	West Allen Parish Council
21	Miss	J	Johnston	Plenmeller with Whitfield Parish Council
22	Miss	E	Walton	Knaresdale with Kirkhaugh Parish Council
23	Mrs	Н	Overfield	Bowes Parish Council
24	Mrs	ВМ	Thwaites	Cotherstone Parish Council
25	Mrs	KA	Toward	Forest and Frith Parish Council
26	Mrs	С	Iceton	Hunderthwaite Parish Council
28	Mr	IC	Jerred	Lartington Parish Council
29	Mr	I	Raine	Lunedale Parish Council
30	Mrs	K	Towler	Mickleton Parish Council
31	Mrs	S	Anderson	Stanhope Parish Council
32	Mr	I	King	Hawes and High Abbotside Parish Council
33	Mrs	Т	Sharp	Muker Parish Council
54		Judith	Nelson	English Heritage
60	Mrs	VM	Gate	Appleby in Westmorland Society
61	Mr	L	Law	Alston Moor History Society
62				Upper Eden History Society
63				Appleby History Archaeological Society
66	Mrs	K	Bowen	Cumbria Council for Voluntary Service
67	Mr	С	Woodsly- Stewart	North Pennines AONB Partnership
69	Mr	W	Collinge	Eden Association of Local Councils
70	Mr	D	Claxton	Cumbria Association of Local Councils
71	Mr	R	Suddaby	Cumbria Action for Sustainability
72	Mr	С	Glynn	Voluntary Action Cumbria
74		Helen	Little	National Farmers Union
75				Campaign for Real Ale
76	Mr	Р	Kempsey	Alston Moor Business Association c/o Countryside Consultants (Architects and Planners) Ltd
78			. ,	Appleby Alliance
79				Appleby Chamber of Trade
80		Helen	Sanderson	Penrith Chamber of Trade and Commerce

ID	Title	Initial/Name	Surname	Authority/Organisation
83	Mrs	С	Johnson	Alston Moor Partnership
84				Appleby Heritage and Training Centre
85				Anchor Trust
86				Eden Housing Association
88				Impact Housing Association
89	Mrs	С	Greenhalgh	Eden Housing Association Ltd - Managing agents for Lowther and District Housing Association
90				Housing 21
91	Mrs	E	Brailey	Mitre Housing Association
93				Two Castles Housing Association
94		Vicky	Thirlwell	Cumbria Rural Housing Trust
95				Abbeyfield Society
96				Hanover Housing Association
98				Methodist Homes for the Aged
100	Mr	J	Bodger	John Bodger Associates
101				Elaine Rigby Architects
102				Countryside Consultants
103				Graham K Norman (Architect) Ltd
105	Mr	Р	Winter	PFK Planning
106				Anthony Wright Associates
107		B/M	Taylor / Hardy	Taylor and Hardy
108	Mr	Nick	Bailey	Manning Elliott
111	Mr	M	Walker	Peacock and Smith
121		Patricia	Bell	Sparkenhoe
124		Annette		De Pol Associates
125		Laura	Ross	Stewart Ross Associates
126	Mr	Matthew	Good	Home Builders Federation
129	Mr	R	Douglas	care4free
130	Mr	Α	Miles	Sustrans
131	Mr	С	Ford	CycleActive
134		Carolyn	Wilson	Mobile Operators Assocation, c/o Mono Consultants Limited
136	Mr	Р	Shuker	White Young Green Planning
137		Cherisse	Buchan	Jura Consultants
139		Jane	Brook	Children and Young People's Partnership
140	Mr	J	Parsons	JMP Consulting
142		Jenny	Hill	Nathaniel Lichfield and Partners
144	Mr	M	Nicholson	Russell Armer Ltd
148	Mr	Р	Bullard	Cumbria Wildlife Trust
149	Mr	R	Pearse	CPRE Friends of the Lake District (Cumbria) Branch
152		Diane	Bowyer	DPDS Consulting Group
153			- J -	England and Lyle
157	Mrs	J	Perry	Friends of the Earth
165	Ms	R	George	Vodafone Ltd
167	Mr	D	Price	Cable and Wireless
168	Mr	E	Lyall	Thus Group plc
169	Mr	T	Dalziel	E.ON UK plc
170	Mr	M	Chaimberlain	Church Commissioners
172	1411	IVI	Chambonan	Eden Rivers Trust
114		1	Parsler	Lacit Mycro Truot

ID	Title	Initial/Name	Surname	Authority/Organisation
174	Mr	1	Mandle	NFU (North Cumbria)
175	Mr	ВК	Jones	Forestry Commission NW England
176	Mr	J	Dunne	Woodlands Trust
177	Mr	Е	Mills	Cumbria Woodlands
178	Mr	J	Sutton	RSPB
182	Mr	Р	Thompson	The Planning Bureau Limited
184	Mr	Р	Stock	North Country Home Group Limited
185	Mr	D	Mitchell	Barton Willmore
190		Rose	Freeman	The Theatres Trust
192		Emily	Ushewo Kunze	Aims Limited
194	Mr	Т	Woof	Development Planning Solutions Ltd
196	Mr	F	Sandwith	King Sturge LLP
197	Mr	N	Sandford	The Woodland Trust
198	Mrs	J	Hubbard	Jennifer Hubbard Planning Consultants
201		J	Woodman	
203	Mr	S	Wildman	Fusion Online Limited
207	Mr	M J	Digby	
208	Mr	Н	Tonge	Steven Abbott Associates
210	Mr	С	Burne	
211	Mr	P	Park	
212	Mr	PD	Markey	
213	Mrs	CM	Brown	
214	Mrs	EM	Cook	
215	Mr	DJ	Blackamore	
216	Mr	M	MacInnes	MMI Ltd
218	Mr	D	Le Poidevin	
220	Mr	DJ	Tomlinson	
221		Christine	Gibson	
223	Mr	I	Smart	IPS Architects
224	Mr	J	Mellor	
227		H C and M R	Barr	
228	Mrs	R	Sisson	
230	Mr	G C Philip	Winter	
231		G and E	Lambert	
232		E J and N A	Wear	
233		G	Page	
		Joanna and	Thompson and	
238		Mark	Thornton	
241		RA	Cowperthwaite	
242		JA	Davis	
		Peter and		
243		Rebecca	Hogg	
244	Mr	D	Oldham	
245	Mr	A M	Ward	Mather Jamie
246	Mr	R	Allsopp	
247	Mr	JD	Claxton	Burnetts Solicitors
	Mr and			
248	Mrs	D	Raine	
240	Mr and	IG	Hamlin	
249	Mrs	J G D J	Hamlin Thomas	
250	Mr	1 1 1 1		

ID	Title	Initial/Name	Surname	Authority/Organisation
254	Mrs	M	George	
256	Mr	KG	Dudson	K G Dudson Builders
257	Mr	MW	Dalton	
258		Joan	Savage	
259		Peter	Northgraves	
260	Mrs	CE	Nicholas	
262		AW	Littlefair	
263		С	Hill	
264	Mr/Mrs	AM	Deall	
266	Mr	K	Sutton	
267		Elaine	Sorek	
268	Mr	J	Atkinson	
269	Mrs	N	Rayworth	
270		F&S	Marsh	
271		L	Leroux	
272	Mr/Mrs		Grinbergs	
273		Janet	Morrison	
274	Mr/Mrs		Banks	
275		JK	Stamper	
276	Mr	R	Hardt	
281	Mr	K	Wharton	J R Wharton and Sons
282		Denise	Wood	
283	Mr/Mrs	K	Harrison	
285		В	Richardson	
286		WAD	Thorn	
287	Mr	JP	Bachem	
289	Mrs	Α	Richardson	
290	Mr/Mrs		Ellis	
291		N	Feighan	Parklands Neighbourhood Watch Association
292	Mr	IS	Wilson	
293	Mr	J	Woodman	Parklands Neighbourhood Watch Association
294	Mr/Mrs	H M and M G	Edwards	
296	Mr	WJ	Lancaster	
	Mr and		_	
297	Mrs	K W and J A	Scott	Penrith Residents
298		Nicola	Banister	
300		Maxine	Willett	
301	Macad	IE	Buckle	
302	Mr and Mrs	C P / Helen	Birnie	
302	Mr	W W	Storey	
303	Mr	В	Ward	
305	Mr	N D	Lowis	L B W Associates
300	Mr and	ND	LUWIS	L D W A3300Iate3
306	Mrs	P M and A	Dawes	
307		С	Patterson	Appleby Town Council
308	Mr	PA	Kingsbury	2
310	Mr	D	Cole	
311	Mr	D	Carlyle	
	Mr and		•	
312	/Mrs	W	Young	
313	Mr	J	Raven	Edwin Thompsons

ID	Title	Initial/Name	Surname	Authority/Organisation
		Patricia /	Cumiskey /	
314		Malcolm	Leaver	
315		Anna	Kirkman	
316		Erica	Arneil	Parklands Neighbourhood Watch Association
318	Mr	S	Harrison	
319		L	White	
321		H C and S G	Bishop	
322	Mr/Mrs		Squires	
323	Mr/Mrs	В	Nicholson	
324		Katy / Robert	Dent / Clarke	
325	Mr/Mrs	S and A	Dottridge	
326	Mrs	BJ	Nicol	
328	Mr	J	Kilduff	
329	Mr	D	Swan	
330	Mr/Mrs	DK	Snaith	
331	Mr/Mrs		Glendinning	
332		Jeanette	Cooper	Kirkby Stephen Town Council
333		D	Turnbull	
334	Mr	AJ	Tatters	
336	Mr	ΑT	Harper	
337	Mr	J	Ratcliffe	
339		С	Ewbank	
340		С	Maughan	
341		E/M	Ewan / Allcock	
342	Mrs	ME	Atkinson	
343	Mr	Р	Taylor	
344		P and F E	Robinson	
345		RB	Barlow	
346	Mrs		Dean	
347	Mrs	J	Woodman	
	Mr and			
349	Mrs		Lea	
350		WT	Storey	
351	Mr	D	Nattrass	
352	Mr	Р	Robinson	
353	Mr	R	Dryell	Capita Symonds Ltd
354	Mr	С	Reed	
355	Mrs	MS	Morrison	
356		Т	Bowman	
	Mr and			
358	Mrs	PJ	Moore	
359	Mr	S	Binney	
360	Mr/Mrs	RV	Bagot	
361	Mr	J	Cope	
362	Miss	I	Woof	
363		Janet	Barlow	
365		RF	Chalmers	
366		Mary J	Law	
367		Diane	Airey	
0.00	Mr and	.		
368	Mrs	J	Pratt	
369		Louise	Dinnes	

Steve and Val	ID	Title	Initial/Name	Surname	Authority/Organisation
Ward B					
David and Wendy Wicholson	370			Fermer	
373 Wendy Nicholson 374 Mrs H Winder 377 Mr M Gibson 378 Mrs J Cross 379 Isa Henderson 380 Susan Bradley 381 Anne Batey 384 Claire Norris 385 Mr J Richardson 386 Mr R Taylor Ian Basely Associates 87 Mr Richardson Ian Basely Associates 88 Mrs T Warburton 380 Mr R The Coal Authority 390 Mr P Stobbart 391 Jennifer Hadland Smiths Gore 392 Mr J Havitin 393 Jennifer Hadland Smiths Gore 399 Mr M Sission Cumbria Affordable and New Homes Group 400 Mr J Heavitin<	371			Hopkins	
Mrs			David and		
Mr M Metcalfe-Gibson 378 Mrs J Cross 379 Isa Henderson 380 Susan Bradley 381 William and Anne 384 Claire Norris 385 Mr J Richardson 386 Mr R Taylor Ian Basely Associates 387 Mr R Gibson Gibson 388 Mrs T Warburton The Coal Authority 390 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore 395 Cumbria County Council 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 401 Mr R Jessop Roger Jessop Planning Consultants 402 Mr R Jessop Roger Jessop Planning Consultants <			Wendy		
377 Mr M Gibson 378 Mrs J Cross 379 Isa Henderson 380 Susan Bradley William and Anne Bately 384 Claire Norris 385 Mr J R 386 Mr R Taylor Ian Basely Associates 387 Mr R Gibson 388 Mrs T Warburton 389 T Warburton 390 Mr P Stobbart 391 Jennifer Hadiand Smiths Gore 395 Lourbria County Council Cumbria County Council 399 Mr M Sission Cumbria Affordable and New Homes Group 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E <td>374</td> <td>Mrs</td> <td>Н</td> <td>Winder</td> <td></td>	374	Mrs	Н	Winder	
378					
Susan					
Susan		Mrs	J		
William and Anne					
381 Anne Batey 384 Colaire Norris 385 Mr J Richardson 386 Mr R Taylor lan Basely Associates 387 Mr R Gibson 388 Mrs T Warburton 389 T Warburton 390 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore Cumbria County Council Cumbria County Council 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership	380			Bradley	
384 Claire Norris 385 Mr J Richardson 386 Mr R Taylor Ian Basely Associates 387 Mr R Gibson 388 Mrs T Warburton 389 T The Coal Authority 390 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore Cumbria County Council Cumbria County Council 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 405 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard Howard <t< td=""><td></td><td></td><td></td><td></td><td></td></t<>					
385 Mr J Richardson 386 Mr R Taylor Ian Basely Associates Metcalfe-Gibson Better Gibson The Coal Authority 388 Mrs T Warburton 389 The Coal Authority 390 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 404 W E Warburg 405 John / Sarah Howard 407 Mr J Godwin 407 Mr J Burns Symon / Floward Howard Howard 410 Mr H How					
Mr					
Metcalfe Gibson					
387 Mr R Gibson 388 Mrs T Warburton 389 T The Coal Authority 390 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore 395 Cumbria County Council 399 M M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 405 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Hogg 413 Mr J	386	Mr	R		Ian Basely Associates
388 Mrs T Warburton The Coal Authority 399 Mr P Stobbart 392 Mr J Martin 393 Jennifer Hadland Smiths Gore 395 Cumbria County Council 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership 407 Mr J Burns Development Planning Partnership 408 John / Sarah Howard Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Hogg 413 Mr J <td< td=""><td></td><td></td><td>_</td><td></td><td></td></td<>			_		
389					
390 Mr		Mrs	T	Warburton	
392 Mr J J Martin Smiths Gore 395 Cumbria County Council 399 Mr M Sission 400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership Symons / Howard Howard Howard Howard 410 Mr H Noblett 411 J A S Wright Wright 411 J A S Wright Wright 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen Nielsens Ltd 417 Mr/Mrs K Bell 420 Mr N Hughes <tr< td=""><td></td><td></td><td>_</td><td></td><td>The Coal Authority</td></tr<>			_		The Coal Authority
393			-		
395		Mr			
399 Mr M Sission Cumbria Affordable and New Homes Group 400 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell 418 J R Bradney River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 42			Jennifer	Hadland	
400 Mr J Hewitson Cumbria Affordable and New Homes Group 402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard Howard 410 Mr H Noblett 411 J A S Wright 411 J A S Wright 412 Mr J Heath 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell 418 J R Bradney River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr N Hughes 421 Mr T Ladhams					Cumbria County Council
402 Mr R Jessop Roger Jessop Planning Consultants 403 W and J McCarthy 404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard 410 Mr H Noblett 411 J A S Wright 411 J A S Wright 412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 418 J R Bradney 419 Mr N Hughes 421 Mr T Ladhams 422 Mr M Bryan 423 Mr M			-		
W and J McCarthy W E Warburg					•
404 W E Warburg 406 Mr J Godwin 407 Mr J Burns Development Planning Partnership Symons / Symons / Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Heath 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell 418 J R Bradney River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 418 J R Bradney and Yorkshire Fly Fisher's Club 420 Mr N Hughes 421 Mr T Ladhams 422 Mr M Bryan 426 Mr M Bryan 429 Mr/Mrs G and V Bowen Sawrey- Sawrey- <		Mr			Roger Jessop Planning Consultants
406 Mr J Godwin 407 Mr J Burns Development Planning Partnership 409 John / Sarah Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club River Eden and Poistrict Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Browen 430 Mr H Cookson 431 Mr M Best 432 Mrs A					
407 Mr					
Mor					
409 John / Sarah Howard 410 Mr H Noblett 411 J A S Wright 412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bowen 429 Mr/Mrs G and V Bowen Sawrey- Sawrey- 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 433 Margaret Hawker	407	Mr	J		Development Planning Partnership
410 Mr H Noblett 411 J A S Wright 412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell 418 J R Bradney River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bowen 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Marg	400		John / Sarah		
411 J A S Wright 412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen 417 Mr/Mrs K Bell River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club Association 418 J R Bradney Bradney 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bowen 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Margaret		Mr			
412 Mr J Hogg 413 Mr J Heath 415 S and L J Dudson 416 Mr M Nielsen Nielsens Ltd 417 Mr/Mrs K Bell 418 J R Bradney River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker		IVII			
413 Mr J Dudson 416 Mr M Nielsen Nielsens Ltd 417 Mr/Mrs K Bell 418 JR Bradney and Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen 5 Sawrey- 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker		Mr			
415 S and L J Dudson 416 Mr M Nielsen Nielsens Ltd 417 Mr/Mrs K Bell River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club 418 J R Bradney And Yorkshire Fly Fisher's Club 419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bowen 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker					
416MrMNielsenNielsens Ltd417Mr/MrsKBell418J RBradneyRiver Eden and District Fisheries Association and Yorkshire Fly Fisher's Club419MrCBendelow420MrNHughes421MrTLadhams425Fisher German LLP Chartered Surveyors426MrMBryan429Mr/MrsG and VBowen430MrHCookson431MrMBest432MrsAMcKenzie434MrAMarsden435RonaBromley439MargaretHawker		1411			
417 Mr/Mrs K Bell All All All All All All All All All		Mr			Nielsens I td
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418J RBradneyand Yorkshire Fly Fisher's Club419MrCBendelow420MrNHughes421MrTLadhams425Fisher German LLP Chartered Surveyors426MrMBryan429Mr/MrsG and VBowenSawrey- 430MrHCookson431MrMBest432MrsAMcKenzie434MrAMarsden435RonaBromley439MargaretHawker	- · · · ·	/14110	1.		River Eden and District Fisheries Association
419 Mr C Bendelow 420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen Sawrey- Sawrey- 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker	418		JR	Bradnev	
420 Mr N Hughes 421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen Sawrey- Cookson Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker		Mr			and contained by Floridia Colub
421 Mr T Ladhams 425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker					
425 Fisher German LLP Chartered Surveyors 426 Mr M Bryan 429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker					
426 Mr M Bryan 429 Mr/Mrs G and V Bowen Sawrey- Sawrey- 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker					Fisher German LLP Chartered Surveyors
429 Mr/Mrs G and V Bowen 430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker		Mr	M	Bryan	
430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker				· ·	
430 Mr H Cookson 431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker			-		
431 Mr M Best 432 Mrs A McKenzie 434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker	430	Mr	Н		
432MrsAMcKenzie434MrAMarsden435RonaBromley439MargaretHawker					
434 Mr A Marsden 435 Rona Bromley 439 Margaret Hawker					
435 Rona Bromley 439 Margaret Hawker					
439 Margaret Hawker					
		Mr	·		

ID	Title	Initial/Name	Surname	Authority/Organisation
443		Lynn	Yare	
		Barbara /	Daniel /	
445		Roger	Butterfield	
446		Georgina	Plowright	
		John and	Mc Farlane /	
448		Julie / Kate	Bellwood	
449		Α	Holder	
450	Miss	J	Clark	
451		Margaret	Harvey	
452	Mr/Mrs		Abbott	
453	Mr	Α	Stopford	
454		R and A	Sheppard	
455	Mr/Mrs	J M	Linsday	
456		В	Kilshaw	
457	Mrs	S	Fletcher	
458	Mr	J	Holliday	
459	Mr	R	Walters	
460		SJ	Holliday	
461	Mr	RP	Tailford	
462	Mr	PD	Searle	
463	Mr/Mrs		Scobie-Youngs	
464	Rev'd		Findlayson	
465	Mr	RJ	Bell	
466	Mr	DC	Mellon	
467	IVII	K and C	Whitehead	
468	Dr/Mrs	G and S	Ainsworth	
469	Mr	N		
471	Mr		Wright	
	IVII	В	Newbury	
472	D - / \ \ \	L	Jennings	
473	Dr/Mrs	R	Gravil	
474	Mr	MR	Lintott	
475	Mr	D	Sharrock	
477		Judith and Haydn	Morris	
478	Mrs	С	Tailford	
479	Mr	Р	Bonsall	The Fat Lamb Country Inn and Restaurant
480	IVII	Elisabeth		The Fat Lamb Country initiand Restaurant
	Man	Elisabetti	Dowes	
481	Mrs	В	Dixon	
482		R	Littlewood Metcalfe-	
483		C and A	Gibson	
484	Mr	D	Tailford	
485	Mr	МН	Calvert	
486	IVII	E	Taylor	
487		<u> </u>		
		GK	Langley	
488			Mossman	
489	N.4 ==	M C	Sweeney	
490	Mrs	K	Johnston	
491		Jane	Callaghan	
493	Mr	T	Daldry	
494		Susan	Taylor	Armathwaite School
495	Mr	M	Bell	

ID	Title	Initial/Name	Surname	Authority/Organisation
496		RE	Oughterson	
498	Mrs	A	Singleton	
500	Mr	S	Scott	
300	IVII	0	Metcalf /	
501		Dot / Dave	Paterson	
		Brian and		
503		Catherine	Cropley	
504	Mr/ Mrs	V	Kirkbride	
505		АВ	Harker	
506	Mr	Р	Taylor	
507	Mr	1	Gibson	Ian Gibson Architecture Ltd
508		Jon / Jennifer	Begg	
509	Mrs	Е	Horn	
510	Mr	ВМ	Gray	
512		Ann and Alf	Fenwick	
513	Mrs	С	Jackson	
515	Mr	G	Armstrong	
516		W M and E	Firth	
518		Anne	Blues	
519	Mr	M	Ennion	
521	Mr/Mrs	RJ	Weymouth	
522	Mr	F	Allan	
523	Mr	G	Box	
524	Mr/Mrs	K and M	Baglee	
526		P	Sayer	
527	Mr	A	Borgogno	
528	Mr	В	Sandland	Eden Valley Railway Trust
020	1411	Lynda /	Carialaria	Each valiey Hallway Hack
529		Richard	Blackburn	
530	Mr/Mrs	Р	Hexter	
531		Alex	Hogg	
534	Mr	М	Melling	
535	Mr/Mrs	IM	Gibson	
537	Mr	D	Robinson	
538		Rosalind	Robinson	
539	Mr/Mrs	W	Irving	
540	Mr/Mrs	N	Balmer	
541		Shirley	Darke	
542	Mr	A	Tarn	
543	Mrs	JA	Taylor	
544		Jean	Duckworth	
545	Mrs	J	Hughes	
546		A J and A M	Hodgson	
549		Anne	Berry	
550	Mr/Mrs	P	Richardson	
551		Tom / Trudy	Stammer	
553	Mr/Mrs	A	Knight	
- 555		Louise /		
554		Alistair	Mayne	
555		ВМ	Davey	
556		Nicola	Davies	
557	Mrs	J	Thompson	

ID	Title	Initial/Name	Surname	Authority/Organisation
558		JW	Allen	
559		JW	Varty	
560		IR	Cousin	
561		WA	Carswell	
	Mr and			
562	Mrs	D W and C A	Morris	
563	Mrs	Р	Ewbank	
565	Mr	JM	Marshall	
567	Mrs	G	Bell	
500	Mr and			
568	Mrs	MD	Howie	
569	Mrs	M P John and	Newsham	
570		Brenda	Wilkinson	
571		D and J	Scott	
572		Jennifer	Geer	
573	Mr	A	Hoyle	
576	IVII	GF	Bennett	
	Mr	M	Tonkin	
577 578	IVII	F R and D A	Hinton	
579	Mr	Agnes T M	Chambers	
580 581	Mr	S	Cockcroft	
	IVII	C	Butterfield	
582	Mr and	C	Black	
583	Mrs		Lockley	
587	Mr	J	Jackson	Persimmon Homes Lancashire
588		L	Scott	
589	Mr	DB	Capstick	
590	Mr/Mrs	J	Guthrie	
591		DT	Conway	
592	Mrs	S	Shaw	
593		RA	Coulthard	
594	Mr	Α	Pyrke	Colliers CRE
595	Mr	Α	Thorley	Taylor Wimpey UK Limited
596		V	Richardson	Walton and Co
597	Mr	С	Garner	Garner Planning Associates
598		F F and F J	Wilson	-
599	Mrs	FEM	Kilduff	
600		G and B	Grundy	
601	Mr/Mrs		Oliver	
602	Mrs	PA	Cherry	
603		WB	Hardcastle	
604	Mr/Mrs	L	Dowson	
605	Mr	J	Exeter	
606	Dr/Mrs	M	Taylor	
607	Mrs	J M	Oliver	
608	Mr/Mrs	DC	Smith	
611		CJ	Mason	
612	Mrs	JE	Mason	
613		WG	Glen	
614		J	Cash	

ID	Title	Initial/Name	Surname	Authority/Organisation
615		J	Derbyshire	
616	Mr/Mrs	H C and J	Jenkinson	
617	Mr	Α	Willison-Holt	Holt Planning Consultancy
618	Mr	M J	Hughes	j
619	Mr	Α	Willison-Holt	
620		G	Atkins	
621	Mrs	S	Beck	
624		S and E	Higgs	
625		W/F	Tidbury / Potter	
626		J	Thompson	
627		J	Rush	
628	Mr/Mrs		Whitehead	
630	Mrs	J	Alderson	
631	Mr	С	Bagshaw	
632		G	Boyd	
633		S and I	Dowson	
635	Mr/Mrs	AW	Mayhew	
636	Mrs	JR	Balmer	
638	Mr	М	Thompson	
639		S	McIldowie	
640	Mr/Mrs	RC	Ewin	
641	Mr/Mrs	J	Little	
642	Mr	M	Eyles	Save our Woodland Heritage
643	Mrs	МН	Gallagher	
644	Mrs	Α	Godber	
645	Mrs	М	Clement	
646	Mr/Mrs	W	Currah	
647	Mrs	J	Stevens	
648	Mr	KJ	Trimmer	
649	Mrs	KM	Trimmer	Cold Keld Guided Walking Holidays
650		K	Allison	Ŭ ,
651	Mr/Mrs	SR	Harnwell	
652	Mrs	С	Ratledge	
653		M and M	Golden	
654	Mr	Α	Hewison	
655	Dr/Mrs	PC	Johnson	
656	Mrs	НМ	Cooper	
658		SM	Lowthian	
659	Mrs	МВ	Gradwell	
660	Mr	RC	Holliday	
661		S and C	Cross	
	Mr and			
662	Mrs		Beattie	
663		F	Mason	
664	Mr	JD	Askew	
665		J	Auty	
	Mr and		5	
666	Mrs	С	Binks	
667	Mr and	GH	Bronnand	
667 668	Mrs	RO	Brennand Dickie	
000		N U	DICKIE	

ID	Title	Initial/Name	Surname	Authority/Organisation
669		J	Dougherty	
670		J	Hope	
671		E	Irving	
672	Mrs	D	Sinclair	
673	Mr/Mrs	J B and M J	Stiles	
675		J and C	Holliday	
676		E	Blackburn	
677	Mr/Mrs	D	Richardson	
678	Ms	Н	Taylor	
679		В	Bentley	
680	Mr/Mrs	W F and A	Scott	
681	Mr/Mrs	ΚI	Szabo	
682		D	llett	
683	Mr/Mrs	M and L	Allan	
684	Mr	D	Atchinson	
686	Mr	G	Wilson	
687	Mrs	IME	Cope	
688	Mr	Н	Harrison	
690	Messrs	М	Cleasby	
691	Mrs	Α	Clement	
	Mr and			
692	Mrs	Α	Turvey	
693		L and M	Dalton	
694		G	Capstick	
695		М	Young	
696	Mrs	Α	Witney	
697	Colonel	W A	Sewell	
698	Mr	TG	Hastwell	
699	Mr	ΡE	Harper	
701		J	Bateman	Bateman Engineering
703		Α	Cater	
704		М	Finnie	
705		W	Higgins	Orton Manor Court
706	Miss	L	Hogg	
707	Mr	JR	Lamb	
709		Barry and Sandra	Littlefair	
710		Stuart and Diane	Marsh	
711	Mr	RC	Mason	
712	Mr	R	McGuffie	
713		ΑE	Metcalfe	
714	Mr and Mrs	R and E	Wright	
715		Teresa	Yare	
718				Reserve Forces and Cadets Association
719	Mr	I	Collinson	
720	Mr	Α	Richmond	Cumbria Army Cadet Force
721		Angela	Haslam	
723		Joan	Armstrong	
724		A and M N	Coulthard	
725		Jill / David	Kelly / Ottley	

ID	Title	Initial/Name	Surname	Authority/Organisation	
726		Constance A	Mollinson		
727	Mr	FH	Walton		
728	Miss	J	Walton		
729	Mr	М	Fisher	The Lawn Tennis Association	
731	Mr	S	Connell	Penrith Congregation of Jehovah's Witnesses	
732	Mr	Т	Williams	Miller Homes Limited - Yorkshire	
734	Mr	М	Hourigan	Hourigan Connolly	
	Mr and				
737	Mrs	J	Thomlinson		
739	Mr		Young		
740	Mr	F	McQueen		
741	Mr		Gladwell		
742	Mr	Т	Cropper	Rapleys LLP	
744	Mr	В	Thompson	Heart of Eden Community Plan	
745	Mr	Т	Woof	Upper Eden Community Plan	
746		Kellie	Bradburn-Sims		
747	Mr	S	Connell	Talk Talk	
748	Mr	D	Holdstock	Entec UK Ltd	
749		Catherine	Newton	Bell Ingram Design Limited	
750	Mr	Chris	Jones	CB Richard Ellis Ltd Planning	
771		_		CAFS	
773	Mr	С	Ecroyd	Cumbria Local Access Forum	
775	Mr	N	English	Alston Moor Business Association	
779	Mrs	J	Mackey	Eusemere Farm House	
780				Alston Small Business Forum	
786		_		Countryside Consultants	
803	Mr	Т	Woof	Furrow Green Farm	
804				AstSigns	
805				Sign Solutions	
806	N 4	134/	Darkinson	Leltex House	
807	Mr	IW	Parkinson	Parkinson Sighs	
808	Mr	M	Irving	Punch Taverns	
809	N.4 m	Δ	Crawa	Union Pub Company	
824	Mr	A	Crowe	Nathaniel Lichfield and Partners	
826	Mr	Р	Dawson	The National Federation of Gypsy Liaison	
833				Groups (NFGLG)	
834		Nicola	Foote		
835		Amanda	Scott	Fusion Online Ltd	
				Kirkwells - town planning and sustainable	
836	Mr	M	Wellock	development consultants	
837	Mr	М	Wyatt	JWPC Limited	
838	Mr	D	Swarbrick	Swarbrick Associates Chartered Architects	
839	Mr	Р	Hutchinson		
840	Mr	S	Staines	FFT Planning (Friends, Families and Travellers ad Traveller Law Reform Project)	
841	Ms	S	Caldwell	Northern Trust	
843	Mr	G	Parkin		
844		Е	Turner		
845	Ms	Julie	Liddle	H and H Land and Property Limited	
846	Mr	G	Smith	GVA	
847	Mrs	Α	Jones	Planning Branch Consultancy	

ID	Title	Initial/Name	Surname	Authority/Organisation	
848	Mr	D	Barton	Story Homes	
849	Ms	RL	Jennings	Concept Town Planning Ltd	
851	Mr	K	Waters	Adlington Planning Team	
852	Mr	JC	Martin		
853	Mr	J	Burns		
855		S	Gooch	Fairhurst	
858		J	Bainbridge	The Open Spaces Society	
859		Н			
860				Turley Associates	
861		Nichola	Traverse- Healey	Barton Willmore LLP	
863				Marine Management Organisation	
864		Jill	Stephenson	Network Rail	
865		Ann	Seipp	Homes and Communities Agency	
866	Mr	Anthony	Gardner	NHS Cumbria Clinical Commissioning Group	
868	Mr	David	Sherratt	United Utilities	
870		Ginny	Hall		
871	Mrs	Sandy	Lancaster		
872		Jennifer	Prosser		
873	Mr	Mike	Davidson		
874	Mr	Thomas	Armstrong		
875		Alexis	Christmas		
876		Iris	Buckle		
877		Sheila	Fletcher		
878	Mr	Charles	Weir		
879		W	Flack		
880		Paul	Telford		
881	Mrs	Donna	Davidson		
882	Mr	Geoff	Thompson	Friends of the Lake District	
883	Mr	Peter	Hinchliffe		
884	Mr	Richard	O'Brien		
885	Mr	Anthony	Borgogno		
886	Mr	Michael	Higgingbottom		
887		Anna	Howard	Johnby Hall Estate	
889		Jane	Potts	Cumbria Rural Housing Trust	
890	Mr	Stephen	Thompson	J	
891	Mr	Stephen	Buckingham	Michael CL Hodgson	
892	Mr	Paul	Sansom		
893	Mr	John	Pallister	Pallister Co Ltd	
894		Sally	Walker		
895		Barbara	Wilkinson		
896		Susan	Donald		
897	Mr	Duncan	Scott		
	Mr &				
898	Mrs	PJ	Moore		
899	Mr	John	Poland		
900			Turvey		
901	Mr	J	Fawcett		
		NW	Marshall		
902		INVV	Maisilali		

ID	Title	Initial/Name	Surname	Authority/Organisation
904		Wade	Tidbury	
905		Kathleen	Payne	
906		Tania	Kirkbride	
907	Mrs	Doreen	Dickson	
908		Fiona	Tidburry	
909		Paul	Harper	
910		Jim	Ratcliffe	
911		Lynne	Miller	
912		Moya	Flynn	
914				Holes Farm Partnership
915	Mr/Mrs	J	Lowrey	c/o Garner Planning
916	Mr	George	Dickson	<u> </u>
917	Mr	Bob	Taylor	Taylor and Hardy Ltd
918		Ruth	Arnold	
		Elizabeth	& Gordon	
919		Howe	Malcolm	
920	Mr	David	Miller	
921	Mr	Steve	Taylor	
922		Christine	Chamberlain	
923		David	Nattrass	
924		Rachael	Coar	Persimmon Homes Lancashire
925				AWAZ
926				OutREACH Cumbria
927				Cumbria Disability Network
928				Age UK Carlisle and Eden
929				Equality Cumbria PO Box 282, Carlisle, Cumbria,
930	Mr	Eric	Roberts	Electricity North West
932		Alice	Unsworth	NFU (North West)
933	Mr	Oliver	Mitchell	Planware LTD
934		D	Leslie	
935	Mrs	В	Wilson	
936	Mr	S	Artiss	Barratt Homes
	Mr			
937	Mr	Neil	Wells	DTZ
938	Mr	Samuel	Stafford	GVA Grimley Limited
939	Ms	Claire	Pegg	GVA Grimley Limited
940	Mr	Dan	Hughes	CH2M HILL
941	Mr	Edward	Harvey	CBRE Ltd Planning
942	Mr	Lee	Crawford	Persimmon Homes PLC
943	Mrs	Sue	Harker	
944	Mr	D	Hurton	
945	Mr	Andy	Pepper	Persimmon Homes Lancashire
946		,	Sir/Madam	
948	Mr	Р	Ainscough	HIMOR Group
949	Mr	S	Shreeve	HIMOR Group
950			555.0	Renewable UK
951	Mr	S	Atkinson	
952	Mr	J	Andrews	
953	1911	В	Walton	
	I	ט	vvailuii	

ID	Title	Initial/Name	Surname	Authority/Organisation
955		Beryl	Eden	
956	Mr	R	Hall	
957	Ms	J	Bond	Taylor Wimpey Strategic Land
958	Mr	Mark	McGovern	SSA Planning Limited
959		Laura	Ross	Dev Plan
960	Dr	E	Insch O.B.E	
961	Dr	D	Williams	
962		Joan	Johnstone	
963		Ann	Sandell	
964	Mr	Robin	Hall	
965		Raynor	Shaw	
966		Liz	Kerrey	
967	Mr	Tony	Rumsey	
968	Mr	Alan	Sowerby	
969		Rachel	Brown	
970	Mr	Dean	Hughes	
971		Jean	Jackson	
972		Julia	Watchman	
973		Veronica	Priest	
974		Paula	Williams	
975		Christine	Hurford	
976		Bridget	Davey	
977		Juliet	Wright	
978	Mr	John	Leveson	
979		G	Hodgson	
980		С	Merrie	
981	Mr	S	Dark	
982		C & H	Morgan	
983		Hollie	Barton	NJL Consulting
984	Mr	Alex	Willis	BNP Paribas Real Estate UK
985	Mr	Tom	Swallow	BNP Paribas Real Estate UK
986		Katherine	Brooker	DTZ
987	Mrs		McQue	
988				Cumbria Local Enterprise Partnership
989				Eden Access Forum
990	Ms	Rosanna	Cohen	NHS Property
991	Mr	Andrew	Hattersley	Smiths Gore
992	Mr and Mrs		Kilduff	
993	Mr	Matthew	Banks	White Young Green
994	Mrs	Viv	Tunnadine	c/o Eden District Council

APPENDIX 3 LOCAL PLAN SCHEDULE OF CHANGES

Eden Local Plan 2014-32 – Publication Version Schedule of Changes

This document sets out the changes we have made following consultation of the 'preferred options' version of our draft Local Plan, and why we have made them.

All policy and paragraph references refer to the numbering set out in the July 2014 'Preferred Options' version of the draft Local Plan.

Policy/ Paragraph	Changes made	Reason
General	The plan has been drafted as a 'final' version – the expectation is that at publication stage the Council presents what it considers will be the final adopted version of the plan.	
Foreword	Some amendments to the foreword	To update and recognise that this is intended as the 'final' version of the plan.
Two page summary & summary table to Penrith on page 40	Some text updated. The figure for anticipated employment development has been amended to 24.38 hectares (from 26.3)	To update and to correct an error on area of the Gilwilly extension and to amend the extent of the northern boundary to account for the flood plain (changed from 7.94 to 11.91), to remove the Bonds Factory at Alston (it now has permission) and to reduce the area of the Kirkby Stephen Business park extension to 3.33 hectares (at the suggestion of Sir Martin Holdgate) so that the site is not extended to the point that it would prejudice construction of a bypass to the town in the future.
1.1.4	Paragraph has been changed to recognise the Final Habitats Regulation Assessment has been completed. This sets out appropriate mitigation measures.	To update

Policy/ Paragraph	Changes made	Reason
1.1.3/1.1.5	The paragraphs covering the evidence base and past consultation have been updated.	To update
1.3	Paragraph covering next steps deleted	To update
2.1.4	'Ward' inserted to make clear the population stated corresponds to Penrith's wards (Penrith is not parished).	Response to suggestion by Mrs A Sandell
2.1.5	Figure for the number of SSSIs amended to 88.	Correction - response by Natural England
2.1.6	Reference to sites of archaeological importance added.	Response to suggestion by Historic England
2.16	Numbers of listed buildings and scheduled ancient monuments updated/amended. Footnote now refers to Historic England	To update
2.1.11 - 2.1.14	Unemployment, earnings, house price and incomes figures updated.	To update
2.1.12	Reference to the agricultural sector added.	Response to suggestion by Sir Martin Holdgate.
2.2.1	Strengths - Reference to outdoor recreation added	Response to suggestion by Sir Martin Holdgate.
2.2.1	Strengths - Reference to low levels of crime added	Response to suggestion by Cumbria Constabulary
2.2.1	Opportunities – Reference to heritage assets added in first bullet.	Response to suggestion by Historic England
2.2.1	Threats – References to high fuel prices and climate change added	Response to suggestion by Friends of the Lake District
2.3.1	Vision for Eden – reference to meeting full housing needs added in the fourth paragraph.	Response to suggestion by Story Homes
2.3.1	Vision for Eden – Reference to <i>enhance</i> as well as <i>protect</i> added it paragraph 2.	Response to suggestion by Natural England
2.4.1	Objectives are now all numbered – Objective now at 11 not previously numbered, previously there were two Objective 3s.	To correct an error.
2.4.1	Objectives - 'Development in the Right Place' changed to 'Development Principles'	For consistency.

Policy/ Paragraph	Changes made	Reason
2.4.1	Objectives - 'Meeting Housing Need' changed to 'Decent Homes for All'	For consistency.
2.4.1	Objectives – some changes to named policy following deletion of previous policies RUR1 and ENV7 and new Policy COM3	To update.
2.4.1	Objectives - Reference to natural environment added at Objective 4.	Response to suggestion from Friends of the Lake District.
2.4.1	'Heritage' replaced by 'Environment' at Objective between 9 & 10.	Response to suggestion by Historic England
2.4.1	Reference to landscape added at Objective 11.	Response to suggestion from Friends of the Lake District.
2.4.1	Reference to 'appropriate' added to objective 12	Response to suggestion from Friends of the Lake District.
3.1 - Policy LS1	The list of village hubs has been amended – it now includes villages where settlements have one hundred or more dwellings and at least three village services out of a list of primary school, post office, shop, village hall, public house, GP surgery and church. 10 villages are added: Bolton, Culgaith, Great Asby, Great Salkeld, Long Marton, Morland, Kirkoswald, Newton Reigny, Skelton, Sockbridge and Tirril. 1 village is removed: Ravenstonedale	To respond to changes in the services that defined the original list, namely the cancellation of the daily 106 bus service between Kendal and Penrith, and the 105 serving Greystoke, together with the loss of the primary school at Ravenstonedale. The list is also expanded to apportion development more evenly throughout the district (the overall distribution has not changed).
3.1- Policy LS1	The list of smaller villages and hamlets has been amended so they adhere to the following criteria – where they are defined as any known settlement comprising a cohesive group 10 or more residential dwellings. 88 settlements include 10 (or more) dwellings. Villages which only meet this threshold due to barn conversions/subdivisions have been excluded. New in the list: Clifton Dykes, Leadbeck, Low Braithwaite, Low Moor,	To update the list based on the 1996 Local Plan and make sure villages have been selected from set criteria.

Policy/ Paragraph	Changes made	Reason
	Nenthead, Old Town (High Hesket), Pallet Hill, Ravenstonedale, South Dykes, Roundthorn, Raisebeck Removed from the list: Drybeck, Hoff, Kirkland, Salkeld Dykes.	
3.1- Policy LS1	Reference to open countryside in title above the list of small villages is removed	In response to suggestion by Brougham Parish Council
3.1- Policy LS1	The term small scale is now replaced by 'appropriate'.	In response to suggestion by Story Homes.
3.1- Policy LS1	Policy now states that housing development on previously-developed land need not be subject to local occupancy, to increase likelihood that such sites may be viable to deliver.	In response to a suggestion by PFK.
3.1- Policy LS1	"Some market housing may be acceptable if it facilitates the provision of a significant amount of affordable housing" added.	In response to a comment made by the Church Commissioners, and to meet the requirements of paragraph 54 of the NPPF
3.1- Policy LS1	The following clarification is included: "New housing developments which would increase the size of a village by more than 10% on a single site will not normally be supported, and proposals will only be acceptable where they respect the historic character and form of the village".	Following discussion with our Development Management colleagues it was felt that we needed to clarify the size of single development appropriate for our key hubs to aid applicants and achieve consistency in decision- making.
3.1- Policy LS1	Final paragraph – 'provision of housing' is replaced by 'amount of development' as applies to more than just housing.	In response to a suggestion by Sir Martin Holdgate
3.1.2/3.1.3/3.1.4	Removed affordable housing requirement – more detail is set out elsewhere (see Policy HS1)	To avoid confusion
3.1.4	Text added: "Villages are identified as hubs if they contain more than one hundred properties and at least three key services out of a primary school, post office, shop, village hall, pub, GP surgery and	To explain how hubs have been reclassified following changes to services

Policy/ Paragraph	Changes made	Reason
	church."	
3.1.5	Text added: "Villages and hamlets have been identified on the basis that they are a coherent grouping of ten or more dwellings".	For explanation
3.1.5	The following text is included: "Where new housing is located on greenfield land a local connection restriction will apply, a local connection restriction will not apply to new housing located on previously developed land."	To provide clarity as to when the local connection criteria will apply.
3.1.5	New text added: "The District Council recognises that there may be some villages and hamlets where local communities aspire to bring forward additional development or allocate sites to help support local services. The District Council will offer support in these circumstances to help them develop neighbourhood plans or orders to deliver these aspirations".	To highlight the role of neighbourhood planning in supporting local communities, and the District Council's support for it.
3.1.6	"Essential agricultural worker's dwellings" added to the list of possible exceptions. Reference to exceptional quality and innovate design removed from supporting text. It is not mentioned in the policy wording and is adequately covered by the NPPF.	To make clear that these may be acceptable, as outlined in Policy HS3. Covered by NPPF.
3.2	Table showing housing targets and distribution updated to show position at April 2015 – includes completions 2014/15. Footnotes now include "Small site permissions discounted to 75% to allow for non-implementation".	To update and to explain that a non- implementation allowance has been applied to small site commitments.
3.2.2	Reference to frontloading removed, text now included at new paragraph. 3.2.5.	For readability
3.2.3	The bulk of this paragraph removed.	Included in error – duplicates text at 3.2.1
3.2.5	New test added to include site N1(a) (Salkeld Road) as a 'reserve' or contingency site. Reference to frontloading added.	This site has been identified to provide an alternative delivery strategy should

Policy/ Paragraph	Changes made	Reason
		sites in Penrith fail to be built out at the rates anticipated – it gives additional certainty as the location of this alternative option.
3.2.5	Last bullet removed (this set out a windfall allowance of 10%) as land is now identified through the Land Availability Assessment.	To update
3.3.1	Following text inserted – "The town has a strong local food economy – it is estimated that local food supports 600 jobs at retailers and supplied around the town, and its sales help support £16.8 million turnover at supply chain businesses ¹ ".	In response to suggestion from Friends of the Lake District.
3.3.2	Reference to deprivation at Pategill and Penrith South wards removed	Over simplification/overstates the case.
3.4.2	References to walking and cycling added	In response to suggestion from Friends of the Lake District.
3.4.2	Reference to green infrastructure and public rights of way added	In response to suggestion from Friends of the Lake District and Penrith Ramblers.
Penrith - Vision	Reference to historic environment added at the end.	In response to suggestion from Historic England
3.5 – Policy PEN1	Reference to the affordable housing requirement from the policy – there is a separate policy covering the requirement for affordable housing and smaller schemes are exempt.	In discussion with our Development Management colleagues it was felt that it was not necessary to repeat Policy HS1
3.5 – Policy PEN1	Updated the overall housing figure and number of sites to 1536 across 14 allocated sites, a reduction from 1691 homes and 16 sites in the previously published version.	Revisions to site allocations following the consultation process and further work on the LAA, housing numbers and

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¹ From Field to Fork – Penrith. Campaign to Protect Rural England, June 2012.

Policy/ Paragraph	Changes made	Reason
		monitoring the approvals and completions from 2014-15.
3.5 – Policy PEN1	Reference to 20% buffer removed. The following text is added: "The main locations for housing are at Carleton to the east, and Salkeld Road, White Ox Farm and Raiselands to the north. A 'reserve' site (N1a) is identified at north of the allocation at Salkeld Road and will be released if land supply is below expectations." Maps have been amended accordingly.	To update the policy and reflect changes to allocations.
3.5 – Policy PEN1	Changed Gypsy and Traveller site allocation to Lakeland View, rather than Maidenhill. Maps have been amended accordingly.	Change to allocated site following consultation and discussions with land owners and substantial objections to the previously proposed site.
3.5 – Policy PEN1	The area of the Gilwilly extension amended to 11.91 hectares	To correct an error and to amend the northern boundary to avoid floodplain.
3.5 – Policy PEN1	The Penrith Town Centre boundary has been extended to include the New Squares development.	To update.
3.5 – Policy PEN1	The following text added to the final sentence: "and to aid movement around the town".	To recognise that other work will be carried out in line with the conclusions of the Penrith Transport Study.
3.5 – Policy PEN1	The following sentence is removed: "A site for mixed-use development is allocated at Old London Road".	The site remains available and is now allocated for housing development only.
3.5 – Policy PEN1	The sentence "an additional site is safeguarded for cemetery use has been identified at Beacon Edge."	No longer necessary.
Penrith Allocations Table/3.5.1/3.5.2	The following amendments are made to the allocations table: 1. Site E1 adjusted to 200 units (2019-24), and 299 units (2024-2032)- a total of 499, which is a reduction from 554 in the earlier plan version. Site E1a has full planning permission for 55 dwellings is under construction and is therefore removed from the	Updated based upon new information and current status of sites and changes to strategy.

Policy/ Paragraph	Changes made	Reason
	land allocations table, resulting in a reduction to the number of units allocated on this site.	
	Site E2 removed – planning permission granted for 44 units on the site.	
	3. Site E3 adjusted to 150 units (2019-24), and 150 units (2024-2032)	
	4. Site E4 adjusted to 54 units (2019-24), and 54 units (2024-2032)	
	5. Site N1 reduced to 100 units from 159, with 50 units expected 2014-19 and the remaining 50 expected between 2020-25. Preapplication discussions have led to a reduction in the number of units the site may be able to accommodate to achieve a suitable design and layout of the scheme. Site area reduced to 4.40 hectares.	
	6. Site N1a has been removed – this site is a 'reserve site'. Reference in supporting text added: "to guard against possible under-delivery a 'reserve site' (N1a) is identified at Salkeld Road. This will be released for development is housing supply is below expectations".	
	7. Site N3 has been amended to 230 units, an increase from 150 units in the earlier version of the plan and reflects a recently submitted planning application for the site. It is expected that 70 units will come forward between 2014-2019 and the remaining 160 units between 2019-2024. This has been updated to reflect the information provide to the Council be the developer in the form of a full planning application which is currently under consideration.	

Policy/ Paragraph	Changes made	Reason
	8. Site N2 has been added, with 49 units expected 2020-25 and a further 106 units expected between 2026-32	
	9. Site P2, phasing altered to 2026-32 from 2014-19	
	10. Site P61 phasing altered to 2019-24 and numbers altered to 37 based on similar nearby scheme density (town centre apartment site)	
	11. Site P71 has been reduced from 6 units to 5	
	12. Site P8, phasing altered to 2026-32 from 2020-25	
	13. Site P61, phasing altered to 2014-19 from 2026-32	
	14. Site P94, phasing altered to 2026-32 from 2020-25	
	15. Site P101 removed following objections and uncertainty over deliverability.	
	16. Site P86 (Garages at William Street) removed as it is in Flood Zone 3 (sequential test applies)	
	17. Site P115 added (Brentfield Way), 10 units expected between 2020 and 25. Deliverable brownfield site.	
	18. Area of the Gilwilly extension amended to 11.91 hectares	
	19. Reference to the safeguarded site for the extension of Penrith Cemetery is removed.	
3.5.1	20. Updated the overall housing figure and number of sites to 1,554 across 14 allocated sites, a reduction from 1691 homes and 16	

Policy/ Paragraph	Changes made	Reason
	sites in the previously published version	
	21. Updated Gypsy and Traveller site allocation to extension to Lakeland View, rather than Maidenhill	
3.6.6	Text added: "This may take the form of financial contributions or serviced land."	To highlight that contributions will be sought.
3.7.1	Sentence "This policy will be reviewed and become more focussed as further work is carried out to decide what best form of growth may be suitable on sites at the college" removed.	To reflect that this is the publication version of the plan.
3.8.3	Reference to importance of social enterprise in Alston added	In response to suggestion by Cllr. Pat Godwin
3.8.4	Reference to recreation added to Alston Vision	In response to suggestion from Friends of the Lake District.
3.9.1	'Historic environment' replaces 'built environment'	In response to suggestion from Historic England
3.10 – Policy AL1	Updated the overall housing figure to 86, a reduction from 87 in the previously published version	Revisions to site allocations following the consultation process and further work on the LAA, housing numbers and
	Added Site AL1 (Jollybeard Lane) as confirmed as available. Removed "Bruntley Meadows" and "Tyne Café" from the sites listed in the policy.	monitoring the approvals and completions from 2014-15. Site AL4 (Bruntley Meadows) removed as application withdrawn due to wildlife conservation issues.
	Removed affordable housing requirement from the policy – there is a separate policy covering the requirement for affordable housing (HS1)	
	Employment site at the Bonds Factory removed as it now has permission.	
3.10 – Policy AL1	Sentence added: "Development will be expected to adhere to	To update and alert readers to the SPD.

Policy/ Paragraph	Changes made	Reason
	guidance set out in the Alston Character Appraisal and Management Plan Supplementary Planning Document."	
Alston Land Allocation Table	Site AL1 (Jollybeard lane) added. Site AL4 removed (wildlife constraints). Sites AL8 and AL10 removed as no longer available. Site AL11, phasing altered to 2026-32 and reduced to 10 units due to known site constraints. Site AL12 re-phased to 2019-24. Site AL15 removed as it has an extant permission. Site AL16 added, with 10 units expected between 2026-32 Employment site at the Bonds Factory removed as it now has permission	Updated our site allocations based upon new information or known site constraints.
3.11 – Policy AL2	Title of policy updated to "Redevelopment in Alston Moor", instead of "Renovation in Alston Moor" -	Following discussion with our Development Management colleagues.
3.11 – Policy AL2	Bullet point 1 updated to read "reflects the scale, form and appearance of the original building".	Following discussion with our Development Management colleagues – scale considered a more suitable term than 'mass'.
3.11 – Policy AL2	Bullet Point 2 amended to read "Evidence can be provided to demonstrate that the former dwelling was once in use at that location and that the proposed redevelopment will make use of substantial remains and on site materials".	Following discussion with our Development Management colleagues and to make clear that the scheme should make re-use of materials.
3.11 – Policy AL2	The order of bullets points 1 & 2 is swapped. Bullet points 3 and 4 deleted	Following discussion with our Development Management colleagues. Bullet 3 now replaced by bullet 2, bullet 4 considered superfluous. Bullets 1 and 2 swapped to aid readability.
3.11 – Policy AL2	Classified replaced by "public" in bullet point 5 (now 3)	For certainty

Policy/ Paragraph	Changes made	Reason
3.11 – Policy AL2	Last sentence amended to read "will remove any permitted development rights which would normally apply to the building and its curtilage"	For clarity.
3.11.1	Renovation" replaced by "Redevelopment"	To match the policy text.
3.11.1	Revised text: "Conditions removing permitted development rights will be imposed at the time planning consent for redevelopment is granted" replaces "conditions removing permitted development rights may be imposed at the time planning consent for redevelopment is granted"	To match the policy text.
3.12.3	Reference to Appleby castle amended to state that its origins lie in the 12 th Century.	Response to suggestion from Sir Martin Holdgate
3.12.4	Reference to Appleby Castle deleted from vision.	Response to suggestion from Barbara Wilson – restricted access.
Site allocations table	Site AP10 - Boundary redrawn to exclude the Coal Yard, site. renamed accordingly.	Following a suggestion from Story Homes.
	Site AP11 – Re-phased to 40 units 2014-19 and 50 units 2024-32 on the basis that site AP5 (Back Lane), in same developer ownership likely to be built out first.	
	Reference amended from Drawbriggs Lane to south of Station Road	
		To correct an error.
3.14 – Policy AP1	Removed affordable housing requirement from the policy – there is a separate policy covering the requirement for affordable housing (HS1)	In discussion with our Development Management colleagues it was felt that it was not necessary to repeat Policy HS1.
3.17 - Policy KS1	Updated the overall housing figure to 192, an increase from 187 in	Revisions to site allocations following

Policy/ Paragraph	Changes made	Reason
	the previously published version	the consultation process and further work on the LAA, housing numbers and monitoring the approvals and completions from 2014-15.
3.17 - Policy KS1	Removed affordable housing requirement from the policy – there is a separate policy covering the requirement for affordable housing (HS1)	In discussion with our Development Management colleagues it was felt that it was not necessary to repeat Policy HS1.
3.17 - Policy KS1	Removed "Land at South Road/Whitehouse Farm" from the list of sites in the policy – the site is no longer allocated for development as planning permission was recently granted on appeal. Area of the business park extension amended to 3.33 hectares.	To update, and to make sure the business park does not prejudice the possible implementation of any bypass scheme that may come forward in the future (suggestion from Sir Martin Holdgate)
Kirkby Stephen – land Allocations Table	Site KS3 removed - the site has been granted planning permission on appeal. Site KS7, phasing altered from 2026-32 to 2014-19 – update to our site allocations based upon new information. Site KS15, number reduced to 60 from 75 in the earlier version of the plan to update our site allocations based upon new information (indicative layout). The overall site area has been reduced to 2.55 hectares. Site KS18 added (new site) with 35 units phased between 2014-19 – an update to our site allocations based upon new information. Area of the Business Park extension reduced to 3.33 hectares	To update, and to make sure the business park does not prejudice the possible implementation of any bypass scheme that may come forward in the future (suggestion from Sir Martin Holdgate)
3.18	Objectives added for the rural areas:	To achieve consistency with Town Plan

Policy/ Paragraph	Changes made	Reason
	To protect and enhance their landscape setting and historic environment	sections and set out the purpose of the policies.
	To allow for sensitively designed small scale new development to help sustain services	
	To encourage self-build housing as a means of allowing local people to meet their own housing needs	
	To encourage tourism as a means of sustaining the rural economy	
	To allow for the sensitive conversion of traditional rural buildings to active use	
	To devolve plan-making to local level where possible, by offering support to communities producing neighbourhood plans	
3.19 – (old) Policy RUR1	Removed general RUR1 policy, as the purpose of the policy was to allocate housing sites in the key hubs. Removed references to RUR1 in the objectives section as no longer relevant.	As we are no longer allocating in the key hubs the policy has lost its purpose. The overall locational strategy for the key hubs is still in LS1, so RUR1 without the allocations wasn't adding anything.
3.19. – New Policy RUR1	Old Policy RUR1 replaced with new policy on large scale agricultural buildings, based on the guidelines in Part 4 of the Eden Design Guide: "New agricultural buildings should be integrated into the existing farm complex wherever possible to reflect the traditional clustering of rural buildings. Where there is justification for a new farm building to be built in isolation from existing buildings, permission will be granted where the following criteria have been met:	Considered necessary given rural nature of Eden, following discussion with Development management colleagues.

Policy/ Paragraph	Changes made	Reason
	The proposal carefully considers topography and landform and how the building can be sited to minimise its visual and landscape impact.	
	 Opportunities have been taken to retain existing planting and introduce new native tree planting to help screen new buildings where necessary. 	
	The proposal utilises subdued colours to reduce the visual prominence of the new building."	
3.19.1 & 2	New supporting text:	To update, and to signpost the Eden
	Explanation	Design Guide.
	 3.19.1 Agriculture is a fundamental part of Eden's economy, culture and landscape. The Local Plan needs to support the rural economy and ensure that the right balance is struck between new development and the protection of the special characteristics of Eden's rural landscape. The farming landscape is characterised by traditional arrangements of farm buildings clustered around farmhouses and courtyards, with simple building forms and traditional local building materials. Modern large agricultural buildings can, if not designed and sited sensitively, have a harmful impact on the landscape character of the rural area. For example where they are positioned in open and obtrusive locations, such as the crests of hills, have unusual and overly complex building forms, or brightly coloured and reflective materials and colouring which make them particularly prominent across long distance views across the landscape. 3.19.2 The Eden Design Guide has been produced to provide guidance to applicants on how good design can be achieved 	

Policy/ Paragraph	Changes made	Reason
	across a range of development types, and will be a material consideration in determining planning applications. The Guide provides guidance on large-scale commercial and agricultural development and proposals for new agricultural buildings will be expected to accord with the guidelines.	
	Reason for the Policy	
	3.19.3 This policy recognises that there will be a need for new purpose built agricultural building s over the plan period and provides a clear framework for assessing planning applications to ensure new buildings are designed and sited sensitively.	
3.20 - Policy RUR2	The word 'redundant' replaces 'existing' in the title and is added in the first sentence.	To make clear that this policy would not apply to change of use from an active holiday let.
3.20 - Policy RUR2	'Structurally sound' deleted (also at 3.21.3)	To make more in line with the findings of the Eden Scrutiny Review and to increase opportunities for sensitive reuse of historic buildings.
3.20 - Policy RUR2	Criterion 3 amended to refer to design and materials and remove reference to internal features	To make more in line with the findings of the Eden Scrutiny Review and to increase opportunities for sensitive reuse of historic buildings.
3.20 - Policy RUR2	Reference to historic environment added at criterion 4.	In response to suggestion from Historic England
3.20 - Policy RUR2	The word "architectural" is inserted before quality in bullet point 2	Following discussion with our Development Management colleagues – additional clarity.
3.20 - Policy RUR2	Removed "and sustainable design" from bullet point 3.	Following discussion with our Development Management colleagues

Policy/ Paragraph	Changes made	Reason
		as unclear as to what is expected.
3.20 - Policy RUR2	Replaced "redeveloped" with "developed" in bullet point 4.	Following discussion with our Development Management colleagues – additional clarity.
3.20 - Policy RUR2	Replaced "classified highway" with "public road' in bullet point 7 and reference to 'habitable' dwellings added	Following discussion with our Development Management colleagues – additional clarity and to reflect that not all roads may be classified and that buildings nearby must be habitable.
3.20 - Policy RUR2	Inserted an additional bullet point "the proposal will not conflict with existing adjoining land uses" (now bullet point 9)	Following discussion with our Development Management colleagues
3.20 - Policy RUR2	Bullet point 9 becomes 10, and is reworded to say "the Council will remove any permitted development rights where appropriate which would normally apply to the building and its curtilage"	Improved wording, and to anticipate that in some circumstances it may not be appropriate or possible to remove rights.
3.20.2	"This policy therefore restricts reuse to traditional buildings only" is deleted from the paragraph	Considered unnecessary as part of the explanation of unsuitable buildings or locations.
3.20.2	Further explanation of the tests that will be applied as 'close proximity' is defined as 'within easy walking distance	For clarity.
(Old) paragraph 3.20.4 (now 3.20.5)	Amendment made to the last sentence: "the means of access and drainage" instead of "the means and access and drainage".	To correct a typing error.
New paragraph 3.20.4	Revised text: "This policy is likely to apply to single dwelling or small scale schemes which will fall under the thresholds above which a contribution to affordable housing will be sought. However, in the event larger suitable schemes come forward under this policy will not be expected to provide any contributions towards affordable housing, or meet affordability criteria, in recognition of the costs of sensitively	In response to a suggestion from PFK agents and to recognise that viability may be compromised if contributions are sought.

Policy/ Paragraph	Changes made	Reason
	reusing existing buildings".	
New paragraphs 3.20.5 & 7	The following paragraphs are added: "The Government recently announced a series of amendments to what are known as 'permitted development rights' where planning permission is not required to change the use of a building. Since June 2013 agricultural buildings under 500 square metres can change to a number of other uses (retail, office, warehousing, hotels and guest houses and leisure uses) without permission being needed. For buildings between 150 square metres and 500 square metres, prior approval from the District Council (covering flooding, highways and transport impacts, and noise) is required. In April 2014 further rights were introduced which allow the change of use and some associated physical works from buildings used for agricultural purposes to residential use (C3). This also involves a 'prior approval' process to allow a local planning authority to consider impacts of the proposed change. Further information is available on the Council's website. This policy is therefore intended to apply to larger schemes or conversion from non-agricultural uses. These new permitted development rights for the conversion of an agricultural building to a dwelling do not apply to listed buildings, or buildings, which are located within a conservation area or within the North Pennines Area of Outstanding Natural Beauty. The permitted development rights also exclude sites, which are, or form part of a Site of Special Scientific Interest, a safety hazard area or a military explosives storage area. Sites, which are, or contain a scheduled monument, are also excluded from these rights. Where these exclusions apply, an application for planning permission will be required, alongside any other associated consent, which may be required."	To update the plan to indicate that permitted development rights may now apply.
3.21 - Policy	Second criterion deleted: "Involve the expansion of appropriate and	Considered over-restrictive – would

Policy/ Paragraph	Changes made	Reason
RUR3	existing businesses"	preclude new business start-ups.
3.21 - Policy RUR3	Reference to historic environment added.	In response to suggestion from Historic England
Implementation and Monitoring, page 89.	Amendments to reflect new policy RUR1	To update.
Paragraph 4.1	Heading 'Development in the right place' changed to 'development principles' to better reflect content of policies.	
4.2 - Policy DEV1	The words 'without delay' are added to more closely follow the model wording suggested by the Planning Inspectorate on the presumption in favour of sustainable development. Exact wording not used as it describes a process rather than a policy.	In response to suggestion from the Church Commissioners
4.2 - Policy DEV1	A reference to unstable land is added	In response to suggestion from the Coal Authority
4.2 - Policy DEV1	A reference to safe communities is added	In response to suggestion from Cumbria Police
4.2 - Policy DEV1	A reference to flood risk is added	In response to suggestion from United Utilities
4.2 - Policy DEV1	A reference to the natural and cultural environment is added	In response to suggestion from Friends of the Lake District.
4.2.2	"that underpin the health and well-being of communities" is added to the end of the paragraph.	To add a reference to health.
4.2 - Policy DEV1	Policy amended to make sure that critical drainage areas are protected from inappropriate development at not all areas at risk of surface water flooding.	Clarity. Policy originally implied all areas at risk of flooding were critical drainage areas.
4.3 - Policy DEV2	Following text added: "Surface water should be discharged in the following order of priority: 1. An adequate soakaway or some other form of infiltration system	In response to a request from United Utilities

Policy/ Paragraph	Changes made	Reason
	2. An attenuated discharge to the watercourse	
	3. An attenuated discharge to a public surface water sewer	
	4. An attenuated discharge to a public combined sewer	
4.3.2	Paragraph amended to reflect that the Sustainable Urban Drainage Approval Boards were now operational	Factual update.
4.3.3	Following paragraph added:	In response to a request from United
	"Surface water should be managed at source and not transferred. On greenfield sites applicants will be expected to demonstrate that the current natural drainage solution from a site is at least mimicked. A discharge to groundwater or the watercourse may require consent from the Environment Agency. Applicants wishing to discharge to a public sewer will need to submit clear evidence demonstrating that alternative options are not available."	Utilities
4.4 - Policy	The following criterion is added:	In response to suggestion from Network
DEV3	"It leads to a material increase or significant change in the character of traffic using a rail crossing, unless it can be demonstrated that safety will not be compromised, in consultation with Network Rail"	Rail
4.4 - Policy DEV3	Reference to future development creating need for public transport added	In response to suggestion from the Church Commissioners
4.4 - Policy DEV3	Reference to disabled people added in second paragraph	In response to suggestion from Cumbria County Council
4.4 - Policy DEV3	Reference to cyclists added in second criterion.	In response to suggestion from Friends of the Lake District.
4.5 - Policy	New sentence added: "Contributions must be necessary and ensure	In response to suggestion from
DEV4	the viability of development is maintained"	Sainsbury's supermarkets.
4.5.1	Reference to phasing added.	In response to suggestion from United Utilities.
4.5.2	Reference to the County Council's planning obligations document	In response to suggestion from

Policy/ Paragraph	Changes made	Reason
	added.	Cumbria County Council.
4.5.4	Under environmental infrastructure 'urban' deleted with reference to green spaces. Landscaping added.	In response to suggestion from Cumbria County Council.
4.5.4	Some further amendments made – references to fire services, drainage infrastructure, schools and adult social care added. Other suggestions not incorporated as they fall outside the definition of infrastructure within the 2008 Planning Act (heritage assets, renewable energy, employment initiatives, and public art).	In response to suggestion from Cumbria County Council.
4.5.4	Education provision amended to include all types of education not just further and higher education facilities	To correct an omission.
4.5.4	Reference to emergency services added	In response to suggestion from Cumbria Police
4.5.4	Drainage infrastructure added to list of environmental infrastructure	To correct an omission.
4.6 – Policy DEV5	Criterion 6 amended to read "uses quality materials which complement or enhance local surroundings" – no longer requires use of local materials	To make the policy less onerous and reflect that suitable materials can be sourced from elsewhere.
4.6 – Policy DEV5	Reference to the forthcoming design guide added	To update
4.6 – Policy DEV5	The sentence "The development of public art, particularly as part of significant new developments will be supported" Has been removed	Provision of public art cannot be required in new development – policy considered superfluous.
4.6.2	The paragraph on character areas now recognises that some areas may contain a mix of styles	In response to suggestion from Sir Martin Holdgate.
4.6.5	Reference to landscape guidance , the AoNB Design Guide and conservation area appraisals added	In response to suggestion from Cumbria County Council.
4.6.6	The following text is added: :Major development proposes will also be expected to adhere to 'Building for Life' principles:"	To improve clarity and readability.

Policy/ Paragraph	Changes made	Reason
4.8 - Policy HS1	Policy has been amended to state that small scale contributions will be paid on completion of the units.	To inform applicants.
4.8 - Policy HS1	The following text is added: "Small numbers of market housing aimed at enabling the delivery of affordable homes to meet local need may be acceptable on an exceptional basis."	In response to suggestion from the Church Commissioners and to better reflect national policy (NPPF paragraph 54).
4.8.3	Paragraph amended to reflect District Council's aspiration that a split of 70% affordable rent and 30% intermediate housing will be sought.	
4.8.3	"Further information on our approach to affordable housing provision is set of in our 'Housing' Supplementary Planning Document" is added.	For information.
4.8.4	'at 'least' is removed.	No circumstances are envisaged where a higher discount would be sought.
4.8.6	Text amended to refer to the update of economic viability evidence currently being undertaken.	To update.
4.8.7	Minimum unit sizes removed for affordable housing.	In response to suggestions from the Home Builders Federation and Barratt Homes and to reflect changes to national planning guidance.
4.9 - Policy HS2	Reference to gross internal floorspace added to maximum space standard of 150 square metres in the resultant building.	To make clear how this policy requirement is to be calculated, to avoid being over restrictive and to harmonise the threshold with the one in Policy HS3.
4.9 - Policy HS2	The words 'throughout the district' are removed from the end of the first sentence as policy is ambiguous as it then refers to infilling and rounding off.	In response to a suggestions from Mr. J Chadwick
4.9 - Policy HS2	The following text is added: "No local occupancy restrictions will be applied where suitable housing comes forward on previously developed land, in recognition of the higher costs of developing such	To help encourage re-use of brownfield land in previously developed land in villages.

Policy/ Paragraph	Changes made	Reason
	sites and the opportunities they may bring to help improve the character and appearance of villages and support local services."	
4.9 - Policy HS2	The reference to self-build from the policy wording as it was confusing the policy, suggesting it just relates to self-build. Self-build promotion is still in the supporting text. Reference to towns and key hubs also removed as superfluous.	For clarity.
4.9 – Policy HS2	Policy renamed to 'Housing to Meet Local Demand 'to ensure consistency with Policy LS1 (previously named Housing Need.	For consistency.
4.9.3	Reworded supporting text relating to the removal of local connection criteria as it wasn't clear and contradicted the criteria by requiring the property to be marketed in the 'locality' rather than in accordance with local connection criteria, which would allow someone from outside the locality to qualify.	For clarity.
4.9.3	Local Connection Criteria – some amendments made – See Appendix 6.	
4.10 Policy HS3	The size limit of 125 m ² is amended to 150m ² . Policy now makes clear this refers to gross internal floorspace. Reference to additional or secondary dwellings removed as policy applies to dwellings in any location. Policy also includes some flexibility for a larger dwelling if there is a proven need to support the enterprise. Reference to 'integral' outbuildings removed as unclear.	To bring the policy into line with current practice as set out in the current housing SPD (paragraph 4.7.2),
4.10.2	Reference to further guidance on the application of this policy being available in Section 4.7 of the Housing Supplementary Planning Document is removed. Relevant text is included within the plan,	This document is being updated/replaced.
4.11 Policy HS4	Bullet point 2 removed: "The Council's Housing Needs Study, which will be kept under review."	Now replaced by the Strategic Housing Market Assessment.
4.11.1	Reference to the Strategic Housing Market Assessment changed from 2009 to 2015.	To update.
4.12 - Policy HS5	Policy HS5 renamed to "Accessible and Adaptable Dwellings" in	As a result of the National Housing

Policy/ Paragraph	Changes made	Reason
	order to enable the Council to apply Optional Building Regulations Requirement M\$(2) Category 2 – Accessible and Adaptable Dwellings. The policy has been rewritten to 'opt in' to the new national standards for accessible and adaptable dwellings. Existing criteria therefore deleted. This policy applies to major housing sites (10 or more new dwellings) where 20% of new housing is expected to be adaptable/accessible. This percentage is based on POPPI (Projecting Older People Population Information and PANSI (Projecting Adult Needs and Service Information) data on mobility' long term illness and physical ability data, along with data on the over 75s living alone.	Standards Review.
4.12 - Policy HS5	Reference to the Lifetimes Homes standard is removed.	To comply with policy changes brought about by the Government's national housing standards review.
4.12 - Policy HS5	Criterion 2 relating to the need to demonstrate a local need for such housing removed.	Not considered necessary. Providers would not be seeking to build such accommodation if there is no need.
4.12.1 to 4.12.3	New supporting text added to justify the introduction of the optional requirement.	To update.
4.14.2	Reference to Lakeland View replaces site at Maidenhill.	To update.
4.16 – Policy EC1	Amount of land identified amended to 24.38 hectares following site changes (see Town Plans sections)	To update.
4.17 - Policy EC2	Following text added:"and there is no significant adverse impact upon the continued operation of neighbouring existing uses".	In response to suggestion from the Royal Mail.
4.18 - Policy EC3	Reference to historic environment added and text amended to refer to 'not causing harm to"	In response to a suggestion from Historic England.
4.18 – Policy EC3	Following text removed: "Developers will be encouraged to consider wider sustainability solutions and compliance with Building Research Establishment Environmental Assessment (BREEAM) ratings unless it can be established that it is not commercially viable to do so".	Removed due to uncertainty on implementation.

Policy/ Paragraph	Changes made	Reason
4.19 - Policy EC4	Title and criterion 1 amended to also refer to facilities.	In response to a suggestion from Appleby Town Council.
4.19 - Policy EC4	First line – 'pressure' replaced with 'numbers'	For clarity.
4.19 - Policy EC4	Bullet point 4 amended to remove reference to "in relation to its historic environment and landscape setting"	Other policies cover impact to the historic environment (ENV10) and landscape setting.
4.19 - Policy EC4	New criterion (7) added covering tranquillity/dark skies 22.	In response to a suggestion from Friends of the Lake District
4.19 - Policy EC4	Replaced "They" with "The development proposed" and "locality" with "area" in bullet point 1	For clarity, and for the avoidance of doubt, "locality" is defined elsewhere in the document as being parish and adjoining parishes, whereas large scale tourism should be assessed across a wider scale, ie Eden.

Policy/ Paragraph	Changes made	Reason
4.19 - Policy EC4	Small Scale Development now reads:	Policy amended following discussion with development management
	"Small scale tourism development will be permitted where it meets one of the following criteria:	colleagues and to improve clarity. Amended to clarify suitable locations for
	i) Any proposed new build development is located within a Town or Key Hub;	tourism development without reference to Policy LS1, which focuses almost solely on new housing development.
	ii) Where the proposal involves the re-use of an existing building, or previously developed land;	Also increase flexibility, allowing reuse of existing buildings or land and in
	iii) The proposed development forms part of a farm diversification scheme;	circumstances where it needs to be in or can benefit from a specific location. Reference to new build development
	iv) The development proposed is located outside of a Town or Key Hub, but due to the nature of the development proposed it relies upon a specific geographic resource or countryside location, and the specific location selected for the development can be justified"	added at criterion (i) to allow for some flexibility for existing businesses.
4.19 - Policy EC4	The generalised statement about occupancy conditions is removed and replaced with a reference to conditions in the permanent structure section of the policy - "The Council may impose planning conditions to avoid continual residential use of such sites where they are located in the open countryside."	To clarify when holiday restrictions will apply
	The following text is added to the section on non-permanent accommodation: "The Council will may impose planning conditions to avoid continual residential use of such sites or seasonal restrictions where necessary to safeguard the landscape".	
4.19 - Policy EC4	The word "new" is deleted" from bullet point 2 of small scale non- permanent development –	This criterion will apply to both new and existing sites.
4.19 - Policy EC5	The word 'visual' is deleted in the first paragraph and 'public'	To refer to all amenity and make clear

Policy/ Paragraph	Changes made	Reason
	substituted for 'highway' before safety.	that safety considerations extend beyond the highway
4.19 - Policy EC5	Reference to the requirement for roadside sign to not carry advertising removed	To avoid confusion
4.22 - Policy EC7	Penrith now termed a Town Centre and Alston, Appleby and Kirkby Stephen as District Centres.	For clarity and to harmonise text with the first line of the policy and the 2014 retail study.
4.22 - Policy EC7	New criterion added (1) about not harming the operation of existing service operations,	Following a response from the Royal Mail
4.22 - Policy EC7	The policy now splits the policy between considerations for development within centres, and outside centres. The term 'primary retail area' has been replaced by 'primary shopping area'.	To aid clarity, to use the NPPF terminology/definition.
4.22 - Policy EC7	The paragraph referring to changes of use within primary shopping frontages has been deleted. References to maintaining vitality and viability of centres is also covered by criterion 2.	Advice from the retail study was it was felt that the limited size and mix of uses within the respective centres made it difficult to define distinct primary and secondary shopping frontages within the primary shopping areas – the study recommended at 8.6. that areas were the same.
4.22 - Policy EC7	Reference to the National Planning Policy Framework added	To make clear that applications will be assessed against the NPPF.
4.22 - Policy EC7	Addition to the final paragraph to make clear that development outside the town and district centres will only be permitted if it will not have a significant adverse impact on the vitality and viability of existing centres.	To make sure the plan is NPPF compliant and to aid clarity.
4.22.1	Supporting text amended –boundaries will be shown on Policies map, not within the Local Plan document.	To update
4.2.2	Reference to potential development at The Sands, Appleby removed.	This is uncertain.
4.22.4	Paragraph removed.	It refers to primary and secondary

Policy/ Paragraph	Changes made	Reason
		frontages and proportions of retail uses that should be expected on them, but the retail study and Local Plan do not identify frontages so the text does not add anything and would be difficult to apply to proposals. Also the text referring to changes of use only covers certain changes, and also some of those mentioned are already covered by permitted development rights so the purpose of the text is unclear. The policy wording itself covers change of
4.24 - Policy ENV1	The following text is removed: <i>Proposals will need to demonstrate</i> that they avoid harm to European sites and will be required to submit sufficient information in the form of a Habitats Regulation Assessment Screening Opinion to confirm that this is the case.	use proposals sufficiently. Superfluous text, and removed to confirm that not all applications will be expected to screen for possible effects.
4.24 - Policy ENV1	'International' added to 'European Sites' in subtitle.	In response to a suggestion from Sir Martin Holdgate to reflect fact that Ramsar sites are an international designation.
4.24 - Policy ENV1	Reference to limestone pavement orders moved to list of national sites	To clarify – designated by local authorities but a national designation under the 1981 Wildlife and Countryside Act.
4.24 - Policy ENV1	Reference to Habitats and Species of Principal Importance (NERC Act Section 41 list) added to Local Sites,	In response to a suggestion from Natural England
4.24 - Policy ENV1	'Protect' added to paragraphs 1 & 2 at the end of the policy.	In response to a suggestion from Natural England
4.24 - Policy	Reference to soils added under Local Sites section	In response to a suggestion from

Policy/ Paragraph	Changes made	Reason
ENV1		Friends of the Lake District
4.25 - Policy ENV2	First sentence amended to: "New development will only be permitted where it conserves and enhances distinctive elements of landscape character and function".	In response to a suggestion from Historic England.
4.25 - Policy ENV2	New criterion 5 added covering tranquillity	In response to a suggestion from Friends of the Lake District
4.26 - Policy ENV3	Policy text amended to use 'conserve and enhance' rather than "'detrimental to"	In response to a suggestion from Mr J Chadwick and use phrasing set out in the in the NPPF
4.27 – Policy ENV4	"Recreational Land" removed from the policy title	To avoid overlap with Policy COM2 and COM3.
4.27 – Policy ENV4	Bullet Point 2 deleted	Considered superfluous
4.27 – Policy ENV4	Bullet Point 3 amended to read "Proposals account for any known local deficiencies of green infrastructure identified by the Council" instead of "Proposals account for any known deficiencies of green infrastructure identified by the Council and seek to address this through development strategies";	To clarify the intention of the policy.
4.27 – Policy ENV4	Bullet Point 4 deleted	Considered superfluous/too onerous for all sites
4.27 – Policy ENV4	Last paragraph updated to "Contributions may be sought for off-site provision where this leads to the creation and maintenance of a strategic network of green infrastructure capable of bringing benefits to the users of the development", instead of "Where it is not possible to provide on-site green infrastructure financial contributions may be sought for off-site provision where this leads to the creation and maintenance of a strategic network of green infrastructure capable of bringing benefits to the users of the development".	To clarify the intention of the policy.

Policy/ Paragraph	Changes made	Reason
4.27.1	A reference to walking and cycling added in third sentence.	In response to a suggestion from Eden Cycling Campaign
4.28 - Policy ENV5	Policy ENV5 and supporting text replaced with a 'Environmentally Sustainability Design' policy, which focuses more on wider layout and general sustainability issues rather than the fabric of buildings:	Partly in response to the national housing standards review which has removed the ability of LAs to require
	"Proposals for residential and commercial development schemes should demonstrate, where practical, that they have considered: - Maximising daylight and passive solar gain through the orientation of buildings.	efficiency standards in excess of those set in Building Regulations.
	- Integrating sustainable urban drainage systems.	
	 Designing and positioning buildings to minimise wind funnelling, frost pockets and uncomfortable microclimates. 	
	 Integrating renewable energy technology into the scheme, and in larger schemes exploring the scope for district heating. 	
	 Minimising construction waste, through for example designing out waste during the design stage, selecting sustainable and efficient building materials and reusing materials where possible. 	
	 Providing well-designed and visually unobtrusive outdoor waste storage areas to promote recycling. 	
	Promoting sustainable transport modes, through for example careful layout and road design to ensure it is conducive to walking and cycling and prioritises the pedestrian and cyclist over the car."	

Policy/ Paragraph	Changes made	Reason
4.28.3	Paragraph revised to read:	To reflect changes to legislation arising
	"Residential development is a major source of greenhouse gas emissions and in Eden household fuel and electricity is estimated to contribute over 20% to each resident's carbon footprint. Driving up energy efficiency standards in new housing is therefore an important priority to help meet greenhouse gas targets, and well as tackling issues of high household bills and fuel poverty which are key issues in Eden. As a result of the Government's National Standards Review, which was finalised in March 2015, local authorities can no longer apply additional standards relating to the construction, internal layout or performance of new dwellings. The review has resulted in the withdrawal of the Code for Sustainable Homes, and the energy efficiency of new homes will instead be delivered through higher standards being required through Part L of the Building Regulations".	from the Government's Housing Standards Review.
4.28.4	Paragraph deleted (discussed the zero carbon standard)	In light of the Government's announcement in the productivity Plan that it will not implement the standard.
4.29 - Policy ENV6	Title of policy changed to 'Renewable Energy'. Revised policy wording: "Renewable and low carbon energy schemes will be supported where: 1. Proposals can be incorporated into the local landscape without significant adverse impact; particular attention will be paid to the landscape impact of proposed developments which are located close to or within the North Pennines AONB and the National Parks; 2. Proposals respect the form of the built environment, including	This policy has been amended in light of comments received during the preferred options consultation - including from Historic England (criterion 2) and Northumberland County Council (criterion 1 includes designated landscapes) and Friends of the Lake District (criterion 6 referring to community schemes)- but also to better reflect a broader range of renewable energy schemes technologies. Criterion 8 now included to reflect the
	settlement character and heritage assets, with particular	Government's revised policy position on

Policy/ Paragraph	Changes made	Reason
	attention paid not only to the potential impact on the heritage asset itself, but also to its wider setting;	wind energy. Suitable areas are shown on the Policies Map.
	3. The development proposed will not have an unacceptable impact on the amenity of local residents and can demonstrate that there is sufficient mitigation measures to minimise the impact of noise, smell or other nuisance or pollutants likely to affect nearby occupiers and neighbouring land uses;	
	 It can be demonstrated that the natural environment, including designated sites will not be adversely affected (and where possible enhanced); 	
	 The local road network can satisfactorily accommodate the development proposed; 	
	6. The proposed scheme will provide benefits to the community through their involvement with the proposal;	
	7. Where necessary, an assessment of the cumulative impacts of renewable energy developments has been undertaken, and there is found to be no significant adverse impact;	
	8. For proposals involving wind energy developments, the development is located in a 'suitable area' (identified on the Policies Map) and following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore	

Policy/ Paragraph	Changes made	Reason
	the proposal has their backing;	
	 The proposed scheme will not have an unacceptable effect on civil or military aviation and/or other defense related installations; 	
	10. The proposed scheme will not have an unacceptable effect on existing telecommunications infrastructure;	
	11. Suitable measures have been included for the removal of redundant structures or equipment and for the restoration of the site, should the site become non-operational.	
	Where mitigation is required to make any identified impacts acceptable these will, where necessary, be secured through condition or planning obligations." –	
4.29.1	Paragraph deleted and replaced by: 4.29.1 "Eden is a large but sparsely populated district with high quality, undeveloped landscapes. It also contains a number of landscape designations such as the North Pennines AONB, which under national planning policy demands that great weight is given to the conservation of landscape and scenic beauty.	To reflect the Government's revised policy position on wind energy. Suitable areas are shown on the Policies Map. To reflect the many comments received requesting an 800 metre separation distance between larger turbines and residential properties.
	4.29.2 The Council recognises the importance protecting our natural environment whilst making the most effective use of our natural resources through renewable energy generation. Renewable energy is the collective term used for repeatedly occurring natural energy sources; typically these include energy from wind, biomass, waste, hydropower, solar, heat pumps, wood fuel and others as technologies develop. This criteria based policy will be used to ensure that renewable energy development is sited in the most	

Policy/ Paragraph	Changes made	Reason
	appropriate locations, be that large scale or micro-renewable schemes (where planning permission is required).	
	4.29.3 Applications for types of renewable energy technologies, such as anaerobic digestion plants which import off-site waste materials would come under the remit of Cumbria County Council as the Planning Authority for Minerals and Waste.	
	4.29.3 The Cumbria Renewable Energy Study (2011) considers a range of renewable energy sources, translating potential into capacity up to 2030. The study considers potential technical capacity from wind, biomass, energy from waste, hydropower, solar and heat pumps. The study identified the potential for an additional 71MW by 2030 ² .	
	4.29.4 Proposals for renewable energy developments may inevitably have some local environmental implications. Any significant adverse impact should be considered against the wider social, economic and environmental benefits of a scheme.	
	4.29.5 In June 2015 Greg Clark MP announced in his Ministerial Statement that new considerations to be applied to proposed wind energy development so that local people have the final say on wind farm applications, the NPPG was subsequently amended to reflect these new provisions. As a result the Council has undertaken an assessment of 'suitable areas', which can be found on the Policies Map.	
	4.29.6 In order to address community concerns and in the interests of residential amenity and safety, a minimum separation distance of	

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² Cumbria Renewable Energy Study (2011): http://www.cumbria.gov.uk/eLibrary/Content/Internet/538/755/1599/40890154140.pdf

Policy/ Paragraph	Changes made	Reason
	800m between wind turbines (over 25m to blade tip) and residential properties will be expected. It is recognised that in some cases due to site - specific factors such as orientation of views, land cover, other buildings and topography it may be appropriate to vary this threshold, where it can be demonstrated through evidence that there is no unacceptable impact on residential amenity. Shorter distances may also be appropriate if there is support from the local community.	
4.29.2	"4.29.6 It is important that we create opportunities through the planning system for decentralised energy, and reduce our reliance on fossil fuels. This policy therefore aims to encourage new low carbon energy schemes whilst setting out safeguards to ensure they have no or minimal impact on quality of life in the district. 4.29.7 The NPPF advises that all local authorities should plan for a low carbon economy, recognising longer-term benefits of low carbon energy generation. The guidance promotes a proactive approach towards the creation of renewable energy sources, which recognises the responsibility of all areas to contribute towards energy generation. This approach is supported by the Cumbria Renewable Energy Study. 4.29.8 This policy aims to mirror the supportive approach within the NPPF, whilst including provisions to ensure local landscapes are protected from inappropriate development and significant adverse effects can be avoided."	Revised explanation to better reflect the newly drafted policy wording.
4.30 - Policy ENV7	Policy deleted.	ENV6 now covers all types of renewable and low carbon energy schemes.
4.30.1-4.30.9	Paragraphs deleted.	Policy ENV7 has been deleted so there is no longer a requirement for the

Policy/ Paragraph	Changes made	Reason
		explanatory text.
New paragraph 4.30.5	"Specific guidance in regard to wind energy developments in Cumbria is contained in the Cumbria Wind Energy Supplementary Planning Document (SPD), which was adopted by Eden District Council in 2008. The SPD, alongside the Cumbria Renewable Energy Study (2011) addresses the concurrent needs, outlined in the NPPF and supporting guidance, for local planning authorities to prepare positive strategies in regard to renewable energy development, and conserve and enhance valued landscapes. The SPD includes a detailed landscape capacity assessment, which highlights the key characteristics and particular sensitivities which inform the potential capacity of different landscape areas to support wind energy development. This has been developed to enable a consistent and holistic approach to be taken when considering the effects of wind energy development on the distinctive and often high quality landscape character of Cumbria. The SPD contains guidance on the assessment of cumulative impact. Cumbria County Council have also produced a further evidence base and guidance in regard to the cumulative impacts of vertical infrastructure upon landscape character and visual amenity across the county. This work will be a material consideration in the assessment of the cumulative effects of wind energy proposals"	In response to a suggestion from Cumbria County Council
4.31.2	'Declared' changed to 'Proposed'	Identification has not yet been finalised.
4.32 - Policy ENV9	The following text is removed: As a minimum, land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990.	Taken out as superfluous and to recognise that land with more issues than sites identified under Part 2A can come forward if there is suitable mitigation.

Policy/ Paragraph	Changes made	Reason
4.34 - Policy	Title of policy amended to refer to historic environment as too	In response to suggestions from
ENV11	narrowly focussed on the built environment.	Cumbria County Council
4.34 - Policy	Policy reworded to better reflect the NPPF, as suggested in Cumbria	In response to a suggestion from
ENV11	County Council's response.	Cumbria County Council
4.34.4	Supporting text amended following comments from Cumbria County	In response to a suggestion from
	Council	Cumbria County Council
Environmental Policies – Implementation and monitoring.	Removed Policy ENV7 and renumbered policies accordingly.	ENV7 is a deleted policy.
4.37 - Policy COM2	Re-titled as 'protection of open space, sport, leisure and recreational facilities'	Amended as the policy aspects relating to providing new space are now in COM3.
4.37 - Policy	"Within settlements" deleted from the first sentence as protection of	
COM2	open space applies to all areas.	
4.37 - Policy	The first sentence now reads: "Development proposals for new open	Considered superfluous/moved to a
COM2	space, sport, leisure and recreational facilities will be supported" is deleted, as well as the final sentence covering contributions (now in Policy COM4)	new policy.
4.37.4 (new)	Reference to open space being shown on the policies map added	Areas now shown on the Policies map.
4.38 - New Policy - COM3	New policy and supporting text to encourage the provision of new open space in development. Threshold of 10 dwellings or more taken from existing policy (Policy BE20 of the 1996 Local Plan) and tested for viability through viability work.	To update the plan and incorporate findings of the Eden Open Space Study.
	"Large-scale residential schemes will be expected to include on-site provision of open space unless it is considered impractical or unfeasible. An off-site contribution may be more considered more appropriate if it results in the provision of accessible open space for the development or would result in the upgrading of existing facilities,	

Policy/ Paragraph	Changes made	Reason
	which can be used for the benefit of the residents. On smaller sites where there is a demonstrable under provision of existing open space, contributions may be sought towards the provision of additional and accessible open space or for the upgrading of existing facilities. The contribution may be sought as a commuted cash sum payment".	
4.8.3	Revised open space standards set out – list reduced to aid clarity.	To update the plan and incorporate findings of the Eden Open Space Study.
4.8.3	Revised open space standards to reflect local standards through the Open Space Audit	To update the plan and incorporate the findings of the Eden Open Space Study in relation to quantum standards.
Page 158	Reference to Local Biodiversity Action Plan removed – now superseded by the UK post 2010 Biodiversity Framework, and Section 41 of the NERC Act.	Response to suggestion by Natural England
Appendix 1	Introductory text updated to reflect that the plan is intended to be a final version: "In accordance with Regulation 8(5) of the Town and County Planning (Local Planning) (England Regulations 2012 the following table explains which policies in this plan are intended to replace existing 'saved' policies contained in the 1996 Eden Local Plan. This plan is also intended to replace all policies in the 2010 Eden District Core Strategy."	Update.
Appendix 2 and 3	Factual updates	Factual updates
Appendix 6	Local occupancy criteria amended for Policy HS2: "New houses permitted in the villages and hamlets under Policy HS2 shall only be occupied by a person with a local connection and this will be controlled by a planning condition or legal agreement. A person with a local connection means a person who meets one of the	Following discussion with Council's Housing Manager and to widen the criteria to ease access to mortgage finance and help brings homes forward:

Policy/ Paragraph	Changes made	Reason
	following criteria:	
	1. The person lives in the locality and has done for a continuous period of at least three years.	
	2. The person works in the locality and has done so for a period of at least a year, for a minimum of 16 hours per week. Where a person is employed in an established business that operates in multiple locations, their employment activities should take place predominantly inside the locality.	
	3. The person has a firm offer of employment, for a minimum of 16 hours per week in an already established business within the locality.	
	4. The person has moved away but has strong established and continuous links with the locality by reason of birth or long term immediate family connections.	
	5. The person needs to live in the locality because they need substantial care from a relative who has lived in the locality for at least three years, or needs to provide substantial care to a relative who has lived in the locality least three years. Substantial care means that identified as required by a medical doctor or relevant statutory support agency.	
	It is intended that housing permitted under policy HS2 will be restricted to those with a local connection in perpetuity.	
	The Council will only consider removing a condition/legal agreement in exceptional circumstances. This may include where it can be demonstrated to the satisfaction of the Council that the property has been appropriately marketed in accordance with the local connection criteria for a reasonable length of time, and that no reasonable offers	

Policy/ Paragraph	Changes made	Reason
	from a qualifying purchaser have been received. "Locality" refers to the parish and surrounding parishes in the first instance. It will generally be expected that a dwelling is actively marketed for at least 6 months before the definition of locality will be extended to cover Eden District."	
Appendix 7	North Pennines Dales Meadows now correctly named.	Response to suggestion by Natural England

APPENDIX 4 SUBMISSION DRAFT CONSULTATION LETTER

Your Reference: Our Reference:

Enquiries to: Planning Policy Team Direct Dial: (01768) 817817

Email: loc.plan2015@eden.gov.uk

Date: 20 October 2015

Dear Sir/Madam

Eden Local Plan 2014-2032 – Submission Document Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

We are writing to inform you that the Eden Local Plan 2014-2032 was agreed by the Executive on 6 October 2015 for publication prior to its submission to the Secretary of State for independent examination.

The Eden Local Plan 2014-2032, its Sustainability Appraisal, Infrastructure Delivery Plan and supporting evidence documents will be available to view and download on the Council's website at http://www.eden.gov.uk/planning-and-development/planning-policy-for-eden from 5pm on Monday 19 October 2015. These documents will also be made available at the Council Offices as well as the Local Links and Libraries across the district.

At this stage, representations can only be made regarding whether the Eden Local Plan 2014-2032 has been prepared in accordance with the legal and procedural requirements, the Duty to Cooperate and whether it is 'sound'.

To make representations you can download the response form and accompanying guidance note from the council's website, or alternatively paper copies of the form will be available at the locations listed above. Please contact the Planning Policy Team on the above telephone number if you need to request a form to be sent to you by post.

All response forms should be sent either:

- By email to: loc.plan2015@eden.gov.uk
- By post to: Planning Policy Team, Eden District Council, Mansion House, Penrith, Cumbria, CA11 7YG.

Please not due to the formal nature of the consultation, and to ensure that the Council has all the relevant information, all comments should be made using the response forms.

Whilst we will acknowledge receipt of all representations received, it will not be possible for us to respond individually to any comments made.

All comments received in writing by 5pm on Monday 30 November 2015 will be submitted to the Secretary of State for Communities and Local Government. These comments will then be taken into account during an examination by an independent

Inspector appointed by the Secretary of State. The Inspector may decide to hold hearing sessions during the examination.

If you have any questions or queries in relation to the Eden Local Plan 2014-2032, the Sustainability Appraisal, Infrastructure Delivery Plan or any of the evidence base documents please contact a member of the Planning Policy Team on 01768 817817 or by email to loc.plan2015@eden.gov.uk.

Yours faithfully

Principal Planning Officer (Policy)

APPENDIX 5 GUIDANCE NOTE

Consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Notes to accompany the representation form for the above consultation. This is the final representations stage for the Local Plan before it is submitted to the Secretary of State for independent examination by a Planning Inspector. The Inspector will consider the comments received alongside the submitted Local Plan to consider whether the Local Plan is capable of being adopted. Representations may be to either support or object on the grounds explained below.

The purpose of the examination, as detailed in the Planning and Compulsory Purchase Act 2004, is to determine whether the Local Plan is 'legally compliant' and 'sound'.

Therefore if you are making a representation about:

- How the plan was prepared in relation to the 'Duty to Cooperate', or legal and procedural requirements, this would mean your concern is whether the Local Plan is legally compliant; and
- If you don't think that the content of the document is 'positively prepared', 'justified', 'effective' or 'consistent with national policy', then the concern is with the soundness of the Local Plan.

The Council considers the Local Plan it intends to submit for examination is sound and legally compliant.

Is the Local Plan legally compliant? - Things to Consider

- The Local Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012. These are explained in the draft Consultation Statement published as part of this consultation and sets out how the Council considers that it has complied with them.
- Is the Local Plan in the current Local Development Scheme (LDS) and have the key stages been followed? If the Local Plan is not in the current LDS it should not have been published for representations.
- The process for community involvement for the Local Plan should be in general accordance with the Council's Statement of Community Involvement.
- Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors. The Council is required to provide a Sustainability Appraisal Report when the Local Plan is published. Do you consider that the policies and proposals contained within the Local Plan are appropriately supported by the SA?

• The Duty to Cooperate is a requirement introduced by the Localism Act (2011). Its purpose is to ensure that Local Plans consider issues that cross boundaries of an individual local authority to affect others, and to consider issues that are of concern to agencies who have a wider geographical responsibility. The Council has prepared a Statement to explain how it considers that these strategic issues have been addressed, the involvement of neighbouring local authorities and relevant agencies, and how the duty has been fulfilled.

All of the documents referred to above are available to view on the Council's website.

If you consider the plan is not legally compliant, your representation should make clear the precise reasons why in relation to the legal and procedural requirements set out above.

Is the Local Plan sound? - Things to Consider

The inspector has to be satisfied that the Local Plan is 'sound'.

Paragraph 182 of the National Planning Policy Framework identifies that for a Local Plan to be considered sound it should be:

- Positively Prepared This means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified This means that the Local Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based upon proportionate evidence.
- **Effective** This means that the plan should be deliverable over its period and based on the effective joint working on cross-boundary strategic priorities; and
- Consistent with National Policy This means that the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you wish to make representation seeking a change to the Local Plan you should make it clear in what way it is not sound having regard to the four tests set out above. You should try to support your representation by evidence showing why the Local Plan should be changed. It will be helpful if you also say precisely how you think it should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication.

If you think the content of the Local Plan is not sound because it does not include a policy where it should do, you should consider the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national policy? If so it does not need to be included.
- Is what you are concerned with already covered by any other policies in the Local Plan or a matter that is to be dealt with in a different plan, for example minerals or waste?
- If the policy is not covered elsewhere, in what way is the Local Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

The Examination

The majority of representations will be considered by way of written representations. This is an efficient way for representations to be dealt with and they carry equal weight to those heard in person by the Inspector. The Inspector will also carry out hearing sessions in the form of a round-table discussion. You should use the Representation Form to identify whether you wish to participate in the hearing sessions at the examination. The appointed Inspector will determine the content of the hearing sessions and who will be heard. This will allow people to have more concentrated discussions of the issues involved. Where there are strongly opposed views on matters within the Local Plan Proposed Submission document, the evidence may need to be tested more formally, with the relevant people being supported with their cases by legal representation.

APPENDIX 6 SUBMISSION DRAFT CONSULTATION LIST

Organisation	Title	First Name	Surname
Persimmon Homes Lancashire		Rachael	Graham
		Andy	Jackson
		John	Innerdale
Historic England		Emily	Hrycan
Durham County Council			,
Story Homes			
North Pennines AONB Partnership	Mr	Simon	Wilson
Bruce Armstrong-Payne Planning	Mr	Bruce	Armstrong-
Consultant			Payne
	Mr	A M P	Davis
Notional Trust	Mrs		Newsham
National Trust		Alan	Hubbard
Cumbria County Council Penrith Chamber of Trade and			
Commerce		Kate	Cunningham
Natural England	Ms	Kate	Wheeler
Kirkby Stephen Town Council		Jeanette	Cooper
Friends of the Lake District		Laura	Fiske
Penrith Town Council	Mrs	Viv	Tunnadine
The Lowther Estates	Mr	Α	Ross
Home Builders Federation	Mr	Matthew	Good
			Mawson and
		E and M	Lawson-
			Johnson
		Susan	Davies
Kirkby Thore Parish Council	Ms	Lindsay	Nicholson
Church Commissioners for England			
Penrith Partnership	Mr	Peter	Ward
	Dr	Phil	Greening
		S	Greening
United Utilities			
DELCO:	Mr	Simon	Pete
PFK Planning	Mr	Neil	Henderson
		J and A	Thomson
Messrs Buckle	Messrs		Buckle
T. O. I.A. II. II.		Clare	Tremayne
The Coal Authority	Ms	Melanie	Lindsley
		1	Ousby
	D.4 :	Judith	Morris
Compan Diagning: Associates	Mr	T	Bell
Garner Planning Associates	Mr	Chris	Garner
	N.4	John	Kirkby
	Mr	Derick	Cotton
	Mr	Frederick	Collins
The Theetines Times	N.4	Joan	Collins
The Theatres Trust	Mr	Ross	Anthony

Organisation	Title	First Name	Surname
Brougham Parish Council	Mrs	Janet	Jennings
	Mr	Robert	Heslop
		Brian	·
		D M	Sanders
		Michelle	Pierce
	Mr	Sindy T W	Phillips
	Mr	H	Phillips Morris
	Mr	Alan	Richardson
	Mrs	Irene	Gate
	Mr	Colin	Brown
	Mrs	Kathleen	Brown
	IVIIS	Sarah M	Lockerbie
	Mr	D Saran W	
	IVII	Chloe	Naylor
	Mrs	Alison	Naylor
			Naylor
	Mr & Mrs	D	Gate Sneddon
		Elspeth	
	N 4	Brenda	Clarke
Cool bridge and Timil Device Course	Mrs	C	Ratledge
Sockbridge and Tirril Parish Council	Mrs	Rachael	Kelly
	Mr	David	Owens
Danith Danih lan	Mr	David	Miller
Penrith Ramblers	Mr	Charlie	Shepherd
	Mr	Martin	Ratledge
	Dr and Mrs	R	Gravil
To the second Assess	Ms	Ann	Sandell
Environment Agency	B.4.	011	NP1
	Mr	Stephen	Nicol
	Mr and Mrs	W	Young
	B.4.	М	Young
1.1.1.20	Mr	-	Young
J.J. Latimer Ltd		T	Young
		Lynn	Yare
		Teresa	Yare
		Julia	Wykeham- Martin
JWPC Limited	Mr	М	Wyatt
Lazonby Parish Council	Ms	Rebecca	Wyatt
-		JAS	Wright
	Mrs	Marion	Wright
	Mr	Gary	Wright
		JAS	Wright
	Mr	N	Wright
	Mr and Mrs	R and E	Wright
		Juliet	Wright

Rowland and Rachel Miss I Woof H & H Land and Property Mr Tom Woof Upper Eden Community Plan Mr T Woof John Woodward Allister Woodstrove Jane Woodstrove Jane Woodman Mrs J Woodman Parklands Neighbourhood Watch Association Miss J Woodman	
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Upper Eden Community Plan Mr T Woof John Woodward Allister Woodstrover Jane Woodstrover J Woodman Mrs J Woodman Parklands Neighbourhood Watch Association Mr J Woodman	
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Jane Woodstrovel J Woodman Mrs J Woodman Parklands Neighbourhood Watch Association Mr J Woodman	
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Parklands Neighbourhood Watch Association Mrs J Woodman Woodman	
Parklands Neighbourhood Watch Association Mr J Woodman	
Association	
Daries Marsal	
Denise Wood	
Mrs A Witney	
Mr G C Philip Winter	
PFK Planning Mr P Winter	
Mrs H Winder	
T Wilson	-
B Wilson	
S Wilson	
John Wilson	
Mrs Barbara Wilson	
Mr and Mrs F W Wilson	
Mrs R Wilson	
Mr David Wilson	
Mrs Linda Wilson	
Edward Wilson	-
Fiona Wilson	
Mr IS Wilson	
F F and F J Wilson	
Mr G Wilson	
Glassonby Parish Council Miss Pamela Wilson	
Mobile Operators Assocation, c/o Mono Consultants Limited Carolyn Wilson	
Impact Housing Association Anne-Marie Willmott	
Holt Planning Consultancy Mr A Willison-Holt	
BNP Paribas Real Estate UK Mr Alex Willis	
Mr Nick Williamson	
Mr Nicholas Williamson	
Mr Nicholas Williamson	
Dr D Williams	
Paula Williams	
Stephen Williams	
Miller Homes Limited - Yorkshire Mr T Williams	
Upper Eden History Society Mr David Williams	

Organisation	Title	First Name	Surname
	Mr	Rick	Willett
		Maxine	Willett
		John and	Wilkinson &
		Brenda	Clark
		Barbara	Wilkinson
	Mr and Mrs	С	Wilkin
		1 & W	Wilding
		L	Wild
		Kimberly	Wilcox
		Ellen	Wilcox
		Charlie	Wilcox
		Andrew	Whittington
		Janine	Whitfield
	Mrs	laura	whitehead
		K and C	Whitehead
	Mr and Mrs		Whitehead
Nateby Parish Meeting	Mrs	Judith	Whitehead
		L	White
	Mrs	J	Wheatley
	Ms	Diane	Wheatley
J R Wharton and Sons	Mr	K	Wharton
	Mrs		Wharton
	Mr and Mrs	RJ	Weymouth
	Mr	Α	Westgarth
	Miss	S	Westgarth
	Councillor	Tom	Wentworth- Waites
	Mr		
DTZ	Mr	Neil	Wells
Kirkwells - town planning and sustainable development consultants	Mr	М	Wellock
	Mr	Charles	Weir
		Joan	Weighman
		William	Weighman
		Nicola	Webb
		Owain	Weaver
		E J and N A	Wear
Dufton Parish Council	Mrs	Sandie	Watson
		Anne	Watson
		Robert	Watson
		Peter	Watson
		Peter	Watson
Murton Parish Council		June	Watson
Adlington Planning Team	Mr	K	Waters
		Julia	Watchman

Organisation	Title	First Name	Surname
		Susan	Wasilewski
		Eric	Wasilewski
		Alexander	Wasilewski
	Mr	Peter	Ward
	Mr	В	Ward
Mather Jamie	Mr	A M	Ward
	Mrs	Т	Warburton
		WE	Warburg
		Helen	Wannop
		John	Wannop
	Mr	FΗ	Walton
	Miss	J	Walton
		В	Walton
Knaresdale with Kirkhaugh Parish Council	Miss	E	Walton
Couriei	Mr	R	Walters
	IVII	Michael	Wallace
		L	Walkingshaw
		S	Walker
		S	Walker
		Norman	Walker
		A L	Walker Walker
		_	
Kaber Parish Council	N/m	Sally Mike	Walker
	Mr		Walker
Little Strickland Parish Meeting	NA:	Majorie	Walker
Peacock and Smith	Mr	M	Walker
Winton Parish Meeting	N 4 -	Linda	Walker
	Mr	Myles	Walker
		S	Vogt
		D	Vogt
		T	Varty
		Lindsey	Varty
		Lauren	Varty
		J	Varty
		JW	Varty
Aims Limited		Emily	Ushewo Kunze
NFU (North West)		Alice	Unsworth
		В	Tyson
		Helen	Tyson
		John	Tweddle
	Mr and Mrs	Α	Turvey
			Turvey
		Lesley	Turney
		Е	Turner

Organisation	Title	First Name	Surname
Atkinson Builders		Barry	Turner
		D	Turnbull
Great Strickland Parish Council	Mrs	R	Tupling
	Mr and Mrs	W	Tunstall
JWPC Chartered Planners	Mr	Paul	Tunstall
		L	Tuck
		Maria	Tuck
		Annette	Trotter
		Roger	Tringham
	Mr	KJ	Trimmer
Cold Keld Guided Walking Holidays	Mrs	KM	Trimmer
Barton Willmore LLP		Nichola	Traverse- Healey
		John	Tratt
		Duncan	Train
Mickleton Parish Council	Mrs	K	Towler
Forest and Frith Parish Council	Mrs	KA	Toward
	Cllr	lan	Torkington
	Mr	M	Tonkin
Steven Abbott Associates	Mr	Н	Tonge
		John	Tompkins
	Mr	J	Tomlinson
	Mr	DJ	Tomlinson
Parklands Neighbourhood Watch Association	Mrs		Tomlin
Peter Tolmie Ltd	Mr	Peter	Tolmie
	Mr	Adrian	Todd
		F	Tiffin
		Е	Tiffin
		Wade	Tidbury
		Fiona	Tidbury
		Fiona	Tidburry
Thwaytes Chartered Surveyors - Mr L Thwaytes	Mr	L	Thwaytes
	Ms	Joanna	Thornton
		David	Thorne
	Mr and Mrs	J	Thornborrow
		WAD	Thorn
Taylor Wimpey UK Limited	Mr	Α	Thorley
		Alison	Thorburn
		Joanna and Mark	Thompson and Thornton
		K	Thompson
		М	Thompson
		Caroline	Thompson
		N	Thompson

Organisation	Title	First Name	Surname
		J	Thompson
		K	Thompson
		R	Thompson
	Mr	Т	Thompson
	Mrs	J	Thompson
		J	Thompson
	Mr	М	Thompson
	Mr	Stephen	Thompson
Heart of Eden Community Plan	Mr	В	Thompson
The Planning Bureau Limited	Mr	Р	Thompson
	Mr	Р	Thompson
	Mr	DJ	Thomas
			The Occupier
			The Occupier
			The Occupier
	Dr	lan	Tench
		Paul	Telford
		Mary	Teasdale
		Shirley	Teasdale
Hunsonby Parish Council	Mrs	Helen	Teasdale
		Derek	Taylor
	Mr	Р	Taylor
		E	Taylor
	Mr	Р	Taylor
	Mrs	JA	Taylor
	Dr and Mrs	М	Taylor
	Ms	Н	Taylor
	Mr	Steve	Taylor
Ian Basely Associates	Mr	R	Taylor
Armathwaite School		Susan	Taylor
Taylor and Hardy Ltd	Mr	Bob	Taylor
		Alan	Tattersall
	Mr	ΑJ	Tatters
Wetheral Parish Council	Mrs	S	Tarrant
	Mr	Α	Tarn
	Mr	RP	Tailford
	Mrs	С	Tailford
	Mr	D	Tailford
	Mr and Mrs	ΚI	Szabo
		John /	Symons /
		Sarah	Howard
		MC	Sweeney
Swarbrick Associates Chartered Architects	Mr	D	Swarbrick
Keepmoat		Andrea	Swanwick
	Mr	D	Swan

Organisation	Title	First Name	Surname
BNP Paribas Real Estate UK	Mr	Tom	Swallow
	Mr	K	Sutton
Mallerstang Parish Meeting	Mrs	Liz	Sutton
RSPB	Mr	J	Sutton
Lunedale Parish Council	Mr	R	Sunderland
Musgrave Parish Council	Mrs	Н	Strong
	Councillor	Gary	Strong
Warcop Parish Council	Mrs	H	Strong
Transpir and Seanon	ivii o	Jane	Stronach
		John	Stronach
		M	Strange
	Mr	W	Storey
	1411	WT	Storey
Story Homes		lan	Storey
	Mr	A	Stopford
	1	Margaret	Stone
		Edna	Stoddart
Sebergham Parish Council	Ms	V	Stockldale
Mungrisdale Parish Council	1110	Veronica	Stockdale
North Country Home Group Limited	Mr	P	Stock
Trorar Country Frome Group Emilion	Mr	P	Stobbart
	Mr and Mrs	J B and M J	Stiles
Penrith and The Border	Mr	Rory	Stewart
T CHILLI GITG THE BOIGE	Mrs	J	Stevens
	Councillor	Martin	Stephenson
	Mrs	Watti	Stephenson
	ivii o	Sarah	Stephen
		Andrew	Steele
		D	Staude
		W	Staude
		Elizabeth	Stannard
		Allison	Stamper
		JK	Stamper
		Tom /	-
		Trudy	Stammer
FFT Planning (Friends, Families and Travellers ad Traveller Law Reform Project)	Mr	S	Staines
GVA Grimley Limited	Mr	Samuel	Stafford
		Barbara	Stables
	Mr and Mrs		Squires
	Cllr	Dorothy	Spence
	Mr	Alan	Sowerby
	1	Yvonne	South
		C	Souter
		В	Souter
			Couloi

Organisation	Title	First Name	Surname
		Elaine	Sorek
	Mr and Mrs	DK	Snaith
District Estates		Nicholas	Smith
		В	Smith
		Lois	Smith
	Mrs	Irene	Smith
		Diana	Smith
		J	Smith
		Mary R	Smith
	Mr and Mrs	DC	Smith
		Dawn	Smart
IPS Architects	Mr	lan	Smart
		Rebekah	Smaile
		M	Slessor
		J	Slessor
		G	Slee
		Jennifer	Slee
		John	Slee
	Mrs	R	Sisson
	Mr	M	Sission
	Mrs	Α	Singleton
	Mrs	D	Sinclair
Stainmore Parish Council	Mrs	ME	Sinclair
	Mrs	Α	Simpson
		Quentin	Simpson
		Pamela and Charles	Simpson
		Elizabeth	Simms
	Dr and Mrs	J	Sibson
		Alan	Shuttleworth
White Young Green Planning	Mr	Р	Shuker
HIMOR Group	Mr	S	Shreeve
	Mr	Tony	Short
		Michael	Shiel
United Utilities	Mr	David	Sherratt
	Mrs	Margaret	Sheppard
		R and A	Sheppard
Sleagill Parish Meeting	Mr	Α	Shepherd
		Jean	Sheffield
		John	Sheffield
	Mrs	S	Shaw
		Raynor	Shaw
	Mr	David	Sharrock
	Mr & Mrs	John & Kaite	Sharp

Organisation	Title	First Name	Surname
	Mr	Stephen	Shannon
	Colonel	WA	Sewell
Homes and Communities Agency		Ann	Seip
	Mr	PD	Searle
Shap Parish Council	Mrs	Jean	Scott-Smith
		Hugh	Scott Duff
		Doug	Scott CBE
		Miriam	Scott
	Mr	S	Scott
		D and J	Scott
		L	Scott
	Mr and Mrs	W F and A	Scott
	Mr	Duncan	Scott
N Arnison & Sons Ltd	Mr	Nigel	Scott
Penrith Residents	Mr and Mrs	K W and J A	Scott
	Mr and Mrs		Scobie-Youngs
		Nick	Scholefield
White Young Green Planning		Angela	Scarr
		Р	Sayer
	Major	Н	Sawrey-
	TVIGJO1		Cookson
		J	Savage
		Mary	Savage
		P	Savage
		Joan	Savage
		Tim	Sarney
		Philip	Sant
		Richard	Sant
King Ot and LLD	Mr	Paul	Sansom
King Sturge LLP	Mr	F	Sandwith
Eden Valley Railway Trust	Mr	В	Sandland
The Woodland Trust	Mr	N	Sandford
		K	Rylands
		JK	Rylands
	N.4	J	Rush
	Mr	Tony	Rumsey
		J	Rudd
Day Dian		Elaine	Rudd
Dev Plan		Laura	Ross
Stewart Ross Associates		Laura	Ross
Cumbria Woodlands		Sarah	Rose
		Andrew	Rogerson
		Helen	Rogerson
	N.4	Julie	Robson
	Mr	David	Robinson

Organisation	Title	First Name	Surname
		Margaret	Robinson
		Jayne	Robinson
		Peter	Robinson
		Philip	Robinson
		Υ	Robinson
		A	Robinson
		Audrey	Robinson
	Mr	Alan	Robinson
		P and F E	Robinson
	Mr	D	Robinson
		Rosalind	Robinson
	Councillor	Mary	Robinson
	Courtomor	Martine	Robertson
	Mr	Alastair	Robertson
	1411	Kirsty	Roberts
		David	Roberts
Electricity North West	Mr	Eric	Roberts
Liectricity North West	IVII	Jean	Riley
		Bernard	Riley
		Susan	
		Melvill	Ridgway
		 	Ridgway
		Melvill	Ridgway
		P	Rickerby
Overskeig Americ Ondat Fares	D. 4	Jane	Rickerby
Cumbria Army Cadet Force	Mr	A	Richmond
	Mr and Mrs	Paul	Richardson
		В	Richardson
	Mrs	A	Richardson
	Mr	J	Richardson
	Mr and Mrs	Р	Richardson
	Mr and Mrs	D	Richardson
	Mr	Alan	Richardson
Walton and Co		V	Richardson
		Phil	Reynolds
	Mr	J	Reynolds
		Mark	Renwick-Smith
		TH	Relph
		D	Reed
		M	Reed
		J	Reed
		W	Reed
	Mr	С	Reed
		Patricia	Redfern
		D	Reay
	Mrs		Reay

Organisation	Title	First Name	Surname
		L	Reay
		Deborah	Reay
	Mrs	N	Rayworth
		Nicky	Raynes
Cumbria County Council	Mr	David	Rawle
Edwin Thompsons	Mr	J	Raven
		Julie	Ratcliffe
		Ges	Ratcliffe
	Mr	J	Ratcliffe
		Jim	Ratcliffe
	Mr	Bill	Raschen
	Mr and Mrs	D	Raine
Colliers CRE	Mr	Α	Pyrke
		Nigel	Pyne
		Jennifer	Prosser
Cable and Wireless	Mr	D	Price
	Mr and Mrs	John and Hazel	Pratt
Cumbria Rural Housing Trust		Jane	Potts
		Doris	Potts
	Mrs	D	Potter
		Alan	Potter
		Simon	Porter
		Allan	Porter
	Mr	John	Poland
		Maureen	Poland
		Georgina	Plowright
		Raymond	Pitt
		Sandra	Pitt
		Deanna	Piper
		Brian Colin	Piper
		Michael	Pincombe
		Michael	Pincombe
F: 1 (1) F 11		Jodie	Petrie
Friends of the Earth	Mrs	J	Perry
		Georgina	Perkins
Overala and an all Divillations Constants		L An drawn	Percy
Cumberland Building Society	Mr	Andrew	Percy
Persimmon Homes Lancashire	Mr	Andy	Pepper
CVA Crimley Limited	Ms	Sue Claire	Pelter
GVA Grimley Limited	IVIS	David	Pegg
	Mr	Charles	Pearson
		Catherine	Pearce
		Kathy	Payne
		Kathleen	Payne

Organisation	Title	First Name	Surname
		Charles	Paxton
	Mr	Richard	Pattison
		Margaret	Pattinson
		Janet	Paterson
Cumbria County Council	Mr	Jeremy	Parsons
JMP Consulting	Mr	J	Parsons
SOLAR (Save Our Land and Resources)	Mrs	JA	Parsler
,		John	Parratt
	Mr	David	Parr
Patkinson Signs	Mr	IW	Parkinson
		Craig	Parkin
	Mr	G	Parkin
Shepherd Estate	Mr	R	Parker
'		M	Park
	Mr	Р	Park
Taylor & Hardy Ltd	Mrs	Sarah	Papaleo
rayion or manay and		Rachel	Palmer
		Craig	Palmer
	Mr	Adrian	Palmer
PallisterCo Ltd	Mr	John	Pallister
1 dillotoi Go Eta	1411	R, C & D	Page
		G	Page
Home Group		Janette	Owen
Bowes Parish Council	Mrs	Н	Overfield
Bowes i distroutien	IVII 3	RE	Oughterson
		C	Oliver
	Mr and Mrs	0	Oliver
	Mrs	JM	Oliver
	Mr	D	Oldham
	Mrs	Norma	O'Dwyer
	Mr	Richard	O'Brien
	IVII	Peter	
		Claire	Northgraves Norris
		Tom	Norman
			Norman
	Mr	Hilary H	Noblett
Turkey Associates Limited	Mr		
Turley Associates Limited		Anna	Noble
Yanwath and Eamont Bridge Parish Council	Mrs	A	Noble
		Keith	Nightingale
		Thomas	Nightingale
Ainstable Parish Council	Mr	Vear	Nigel
	Mrs	BJ	Nicol
	Mr and Mrs	В	Nicholson

Organisation	Title	First Name	Surname
		David and Wendy	Nicholson
Russell Armer Ltd	Mr	M	Nicholson
Russell Alfflet Ltd	Mrs	CE	Nicholas
	IVIIS	Christine	Newton
Essar Oil UK	C/o Ms	Cilistile	Newton
Bell Ingram Design Limited	C/O IVIS	Catherine	Newton
Deli ingram Design Elimited	Mrs	M	Newsham
	Mrs	P	Newcombe
	Mr	В	Newbury
	IVII	Nigel	Newbery
		S	Nelson
		Joe	Nelson
		Julie	Nelson
Listoria England			
Historic England	N / m	Judith	Nelson
	Mr	Terence	Neale
	N 4 -	D	Nattrass
	Mr	D	Nattrass
		David	Nattrass
Northumberland County Council	Mr	Rob	Naples
		Keith	Mycock
		A	Murray
		G	Murray
		James	Murphy
		James	Murdock
		Andrew	Munnoch
		Carys	Munnoch
		K	Mullett
		G	Mullett
	Mr	D	Mullen
		GK	Mossman
		Brenda	Morton
		Brian	Morton
		Helen	Morton
		G.H.	Mortimer
		Rebecca	Mortimer
		Janet	Morrison
	Mrs	MS	Morrison
		Richard	Morris
	Mr and Mrs	D W and C A	Morris
	Mr and Mrs		Morris
		Nicola	Morley
		Laura	Morley
		Robert	Morley

Organisation	Title	First Name	Surname
_		C & H	Morgan
Rowland		Andy	Morgan
	Dr	Murad	Moosa
	Mr and Mrs	N	Moore
	Mr and Mrs	PJ	Moore
	Mr	G	Monkhouse
		Constance A	Mollinson
		Jacqueline	Moffat
Lambert Smith Hampton		Richard	Moffat
	Mr	Derek	Mitchell
		L	Mitchell
Planware LTD	Mr	Oliver	Mitchell
Barton Willmore	Mr	D	Mitchell
		Jan	Mills
	Miss	Zoe	Mills
		Lynne	Miller
		Lynne	Miller
North Associates Limited	Mr	Dave	Miller
Sustrans	Mr	A	Miles
Dalston Parish Council	Miss	S	Milburn
Castle Carrock Parish Council	Ms	T	Meynell
		Steve	Meyfroidt
	Mr	М	Metcalfe- Gibson
	Mr	R	Metcalfe- Gibson
		C and A	Metcalfe- Gibson
		Joanne	Metcalfe
	Mr	Tony	Metcalfe
		ΑE	Metcalfe
Shap Wells Developments	Mr	D	Metcalfe
		Dot / Dave	Metcalf /
			Paterson
		С	Merrie
	Mr	J	Mellor
	Mr	DC	Mellon
Brough Sowerby Parish Meeting		Therese	Mellish
	Mr	M	Melling
	Mr	Alasdair	Meek
	Mr	Phil	Meades
	Mr	F	McQueen
	Mrs		McQue
		Robert	McQuarrie
		Barbara	McQuarrie

Organisation	Title	First Name	Surname
		Robin	McNamara
		Helen	McManus
		Steven	McManus
		Karen	McKenzie
	Mrs	Α	McKenzie
		S	McIldowie
	Mr and Mrs	Т	McHugh
	Mr	R	McGuffie
SSA Planning Limited	Mr	Mark	McGovern
	Mr	DW	McGlasson
	Mrs	Kathleen	McGlasson
	Mr and Mrs	J	McFarlane
		W and J	McCarthy
St Cuthbert Without Parish Council	Ms	Α	McCallum
		Peter	McCall
		Anne	McAllister
		Neil	McAllister
		Louise / Alistair	Mayne
	Mr and Mrs	AW	Mayhew
		С	Maughan
		John	Mattinson
		Keith	Matson
		Paula	Matson
		CJ	Mason
	Mrs	JE	Mason
		F	Mason
	Mr	RC	Mason
Wharton Parish Meeting	Mrs	EJ	Mason
		Alexandra	Mary Barbour
	Mr	John	Martin
		Elaine	Martin
		Jenny	Martin
	Mr	J	Martin
	Mr	JC	Martin
		Gillian Margot	Marshall
	Mr	JM	Marshall
		NW	Marshall
	Mr	Steven	Marsh
		Fiona and Steven	Marsh
		Stuart and Diane	Marsh
		Lynn	Marsden
	Mr	А	Marsden

Organisation	Title	First Name	Surname
	Mr	PD	Markey
NFU (North Cumbria)	Mr	I	Mandle
,		Dan	Mandale
	Mrs	S	Mallinson
		Peter	Makin
		S	Majewski
Eusemere Farm House	Mrs	J	Mackey
Barton Parish Council	Mrs	Gill	Mackey
		Rod	MacKenzie
		Jennifer	MacKenzie
		Valerie	MacKenzie
MMI Ltd	Mr	М	MacInnes
Martindale Parish Meeting	Mr	Brimmer	М
Great Salkeld Parish Council	Ms	Rachel	Lytollis
Kirkoswald Parish Council	Ms	Rachel	Lytollis
Thus Group plc	Mr	E	Lyall
		JA	Lush
		Janet	Lush
		L	Luck
		Malcolm	Luck
		В	Luck
		Tracy	Luck
		Darran	Luck
		SM	Lowthian
c/o Garner Planning	Mr & Mrs	J	Lowrey
		Rhonda	Lowney
		Anthony	Lowney
L B W Associates	Mr	N D	Lowis
		Freya	Lovett
Eden Cycle Campaign	Mr	Nigel	Longworth
, 1 3	Mr and Mrs		Lockley
		R	Littlewood
		AW	Littlefair
		Barry and Sandra	Littlefair
		Winifred	Little
		John	Little
	Mr and Mrs	J	Little
National Farmers Union		Helen	Little
	Mr	MR	Lintott
	Mr and Mrs	J M	Linsday
		Garry	Lindsay
formerly President Penrith Civic Society	Dr	Bryan C	Lindley
,		John	Lince
Positive Planning Solutions		Rachel	Lightfoot

Organisation	Title	First Name	Surname
Bolton Parish Council		Shelagh	Leyland
	Dr	Danette	Leslie
		L	Leroux
Lowther Parish Council	Mr	JC	Leece
Clifton Parish Council	Mr	JC	Leece
		Ryan	Lee
		Ruth	Lee
		A	Lee
	Mr	Malcom	Leaver
		Malcolm	Leadbetter
	Mr and Mrs	.viciooiiii	Lea
	Mr	D	Le Poidevin
	IVII	Eric	Lazenby
		H	Lawson
		Mary J	Law
Alston Moor History Society	Mr	L	Law
Alstori Moor Flistory Society	IVII	L	
			Langley Landowner
	Ms	Victoria	
		W J	Lancaster
	Mr		Lancaster
	Mrs	Sandy	Lancaster
	B.4.	G and E	Lambert
	Mr	T	Ladhams
		M	Labram
		A	Labram
	Mr and Mrs	Α	Knight
		Anna	Kirkman
The White Ox Partnership		Karon	Kirkland
	Mr and Mrs	V	Kirkbride
		Tania	Kirkbride
		Mary	Kirk
		John	Kirk
	Mr	PA	Kingsbury
Hawes and High Abbotside Parish Council	Mr	1	King
		В	Kilshaw
	Mr	J	Kilduff
	Mrs	FEM	Kilduff
	Mr and Mrs		Kilduff
		Sylvia	Kidd
Allerdale Borough Council	Mr	Kevin	Kerrigan
		Liz	Kerrey
	Mr	Stephen	Keogh
		Helen	Keogh
ļ	Mr	Ronald	Kenyon

Organisation	Title	First Name	Surname
		Anthony	Kendall
		Dorothy	Kendall
		Sharon	Kendal
		Deborah	Kendal
		TG	Kelso
		Jill / David	Kelly / Ottley
Greystoke Parish Council	Mrs	Rachael	Kelly
Skelton Parish Council	Mrs	Rachael	Kelly
Threlkeld Parish Council	Mrs	Rachael	Kelly
Crackenthorpe Parish Meeting	Mrs	L	Kelly
		J.	Keighley
		Carole	Jones
		David	Jones
		D	Jones
		Philip	Jones
	Mr and Mrs	D	Jones
Hesket Parish Council	Mr	Lesley	Jones
Hutton Parish Council	IVII	lan	Jones
Oakmere Homes		Gill	Jones
Planning Branch Ltd.	Mrs	A	Jones
Flaming Branch Ltu.	IVIIS	Anthony	Jolley
	Mr	Keith	Johnstone
	IVII	Gerda	
			Johnstone
		Tracey	Johnstone
		Judith	Johnstone
	N d a a	Joan	Johnstone
Kartara Badah Marka	Mrs	K	Johnston
Kentmere Parish Meeting	Mr		Johnston
Plenmeller with Whitfield Parish Council	Miss	J	Johnston
	D 114	Jennifer	Johnson
	Dr and Mrs	PC	Johnson
Eden Rivers Trust	Mr	Simon	Johnson
Lakes Parish Council	Mr	M	Johnson
Alston Moor Parish Council	Mrs	Chris	Johnson
Alston Moor Partnership	Mrs	C	Johnson
Patterdale Parish Council		Michael	Johnson
Garsdale Parish Council	Mr	P	Johns
Roger Jessop Planning Consultants	Mr	R	Jessop
Lartington Parish Council	Mr	I C	Jerred
		L	Jennings
Concept Town Planning Ltd	Ms	RL	Jennings
		Kara	Jenkinson
		Peter	Jenkinson
	Mr and Mrs	H C and J	Jenkinson
		Mary	Jenkin

Organisation	Title	First Name	Surname
	The Reverend	Christopher	Jenkin
Longsleddale Parish Meeting	Ms	L	Jarvis
		D	James
		N	James
	Professor	Ann	Jacoby
		Julia	Jacob
	Mrs	С	Jackson
		Jean	Jackson
Ousby Parish Council	Ms	Gillian	Jackson
		Paul	Irving
		Barbara	Irving
	Mr and Mrs	W	Irving
		Е	Irving
Punch Taverns	Mr	М	Irving
		Α	Ireland
	Dr	E	Insch O.B.E
West Allen Parish Council	Mrs	В	Ingman
		Cressida	Inglewood
		D	llett
Hunderthwaite Parish Council	Mrs	C	Iceton
Transcrutivate Fanon Council	1411.0	Helen	Hutchinson
	Mr	P	Hutchinson
	1711	Derek	Hurton
		Dawn	Hurton
	Mr	David	Hurford
	1711	Christine	Hurford
Cumbria Constabulary	Mr	Andrew	Hunton
- Carriotta Corrotabatary	1711	Jill	Hunt
		Graham	Hunt
		David	Humpston
	Mr	N	Hughes
	Mrs	J	Hughes
	Mr	M J	Hughes
	Mr	Dean	Hughes
2030 Architects Ltd	Mr	Rod	Hughes
2000 / Hornteoto Eta	Councillor	Neil	Hughes
	Journalia	Christine	Hudson
		David	Hudson
	Mrs	J	Huck
Jennifer Hubbard Planning Consultants	Mrs	J	Hubbard
ochimici Flubbara Flamining Consultants	Mr	A	Hoyle
	Mr and Mrs	/ \	Howie
Johnby Hall Estate	IVII AIIU IVIIS	Anna	Howard
	Mr	M	
Hourigan Connolly	IVII	IVI	Hourigan

Organisation	Title	First Name	Surname
Story Homes		Phil	Houghton
	Mrs	E	Horn
	Mr	James	Horgan-Briggs
		В	Hopkins
		M	Hopkins
		W and B	Hopkins
		J	Hope
United Utilities		Jenny	Hope
	Mrs	Р	Holmes
		Janet	Holloway
	Mr	J	Holliday
		SJ	Holliday
	Mr	RC	Holliday
		J and C	Holliday
Entec UK Ltd	Mr	D	Holdstock
	Sir	Martin	Holdgate
		Α	Holder
		Tommy	Hogg
		Julie	Hogg
		Peter and Rebecca	Hogg
	Mr	J	Hogg
		Alex	Hogg
	Miss	L	Hogg
	Mr	M	Hodgson
	Mrs	R	Hodgson
		Elaine	Hodgson
		Mark	Hodgson
		Lynda	Hodgson
		A J and A M	Hodgson
		G	Hodgson
		Tanya	Hoare
		EM	Hoare
		F R and D A	Hinton
		J	Hindson
		Stephen	Hinchliffe
	Mr	Peter	Hinchliffe
Nathaniel Lichfield and Partners		Jenny	Hill
Trustees of Mrs E Guthrie 91 Settlement	Mr	James	Hill
		Rowland	Hill
		S	Hill
		С	Hill
		S and E	Higgs

Organisation	Title	First Name	Surname
	Mr	Steward W	Higgins
	Mrs	W	Higgins
	Mr	Michael	Higgingbottom
	Dr	Judith A	Heyworth
	Mr and Mrs	Р	Hexter
		R	Hewitt
	Mr	Α	Hewison
		F	Hetherington
		F	Hetherington
	Mr	Jonathon	Henry
		Isa	Henderson
		Jennifer	Heaton
	Mr	J	Heath
		James	Haze
		Kathleen	Haynes
		Christopher	Haynes
Helbeck Parish Meeting	Mrs	С	Hayllar
Trendon and moduly		Julie	Hayes
		Andrew	Hawley
		Margaret	Hawker
Savills Smiths Gore	Mr	Andrew	Hattersley
Cavillo Cittatio Coro	1411	John	Hatt
	Mr	John	Hatt
	1411	Thomas	Hastwell
	Mr	TG	Hastwell
PlanInfo	1411	Alla	Hassan
Sedbergh Parish Council	Ms	J	Hassam
	IVIO	Angela	Haslam
CBRE Ltd Planning	Mr	Edward	Harvey
	1011	Timothy	Harvey
		Margaret	Harvey
	Mr and Mrs	A & M	Harrison
	Mr	Norman	Harrison
		E	Harrison
		Rex	Harrison
		Thelma	Harrison
		Edna	Harrison
		Tatiana	Harrison
		Patrick	Harrison
	Ms	Katinka	Harrison
	Mr and Mrs	K	Harrison
	Mr	S	Harrison
	Mr	Will	Harris
	IVII	Juliet	
		Elizabeth	Harris

Organisation	Title	First Name	Surname
	Mr	George Peter	Harris
	Mr	A T	Harper
	Mr	PE	Harper
	1411	Paul	Harper
	Mr and Mrs	SR	Harnwell
	IVIII arra IVIII O	AB	Harker
	Mrs	Sue	Harker
	Mr	R	Hardt
	1411	WB	Hardcastle
		S	Hannah
Morland Parish Council	Ms	Meg	Hancock
Newby Parish Meeting	Mrs	M	Hancock
Newby I alish Meeting	IVIIS	Jo	Hampson
	Mr and Mrs	J G	Hamlin
	IVII allu IVII S	Elizabeth	Halls
			Halls
Mono Consultants		Anthony Ginny	Hall
WOTO COnsultants		•	Hall
		Jayne	Hall
		Angela S	
			Hall
		Elizabeth	Hall
		Maynard	Hall
		Colin	Hall
		Marjorie	Hall
	NA I NA	Michael	Hall
	Mr and Mrs	J	Hall
	Mr	R	Hall
0 11 0 11 0	Mr	Robin	Hall
Savills Smiths Gore		Jennifer	Hadland
		James	H
	Mr and Mrs	J	Guthrie
		Christine	Guise
		Eric	Guise
		Victor	Gubbins
		G and B	Grundy
		С	Grinbergs
	Mr and Mrs		Grinbergs
		Anne	Griffiths
	Mr	Peter	Griffiths
	Mr and Ms	J and Z	Grice and Mills
	Mrs	K	Greenwood
Asby Parish Council	Mrs	Emma	Greenshaw
Tebay Parish Council	Mrs	Emma	Greenshaw

Organisation	Title	First Name	Surname
Eden Housing Association Ltd -	Nan	0	Casaabalab
Managing agents for Lowther and District Housing Association	Mrs	С	Greenhalgh
		Wendy	Green
	Mr	ВМ	Gray
		J	Graves
		Α	Graves
		David	Graves
		Thomas	Graves
		Е	Graves
		JA	Graves
		W & H	Grainger
		Christopher Graham	Graham Hunter
		Janice	Graham
		Geoffrey	Graham
		Ken	Graham
		Р	Graham
	Mrs	MB	Gradwell
		Р	Grabarz
		J	Gowling
		Isobel	Goulding
		Valerie	Gornell
		Noel	Gornell
Lazonby Neighbourhood Plan Steering Group	Mr	Malcolm	Gordon
Fairhurst		S	Gooch
		M and M	Golden
	Cllr	Pat	Godwin
	Mr	J	Godwin
		PM	Godfrey
		Richard	Goddard
	Mrs	Α	Godber
	Mr and Mrs		Glendinning
		WG	Glen
		Е	Glasby
		Annwen	Gladwin
	Mr		Gladwell
	Mr	Richard	Gill
		Richard	Gill
		Patricia	Gill
Cotherstone Parish Council	Mrs	Е	Gill
Ian Gibson Architecture Ltd	Mr	1	Gibson
Lovell Homes		Wendy	Gibson
	Mr	Jim	Gibson
	Mrs	С	Gibson

Organisation	Title	First Name	Surname
3		С	Gibson
		Barbara	Gibson
		М	Gibson
		J	Gibson
		Christine	Gibson
	Mr and Mrs	I M	Gibson
		Dinah	George
	Mr	Dennis	George
		Susan	George
	Mrs	М	George
Marine Management Organisation	Mrs	Angela	Gemmill
		Jennifer	Geer
		P	Gates
Appleby in Westmorland Society	Mrs	VM	Gate
Transfer Tra	1	David	Gaskell
NHS Cumbria Clinical Commissioning Group	Mr	Anthony	Gardner
		Rena	Gardner
	Mr	Chris	Game
		Terence	Gallimore
	Mrs	МН	Gallagher
Two Castles Housing Association	-	Jeanette	Fuller
3	Mr	Graham	Frost
	Mr	Alan	Fox
		Belinda	Fox
	Mr	Richard	Fox
		Robert	Fowler
		Karen	Fothergill
A J Forster Limited	Mr	ΑJ	Forster
	Mr	С	Forster
	Mrs	Mavis	Forster
Sport England	Mr	Richard	Fordham
CycleActive	Mr	С	Ford
		Nicola	Foote
Alston Moor Business Association	Ms	Louise	Folkard
Hartley Parish Meeting		Moya	Flynn
, j		Moya	Flynn
		Sheila	Fletcher
		W	Flack
		Marion	Fitzgerald
Soulby Parish Council		Tracy	Fisher
The Lawn Tennis Association	Mr	M	Fisher
		David	Fisher
		Adam	Fisher
		Jenny	Firth
		1	1

Organisation	Title	First Name	Surname
		W M and E	Firth
		M	Finnie
	Rev'd and Mrs		Findlayson
Eden Housing Association		Rebecca	Field
		Steve and Val	Fermer
		Ann and Alf	Fenwick
		Catherine	Fenton
Parklands Neighbourhood Watch Association		N	Feighan
Mono Consultants Ltd	Ms	Jacquelyn	Fee
	Councillor	Helen	Fearon
Penrith Building Society		Amyn	Fazal
	Mr	J	Fawcett LLB
		Kerry	Faulder
	Mr	Michael	Faulder
		Janet	Farrell
		Martyn	Farmer
	Miss	S	Farley
		Kenneth	Falck.
		Eve	Falck
Langwathby Parish Council	Ms	Sarah	Fairlamb
		David	Eyley
Save our Woodland Heritage	Mr	M	Eyles
	Mr	Graham	Exton
	Mr	J	Exeter
	Mr and Mrs	RC	Ewin
		С	Ewbank
	Mrs	Р	Ewbank
		E/M	Ewan / Allcock
		Peter	Evans
		Beatrice	Errington
	Mr	M	Ennion
Esh Group		Wes	English
		Joyce	Emery
		Richard	Elton
Orton Parish Council	Mr	Chris	Elphick
Ravenstonedale Parish Council	Mr	Chris	Elphick
	Mr	С	Elphick
	Mr	D	Ellwood
		Allan	Ellison
		Chris	Ellison
	Mr and Mrs		Ellis
	The Reverend	lan & Veronica	Elliott

Organisation Title First Name Surname Cumbrian Homes S Edwards Mr Mervyn Edwards Shane Edwards Judith Edwards	
Mr Mervyn Edwards Shane Edwards	
Mr Mervyn Edwards Shane Edwards	
Shane Edwards	
ludith Edwards	
Juditi Luwaius	
Tony Edwards	
Mr and Mrs G H M and M Edwards	
S Edmondson	
Kevin Edmondson	
Peter Edge	
Beryl Eden	
Cumbria Local Access Forum Mr C Ecroyd	
Grayrigg Parish Meeting Mrs A Eastwood	
Liz Duthie	
Woodlands Trust Mr J Dunne	
Jennie Duncan	
Michael Dugdale	
K G Dudson Builders Mr K G Dudson	
c/o Swarbrick Associates Messrs Dudson	
S and L J Dudson	
Becky Duckworth	
Keith Duckworth	
Sue Duckworth	
Stuart Duckworth	
Jean Duckworth	
Askham Parish Council Mrs Marion Drinkwater	
Bampton Parish Council Mrs Marion Drinkwater	
Sheila Dowton	
Mr and Mrs L Dowson	
S and I Dowson	
A G Downs	
Elisabeth Dowes	
Laura Douthwaite	
J Dougherty	
Mr and Mrs S and A Dottridge	
David Dorman	
Susan Donald	
Miss Jane Dolan	
Miss Jane Dolan	
Appleby Town Council Miss Caroline Dodgeon	
Jackie Dobson	
Jane Doan	
Mr D Dixon	

Organisation	Title	First Name	Surname
		G	Dixon
	Mrs		Dixon
		Louise	Dinnes
		Р	Dillon
	Mr	ΜJ	Digby
		J&J	Dickson
	Mrs	Doreen	Dickson
	Mr	George	Dickson
		Dennis	Dickins
		RO	Dickie
		Elaine	Dias
Taylor & Hardy Ltd	Ms	Julie	Diamond
		J	Derbyshire
Two Castles Housing Association		Greg	Denwood
		Katy / Robert	Dent / Clarke
Friends of Pategill Backfield	Mrs	Sarah	Dent
		Charlotte	Dent
	Mr	John	Dent
		J	Dent
		М	Dent
	Ms	Katy	Dent
	Mrs		Dean
	Mr and Mrs	A M	Deall
		Diana	de Gruyther
	Ms	Katy	De
		Richard	Daykin
		Tamsin	Dawson
	Mr	Р	Dawson
	Mr and Mrs	P M and A	Dawes
		Nicola	Davis-Merry
		J	Davis
		JA	Davis
		Gill	Davies
		Nicola	Davies
		Barry Sean	Davidson
	Mr	Mike	Davidson
	Mrs	Donna	Davidson
		ВМ	Davey
		Shirley	Darke
	Mr	S	Dark
		Barbara / Roger	Daniel / Butterfield
E.ON UK plc	Mr	Т	Dalziel
•		Irene	Daltrey

Organisation	Title	First Name	Surname
		Alan	Daltrey
	Mr	MW	Dalton
		L and M	Dalton
	Mr	Т	Daldry
		Stuart	Cuthell
		Sherolyn	Cuthell
		Duncan	Cuthell
		Richard	Currie
	Mr and Mr and Mrs	W	Currah
		Joan	Cumpstey
		Patricia /	Cumiskey /
		Malcolm	Leaver
Cumwhitton Parish Council	Ms	J	Crozier
Carlatton & Cumrew Parish Council	Ms	J	Crozier
Nathaniel Lichfield and Partners	Mr	Α	Crowe
		Steve	Crossley
	Mrs	J	Cross
		S and C	Cross
Rapleys LLP	Mr	Т	Cropper
		Brian and Catherine	Cropley
	Mr	SJ	Crook
		Cheryl	Crook
	Mr	Peter	Cresswell
		K	Creighton
		N	Creighton
Persimmon Homes PLC	Mr	Lee	Crawford
		D	Craig
Holes Farm Partnership	Mr	Brian	Cox
		RA	Cowperthwaite
		J	Cowin
		Edna	Cowan
		IR	Cousin
		RA	Coulthard
		A and M N	Coulthard
	Mr	Neill	Copper
	Mr	J	Cope
	Mrs	IME	Cope
		R	Cooper
	Mrs	HM	Cooper
		E	Cook
		Elizabeth	Cook
	Mrs	EM	Cook
		DT	Conway

Organisation	Title	First Name	Surname
Milburn Parish Council	Mrs	Joan	Connelly
Penrith Congregation of Jehovah's	Mr	S	Connell
Witnesses		3	Connen
Talk Talk	Mr	S	Connell
Brough Parish Council	Mrs	Christina	Collis
	Mr	1	Collinson
		Stan	Collins
Eden Association of Local Councils	Mr	W	Collinge
		Winston	Collinge
		Dawn	Collier
		Bernard	Cole
		J	Cole
	Mr	D	Cole
		David	Colborn
Long Marton Parish Council	Mrs	Olivia	Colbear
Bandleyside Parish Council	Mrs	В	Colbear
	Mr	TM	Cockcroft
Muker Parish Council	Mrs	Р	Coates
		Edward	Coates
Crosby Garrett Parish Meeting	Mrs	Linda	Close
,		Barry	Clifford
		Carol	Clifford
	Mrs	M	Clement
	Mrs	Α	Clement
		Margaret	Cleave
		Richard	Cleave
Temple Sowerby Parish Council	Mrs	AW	Cleasby
,	Mr and Mrs		Cleasby
	Mr	Richard	Cleasby
	Messrs	M	Cleasby
Burnetts Solicitors	Mr	JD	Claxton
Cumbria Association of Local Councils	Mr	D	Claxton
Network Rail		Diane	Clarke
		Emma	Clarke
	Mrs	Karen	Clark
	Miss	J	Clark
Caldbeck Parish Council	Mrs	Е	Clark
		S	Childerley
	Mrs	РА	Cherry
		Wilcox	Charlie
		Agnes	Chambers
		David	Chamberlin
		Christine	Chamberlain
		RF	Chalmers
	Mr	John	Chadwick

Organisation	Title	First Name	Surname
		Judith	Cattermole
		Α	Cater
		Val	Castle
	Mr	Chris	Castle
	Mr	Matthew	Castle
		Charlotte	Castle
		J	Cash
Dacre Parish Council		Becx	Carter
Underskiddaw Parish Council		Весх	Carter
		T.A	Carter
		A.L.	Carter
		Andrew	Carter
		Alan	Carter
	Mr	Stephen	Carter
		Melanie	Carter
		Wendy	Carter
		Alan Duncan	Carter
		M & J	Carruthers & Faulder
		Michael	Carrier
	Councillor	Hilary	Carrick
	Mr	D	Carlyle
	Mr	DB	Capstick
		G	Capstick
		Johnson	Cann
		George	Campbell
	Mr	МН	Calvert
		Jane	Callaghan
	Mr	M	Cairns
	Mr	S	Butterfield
		Clare	Butler
		Nigel	Burton
		Sheena	Burrell
		Darius	Burrell
		Kim	Burrell
Development Planning Partnership	Mr	J	Burns
National Housing Federation		Monica	Burns
Cliburn Parish Meeting	Mrs	M	Burne
		Claire	Burke
		Mark	Burke
		Iona	Bulman
Cumbria Wildlife Trust	Mr	Р	Bullard
		Tom	Budesha
The White Ox Partnership		Iris	Buckle
The White Ox Partnership	Mr	Keith	Buckle

Organisation	Title	First Name	Surname
		ΙE	Buckle
Michael CL Hodgson	Mr	Stephen	Buckingham
Jura Consultants		Cherisse	Buchan
	Mr	M	Bryan
		E	Brunskill
		EM	Brunskill
Castle Sowerby Parish Council	Mrs	L	Brownrigg
	Mr & Mrs	G	Brown
Matterdale Parish Council	Mr	D	Brown
		Roger	Brown
		Marian	Brown
		Adrian	Brown
		S	Brown
		С	Brown
	Mrs	CM	Brown
		Rachel	Brown
Centre for Public Health	Miss	Rachel Elizabeth	Brown
Riverside Housing Association		Gillian	Brough
		Jennifer	Brooks
		Leah Patricia	Brooks
		Paul Herbert	Brooks
		Stella Patricia	Brooks
DTZ		Katherine	Brooker
		Andrew	Bromley
		Rona	Bromley
		Glenn	Bridge
	Mr and Mrs	GH	Brennand
		S	Breaks
Lakeland Eggs Co.	Mr	D	Brass
Home Group		Elsa	Brailey
Mitre Housing Association	Mrs	E	Brailey
River Eden and District Fisheries Association and Yorkshire Fly Fisher's Club		JR	Bradney
		Susan	Bradley
		Kellie	Bradburn-Sims
	Miss	LJ	Boylan
		Jo	Boyd
		G	Boyd
	Mr	G	Box
DPDS Consulting Group		Diane	Bowyer
		Stuart	Bowie

Organisation	Title	First Name	Surname
Cumbria Council for Voluntary Service	Mrs	K	Bowen
	Mr and Mrs	G and V	Bowen
		Anne	Boustead
	Mr	L	Bousfield
	Mr & Mrs		Bousefield
		lan	Borrowdale
	Mr	Α	Borgogno
	Mr	Anthony	Borgogno
		Kenneth	Bonsor
The Fat Lamb Country Inn and Restaurant	Mr	Р	Bonsall
Taylor Wimpey Strategic Land	Ms	J	Bond
		Sally and Michael	Bohling
2030 Architects Ltd	Mr	John	Bodger
John Bodger Associates	Mr	J	Bodger
		Anne	Blues
	Mr	Kyle K C	Blue
		J	Blue
		Kyle.K.C.	Blue
		R	Blackburn
		Lynda / Richard	Blackburn
		E	Blackburn
	Mr and Mrs	D	Blackamore
	Mr	DJ	Blackamore
		H C and S G	Bishop
		Colin	Birnie
	Mr & Mrs	С	Birnie
	Mr	Frank	Birkett
	Mr & Mrs		Bird
		J	Birch
	Mr	S	Binney
Culgaith Parish Council	Mrs	Kathryn	Binney
	Mr and Mrs	С	Binks
St Johns, Castlerigg and Wythburn Parish Council	Mrs	SM	Bickerdyke
		G	Bibby
		Α	Bibby
	Mr	М	Best
		Anne	Berry
		В	Bentley
	Mr	С	Benson
	Mrs	Н	Benson
		J	Bennett

Organisation	Title	First Name	Surname
		D	Bennett
		Charles	Bennett
		GF	Bennett
Appleby Rural Growth Network Hub	Mr	Carl	Bendelow
	Mr	С	Bendelow
		Howard	Bellis
		Caroline	Bellas
Cumbria County Council	Mrs	Patricia	Bell
	Mr	JP	Bell
	Mr	Robin J	Bell
	Mr	Jonathon	Bell
		Kath	Bell
		David	Bell
	Mr and Mrs	K	Bell
	Mr	RJ	Bell
	Mr	M	Bell
	Councillor	Patricia	Bell
		Jon / Jennifer	Begg
	Mrs	S	Beck
	Mr and Mrs		Beattie
		John	Baxter
		William and Anne	Batey
	Councillor	Olivia	Bateman
Bateman Engineering		J	Bateman
		Pauline	Bateman
William Bashall Associates	Mr	William	Bashall
NJL Consulting		Hollie	Barton
Story Homes		Daniel	Barton
		H C and M R	Barr
Whinfell Parish Meeting	Mr	Т	Barnes
Crosby Ravensworth Parish Council	Mr	Christian	Barnes
		RB	Barlow
		Janet	Barlow
		Alan	Barker
	Mr	David	Barker
Barden Planning Consultants		Brian	Barden
		David	Barbour
		Alexandra	Barbour
Catterlen Parish Council	Mr	Frank	Barbour
White Young Green	Mr	Matthew	Banks
	Mr & Mrs		Banks
		С	Banks
		L	Banks

Organisation	Title	First Name	Surname
		J	Banks
		Robinson	Banks
		Gwen	Banks
	Mr and Mrs		Banks
		Nicola	Banister
	Mr and Mrs	N	Balmer
	Mrs	JR	Balmer
	Mr and Mrs	T	Ball
		Tracy	Bakey
	Professor	Gus A	Baker
	1.10.00001	Kate	Baker
		Michael	Baker
		Andrew	Baker
		Alan	Baker
The Open Spaces Society		J	Bainbridge
The Open Spaces Society		T	Bainbridge
		D	Bainbridge
		Sam	
			Bainbridge
		Janette	Bainbridge
		Eva	Bainbridge
		Poppy	Bainbridge
		Dennis	Bain
		Lucy	Bailie
Manning Elliott	Mr	Nick	Bailey
	Mr	С	Bagshaw
	Mr and Mrs	RV	Bagot
	Mr and Mrs	K and M	Baglee
	Mr	JP	Bachem
		J	Auty
		E	Austin
		D	Austin
Newbiggin Parish Meeting	Mr	DG	Atkinson
Waitby Parish Meeting	Mrs	J	Atkinson
		Arthur	Atkinson
		J	Atkinson
		Carol	Atkinson
		Kenneth	Atkinson
		Chloe	Atkinson
		John	Atkinson
	Mr	J	Atkinson
	Mrs	ME	Atkinson
	Mr	S	Atkinson
		G	Atkins
	Mr	G D	Atkins Atchinson

Organisation	Title	First Name	Surname
	Mrs	IE	Askins
	Mr	JD	Askew
River Eden & District Fisheries Association	Mr	Mike	Ashwin
Keepmoat		Will	Ashton
Barratt Homes	Mr	Simon	Artiss
		Ruth	Arnold
Parklands Neighbourhood Watch Association		Erica	Arneil
		Susan	Armstrong
	Mr	G	Armstrong
		Joan	Armstrong
	Mr	Thomas	Armstrong
	Mr	S	Argyll
		Mark	Aplin
	Anon	Anonymous	Anonymous
	Mr	J	Andrews
		Norman	Andreassen
Stanhope Parish Council	Mrs	S	Anderson
	Mr	D	Altham
	Mr	R	Allsopp
		Peter	Allison
		K	Allison
		Antonia	Allen
	Mrs	М	Allen
	Mrs	Р	Allen
		JW	Allen
	Mr	F	Allan
	Mr and Mrs	M and L	Allan
	Mrs	J	Alderson
	Mr	Davis	Alastair
	Mr	John	Airey
		Diane	Airey
	Dr and Mrs	G and S	Ainsworth
HIMOR Group	Mr	Р	Ainscough
King's Meaburn Parish Meeting	Mr	RI	Addison
	Mr	Frank	Addis
	Mrs	Julie	Addis
		Е	Adamson
	Mr and Mrs		Abbott
		Elizabeth Howe	& Gordon Malcolm
Cumbria Constabulary			
Cumbria County Council			
Cumbria Disability Network			
Cumbria Local Enterprise Partnership			

Organisation	Title	First Name	Surname
Cumbrian Homes			
Damson Design Ltd.			
Day Cummins Ltd.			
De Pol Associates		Annette	
District Estates Ltd			
Eden Access Forum			
Eden Architecture: Environmental			
Design			
Eden Housing Association			
Abacus Building Design			
Eden Rivers Trust			
Eden Valley Railway Trust			
Edenholme Building & Architectural			
Surveyors			
Edwin Thompson			
Edwin Thompson - Carlisle			
Elaine Rigby Architects			
Electricity North West			
Abbeyfield Society			
150			
Equality Cumbria			
Fawcett Forest Parish Meeting			
Action with Communities Cumbria			
Fisher German LLP Chartered			
Surveyors			
		The	
		Occupier	
		The Occupier	
	Ms	Maureen	
	IVIS	H	
Forestry Commission NW England		11	
Torestry Commission NVV England			
Foskett Hylton			
G K D			
G R Architects			
ADK Architects			
Graham K Norman (Architect) Ltd			
Gray Associates Limited			
H & H Land & Property Ltd			
Hanover Housing Association			
Hartbrights			
Hendersons Garage Ltd			
Age UK Carlisle and Eden			
Highways England			
i ligitways Etigialiu			

Organisation	Title	First Name	Surname
Hogg & Robinson (Builders) Ltd			
Housing 21			
Ian Carrick (Designs)			
Ian Cleasby Drafting & Design			
Impact Housing Assocation			
JABA Architect Ltd			
Jock Gordon			
John Coward Architects Ltd			
John Westgarth			
Johnston & Wright			
KDS			
Lake District National Park			
Local Nature Partnership			
M Archer - Eden Architecture			
Environmental Design			
Manning Ellliot Architects			
Martin Boyd Architectural Services			
Martin Cuthell Ltd			
Martin Wainhouse			
Appleby Alliance			
Methodist Homes for the Aged			
Ministry of Defence MJN Associates			
ML Planning Services Ltd.			
Appleby Chamber of Trade			
Mobile Operators Association			
Appleby Heritage and Training Centre			
National Grid			
Appleby History Archaeological Society			
NHS Cumbria Clinical Commissioning			
Group			
NHS Property Nielsens Ltd			
North Yorkshire County Council			
Northern Trust			
Northumberland County Council OutREACH Cumbria			
Architects Plus			
Planning Branch Ltd.			
Planware			
Renewable UK			
Architectural Design & Planning Ltd - Mr C Reed			
Reserve Forces and Cadets			
Association			
Richard Dryell Architect			

Organisation	Title	First Name	Surname
Richmondshire District Council			
Royal Mail Group			
S Mansbridge			
S P Dobinson Building & Machinery			
Sainsbury's Supermarkets			
Savills Smiths Gore			
Sign Solutions			
Simpson Towler			
Ashton Design			
South Lakeland District Council			
Space Designed Solutions Ltd.			
Stephen Crichton Chartered Architect			
Ltd			
Steven Abbott Associates			
Ast Signs			
The National Federation of Gypsy			
Liaison Groups (NFGLG)			
Thrimby Parish Meeting			
Atkinson Building Contractors			
Turley Associates			
Tweddell & Slater Consulting Engineers			
TWT Projects			
Atric Ltd			
Union Pub Company			
Unwin Jones Partnership			
Upper Eden History Society			
AWAZ Cumbria			
Yorkshire Dales National Park			
Bingham Yates & Partners			
Black Box Architects Ltd			
Blackett-Ord Conservation Architecture			
Brackenburgh Estate			
Brier Associates			
Brooke Planning Consultants			
CAFS			
Campaign for Real Ale			
Carlisle City Council			
Carrock Design & Build			
CH2M HILL			
Civil Aviation Authority			
Countryside Consultants			