



EDEN LOCAL PLAN

STATEMENT OF CONSULTATION

PRE-SUBMISSION STAGE

October 2015.

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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 Regulation 18 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.

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;
- Primary Care Trust;
- 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 who 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	To
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

- 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 seeks 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	To	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	To	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

- 5.4 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	To	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
 - 30.5 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	To	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. 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 need for an up to date assessment of open space

Top Ten Most Commented Policies				
				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. 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 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

Top Ten Most Commented Policies				
9	HS4	Housing Type and Mix	11	Concerns raised about the SHMA being out of date and the Policy being over prescriptive
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 policies 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 its 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 13th July 2015 and Monday 24th 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. 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 13th July and Monday 24th 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.

Site	Representation(s)	EDC Response
KS9 - Field adjacent the Crescent, Nateby Road	Concern regarding suitability resulting from visual impact	Site now discounted.
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	This land could be used as access to KS13 - Land west of Faraday Road	Reassessed and now discounted as unsuitable due to size constraints and value as garden ground for care home.
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.

Site	Representation(s)	EDC Response
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.
P111 - Land at Scaws Drive	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	Supports sites discount	Noted
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.

Site	Representation(s)	EDC Response
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.
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 - Scour 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.

Site	Representation(s)	EDC Response
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.
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	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.

Representation Summary	EDC Response
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.
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
<p>The following settlements should not be identified as a Key Hub</p> <ol style="list-style-type: none"> 1. Sockbridge and Tirril 2. Bolton 3. Kirkoswald 4. Great Salkeld 5. Orton 	<ol style="list-style-type: none"> 1. 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. 2. No Change. Bolton satisfies all criteria for identification as a Key Hub. 3. No Change. Kirkoswald satisfies all criteria for identification as a Key Hub. 4. No change. Great Salkeld satisfies all criteria for identification as a Key Hub. 5. No change. Orton satisfies all criteria for identification as a Key Hub.
<p>The following settlements should be designated/remain as Key Hubs:</p> <ol style="list-style-type: none"> 1. Culgaith 2. Calthwaite 3. Yanwath 4. Ravenstonedale 5. Sockbridge and Tirril 6. Nenthead 	<ol style="list-style-type: none"> 1. Agreed. Culgaith is identified as a Key Hub in the revised settlement strategy and Pre-submission Local Plan 2. No Change. The settlement does not meet criteria for identification as a Key Hub. 3. No change. Yanwath is well below the 100 properties required for identification as Key Hub 4. No Change. School closure means Ravenstonedale no longer meets essential criteria for Key Hub status. 5. Agreed. Settlement is identified as a Key Hub in the revised settlement strategy and Pre-submission Local Plan 6. Agreed. Following comments from the Parish Council Nenthead has been reintroduced as a Key Hub.

Representation Summary	EDC Response
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 Summary

7.1 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						✓

7.2 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-and-development/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

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ruth Atkinson', with a long, sweeping flourish at the end.

Ruth Atkinson
Communities Director

APPENDIX 2

PREFERRED OPTIONS CONSULTEE LIST

ID	Title	Initial/Name	Surname	Authority/Organisation
2	Mrs	A	Ward	Caldbeck Parish Council
3	Mrs	S M	Bickerdyke	St Johns Parish Council
4	Ms	P L	Gauntlett	Sebergham Parish Council
5		Becx	Carter	Underskiddaw Parish Council
6	Mrs	M J	Crozier	Carlatton & Cumrew Parish Council
7	Ms	T	Meynell	Castle Carrock Parish Council
8	Mrs	L	Hutchinson	Cumwhitton Parish Council
9	Mrs	A	McCallum	Dalston Parish Council
10	Mr	D E	Johnson	St Cuthbert Without Parish Council
11	Mrs	S	Tarrant	Wetheral Parish Council
12	Mr	T	Roberts	Garsdale Parish Council
13	Mr	M	Johnson	Lakes Parish Council
14	Mr	C	Robertshaw	Sedbergh Parish Council
15	Mrs	L	Knowles	Fawcett Forest Parish Meeting
16	Mrs	A	Eastwood	Grayrigg Parish Meeting
17	Mr	I	Johnston	Kentmere Parish Meeting
18	Mr	J	Farmer	Longsleddale Parish Meeting
19	Mr	T	Barnes	Whinfell Parish Meeting
20	Mrs	B	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	H	Overfield	Bowes Parish Council
24	Mrs	B M	Thwaites	Cotherstone Parish Council
25	Mrs	K A	Toward	Forest and Frith Parish Council
26	Mrs	C	Ice-ton	Hunderthwaite Parish Council
28	Mr	I C	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	T	Sharp	Muker Parish Council
54		Judith	Nelson	English Heritage
60	Mrs	V M	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	C	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	C	Glynn	Voluntary Action Cumbria
74		Helen	Little	National Farmers Union
75				Campaign for Real Ale
76	Mr	P	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	C	Johnson	Alston Moor Partnership
84				Appleby Heritage and Training Centre
85				Anchor Trust
86				Eden Housing Association
88				Impact Housing Association
89	Mrs	C	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	P	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	A	Miles	Sustrans
131	Mr	C	Ford	CycleActive
134		Carolyn	Wilson	Mobile Operators Association, c/o Mono Consultants Limited
136	Mr	P	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	P	Bullard	Cumbria Wildlife Trust
149	Mr	R	Pearse	CPRE Friends of the Lake District (Cumbria) Branch
152		Diane	Bowyer	DPDS Consulting Group
153				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	Lyll	Thus Group plc
169	Mr	T	Dalziel	E.ON UK plc
170	Mr	M	Chamberlain	Church Commissioners

ID	Title	Initial/Name	Surname	Authority/Organisation
172				Eden Rivers Trust
173	Mrs	J A	Parsler	SOLAR (Save Our Land and Resources)
174	Mr	I	Mandle	NFU (North Cumbria)
175	Mr	B K	Jones	Forestry Commission NW England
176	Mr	J	Dunne	Woodlands Trust
177	Mr	E	Mills	Cumbria Woodlands
178	Mr	J	Sutton	RSPB
182	Mr	P	Thompson	The Planning Bureau Limited
184	Mr	P	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	T	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	H	Tonge	Steven Abbott Associates
210	Mr	C	Burne	
211	Mr	P	Park	
212	Mr	P D	Markey	
213	Mrs	C M	Brown	
214	Mrs	E M	Cook	
215	Mr	D J	Blackamore	
216	Mr	M	MacInnes	MMI Ltd
218	Mr	D	Le Poidevin	
220	Mr	D J	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	
238		Joanna and Mark	Thompson and Thornton	
241		R A	Cowperthwaite	
242		J A	Davis	
243		Peter and Rebecca	Hogg	
244	Mr	D	Oldham	
245	Mr	A M	Ward	Mather Jamie
246	Mr	R	Allsopp	
247	Mr	J D	Claxton	Burnetts Solicitors
248	Mr and Mrs	D	Raine	

ID	Title	Initial/Name	Surname	Authority/Organisation
249	Mr and Mrs	J G	Hamlin	
250	Mr	D J	Thomas	
251	Mrs		Tomlin	Parklands Neighbourhood Watch Association
254	Mrs	M	George	
256	Mr	K G	Dudson	K G Dudson Builders
257	Mr	M W	Dalton	
258		Joan	Savage	
259		Peter	Northgraves	
260	Mrs	C E	Nicholas	
262		A W	Littlefair	
263		C	Hill	
264	Mr/Mrs	A M	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		J K	Stamper	
276	Mr	R	Hardt	
281	Mr	K	Wharton	J R Wharton and Sons
282		Denise	Wood	
283	Mr/Mrs	K	Harrison	
285		B	Richardson	
286		W A D	Thorn	
287	Mr	J P	Bachem	
289	Mrs	A	Richardson	
290	Mr/Mrs		Ellis	
291		N	Feighan	Parklands Neighbourhood Watch Association
292	Mr	I S	Wilson	
293	Mr	J	Woodman	Parklands Neighbourhood Watch Association
294	Mr/Mrs	H M and M G	Edwards	
296	Mr	W J	Lancaster	
297	Mr and Mrs	K W and J A	Scott	Penrith Residents
298		Nicola	Banister	
300		Maxine	Willett	
301		I E	Buckle	
302	Mr and Mrs	C P / Helen	Birnie	
303	Mr	W	Storey	
304	Mr	B	Ward	
305	Mr	N D	Lowis	L B W Associates
306	Mr and Mrs	P M and A	Dawes	
307		C	Patterson	Appleby Town Council

ID	Title	Initial/Name	Surname	Authority/Organisation
308	Mr	P A	Kingsbury	
310	Mr	D	Cole	
311	Mr	D	Carlyle	
312	Mr and /Mrs	W	Young	
313	Mr	J	Raven	Edwin Thompsons
314		Patricia / Malcolm	Cumiskey / 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	B	Nicholson	
324		Katy / Robert	Dent / Clarke	
325	Mr/Mrs	S and A	Dottridge	
326	Mrs	B J	Nicol	
328	Mr	J	Kilduff	
329	Mr	D	Swan	
330	Mr/Mrs	D K	Snaith	
331	Mr/Mrs		Glendinning	
332		Jeanette	Cooper	Kirkby Stephen Town Council
333		D	Turnbull	
334	Mr	A J	Tatters	
336	Mr	A T	Harper	
337	Mr	J	Ratcliffe	
339		C	Ewbank	
340		C	Maughan	
341		E / M	Ewan / Allcock	
342	Mrs	M E	Atkinson	
343	Mr	P	Taylor	
344		P and F E	Robinson	
345		R B	Barlow	
346	Mrs		Dean	
347	Mrs	J	Woodman	
349	Mr and Mrs		Lea	
350		W T	Storey	
351	Mr	D	Nattrass	
352	Mr	P	Robinson	
353	Mr	R	Dryell	Capita Symonds Ltd
354	Mr	C	Reed	
355	Mrs	M S	Morrison	
356		T	Bowman	
358	Mr and Mrs	P J	Moore	
359	Mr	S	Binney	
360	Mr/Mrs	R V	Bagot	
361	Mr	J	Cope	

ID	Title	Initial/Name	Surname	Authority/Organisation
362	Miss	I	Woof	
363		Janet	Barlow	
365		R F	Chalmers	
366		Mary J	Law	
367		Diane	Airey	
368	Mr and Mrs	J	Pratt	
369		Louise	Dinnes	
370		Steve and Val	Fermer	
371		W and B	Hopkins	
373		David and Wendy	Nicholson	
374	Mrs	H	Winder	
377	Mr	M	Metcalfe-Gibson	
378	Mrs	J	Cross	
379		Isa	Henderson	
380		Susan	Bradley	
381		William and Anne	Batey	
384		Claire	Norris	
385	Mr	J	Richardson	
386	Mr	R	Taylor	Ian Basely Associates
387	Mr	R	Metcalfe-Gibson	
388	Mrs	T	Warburton	
389				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
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	Symons / 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	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

ID	Title	Initial/Name	Surname	Authority/Organisation
426	Mr	M	Bryan	
429	Mr/Mrs	G and V	Bowen	
430	Mr	H	Sawrey-Cookson	
431	Mr	M	Best	
432	Mrs	A	McKenzie	
434	Mr	A	Marsden	
435		Rona	Bromley	
439		Margaret	Hawker	
441	Mr	T	Thompson	
443		Lynn	Yare	
445		Barbara / Roger	Daniel / Butterfield	
446		Georgina	Plowright	
448		John and Julie / Kate	Mc Farlane / Bellwood	
449		A	Holder	
450	Miss	J	Clark	
451		Margaret	Harvey	
452	Mr/Mrs		Abbott	
453	Mr	A	Stopford	
454		R and A	Sheppard	
455	Mr/Mrs	J M	Linsday	
456		B	Kilshaw	
457	Mrs	S	Fletcher	
458	Mr	J	Holliday	
459	Mr	R	Walters	
460		S J	Holliday	
461	Mr	R P	Tailford	
462	Mr	P D	Searle	
463	Mr/Mrs		Scobie-Youngs	
464	Rev'd		Findlayson	
465	Mr	R J	Bell	
466	Mr	D C	Mellon	
467		K and C	Whitehead	
468	Dr/Mrs	G and S	Ainsworth	
469	Mr	N	Wright	
471	Mr	B	Newbury	
472		L	Jennings	
473	Dr/Mrs	R	Gravil	
474	Mr	M R	Lintott	
475	Mr	D	Sharrock	
477		Judith and Haydn	Morris	
478	Mrs	C	Tailford	
479	Mr	P	Bonsall	The Fat Lamb Country Inn and Restaurant
480		Elisabeth	Dowes	
481	Mrs		Dixon	
482		R	Littlewood	

ID	Title	Initial/Name	Surname	Authority/Organisation
483		C and A	Metcalf-Gibson	
484	Mr	D	Tailford	
485	Mr	M H	Calvert	
486		E	Taylor	
487			Langley	
488		G K	Mossman	
489		M C	Sweeney	
490	Mrs	K	Johnston	
491		Jane	Callaghan	
493	Mr	T	Daldry	
494		Susan	Taylor	Armathwaite School
495	Mr	M	Bell	
496		R E	Oughterson	
498	Mrs	A	Singleton	
500	Mr	S	Scott	
501		Dot / Dave	Metcalf / Paterson	
503		Brian and Catherine	Cropley	
504	Mr/ Mrs	V	Kirkbride	
505		A B	Harker	
506	Mr	P	Taylor	
507	Mr	I	Gibson	Ian Gibson Architecture Ltd
508		Jon / Jennifer	Begg	
509	Mrs	E	Horn	
510	Mr	B M	Gray	
512		Ann and Alf	Fenwick	
513	Mrs	C	Jackson	
515	Mr	G	Armstrong	
516		W M and E	Firth	
518		Anne	Blues	
519	Mr	M	Ennion	
521	Mr/Mrs	R J	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	B	Sandland	Eden Valley Railway Trust
529		Lynda / Richard	Blackburn	
530	Mr/Mrs	P	Hexter	
531		Alex	Hogg	
534	Mr	M	Melling	
535	Mr/Mrs	I M	Gibson	
537	Mr	D	Robinson	
538		Rosalind	Robinson	
539	Mr/Mrs	W	Irving	
540	Mr/Mrs	N	Balmer	

ID	Title	Initial/Name	Surname	Authority/Organisation
541		Shirley	Darke	
542	Mr	A	Tarn	
543	Mrs	J A	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	
554		Louise / Alistair	Mayne	
555		B M	Davey	
556		Nicola	Davies	
557	Mrs	J	Thompson	
558		J W	Allen	
559		J W	Varty	
560		I R	Cousin	
561		W A	Carswell	
562	Mr and Mrs	D W and C A	Morris	
563	Mrs	P	Ewbank	
565	Mr	J M	Marshall	
567	Mrs	G	Bell	
568	Mr and Mrs		Howie	
569	Mrs	M P	Newsham	
570		John and Brenda	Wilkinson	
571		D and J	Scott	
572		Jennifer	Geer	
573	Mr	A	Hoyle	
576		G F	Bennett	
577	Mr	M	Tonkin	
578		F R and D A	Hinton	
579		Agnes	Chambers	
580	Mr	T M	Cockcroft	
581	Mr	S	Butterfield	
582		C	Black	
583	Mr and Mrs		Lockley	
587	Mr	J	Jackson	Persimmon Homes Lancashire
588		L	Scott	
589	Mr	D B	Capstick	
590	Mr/Mrs	J	Guthrie	
591		D T	Conway	
592	Mrs	S	Shaw	
593		R A	Coulthard	
594	Mr	A	Pyrke	Colliers CRE
595	Mr	A	Thorley	Taylor Wimpey UK Limited

ID	Title	Initial/Name	Surname	Authority/Organisation
596		V	Richardson	Walton and Co
597	Mr	C	Garner	Garner Planning Associates
598		F F and F J	Wilson	
599	Mrs	F E M	Kilduff	
600		G and B	Grundy	
601	Mr/Mrs		Oliver	
602	Mrs	P A	Cherry	
603		W B	Hardcastle	
604	Mr/Mrs	L	Dowson	
605	Mr	J	Exeter	
606	Dr/Mrs	M	Taylor	
607	Mrs	J M	Oliver	
608	Mr/Mrs	D C	Smith	
611		C J	Mason	
612	Mrs	J E	Mason	
613		W G	Glen	
614		J	Cash	
615		J	Derbyshire	
616	Mr/Mrs	H C and J	Jenkinson	
617	Mr	A	Willison-Holt	Holt Planning Consultancy
618	Mr	M J	Hughes	
619	Mr	A	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	C	Bagshaw	
632		G	Boyd	
633		S and I	Dowson	
635	Mr/Mrs	A W	Mayhew	
636	Mrs	J R	Balmer	
638	Mr	M	Thompson	
639		S	McIldowie	
640	Mr/Mrs	R C	Ewin	
641	Mr/Mrs	J	Little	
642	Mr	M	Eyles	Save our Woodland Heritage
643	Mrs	M H	Gallagher	
644	Mrs	A	Godber	
645	Mrs	M	Clement	
646	Mr/Mrs	W	Currah	
647	Mrs	J	Stevens	
648	Mr	K J	Trimmer	
649	Mrs	K M	Trimmer	Cold Keld Guided Walking Holidays
650		K	Allison	
651	Mr/Mrs	S R	Harnwell	

ID	Title	Initial/Name	Surname	Authority/Organisation
652	Mrs	C	Ratledge	
653		M and M	Golden	
654	Mr	A	Hewison	
655	Dr/Mrs	P C	Johnson	
656	Mrs	H M	Cooper	
658		S M	Lowthian	
659	Mrs	M B	Gradwell	
660	Mr	R C	Holliday	
661		S and C	Cross	
662	Mr and Mrs		Beattie	
663		F	Mason	
664	Mr	J D	Askew	
665		J	Auty	
666	Mr and Mrs	C	Binks	
667	Mr and Mrs	G H	Brennand	
668		R O	Dickie	
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	H	Taylor	
679		B	Bentley	
680	Mr/Mrs	W F and A	Scott	
681	Mr/Mrs	K I	Szabo	
682		D	Ilett	
683	Mr/Mrs	M and L	Allan	
684	Mr	D	Atchinson	
686	Mr	G	Wilson	
687	Mrs	I M E	Cope	
688	Mr	H	Harrison	
690	Messrs	M	Cleasby	
691	Mrs	A	Clement	
692	Mr and Mrs	A	Turvey	
693		L and M	Dalton	
694		G	Capstick	
695		M	Young	
696	Mrs	A	Witney	
697	Colonel	W A	Sewell	
698	Mr	T G	Hastwell	
699	Mr	P E	Harper	
701		J	Bateman	Bateman Engineering

ID	Title	Initial/Name	Surname	Authority/Organisation
703		A	Cater	
704		M	Finnie	
705		W	Higgins	Orton Manor Court
706	Miss	L	Hogg	
707	Mr	J R	Lamb	
709		Barry and Sandra	Littlefair	
710		Stuart and Diane	Marsh	
711	Mr	R C	Mason	
712	Mr	R	McGuffie	
713		A E	Metcalfe	
714	Mr and Mrs	R and E	Wright	
715		Teresa	Yare	
718				Reserve Forces and Cadets Association
719	Mr	I	Collinson	
720	Mr	A	Richmond	Cumbria Army Cadet Force
721		Angela	Haslam	
723		Joan	Armstrong	
724		A and M N	Coulthard	
725		Jill / David	Kelly / Ottley	
726		Constance A	Mollinson	
727	Mr	F H	Walton	
728	Miss	J	Walton	
729	Mr	M	Fisher	The Lawn Tennis Association
731	Mr	S	Connell	Penrith Congregation of Jehovah's Witnesses
732	Mr	T	Williams	Miller Homes Limited - Yorkshire
734	Mr	M	Hourigan	Hourigan Connolly
737	Mr and Mrs	J	Thomlinson	
739	Mr		Young	
740	Mr	F	McQueen	
741	Mr		Gladwell	
742	Mr	T	Cropper	Rapleys LLP
744	Mr	B	Thompson	Heart of Eden Community Plan
745	Mr	T	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	C	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	T	Woof	Furrow Green Farm
804				AstSigns

ID	Title	Initial/Name	Surname	Authority/Organisation
805				Sign Solutions
806				Leltex House
807	Mr	I W	Parkinson	Parkinson Sighs
808	Mr	M	Irving	Punch Taverns
809				Union Pub Company
824	Mr	A	Crowe	Nathaniel Lichfield and Partners
826	Mr	P	Dawson	
833				The National Federation of Gypsy Liaison Groups (NFGLG)
834		Nicola	Foote	
835		Amanda	Scott	Fusion Online Ltd
836	Mr	M	Wellock	Kirkwells - town planning and sustainable development consultants
837	Mr	M	Wyatt	JWPC Limited
838	Mr	D	Swarbrick	Swarbrick Associates Chartered Architects
839	Mr	P	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		E	Turner	
845	Ms	Julie	Liddle	H and H Land and Property Limited
846	Mr	G	Smith	GVA
847	Mrs	A	Jones	Planning Branch Consultancy
848	Mr	D	Barton	Story Homes
849	Ms	R L	Jennings	Concept Town Planning Ltd
851	Mr	K	Waters	Adlington Planning Team
852	Mr	J C	Martin	
853	Mr	J	Burns	
855		S	Gooch	Fairhurst
858		J	Bainbridge	The Open Spaces Society
859		H		
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	

ID	Title	Initial/Name	Surname	Authority/Organisation
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	
891	Mr	Stephen	Buckingham	Michael CL Hodgson
892	Mr	Paul	Sansom	
893	Mr	John	Pallister	PallisterCo Ltd
894		Sally	Walker	
895		Barbara	Wilkinson	
896		Susan	Donald	
897	Mr	Duncan	Scott	
898	Mr & Mrs	PJ	Moore	
899	Mr	John	Poland	
900			Turvey	
901	Mr	J	Fawcett	
902		NW	Marshall	
903		Angela	Davies	
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	
917	Mr	Bob	Taylor	Taylor and Hardy Ltd
918		Ruth	Arnold	
919		Elizabeth Howe	& Gordon Malcolm	
920	Mr	David	Miller	
921	Mr	Steve	Taylor	
922		Christine	Chamberlain	
923		David	Natgrass	
924		Rachael	Coar	Persimmon Homes Lancashire
925				AWAZ
926				OutREACH Cumbria
927				Cumbria Disability Network
928				Age UK Carlisle and Eden

ID	Title	Initial/Name	Surname	Authority/Organisation
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	B	Wilson	
936	Mr	S	Artiss	Barratt Homes
937	Mr 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	P	Ainscough	HIMOR Group
949	Mr	S	Shreeve	HIMOR Group
950				Renewable UK
951	Mr	S	Atkinson	
952	Mr	J	Andrews	
953		B	Walton	
954	Mr/Mrs	J	Hall	
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	

ID	Title	Initial/Name	Surname	Authority/Organisation
975		Christine	Hurford	
976		Bridget	Davey	
977		Juliet	Wright	
978	Mr	John	Leveson	
979		G	Hodgson	
980		C	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.

Policy/ Paragraph	Changes made	Reason
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
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

Policy/ Paragraph	Changes made	Reason
2.3.1	Vision for Eden - Reference to <i>enhance</i> as well as <i>protect</i> added in 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.
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	' <i>Heritage</i> ' replaced by ' <i>Environment</i> ' 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 ' <i>appropriate</i> ' 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).

Policy/ Paragraph	Changes made	Reason
3.1- Policy LS1	<p>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.</p> <p>88 settlements include 10 (or more) dwellings. Villages which only meet this threshold due to barn conversions/subdivisions have been excluded.</p> <p>New in the list: Clifton Dykes, Leadbeck, Low Braithwaite, Low Moor, Nenthead, Old Town (High Hesket), Pallet Hill, Ravenstonedale, South Dykes, Roundthorn, Raisebeck</p> <p>Removed from the list: Drybeck, Hoff, Kirkland, Salkeld Dykes.</p>	To update the list based on the 1996 Local Plan and make sure villages have been selected from set criteria.
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 <i>'appropriate'</i> .	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	<i>"Some market housing may be acceptable if it facilitates the provision of a significant amount of affordable housing"</i> added.	In response to a comment made by the Church Commissioners, and to meet the requirements of paragraph 54 of the NPPF

Policy/ Paragraph	Changes made	Reason
3.1- Policy LS1	The following clarification is included: <i>“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”.</i>	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 - <i>‘provision of housing’</i> is replaced by <i>‘amount of development’</i> 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: <i>“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 church.”</i>	To explain how hubs have been reclassified following changes to services
3.1.5	Text added: <i>“Villages and hamlets have been identified on the basis that they are a coherent grouping of ten or more dwellings”.</i>	For explanation
3.1.5	The following text is included: <i>“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.”</i>	To provide clarity as to when the local connection criteria will apply.

Policy/ Paragraph	Changes made	Reason
3.1.5	New text added: <i>“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”.</i>	To highlight the role of neighbourhood planning in supporting local communities, and the District Council’s support for it.
3.1.6	<i>“Essential agricultural worker’s dwellings”</i> 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 <i>“Small site permissions discounted to 75% to allow for non-implementation”.</i>	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 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

Policy/ Paragraph	Changes made	Reason
3.3.1	Following text inserted - <i>“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 businesses¹”.</i>	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 monitoring the approvals and completions from 2014-15.

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

Policy/ Paragraph	Changes made	Reason
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: " <i>and to aid movement around the town</i> ".	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: " <i>A site for mixed-use development is allocated at Old London Road</i> ".	The site remains available and is now allocated for housing development only.
3.5 - Policy PEN1	The sentence " <i>an additional site is safeguarded for cemetery use has been identified at Beacon Edge.</i> "	No longer necessary.

Policy/ Paragraph	Changes made	Reason
Penrith Allocations Table/3.5.1/3.5.2	<p>The following amendments are made to the allocations table:</p> <ol style="list-style-type: none"> 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 land allocations table, resulting in a reduction to the number of units allocated on this site. 2. 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. Pre-application 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". 	Updated based upon new information and current status of sites and changes to strategy.

Policy/ Paragraph	Changes made	Reason
	<p>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.</p> <p>8. Site N2 has been added, with 49 units expected 2020-25 and a further 106 units expected between 2026-32</p> <p>9. Site P2, phasing altered to 2026-32 from 2014-19</p> <p>10. Site P61 phasing altered to 2019-24 and numbers altered to 37 based on similar nearby scheme density (town centre apartment site)</p> <p>11. Site P71 has been reduced from 6 units to 5</p> <p>12. Site P8, phasing altered to 2026-32 from 2020-25</p> <p>13. Site P61, phasing altered to 2014-19 from 2026-32</p> <p>14. Site P94, phasing altered to 2026-32 from 2020-25</p> <p>15. Site P101 removed following objections and uncertainty over deliverability.</p>	

Policy/ Paragraph	Changes made	Reason
	<p>16. Site P86 (Garages at William Street) removed as it is in Flood Zone 3 (sequential test applies)</p> <p>17. Site P115 added (Brentfield Way), 10 units expected between 2020 and 25. Deliverable brownfield site.</p> <p>18. Area of the Gilwilly extension amended to 11.91 hectares</p> <p>19. Reference to the safeguarded site for the extension of Penrith Cemetery is removed.</p>	
3.5.1	<p>20. Updated the overall housing figure and number of sites to 1,554 across 14 allocated sites, a reduction from 1691 homes and 16 sites in the previously published version</p> <p>21. Updated Gypsy and Traveller site allocation to extension to Lakeland View, rather than Maidenhill</p>	
3.6.6	Text added: <i>“This may take the form of financial contributions or serviced land.”</i>	To highlight that contributions will be sought.
3.7.1	Sentence <i>“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”</i> 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.

Policy/ Paragraph	Changes made	Reason
3.9.1	'Historic environment' replaces 'built environment'	In response to suggestion from Historic England
3.10 - Policy AL1	<p>Updated the overall housing figure to 86, a reduction from 87 in the previously published version</p> <p>Added Site AL1 (Jollybeard Lane) as confirmed as available. Removed "Bruntley Meadows" and "Tyne Café" from the sites listed in the policy.</p> <p>Removed affordable housing requirement from the policy - there is a separate policy covering the requirement for affordable housing (HS1)</p> <p>Employment site at the Bonds Factory removed as it now has permission.</p>	<p>Revisions to site allocations following the consultation process and further work on the LAA, housing numbers and monitoring the approvals and completions from 2014-15.</p> <p>Site AL4 (Bruntley Meadows) removed as application withdrawn due to wildlife conservation issues.</p>
3.10 - Policy AL1	Sentence added: <i>"Development will be expected to adhere to guidance set out in the Alston Character Appraisal and Management Plan Supplementary Planning Document."</i>	To update and alert readers to the SPD.
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 <i>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</i> Employment site at the Bonds Factory removed as it now has permission	Updated our site allocations based upon new information or known site constraints.

Policy/ Paragraph	Changes made	Reason
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 <i>“reflects the scale, form and appearance of the original building”</i> .	Following discussion with our Development Management colleagues - scale considered a more suitable term than ‘mass’.
3.11 - Policy AL2	<i>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”</i> .	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
3.11 - Policy AL2	Last sentence amended to read <i>“will remove any permitted development rights which would normally apply to the building and its curtilage”</i>	For clarity.
3.11.1	Renovation” replaced by “Redevelopment”	To match the policy text.
3.11.1	Revised text: <i>“Conditions removing permitted development rights will be imposed at the time planning consent for redevelopment is granted”</i> replaces <i>“conditions removing permitted development rights may be imposed at the time planning consent for redevelopment is granted”</i>	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

Policy/ Paragraph	Changes made	Reason
3.12.4	Reference to Appleby Castle deleted from vision.	Response to suggestion from Barbara Wilson - restricted access.
Site allocations table	<p>Site AP10 - Boundary redrawn to exclude the Coal Yard, site. renamed accordingly.</p> <p>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.</p> <p>Reference amended from Drawbriggs Lane to south of Station Road</p>	<p>Following a suggestion from Story Homes.</p> <p>To correct an error.</p>
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 the previously published version	Revisions to site allocations following 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.

Policy/ Paragraph	Changes made	Reason
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	<p><i>Site KS3 removed</i> - the site has been granted planning permission on appeal.</p> <p><i>Site KS7, phasing altered from 2026-32 to 2014-19</i> - update to our site allocations based upon new information.</p> <p><i>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.</i></p> <p><i>Site KS18 added (new site) with 35 units phased between 2014-19</i> - an update to our site allocations based upon new information.</p> <p><i>Area of the Business Park extension reduced to 3.33 hectares</i></p>	<i>To update</i> , 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)

Policy/ Paragraph	Changes made	Reason
3.18	<p>Objectives added for the rural areas:</p> <ul style="list-style-type: none"> • To protect and enhance their landscape setting and historic environment • 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 	To achieve consistency with Town Plan sections and set out the purpose of the policies.
3.19 - (old) Policy RUR1	<p>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.</p> <p>-</p>	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.

Policy/ Paragraph	Changes made	Reason
3.19 - New Policy RUR1	<p>Old Policy RUR1 replaced with new policy on large scale agricultural buildings, based on the guidelines in Part 4 of the Eden Design Guide:</p> <p><i>“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:</i></p> <ul style="list-style-type: none"> <i>• The proposal carefully considers topography and landform and how the building can be sited to minimise its visual and landscape impact.</i> <i>• Opportunities have been taken to retain existing planting and introduce new native tree planting to help screen new buildings where necessary.</i> <i>• The proposal utilises subdued colours to reduce the visual prominence of the new building.”</i> 	<p>Considered necessary given rural nature of Eden, following discussion with Development management colleagues.</p>

Policy/ Paragraph	Changes made	Reason
3.19.1 & 2	<p>New supporting text:</p> <p style="text-align: center;">Explanation</p> <p>3.19.1 <i>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.</i></p> <p>3.19.2 <i>The Eden Design Guide has been produced to provide guidance to applicants on how good design can be achieved 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.</i></p>	To update, and to signpost the Eden Design Guide.

Policy/ Paragraph	Changes made	Reason
	<p><i>Reason for the Policy</i></p> <p><i>3.19.3 This policy recognises that there will be a need for new purpose built agricultural buildings over the plan period and provides a clear framework for assessing planning applications to ensure new buildings are designed and sited sensitively.</i></p>	
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 re-use 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 re-use 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 as unclear as to what is expected.

Policy/ Paragraph	Changes made	Reason
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 <i>“the proposal will not conflict with existing adjoining land uses” (now bullet point 9)</i>	Following discussion with our Development Management colleagues
3.20 - Policy RUR2	Bullet point 9 becomes 10, and is reworded to say <i>“the Council will remove any permitted development rights where appropriate which would normally apply to the building and its curtilage”</i>	Improved wording, and to anticipate that in some circumstances it may not be appropriate or possible to remove rights.
3.20.2	<i>“This policy therefore restricts reuse to traditional buildings only”</i> 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: <i>“the means of access and drainage”</i> instead of <i>“the means and access and drainage”</i> .	To correct a typing error.

Policy/ Paragraph	Changes made	Reason
New paragraph 3.20.4	Revised text: <i>“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 reusing existing buildings”.</i>	In response to a suggestion from PFK agents and to recognise that viability may be compromised if contributions are sought.
New paragraphs 3.20.5 & 7	The following paragraphs are added: <i>“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.</i>	To update the plan to indicate that permitted development rights may now apply.

Policy/ Paragraph	Changes made	Reason
	<i>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.”</i>	
3.21 - Policy RUR3	Second criterion deleted: <i>“Involve the expansion of appropriate and existing businesses”</i>	Considered over-restrictive - would 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

Policy/ Paragraph	Changes made	Reason
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	<p>Following text added:</p> <p><i>“Surface water should be discharged in the following order of priority:</i></p> <ol style="list-style-type: none"> <i>1. An adequate soakaway or some other form of infiltration system</i> <i>2. An attenuated discharge to the watercourse</i> <i>3. An attenuated discharge to a public surface water sewer</i> <i>4. An attenuated discharge to a public combined sewer</i> 	In response to a request from United Utilities
4.3.2	Paragraph amended to reflect that the Sustainable Urban Drainage Approval Boards were now operational	Factual update.

Policy/ Paragraph	Changes made	Reason
4.3.3	Following paragraph added: <i>“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.”</i>	In response to a request from United Utilities
4.4 - Policy DEV3	The following criterion is added: <i>“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”</i>	In response to suggestion from Network 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 DEV4	New sentence added: <i>“Contributions must be necessary and ensure the viability of development is maintained”</i>	In response to suggestion from 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 added.	In response to suggestion from 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.

Policy/ Paragraph	Changes made	Reason
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: <i>“Small numbers of market housing aimed at enabling the delivery of affordable homes to meet local need may be acceptable on an exceptional basis.”</i>	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	<i>“Further information on our approach to affordable housing provision is set out in our ‘Housing’ Supplementary Planning Document”</i> is added.	For information.
4.8.4	<i>‘at least’</i> 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

Policy/ Paragraph	Changes made	Reason
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 sites and the opportunities they may bring to help improve the character and appearance of villages and support local services.”	To help encourage re-use of brownfield land in previously developed land in villages.
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 ‘ <i>Housing to Meet Local Demand</i> ’ 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.

Policy/ Paragraph	Changes made	Reason
4.11 Policy HS4	Bullet point 2 removed: <i>“The Council’s Housing Needs Study, which will be kept under review.”</i>	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 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.	As a result of the National Housing 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.

Policy/ Paragraph	Changes made	Reason
4.17 - Policy EC2	Following text added: ... <i>"and there is no significant adverse impact upon the continued operation of neighbouring existing uses"</i> .	In response to suggestion from the Royal Mail.
4.18 - Policy EC3	Reference to historic environment added and text amended to refer to <i>'not causing harm to...'</i>	In response to a suggestion from Historic England.
4.18 - Policy EC3	Following text removed: <i>"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"</i> .	Removed due to uncertainty on implementation.
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	<p><i>Small Scale Development now reads:</i></p> <p><i>“Small scale tourism development will be permitted where it meets one of the following criteria:</i></p> <ul style="list-style-type: none"> <i>i) Any proposed new build development is located within a Town or Key Hub;</i> <i>ii) Where the proposal involves the re-use of an existing building, or previously developed land;</i> <i>iii) The proposed development forms part of a farm diversification scheme;</i> <i>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”</i> 	<p>Policy amended following discussion with development management colleagues and to improve clarity. Amended to clarify suitable locations for tourism development without reference to Policy LS1, which focuses almost solely on new housing development. Also increase flexibility, allowing reuse of existing buildings or land and in circumstances where it needs to be in or can benefit from a specific location. Reference to new build development added at criterion (i) to allow for some flexibility for existing businesses.</p>
4.19 - Policy EC4	<p>The generalised statement about occupancy conditions is removed and replaced with a reference to conditions in the permanent structure section of the policy - <i>“The Council may impose planning conditions to avoid continual residential use of such sites where they are located in the open countryside.”</i></p> <p>The following text is added to the section on non-permanent accommodation: <i>“The Council will may impose planning conditions to avoid continual residential use of such sites or seasonal restrictions where necessary to safeguard the landscape”.</i></p>	<p>To clarify when holiday restrictions will apply</p>

Policy/ Paragraph	Changes made	Reason
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’ substituted for ‘highway’ before safety.	To refer to all amenity and make clear 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.

Policy/ Paragraph	Changes made	Reason
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 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 use proposals sufficiently.
4.24 - Policy ENV1	The following text is removed: <i>Proposals will need to demonstrate 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.</i>	Superfluous text, and removed to confirm that not all applications will be expected to screen for possible effects.

Policy/ Paragraph	Changes made	Reason
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 ENV1	Reference to soils added under Local Sites section	In response to a suggestion from Friends of the Lake District
4.25 - Policy ENV2	First sentence amended to: <i>"New development will only be permitted where it conserves and enhances distinctive elements of landscape character and function"</i> .	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

Policy/ Paragraph	Changes made	Reason
4.27 - Policy ENV4	Bullet Point 3 amended to read <i>“Proposals account for any known local deficiencies of green infrastructure identified by the Council”</i> instead of <i>“Proposals account for any known deficiencies of green infrastructure identified by the Council and seek to address this through development strategies”</i> ;	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 <i>“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”</i> , instead of <i>“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”</i> .	To clarify the intention of the policy.
4.27.1	A reference to walking and cycling added in third sentence.	In response to a suggestion from Eden Cycling Campaign

Policy/ Paragraph	Changes made	Reason
4.28 - Policy ENV5	<p>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:</p> <p><i>“Proposals for residential and commercial development schemes should demonstrate, where practical, that they have considered:</i></p> <ul style="list-style-type: none"> - <i>Maximising daylight and passive solar gain through the orientation of buildings.</i> - <i>Integrating sustainable urban drainage systems.</i> - <i>Designing and positioning buildings to minimise wind funnelling, frost pockets and uncomfortable microclimates.</i> - <i>Integrating renewable energy technology into the scheme, and in larger schemes exploring the scope for district heating.</i> - <i>Minimising construction waste, through for example designing out waste during the design stage, selecting sustainable and efficient building materials and reusing materials where possible.</i> - <i>Providing well-designed and visually unobtrusive outdoor waste storage areas to promote recycling.</i> <p><i>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.”</i></p>	Partly in response to the national housing standards review which has removed the ability of LAs to require efficiency standards in excess of those set in Building Regulations.

Policy/ Paragraph	Changes made	Reason
4.28.3	<p>Paragraph revised to read:</p> <p><i>“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”.</i></p>	<p>To reflect changes to legislation arising from the Government’s Housing Standards Review.</p>
4.28.4	<p>Paragraph deleted (discussed the zero carbon standard)</p>	<p>In light of the Government’s announcement in the productivity Plan that it will not implement the standard.</p>

Policy/ Paragraph	Changes made	Reason
4.29 - Policy ENV6	<p>Title of policy changed to 'Renewable Energy'. Revised policy wording:</p> <p><i>“Renewable and low carbon energy schemes will be supported where:</i></p> <ol style="list-style-type: none"> <li data-bbox="510 480 1456 683">1. <i>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;</i> <li data-bbox="510 719 1456 863">2. <i>Proposals respect the form of the built environment, including settlement character and heritage assets, with particular attention paid not only to the potential impact on the heritage asset itself, but also to its wider setting;</i> 	<p>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.</p> <p>Criterion 8 now included to reflect the Government's revised policy position on wind energy. Suitable areas are shown on the Policies Map.</p>

Policy/ Paragraph	Changes made	Reason
	<p>3. <i>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;</i></p> <p>4. <i>It can be demonstrated that the natural environment, including designated sites will not be adversely affected (and where possible enhanced);</i></p> <p>5. <i>The local road network can satisfactorily accommodate the development proposed;</i></p> <p>6. <i>The proposed scheme will provide benefits to the community through their involvement with the proposal;</i></p> <p>7. <i>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;</i></p>	

Policy/ Paragraph	Changes made	Reason
	<p>8. <i>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 the proposal has their backing;</i></p> <p>9. <i>The proposed scheme will not have an unacceptable effect on civil or military aviation and/or other defense related installations;</i></p> <p>10. <i>The proposed scheme will not have an unacceptable effect on existing telecommunications infrastructure;</i></p> <p>11. <i>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.</i></p> <p><i>Where mitigation is required to make any identified impacts acceptable these will, where necessary, be secured through condition or planning obligations." –</i></p>	
4.29.1	<p>Paragraph deleted and replaced by:</p> <p>4.29.1 <i>"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.</i></p>	<p>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.</p>

Policy/ Paragraph	Changes made	Reason
	<p><i>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 appropriate locations, be that large scale or micro-renewable schemes (where planning permission is required).</i></p> <p><i>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.</i></p> <p><i>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 2030².</i></p>	

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

Policy/ Paragraph	Changes made	Reason
	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>4.29.6 In order to address community concerns and in the interests of residential amenity and safety, a minimum separation distance of 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.</i></p>	

Policy/ Paragraph	Changes made	Reason
4.29.2	<p>Paragraph deleted and replaced by:</p> <p><i>“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.</i></p> <p><i>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.</i></p> <p><i>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.”</i></p>	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 explanatory text.

Policy/ Paragraph	Changes made	Reason
New paragraph 4.30.5	<p>New paragraph added covering the wind energy SPD:</p> <p><i>“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”</i></p>	In response to a suggestion from Cumbria County Council
4.31.2	‘Declared’ changed to ‘Proposed’	Identification has not yet been finalised.

Policy/ Paragraph	Changes made	Reason
4.32 - Policy ENV9	The following text is removed: <i>As a minimum, land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990.</i>	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.
4.34 - Policy ENV11	Title of policy amended to refer to historic environment as too narrowly focussed on the built environment.	In response to suggestions from Cumbria County Council
4.34 - Policy ENV11	Policy reworded to better reflect the NPPF, as suggested in Cumbria County Council's response.	In response to a suggestion from Cumbria County Council
4.34.4	Supporting text amended following comments from Cumbria County Council.	In response to a suggestion from 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 COM2	<i>"Within settlements"</i> deleted from the first sentence as protection of open space applies to all areas.	
4.37 - Policy COM2	The first sentence now reads: <i>"Development proposals for new open space, sport, leisure and recreational facilities will be supported"</i> is deleted, as well as the final sentence covering contributions (now in Policy COM4)	Considered superfluous/moved to a new policy.
4.37.4 (new)	Reference to open space being shown on the policies map added	Areas now shown on the Policies map.

Policy/ Paragraph	Changes made	Reason
4.38 - New Policy - COM3	<p>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.</p> <p><i>“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, 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”.</i></p>	To update the plan and incorporate findings of the Eden Open Space Study.
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

Policy/ Paragraph	Changes made	Reason
Appendix 1	<p>Introductory text updated to reflect that the plan is intended to be a final version:</p> <p><i>“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.”</i></p>	Update.
Appendix 2 and 3	Factual updates	Factual updates
Appendix 6	<p>Local occupancy criteria amended for Policy HS2:</p> <p><i>“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 criteria:</i></p> <ol style="list-style-type: none"> <i>1. The person lives in the locality and has done for a continuous period of at least three years.</i> <i>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.</i> 	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
	<p>3. <i>The person has a firm offer of employment, for a minimum of 16 hours per week in an already established business within the locality.</i></p> <p>4. <i>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.</i></p> <p>5. <i>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.</i></p> <p><i>It is intended that housing permitted under policy HS2 will be restricted to those with a local connection in perpetuity.</i></p> <p><i>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 from a qualifying purchaser have been received.</i></p> <p><i>“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.”</i></p>	
Appendix 7	North Pennines Dales Meadows now correctly named.	Response to suggestion by Natural England