

Neighbourhood Development Plan – Comments Received as Part of Regulation 16 Consultation

General comment on EDC’s “vague and imprecise” wording comments. we adopted a “vaguer” wording at EDC’s request on previous versions of the PNDP. Sometimes with good reason eg do all proposals have to have social inclusion measures eg a house extension? It would be good to have examiners view

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
CCC 4	Working with the District and County Councils.	Misleading – suggests more than one County Council	Working with the District Council and County Council to identify.....	Agreed
Historic England 11 Key Issues		Include a Historic Environment section in 3 Key Issues as a key driver including preventing unjustified harm, reducing risk and seeking enhancement		Comment noted, no change.. These issues are addressed in paragraphs 3.8.1 and 3.8.2 of section 3”

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
CCC 13 Para 3.2.15	There are no national standards for the number of parking spaces provided for individual properties on new developments. Consequently developers may plan for the minimum (1.3) parking spaces as recommended by CCC, rather than the number needed relative to the size of the prospective household.	Misleading. CCC would recommend parking is provided in line with the current Cumbria Development Design Guide. The guide details different parking provision for different development sizes and types	There are no national standards for the number of parking spaces provided for individual properties on new developments. Consequently developers may plan for the minimum number of parking spaces as recommended in the current CCC Cumbria Development Design Guide https://www.cumbria.gov.uk/planning-environment/flooding/cumbriadevelopmentdesignguide.asp , rather than the number needed relative to the size of the prospective household.	Noted – supporting text accurately reflects situation. Policy (see P20) will be changed to reflect design guide
EDC 14 para 3.3.3	‘There are few developed land sites available ’	Typo	‘There are few undeveloped land sites available	Agreed
EDC 16 para 3.5.3	‘.. or privately (table 2) for adult patients.	Consistency	‘.. or privately for adult patients (Table 2).	Agreed
CCC 3.6		The evidence presented in 3.6 should be updated to reflect the extensive evidence base collected as part of the PPMS		To check further and update as necessary

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CCC 19 3.7	However, this needs to be achieved without discouraging visitors to the town by using appropriate signage and possibly a park and ride scheme.	Park and ride was explored as part of the PPMS so any comments should reflect the evidence and recommendation of the PPMS	However this needs to be achieved without discouraging visitors to the town by using appropriate signage or other methods. Park and ride schemes were explored as part of the PPMS when it was agreed that should the longer-term needs of the town result in an increased requirement for more long stay parking, the provision of additional long stay car park capacity in the form of a park and ride outside the town centre may be a viable option	Agreed
CCC 20 3.72	Interruption to traffic flow... and Figure 7	Refers to the first stage of the Penrith Transport Improvement Study (2015). Further iterations OF THE Penrith Transport Improvement Study developed highways and sustainable transport schemes which when implemented would mitigate these pinch points. Paragraph and figure are misleading and should be removed.	Interruption to traffic flow on either the M6 or A66 results in traffic displacement and severe congestion on the approaches to Penrith and the town itself (Figure 7). The Penrith Transport and Movement Study developed by Cumbria County Council has developed highways and sustainable transport schemes which, when implemented, would mitigate these pinch points.	Agreed
CCC 21 Para 3.75	Highways England have agreed to the duelling of the A66 (2024 to 2032) and are considering improvements at the junction of the A66 with the A6 (Kemplay Bank)	Highways England are the project's promoter – they should be contacted to clarify the text in this paragraph.	Highways England have agreed to the duelling of the A66 (2024 to 2032). The preferred routes have been released including an underpass under Kemplay Bank roundabout to J40 and the formal consultation is about to commence (Spring 2021)	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 21 para 3.8.1	'.. character of the town is red sandstone and stucco, the...'	Slate roofs are a predominant material in the town centre	'.. character of the towns is red sandstone, stucco under slate roofs, the....'	Agreed Conservation area report states Westmorland Slate roofs – this can be amended
EDC 24 para 3.9.6	'20142032'	Typo	'2014-2032'	Agreed
EDC 24 para 3.10.2	'Askham Bryan College at Newton Rigg Campus provides courses in tourism as well as land-based courses and.....'	Current situation is changing	'Askham Bryan College at Newton Rigg Campus currently provides courses in tourism as well as land based courses although its long-term future is currently in doubt and..'	Agreed Recent development since submission of the draft to EDC
EDC 28 Figure 8	'ELP 2014 to 2032'	Consistency	'ELP 2014-2032'	Agreed
MOP 34 Objective 1		Sustainability ambitions are not sufficiently ambitious. Any new homes must now and in the future be 100% carbon neutral, constructed / insulated so as not to require any heating or cooling and lighting and cooking energy green generated		No Change Government target is for zero carbon to be introduced through progressive changes to Building Regulations by 2050. Not possible to meet this comment.

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<p>CPRE Cumbria Assoc General</p>		<p>Limited reference to landscape. Recommend that landscape impacts and landscape character be treated as separate from heritage and be considered in relation to all new development not just housing proposals</p>		<p>Comment noted. No change. Landscape addressed by Eden Local Plan Policy ENV2.</p>
<p>CPRE Cumbria Assoc</p>		<p>The NDP might usefully refer to the parish being in the setting of the LDNP and the importance of this. The statutory duty to national parks applies in the setting and so is important to reflect this in policy terms. The NP should refer to the Cumbria landscape character assessment and the LDNP landscape character assessment ? There is a strong indication that parts of the parish lie within the setting of the park and it would be beneficial to refer to both LCAs in policy or supporting text</p>		<p>No Change No part of Penrith parish lies within the LDNP and these issues are addressed in the Eden Local Plan..</p>

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CPRE Cumbria Assoc		The NDP could help protect the dark skies in the area by incorporating elements of our dark skies policy		<p>No change. This issue is addressed in Eden Local Plan policies:</p> <p>Policy EC4 - Tourism Accommodation and Facilities</p> <p>Policy ENV9- Other Forms of Pollution</p>
EDC 31 Policy 1	‘1. Development proposals should be designed to incorporate sustainable development principles and measures. These measures should build in reliance and achieve development that is adaptable to meet the challenges of future climate and socio-economic change. Development proposals should demonstrate where practicable, that they meet all of the following criteria.’	<p>The format of the policy should be the main aim followed by the series of criteria. The wording of the policy is vague and imprecise including words such as ‘should’ and ‘where practicable’.</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>The word ‘should’ introduces imprecision and be replaced by ‘shall’ . The format should be amended to the main aim and a series of criteria.</p> <p>‘Development proposals shall be designed to incorporate sustainable development principles and measures. These measures shall build in resilience and achieve development that is adaptable to meet the challenges of future climate and socioeconomic change. Development proposals shall demonstrate that it meets, or has fully considered all of the following criteria:’</p>	?????????????

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 31 criteria 2	'2 The inclusion of design features and measures that encourage.....'	Clarity	'1 Design features and measures that encourage...'	Semantics – no change
MOP 31 Policy 1		Some of the PTC policy is repeating the Local Plan. However I am pleased that PTC wish for high standards of thermal insulation and that in any design and access statements applicants must say how their proposal meets the criteria in PNDP Policy 1. I am not entirely sure how enforceable the proposals can be but it is good to know that PTC prefer developers to install sustainable features on new builds rather than occupants having to retro fit at a later date.		Comment Noted – no change.
EDC 31 criteria 3	'3 Measures to prevent flooding and watercourse pollution and measures to minimise water consumption, including...'	Clarity	'2 The prevention of flooding, watercourse pollution and minimise water consumption, including..'	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>Historic England 31 Policy 1.8</p>		<p>Could be expanded to highlight that protecting and enhancing historic character and local distinctiveness directly contributes to economic vitality and desirable neighbourhoods making Penrith a more sustainable place in the round. The inherently sustainable benefits of re-using historic buildings and their embodied energy could also inform an amendment to these policies</p>		<p>Amend Policy 1.5 to</p> <p>“protecting and enhancing historic character and local distinctiveness directly contributes to economic vitality and desirable neighbourhoods making Penrith a more sustainable place in the round Re-using buildings and recycling building materials, wherever possible (eg masonry, roofing materials, aggregate etc.)”</p>
<p>Env Agency 32 Criteria 5</p>	<p>Utilising recycled building materials wherever possible...</p>	<p>Suggest this paragraph instead refers to new construction adhering to the principles of waste hierarchy which gives top priority to preventing waste in the first place – to reduce, reuse and recycle</p>		<p>Amend to read</p> <p>New construction should adhere to the principles of waste hierarchy giving top priority to preventing waste by reducing, re-using and recycling building materials wherever possible (eg masonry, roofing materials, aggregate etc)</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Env Agency 33	New 6.7 and renumber existing 6.7 to 6.8	There needs to be a para added which describes the benefits of SuDS		Amend to add in Surface water runoff should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water runoff by simulating natural drainage systems and retain water on or near to the site. As well as reducing flood risk this promotes ground water recharge, helps absorb diffuse pollutants and improves water quality ✓
Env Agency		The plan could require the provision of new green infrastructure features on the high street. It can reinvent retail areas and encourage new uses that promote them as a destination for local residents. It can also have positive environmental and wellbeing impacts and contribute to the attractiveness of the area.		Comment noted. No change.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 32 criteria 5	'5 Utilising recycled building materials'	Clarity	'4 That the proposal utilises...'	Numbering
EDC 32 criteria 6	'6 Maximise opportunities for..'	Clarity	'5 Maximises opportunities for..'	Numbering
EDC 35 criteria 7	'7 use of sustainable, renewable, healthy products...'	Clarity	'6 The use of sustainable, renewable, healthy products..'	Numbering
EDC 32 criteria 8	'8 protection of green spaces, creation of new green spaces and, where practicable, the development achieve net gains in biodiversity.'	Clarity	'7 The protection of green spaces, creation of new green spaces and achieves a net gain in biodiversity.'	Numbering

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Sport England 32 Policy 1.8	8 protection of green spaces, creation of new green spaces and, where practicable, the development achieve net gains in biodiversity.'	Concerned about the quantity and quality of playing fields that could be eroded, reduced or lost by works to achieve net gains in biodiversity as this could include tree planting, engineering operations, wildlife enhancements etc		No Change - noted
EDC 32 criteria 9	'9 inclusion of adequate infrastructure to service the development and to ensure the development is sustainable – economically, socially and environmentally.	Clarity	'8 includes infrastructure to adequately service the development and which ensures that the development is sustainable (economically, socially and environmentally).'	Numbering
EDC 32 criteria 10	'10 Protection and enhancement of local identity, character and distinctiveness of the town by way of sympathetic use of building styles, layouts, materials and landscaping.'	Clarity and reflects NPPF paragraph 127 a) adding to the overall quality of the area.	'9 The enhancement of local identity, character and distinctiveness of the town by way of sympathetic and complementing use of design , building styles, layouts, materials and landscaping.'	Noted – no change

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Cumbria Police		Only refers to crime at Policy 11 yet crime prevention may be a consideration for all sustainable development		Amend Policy 1.10 to add to the end 'which also reduces opportunities for crime' MW comment – noted no change – Eden Local Plan notes one of strengths of area is low crime – this issue is covered by Local Plan Policy DEV5 that says “Incorporates appropriate crime prevention measures.” As the two plans will be read together there is no need for duplication.
CCC 33 6.5		Whilst it is welcomed that the background and justification text identifies the role of CCC as infrastructure providers, there are other infrastructure providers who play a key role		Comment noted – no change

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EDC 33 6.7 line 3	'.. Requirements applicants should set out how the proposal meets the..'	The wording of the policy is vague and imprecise including words such as 'should'. Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'...requirements applicants must set out how the proposal meets the..'	Agreed
MOP 3.2.12		Some flex would be desirable esp in context P2. Vernacular style increases costs – it would be good to see modern designs to reflect our times		Noted – no change Policy 2.3 covers this
MOP		It would be good to see some aspiration for CLH to play a role in Penrith's future		Noted – no change Policy 7 includes custom and self-build.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 34 Policy 2</p>	<p>'Development should be designed.... Proposals should, therefore..... Contemporary design will be encouraged....</p>	<p>The wording of the policy is vague and imprecise including words such as 'should'. Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Development proposals shall be designed in such a way that it promotes high quality, environmentally sustainable design. Proposals shall, therefore, be informed by, and respect, the town's wider character and the local site context. High quality, traditional and contemporary design will be required to promote local distinctiveness, or where appropriate, reflect or complement a 21st-century responses, including technical design, required to reduce the impact of climate change. Planning applications will be assessed against the following criteria:'</p>	<p>Agreed</p>
<p>EDC 34 policy 2.1</p>	<p>'1 Design and access statement, where they are required to accompany a planning application, should set out how the proposal achieves a high quality design and sustainable development.'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should'. Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'1 design and access statement, where they are required to accompany a planning application, shall set out how.....'</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Env Agency 34 Policy 2		<p>The submission of a construction environment management plan should be a requirement for proposals involving major development within the plan area. It should outline how a construction project would avoid, minimise or mitigate effects on the environment and surrounding area.</p>		<p>Comment noted – no change – this is a development management issue to addressed by Eden District at planning application stage.</p>
EDC 34 policy 2.3	<p>‘3 If the proposals are and innovative sustainable design solution such proposals will be encouraged to ensure.....’</p>	<p>The wording of the policy is vague and imprecise including words such as ‘encouraged’</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>‘3 if the proposals are considered to be an innovative sustainable design solution, such proposals will be required to ensure that the development remains at the forefront of contemporary, sustainable building design and as such, will be assessed for the way in which they include measures for:</p> <ul style="list-style-type: none"> i. Adopting water recycling methods at source ; ii. Using sustainable building materials; iii. Recycling of grey and rainwater; iv. Adopting v. Inclusionetc.’ 	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 35 6.10</p>	<p>'Applicants will be encouraged to provide..'</p>	<p>The wording of the policy is vague and imprecise including words such as 'encouraged'</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Applicants will be required to provide....'</p>	<p>Agreed</p>
<p>EDC 35 6.10</p>	<p>'Measures that could be included...'</p>	<p>The wording of the policy is vague and imprecise including words such as 'could'</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Measures that should be included..'</p>	<p>Comment noted, no change, this is only supporting text – not policy.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Persimmon 36 6.13 relating to Policy 2	The reality is that homes we build today will still be in use in 2050 when all our housing stock must be carbon neutral. The homes we build today must be built to run without emitting greenhouse gas emissions. If this does not happen.....	Whilst this statement is an admirable goal, there is no evidence suggesting that developments today are being built with zero carbon emissions. Not reasonable to require when it is not currently achievable		Comment noted – no change.
EDC 36 policy 3	‘Developers of major proposals above a threshold of... Unless this can be demonstrated to be neither practicable nor viable.’	The wording of the policy is vague and imprecise’ Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	‘Major development proposals above the threshold of 1000 m ² or 10 dwellings, shall provide at least 15% of the developments total predicted energy requirements from on-site renewable energy generation and storage, unless this can be demonstrated to be neither technically practicable nor financially viable (through the submission of a financial viability assessment).	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Historic England 36 Policy 3		How will 'unless neither practical nor viable' be assessed: we suggest the impact of proposed measures on the significance of heritage assets would be one aspect to be considered		No Change Issues of practicality and viability would be assessed at the planning application stage. Issues of impact on heritage assets would be assessed at same stage against development plan, PNDP and national planning policy.
MOP		Interested that just 15% renewable is requested and that if it isn't practicable or viable it isn't essential		Comment noted. No change.
EDC 37 6.17	'Such schemes should be practical eg small wind turbines in suitable locations, such as where they would not have significant adverse impacts.	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'Such schemes must be practical e.g. small wind turbines in suitable locations of the installation of photovoltaic panels in suitable locations, such as where they would not have significant adverse visual impacts...	Amend to 'small wind turbines or photovoltaic panels in suitable locations, such as where they would not have significant adverse visual impacts...

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>DC 37 policy 4</p>	<p>To ensure that all development proposals meet the needs of all groups and sections of the community they should be in a location that can be reasonably accessed by walking, cycling, those with mobility aids, public transport and motor vehicles..... ‘</p>	<p>The wording of the policy is vague and imprecise including words such as ‘encouraged’</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>‘To ensure that all development proposals meet the needs of all groups and sections of the community, they shall be in a location that can be accessed by walking, cycling, those with mobility aids, public transport in addition to access by private motor vehicles.....’</p>	<p>Agreed</p>
<p>EDC 37 Policy 4</p>	<p>‘To improve social inclusion proposals should also:’</p>	<p>The wording of the policy is vague and imprecise including words such as ‘should’</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>‘To improve social inclusion all development proposals shall meet the following criteria:’</p>	<p>??</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
MOP Policy 4	'design and accessibility is necessary for future proofing our housing stock	Not clear how this is to be achieved		Comment noted. No change.
EDC 37 policy 4.1	'... where feasible and appropriate.'	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	Delete 'where feasible and appropriate' and replace with 'in accordance with the requirements of policy COM 3 – Provision of New Open Space, of the ELP 2014-2032'	Agreed
EDC 38 Relevant District Planning Policies: Eden Local Plan 2014 – 2032	Add additional policy reference	Lack of information	Include under DEV 1,3 and 5 COM3 Provision of New Open Space	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 39 Policy 5 A	'Penrith Conservation Are'	Typo	'Penrith Conservation Area'	Agreed
EDC 39 Policy 5 A	'Development within or affecting the setting of the Penrith Conservation Area should be designed to take account of the conservation or enhancement of the following:'	The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'New development proposals within or affecting the setting or character of the Penrith Conservation Area shall be designed to take account of the conservation and enhancement of the following:'	Agreed
Historic England 39 Policy 5		Welcomed. Recommend ensuring each clause is linked to evidence, most importantly in the adopted conservation area appraisal for the areas. Penrith New Streets does not have an adopted character appraisal which is a gap in the evidence base for the plan. We recommend getting this in place now to clearly set out its special architectural and historic interest thus informing this policy.	Change 'take account of' in parts A and B to 'pay special attention to' as this would be stronger and reflects the statutory duty relating to conservation areas. Question the term Burlington Slate as this is a commercial supplier even if used with the generic term 'Westmorland Slate'	Comment Noted EDC to be approached to update New Streets character appraisal.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 39 Policy 5 A 2</p>	<p>'The fine grain of built development and well defined building hierarchy within buildings generally to stories in height and not exceeding four stories and less of exceptional design and having no other significant adverse impact.'</p>	<p>Clarity/ ambiguity</p>	<p>The fine grain of built development and the well-defined building hierarchy, comprising buildings generally two to four storeys in height. Any development exceeding four storeys in height may only be considered if they are of exceptional design</p> <p>complementing and enhancing the area within which they are located and have no other significant adverse impact.</p>	<p>Agreed</p>
<p>EDC 39 Policy 5 A 4</p>	<p>'Retention, reuse and use of local materials for example red sand stone...'</p>	<p>Clarity</p>	<p>The retention, reuse and.....'</p>	<p>Agreed</p>
<p>EDC 39 Policy 5 A 7</p>	<p>'Key views and vistas within and of the conservation area, including:'</p>	<p>Clarity/ ambiguity</p>	<p>'The retention and improvement of key views and vistas within the Conservation Area in addition to:'</p>	<p>Noted no change It ignores the policies preamble?</p>

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<p>EDC 39 Policy 5 A 8</p>	<p>'Hard and soft landscaping in local materials with native species planting.'</p>	<p>The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The introduction, retention and improvement of hard and soft landscaping in local materials with native species planting.'</p>	<p>Noted – no change It ignores the policies preamble?</p>
<p>EDC 40 Policy 5 B</p>	<p>'Development within or affecting the setting of the Penrith New Streets Conservation Area should be designed to take account of the conservation or enhancement of the following:'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'New development proposals within or affecting the setting or character of the Penrith New Streets Conservation Area shall be designed to take account of the conservation and enhancement of the following:'</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 40 Policy 5 B 1</p>	<p>'Retain the layout of tightly knit terraces and larger semi-detached and detached villas.'</p>	<p>The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The retention of the character and appearance of the layout of the tightly knit terraces and semidetached and detached villas.'</p>	<p>Noted no change it ignores the policies preamble?</p>
<p>MOP Policy 5</p>		<p>Agree that parts of Castletown, Croft Avenue and Drovers Lane should be considered for conservation area – however has this been through a design code.</p>		<p>Noted – no change there is no need for a Design Code – changes to the Conservation Area boundary is a matter for EDC through other planning legislation.</p>
<p>MOP Policy 5</p>		<p>Agree with retention of mature gardens and open spaces which are integral to the conservation area. Would like to see inclusion of Beacon Edge as a conservation area from Lowther Street to Roundthorn</p>		<p>Comment noted. No change.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 40 policy 5 B 2</p>	<p>'Use suitable materials such as red sandstone...'</p>	<p>The wording of the policy is vague and imprecise including words such as 'suitable' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The retention, use and reuse of suitable materials such as red sandstone and Westmorland/Burlington slate roofs or sympathetic alternatives, that would result in a high quality, innovative design.'</p>	<p>Noted no change it ignores the policies preamble?</p>
<p>EDC 40 Policy 5 B 4</p>	<p>'Retention of mature gardens and open spaces...'</p>	<p>Clarity</p>	<p>'The retention of mature gardens and open spaces...'</p>	<p>Noted no change it ignores the policies preamble?</p>
<p>EDC 43 Policy 6</p>	<p>'To ensure new housing development is of high quality design that reinforces local identity and reflects local distinctiveness it should have regard to and will be assessed against the following'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'To ensure new housing development proposals are of a high quality design that reinforces local identity and reflects local distinctiveness it shall have regard to and will be assessed against the following criteria:'</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
CCC 43 Policy 6	Outside the town centre.... Defined in Part 1 of the Cumbria Design Guide....		Change to 'Cumbria Development Design Guide (November 2017) – Major development over 10 units 1 bed – 1.5 spaces (1 space minor) 2 bed - 2 spaces (2 spaces minor) 3-4 bed – 2.5 spaces (2 spaces minor) 5 bed 3 spaces (3 spaces minor) Sheltered housing – 1 space per unit and developments under 10 units 1 Bed – 1 space 2,3 and 4 bed 2 spaces 5+ bedrooms 3 spaces	Amend to reflect Development Design Guide.

<https://www.cumbria.gov.uk/planning-environment/flooding/cumbriadevelopmentdesignguide.asp>

EDC 43 Policy 6 1	'Use of sympathetic layouts'	Clarity	'The use of sympathetic layouts...'	Noted no change it ignores the policies preamble?
EDC 43 Policy 6 2	'Visual and landscape character impact.'	Clarity / ambiguity	'The development proposals impact on visual and landscape character.'	Noted no change it ignores the policies preamble?
EDC 43 Policy 6 3	'Access to local facilities and services.'	Clarity / ambiguity	'The ability of the development proposal to access local facilities and services.'	Noted no change it ignores the policies preamble?

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 43 Policy 6 4	'Impact on existing communities in terms of residential amenity and impact on local infrastructure.'	Clarity / ambiguity	'The developments impact on existing community in terms of the existing residential amenity and local infrastructure.'	Noted no change it ignores the policies preamble?
EDC 43 Policy 6 5	'Traffic generation and its impact.'	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'The potential additional traffic generation and its impact on both the local and wider community.'	Noted no change it ignores the policies preamble?
MOP 43 Policy 2		While P2 wants new homes to be built in accordance with the Code for Sustainable Homes, Policy 6 makes no mention of the space standard 'Technical Housing Standard – nationally described space standard'	Policy 6 should state that the Technical Housing Standard should be included in the Eden District Council Local plan and included within the NDP.	Comment noted. No change. There is no need to reference the Technical Standard – this is a nationally set standard that must be met.

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<p>EDC 43 Policy 6 6</p>	<p>'Provision of appropriate social infrastructure to meet the needs arising from the development, including.....'</p>	<p>The wording of the policy is vague and imprecise including words such as 'appropriate'</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The provision of necessary and identifiable social infrastructure to meet the needs arising from the development, including accessible and usable public open space, and landscaping incorporating native plant and tree species, including food plants and fruit trees.'</p>	<p>Agreed</p>
<p>EDC 43 Policy 6 7</p>	<p>'Provision of features to encourage wildlife movement, migration, nesting (eg bird boxes, bat roosts, hedgehog holes), roosting and foraging</p>	<p>The wording of the policy is vague and imprecise</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>The development proposal shall include both natural and constructed features to encourage wildlife movement, migration, nesting (e.g. bird boxes, bat roosts and hedgehog holes), roosting and foraging to provide for biodiversity net gain.</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 43 Policy 6 8	'Outside the town centre as defined in....'	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'That for development proposals outside the town centre as defined in ELP 2014-2032, off-street car parking provision shall meet the standards defined in part one of the Cumbria Design Guide produced by Cumbria County Council as set out below (all garages where they are proposed, to be of a sufficient size to accommodate contemporary vehicles).	Agreed
Persimmon 44 6.28	Locally, there is concerns that conditions and obligations on development sites are not enforced.....	This para references the use of supporting Town Council actions for planning conditions. It would be appreciated if more clarity is provided in how the process would work		Noted – no change. These are none planning Town Council Actions
EDC 45 Policy 7	'New housing development should provide a range of types and sizes of dwellings that meet identified local needs in accordance with ELP 2014 2032 Policy HS4.'	The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'That all new housing development shall provide for a range of types and sizes of dwellings which meet identified local needs in accordance with ELP 2014 – 2032 Policy HS4.	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Persimmon 45 Policy 7	Based on the 2018 Housing Need Survey and in consultation with the community, developers should include bungalows within the mix of homes on individual sites	We feel that using Building Regs Part M 9M4(2) and M4(3) instead of providing a preference for bungalows would provide more flexibility		Comment noted no change – the PNDP sets planning policy
Persimmon 45 Policy 7	As above	This policy contradicts Policy 4 of the draft plan.... By using Building Regs part M it will ensure that these policies align and provide adaptable homes for future homeowners		Comment noted. No change. It will be a matter for decision makers to weigh the different requirements of PNDP and other development plan policy.
EDC 45 Policy 7	'In Penrith, as confirmed by the 2018 Housing Need Survey, the priority should be for the provision of homes..'	The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'Within Penrith, as confirmed in the 2018 Housing Need Survey, the priority shall be for the provision of homes to meet the needs of young renters with/without children, first-time buyers, empty nesters and the ageing population. The provision of serviced plots, individually or within schemes, for custom build and self- build affordable housing will also be required on sites/schemes of 10 or more homes, or where the site area is 0.5 hectares or more.	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 45 Policy 7</p>	<p>'Based on the 2018 Housing need survey and in consultation with the local community, developers should include bungalows within the mix of homes on individual sites. Extra care housing to meet the needs of the ageing population will also be supported'.</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Based on the 2018 Housing need survey and in consultation with the local community, developers shall include bungalows within the mix of homes on individual sites. Extra care housing to meet the needs of the ageing population will also be supported on appropriate sites supported by Policy HS4 of the ELP 2014 – 2032.'</p>	<p>Agreed</p>
<p>EDC 45 6.29</p>	<p>'Policy HS4 Housing Type of Mix in the ELP 2014 – 2032 seeks to secure a suitable mix of homes on development sites this will be informed by using evidence from and set out in ELP 2014 – 2032 Policy HS4.'</p>	<p>The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Policy HS4 Housing Type of Mix in the ELP 2014 – 2032 seeks to secure a suitable mix of homes all development sites and this will be informed by using evidence from and set out in ELP 2014 – 2032 Policy HS4, in addition to an assessment of the following more up-to-date criteria:'</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 46 6.35</p>	<p>'The PNDP seeks to meet such need by seeking the provision of service plots,.....'</p>	<p>The wording of the policy is vague and imprecise including words such as 'seeking'</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The PNDP seeks to meet such need by requiring the provision of serviced plots,.....'</p>	<p>Agreed</p>
<p>EDC 47 Policy 8</p>	<p>'Development of the designated Local Green Spaces must be consistent with national planning policy for Green Belts.'</p>	<p>The wording of the policy is vague and imprecise</p> <p>Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'Development within or affecting the designated Local Green Spaces identified above shall be consistent with national planning policy for Green Belts'.</p>	<p>Noted no change NPPF wording is “ Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” – “must” is very precise</p>
<p>Pategill Tenants Policy 8</p>	<p>PP67 Pategill Back Field</p>	<p>Broadly support it being protected but would now like half the area given over to parking to help with amenity of the area – is also registered Asset of Community value</p>		<p>Comments noted – no change</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>Sport England 47 Policy 8</p>	<p>To protect greenspaces that have been identified....</p>	<p>Comment 5 – Playing field sites and sports clubs and facilities have protection under para 97 of the NPPF. Adding green space designation places those sites under undue restriction affecting how they could be developed without such designation. The policy isn't clear on what it would or would not permit and may prevent those sites being developed for sport or recreation facilities in the future</p>		<p>Amend to add “Green Belt policy does allow for amongst other development: “ the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; (NPPF, paragraph 145b).</p>
<p>Sport England 49 Policy 9</p>	<p>To ensure the town's range of leisure and recreation facilities are enhanced and protected with a particular focus on wellbeing.....</p>	<p>It is not clear what this is trying to achieve beyond listing sites relevant to the Eden Local Plan COM2 It's not clear if this would permit or not enhancement and future development of their sport and recreation offer or development of an alternative use and replacement elsewhere</p>		<p>Comment noted no change – the policy identifies the sites to which Policy COM2 would be applied in Penrith.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 51 Policy 10</p>	<p>When a non—community use (eg housing) is proposed to replace, either by conversion or redevelopment, one of the facilities, such development will only be supported when it can be demonstrated that: a) there is no longer a need for the facility or suitable and accessible alternatives exist. b) that it is no longer economically viable to provide the facility c) that the site has been unsuccessfully marketed for sale in its current use.</p>	<p>Clarity / ambiguity / format</p>	<p>When a non—community use (e.g. housing, commercial development or a mix of development) is proposed to be replaced, either by conversion or redevelopment, such development will only be supported when it can be demonstrated that it meets each of the following criteria:</p> <p>a) there is no longer a need for the facility and that suitable and accessible alternatives with the necessary spare capacity exist elsewhere; b) that it is no longer economically viable to provide the facility; and c) that the site has been unsuccessfully marketed in its current use and at the value that reflects its current use</p>	<p>Agreed</p>
<p>EDC 51 6.46</p>	<p>'To ensure that quality of life is maintained and, where possible, enhanced the PNDP identifies and seeks to protect key community facilities.....'</p>	<p>Clarity</p>	<p>'To ensure that quality of life is maintained and where possible, enhanced, the PNDP identifies and seeks to protect key community facilities.....'</p>	<p>Noted no change – this is supporting text.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 52 Policy 11</p>	<p>'The provision and enhancement of walking and cycling links within the town especially between existing and new residential areas and key destinations, such as the town centre, employment sites, schools and other community facilities will be supported. Where appropriate, new development should include walking and cycling infrastructure that is of high – quality design and accessible to all.</p> <p>To ensure new development meets this policy, assessment will be made against the following;'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to</p> <p>NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'The provision and enhancement of new and existing walking and cycling links within the town, especially between existing and proposed new residential areas and key destinations, such as the town centre, employment sites, schools and other community facilities, will be supported. New major developments shall include walking and cycling infrastructure within the site which links on to adjacent existing infrastructure. All such links must be of high-quality design and accessible to all.</p> <p>To ensure new development meets this policy, assessment will be made against the following criteria;'</p>	<p>Comment Noted no change NDP Group wish it to be inclusive and not just for major development</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 52 Policy 11 1	'1 where necessary and feasible, provision of links to existing open spaces, green infrastructure and watercourses (rivers, backs and streams) and water features (eg ponds).	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'1 Within Major Developments walking and cycling links shall be provided within the scheme linking proposed open spaces, green infrastructure, watercourses (e.g. rivers, backs and streams) and water features (e.g. ponds) and these walking and cycling links shall be made to link into existing adjoining and adjacent open spaces, green infrastructure, watercourses and water features, as part of the proposal. '	Agreed subject to use of "major"
EDC 52 Policy 11 2	'2 connections to the existing network of walking and cycling path routes, where this is feasible, including ease and directness of any new connections created to the existing path and cycle path network.'	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'2 As part of a Major Development, the proposal shall include connections to the existing network of walking and cycling path routes, where this is financially viable and technically feasible, taking into account ease and directness of any new connections created to the existing path and cycle path network.'	Agreed subject to use of "major"
EDC 52 Policy 11 3	'3 The design of the foot and cycle paths within the development site should be legible and permeable (structured to provide routes to distinctive places and allow easy navigation around the site.'	The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'3 The design of the foot and cycle paths within the development site shall be legible and permeable within an overall highway hierarchy structured to link to distinctive areas and promote easy navigation, around the site.'	Agreed

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 52 Policy 11 6	'6 Routes of all kinds should be designed in such a way so as to be as safe as practicable, appropriately lit and to minimise opportunities for crime; and	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'6 Both public highways and private access ways shall be designed to allow safe passage for all users and be lit to minimise opportunities for crime;	Agreed
EDC 52 Policy 11	The criteria involve a mix of full stops and semi-colons, but all criteria commence with a capital letter	Consistency Unclear mixed format	Each criteria should commence with lowercase, and finish with a semi colon with the exception of the final criteria.	Agreed
EDC 53 6.49	'In some cases, eg where an existing route is not adjacent or related to existing walking and cycling routes it may not be feasible to create new connections to the existing walking and cycle network. '	The wording of the explanation is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'In some cases, e.g. where an existing route is not related to existing walking and cycling routes it may not be technically feasible or financially viable to create new connections from the development site to the existing walking and cycle network. '	Comment noted no change – this is supporting text.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>CCC 53 Policy 11 Background Justification</p>		<p>Needs to be clearer to make reference to the work undertaken by partners on the PPMS and LCWIP</p>		<p>Agreed – amend The PPMS was only commencing when the draft documentation was submitted – this can be included</p>
<p>CCC 54 Objective 6 Para 6.51</p>		<p>Refers to CCC commissioning a study</p>	<p>Change justification to read – Car parking is a major problem in Penrith, particularly in the town centre and the older residential areas close to the town centre. The Penrith Parking and Movement Study (September 2020) was jointly funded by CCC, EDC and PTC to develop a coherent and comprehensive parking and movement study for Penrith.</p> <p>The PPMS was based on robust assessment and defined methodology on what type of interventions are required to improve parking provision in Penrith</p>	<p>Change supporting actions to those in the PPMS</p>
<p>CCC 55 Policy 12.1</p>	<p>A new route to divert through-traffic around the town, introduce.....</p>	<p>Object to inclusion</p>		<p>Comment Noted no change. This was intended to be supportive and not suggest a route – new routes through Penrith have been under discussion for some time.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>MOP 55 Objective 7</p>		<p>There seems little detail/consideration on how the towns roads and systems can be improved to solve existing peak flow conditions and will not be exacerbated further by further expansions. Essential pre requisites to any further development would be: improvements to A66 to negate any roundabouts or junctions for through traffic and heading up or down the M6 and similarly that from the M6 heading East or West. Also A6 traffic must be able to bypass the town or get onto the A66.</p>		<p>Comments noted. These matters have been considered -but are highway matters to be considered by others. PTC can only put forward suggestions – some of which are included in PNDP.</p>
<p>CCC 55 Para 6.53</p>	<p>This will include maximising opportunities to channel financial contributions from new developments</p>	<p>No clarity suggest removal</p>		<p>Agreed Remove sentence.</p>
<p>CCC 55 Para 6.53</p>	<p>....promoting the use of J41 to take pressure off the overburdened J40</p>	<p>PNDP does not allocate land this statement is therefore ambiguous. Promotion should be considered and evidenced through the review of the Eden Local Plan.</p>		<p>Development land for business has been agreed just off J41. There has also been discussion by EDC to allocate land to the north between the A6 and M56 as development land. Signage is required to direct to Penrith North</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Historic England 55 Policy 12		Would be strengthened by indicating the need to protect the significance of designated and non-designated heritage assets, including significance generated by their settings, when supporting a new route.		Comment noted. Such impacts would be assessed against other development plan, PNDP and national planning policies at the proposal development and planning application stage.
Rotary 52 Policy 11		Very weak – needs strengthening. With the arrival of electric assisted cycles etc many areas out of cycling reach will become within and high quality cycle and walking routes from all the new developments to the centre and the employment areas are absolutely essential policy. Line 5 change should for must		Comments noted. No change.
EDC 55 Policy 12 1	'1 A new route to divert through – traffic around the town, introduce traffic calming to improve safety, access for emergency vehicles and maintain traffic flows	The wording of the policy is vague and imprecise' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'1 Identify and develop a new route to divert through-traffic around the town centre, introduce traffic calming to improve road/pedestrian safety, ensure access for emergency vehicles is maintained and maintain traffic flows through the town.	Noted no change it ignores the policies preamble. The policy isn't to identify and develop a new route but to support such measures to improve traffic flows and ease congestion as may arise.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 55 Policy 12 2</p>	<p>'2 Measures to mitigate the impacts of traffic generated from new development.'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'2 The introduction of measures to mitigate the offsite adverse impacts of traffic generated from new development proposals, either individually or cumulatively.'</p>	<p>Agreed</p>
<p>EDC 57 Policy 13</p>	<p>Development to improve the appearance of the town centre will be supported. Where appropriate, new development should seek to include or make contributions to the following:</p>	<p>The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>Development proposals to improve the appearance of the town centre will be supported. Where directly attributable to the development proposed, either individually or cumulatively, contributions will be required in respect of the following:</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
EDC 57 Policy 13 1	'1 improve the key gateways (entry points such as Castlegate, Bridge Lane and Ullswater Road) to the town centre and the main routes through the town.	The wording of the policy is vague and imprecise Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28	'1 Provide for the visual improvement of the key gateways (entry points such as Castlegate, Bridge Lane and Ullswater Road) to the town centre and the main routes through the town.	Agreed
EDC 57 Policy 13 2	'2 To incorporate native species of street trees and other plants in at key gateways and through routes.'	Consistency	'2 To incorporate native species of street trees and other planting at key gateways to the town centre and the main routes through the town. '	Comment Noted change original wording to add in key gateways to the town- This policy is not just the town centre ✓
EDC 57 Policy 13 3	'3 Measures to improve the environment for walking and cycling, including possible pedestrianisation of areas of the town centre.'	consistency	'3 The introduction of measures to improve the environment for walking and cycling, including the pedestrianisation of areas of the town centre.'	Noted no change -This should say possible pedestrianisation – the Town Council is not advocating pedestrianisation but realises that it is a conversation that will arise again in the future Most wording accepted with the addition of possible ✓

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
Penrith & Border Liberal Democrats 57 Policy 13	13.3 To incorporate native species of street trees and other planting at key gateways and through routes	The Town Council could plant trees itself in public areas of the town centre without waiting for new developments. This could include all car parks as well as the market square and other open spaces within the town.		Noted – No change The Town Council is planting trees however it doesn't own car parks and we already work with partners to look at greening
Rotary 57 Objective 8	Burrowgate should be included in the list of support packages in d of the supporting town council actions			Agreed
Historic England 57 Objective 8		A wider clearly expressed intention to conserve and enhance heritage assets would help focus the positive strategy for the historic environment which the plan should contain.		Comment noted. No change – wider heritage policy is addressed in the Eden Local Plan.

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>Historic England 57 Policy 13</p>		<p>Welcome. Recommend a stronger link between this and Policy 5 to protect special town centre architectural and historic character and appearance in the round. Policy and supporting text should explain how character and appearance should influence such development and how to interpret policy wording such as 'where appropriate', 'improve', 'high quality' and 'suitable'. Policy could recognise the strong link between a well-cared for and presented historic town centre and improved economic activity</p>	<p>Recommend advice in Streets for All: Advice for Highways and Public Realm Works in Historic Places (2018) https://historicengland.org.uk/</p> <p>Images books/publications/ Streets/for/all/ to ensure historic environment is properly addressed.</p>	<p>Comment noted. There is no need for links between the PNDP's various policies – the policies of the PNDP will be read as a whole and will also be read alongside development plan and national planning policy.</p>
<p>EDC 58 6.54</p>	<p>'6.54ELP 20142032...'</p>	<p>Typo</p>	<p>'6.54ELP 2014-2032..'</p>	<p>Agreed</p>
<p>CCC 58 Objective 8 Para 6.58</p>	<p>Where public realm improvements impact on the highway, consultation should take place.....</p>	<p>Needs to be clearer and explain that the schemes contained within the Penrith Transport Improvement Study form part of Eden Local Plan's Delivery Plan</p>	<p>Where public realm improvements impact on the highways as detailed in the Penrith Transport Improvements Study, consultation between CCC, EDC and PTC should take place. These schemes were identified as necessary highway infrastructure to help facilitate the delivery of the level of growth proposed in the Local Plan up to 2032..</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 61 Policy 14</p>	<p>‘To maintain the quality, character and distinctiveness of Penrith town centre new shopfronts and alterations to existing shopfronts should take account of the following:’</p>	<p>The wording of the policy is vague and imprecise including words such as ‘should’ Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>‘To maintain the quality, character and distinctiveness of Penrith town centre, new shopfronts and alterations to existing shopfronts where planning permission is required, shall take account of each of the following criteria:’</p>	<p>Agreed</p>
<p>EDC 61 Policy 14 1</p>	<p>‘1 the scale and architectural style of the existing building and any existing shopfront. The overall aim should be to seek where possible, the retention and repair of existing traditional and historic features that contribute to the interest of the building and the street frontage.’</p>	<p>The wording of the policy is vague and imprecise including words such as ‘should’ Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>‘1 the scale and architectural style of the existing building within which the shopfront will be framed together with and any original and traditional existing shopfront which remains. A new or altered shopfront shall ensure the replacement, retention and repair of existing traditional and historic features that contribute to the interest of the building and the street frontage.’</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>Cumbria Police 61 Policy 14 and 6.61</p>		<p>There is now an aesthetic alternative to the presence of external shutters or grilles in modern (not historical) frontages with the deployment of Hammerglass integrated with specialist internal security measures</p>		<p>Agreed Amend 14.3 to say Security grilles and shutters should be installed on internal aspects only in older shopfronts. In modern shopfronts, the use of hammerglass integrated with specialist internal security measures would be acceptable.</p> <p>Amend 6.61 This policy should be read in conjunction with EDCs Shopfront and Advertisement Design Supplementary Planning Document although developers are also encouraged to seek crime prevention advice from Cumbria Constabulary prior to submitting their proposals.</p>
<p>EDC 61 Policy 14 2</p>	<p>'2 the size, detailing and materials of signage should respect the character and the area within which it is located.'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'2 the size, detailing and use of materials of signage shall respect the form and character both of the building on which it is sited and the area within which the building is located.'</p>	<p>Agreed</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>EDC 61 Policy 14 4</p>	<p>'4 where in use, blinds, blind boxes and awnings should respect the scale and character of the building and the area within which it is located.'</p>	<p>The wording of the policy is vague and imprecise including words such as 'should' Contrary to NPPF February 2019 Section 3 Plan-Making 16d, 28</p>	<p>'4 where proposed, new blinds, blind boxes and awnings should respect the scale and character of the building on which they are sited and the area within which the building is located.'</p>	<p>Agreed</p>
<p>MOP 61 Policy 14</p>		<p>Could this be one of the reasons national retailers avoid Penrith</p>		<p>Comment Noted -No Change National chains in places like Ludlow respect local requirements re signage</p>
<p>MOP 61 Policy 14</p>		<p>Agree that they should be in keeping with conservation area and heritage aspect. However I am not convinced that national retailers will comply with this. Therefore PTC could be restricting the number of companies which might consider locating to Penrith. Aesthetics v practicalities is difficult. If all the shops looked the same that would be boring but to have a high standard of shop frontage is commendable.</p>		<p>Comment Noted Once made the plan will set planning policy for the area – irrespective of who the applicant is. The TC do not accept the argument that this policy would discourage certain retailers from investing in the town.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>Historic England 61 Policy 14</p>		<p>Welcomed. Could be more strongly linked to Policy 5 which partly addresses the same issue. It should seek to enhance as well as maintain. If the policy is to carry stronger weight in the conservation areas, we recommend using 'pay special attention to' rather than the weaker 'take account of' Explanatory text should include any criteria or thresholds you would want 'where possible' to be judged against eg scheme viability, new design characteristics, perhaps consider what is discussed in the shopfront design guide which the supporting text refers to. 14.3 could spell out that shutter boxes could not be installed externally</p>		<p>Amend policy wording to include “enhance” and replace “take account of” with “pay special attention to”.</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
<p>UU New Policy Suggestion</p>			<p>“New development should be designed to maximise the retention of surface water on the development site and to minimise runoff. The approach to surface water drainage should be considered in liaison with the LLFA, the public sewerage undertaker and where appropriate the Environment Agency”.</p> <p>Surface water should be discharged in the following order of priority:</p> <ul style="list-style-type: none"> • An adequate soakaway or some other form of infiltration system. • An attenuated discharge to watercourse or other water body. • An attenuated discharge to public surface water sewer. □ An attenuated discharge to public combined sewer. <p>Applicants wishing to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.</p>	<p>No change – these issues are already addressed by Eden Local Plan Policy Policy DEV2 - Water Management and Flood Risk</p>

Page / Paragraph	Wording	Comment	Revised Wording	MW Comment
			<p>All residential developments of 10 properties or more and major commercial development should incorporate sustainable drainage systems which minimises surface water run-off and ensures that all surface water is addressed within the site boundary. These may include features such as ponds, swales and permeable paving designed as part of the development and to reflect the rural character of the area. Every option should be investigated before discharging surface water into a public sewerage network, in line with the above surface water hierarchy.”</p>	
<p>MOP 130 Appendix XII</p>	<p>Operations times of the Penrith-Appleby bus service the 563 route</p>	<p>Information is out of date.</p>	<p>Now operates 0915 Penrith-Appleby 0950 Appleby-Penrith (via Cross Croft and Kirkby Thore 1050 Penrith-Appleby 1125 Appleby-Penrith 1330 Penrith-Appleby (via) 1425 Appleby-Penrith</p>	<p>Comment Noted – update where necessary Details were correct at time of submission on the Plan (end of Nov 2019) Note – the Town Service is currently not running at all due to Covid</p>
<p>Rotary Comments</p>			<p>The plan is full of weak words such as should/expect which should be replaced by must eg objective 1 policy 1 and policy 2 line 1 – developments MUST comply</p>	<p>See suggested changes elsewhere in this table.</p>