

Allithwaite and Cartmel Neighbourhood Development Plan

Regulation 16 representations

A summary of the representations made at Regulation 16 stage to the Allithwaite and Cartmel Neighbourhood Development Plan

Name	Organisation	Overview of representation
Diane Clarke	Network Rail	General advice provided regarding the need to ensure development protects and enhances the railway infrastructure and need for transport assessments and statements where development may impact/affect railway infrastructure
Natasha Markham obo	North Yorkshire County Council	No comment
Olivia Allen obo	Environment Agency	Support updates in accordance with previous response
Christopher Telford obo	Coal Authority	No comments
Charlotte Ditchburn obo	The British Horse Society	Objection - plan fails to meet test of para 100 of NPPF by excluding equestrian access, No specific policies referenced.
	Marine Management Organisation	General advice around marine planning and implications and considerations for Local Plan making and planning decisions
Steve Sim		Support in full; it's time that local opinion is taken into account and the document goes a long way into achieving much on so many subjects that concern residents. Nothing perfect but the document at least sets out opinion and standard of locals.
Cllr Ian Charles Wharton	SLDC Member	No comments - indicated wish to be informed of decision to 'make' the Plan

Name	Organisation	Overview of representation
Grange-over-Sands Town Council	Grange-over-Sands Town Council	Grange Town Council supports the principle of constructing more safe off-road pedestrian pathways and any move for these to link in with neighbouring developments across parish boundaries. Specifically, the big development at the top of Kirkhead Road would benefit from this. Grange Town Council is willing to work with neighbour parishes on developing safe pedestrian networks.
HSE	Health & Safety Executive	States that not a statutory consultee for local & neighbourhood plans.
Lorayne Wall	Friend of the Lake District	We welcomed and supported the landscape, dark skies and principal residence policies in particular throughout the preparation of the Neighbourhood Plan. During previous stages, we have sought to be supportive and make suggestions that would strengthen the policies and help to ensure they met the vision, aims and objectives of the Neighbourhood Plan, as well as the Basic Conditions. We are therefore disappointed to find that few, if any of our comments have resulted in changes to the Plan and we have therefore found it necessary to repeat several of the comment we made previously (see attached document).

Name	Organisation	Overview of representation
Lorayne Wall	Friends of the Lake District	<p>Request changes to Policy AC3, referring in the supporting text to the potential National Park extension i.e. the fact that this area has been independently assessed as being worthy of National Park status would help to demonstrate the quality of the landscape and provides important evidence and context for Policy AC3. Welcome the policy reference to the Cumbria Landscape Character assessment but for accuracy and completeness it should also refer to the LNP Landscape character assesement - several of the the Areas of Distinctive Character extend beyond the LDNP boundary and into the Parish - Parish appears to straddle two or three of these (ADCs 64, 65 and 66). Relevant in properly reflecting local and national policy and in providing evidence and context for AC3 meeting Basic Conditions a and e. Paragraph 2.2.6 should be revised for factual correctness. Humphrey Head is a Cumbria Wildlife Trust Reserve and a large part of Humphrey Head is subject to SSSI designation and a Limestone Pavement Order, bounded on three sides by Ramsat, SAC and SPA designations but the promontory itself is not. Final sentence of AC3 should be amended to apply to both hedges and walls in order to be in general conformity with CS8.2 and DM2 - should read 'Landscaping schemes in areas where dry-stone walls or hedgerows have been lost or are unmanaged should restore walls / hedgerows through traditional rebuilding or hedge-laying and/or replanting with native species, to benefit wildlife and maintain landscape character. The link should be made in the text and policy AC3 between landscape character and tranquility (as this will provide connection with / justification for the dark skies policy) and ensure genral conformity with CS8.2 and DM2(10).</p>

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Lorayne Wall	Friends of the Lake District	<p>Policy AC5 - Part A of the policy cannot be in general conformity with local or national policy if it does not include siting as well as design - siting is crucial and should avoid harm as a priority. Part E seems to be trying to do too much making it unclear and ineffective. It should be split into two or even three points. Protecting and enhancing biodiversity and important habitats is an overriding point covered at the start of the policy. Putting up bird and bat boxes is a separate point specific to net gain, enhancement or mitigation. Using trees to break up roof massing is a design point that should be covered elsewhere such as in the Design Code.</p>
Lorayne Wall	Friends of the Lake District	<p>AC8 - Strongly support the inclusion of this policy and welcome the changes made and boundary map. Paragraphs 2.4.7 and 2.4.10 should be combined to avoid duplication of the same four lines of text. The words 'second homes' should be removed from the sentence beginning 'new unrestricted...' and replaced with 'dwellings'. Applications are not made specifically for 'second homes' and it could create a loophole if someone is seeking an unrestricted homes that is not a second home but first or third.</p>
Lorayne Wall	Friends of the Lake District	<p>AC6 - very much welcome this policy , the policy wording remains weak and ineffective. It is not in general conformity with DM2(10) or NPPF 186 or NPPG on light pollution. Internal lighting and 'significant' openings is not just about the lighting being seen, but about it spilling out and creating light pollution and harming wildlife etc. Significant openings - traditional buildings tend not to be the main culprits, it is the current trend for large expanses of glazing in new development, the policy and design code should reflect this aim. Rather than just saying that the ILP had provided some guidance, the policy could include a requirement for proposals to be in accordance with it and/or other guidance - a recently published document called Towards a Dark Sky Standard might help provide the detail. Consider incorporating more detail to ensure lighting is designed appropriately. The Dark Skies Technical Advice Note is being revised and all the basic principles for good lighting could readily be incorporated into the policy. The policy could be the first in the County to refer to proposals needing to be in line with the TAN.</p>

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Lorayne Wall	Friends of the Lake District	<p>Design Code - There is still very little reference to lighting other than street lighting. There is also no mention of design features related to lighting and light pollution such as glazing, window sizes and the design of lighting itself. These aspects should be covered in order to better support the relevant policies (e.g the Dark Skies policy). The points of guidance provided above in relation to the Dark Skies policy may be helpful in informing the content.</p>

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Chris Ashton	Ashton Planning	<p>Raises various concerns, suggests modifications, deletions, corrections etc across the Plan. General concern the aspiration of the Parish Council to protect the countryside, urban green spaces and the Conservation Areas is understandable but for the Plan to be part of the statutory planning framework it should be focused just as much or even more on where new development could be and the policies to manage it. Otherwise 'development' in the plan title has little meaning. There is much repetition of national and local plan guidance which national government expected to cease in local plans, the same principle should apply to this Plan for e.g. para 2.1.8 even states design principle are provided in the NPPF and Local Plan and para 2.1.10- surface water management directly restates the NPPG Guidance. So they should be deleted and any other objectives that repeat those 'higher tier' planning documents. Policy AC1 and the Design Code need to be made clear that they are to apply in the villages i.e. to the built environment only, as is indicated in the text details. 2.2. Landscape Character and objective 2 about protecting views in the countryside is too vague and lacking any methodology, so it could not be of planning use e.g. to help assess planning applications. Para 2.1.11 appears on pages 17 and 19 - is this typographical or is there missing text? Policy AC3 - the typography or grammar needs clarification and correction. 'Preserves' should be deleted it is unacceptable given inevitable, evolutionary changes in the countryside which are not Conservation Areas. It is unnecessary because it refers to the Cumbria Landscape Character Guidance and the Local Plan. Objective 7 is an objective without objective means of assessment. It could conflict with the purpose and responsibility of the Authority by means of their Local Plan, which is under review, to allocate land for development e.g. to meet identified local housing needs in this civil parish. Policy AC9 - why have these been identified specifically and not for development proposals as a whole? Besides the criteria are six of those in the Local Plan Policy DM18 for Caravan Park development proposals so the policy is superfluous. At least correct Point F is unfinished was text to continue on the next page. AC10 delete the mandatory expectation upon developers is unreasonable and strays into provision of government services beyond planning control e.g. health care. Implementation - 'The Parish Council will scrutinise all planning applications in relation to the policies in the Neighbourhood Plan' highlights my concerns that unless the NP is scrutinised at examination and not revised or modified, then the planning purposes and efficacy of it are a missed opportunity and could inhibit sustainable development in the NP area.</p>
Pippa Brown	Historic England	No comments
Tim Bettany-Simmons	Canal & Rivers Trust	No comments

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D Knipe		<p>In my opinion this is a "general comment" in relation to the Allithwaite & Cartmel Neighbourhood plan (Submission Version). but overall I object because of the way my case has been dealt with.</p> <p>I have attended public consultation events, attended several Parish Council meetings, following the process of the Neighbourhood plan. I believe the Parish Council is not supported by the community, and I understand why. Many people in the community don't follow the documents provided on the website, but i have taken an interest on behalf of the family because of a plot of land in our ownership which had been designated as important open space, then Amenity open Space with no public access and then Amenity open space presented in the Draft Design Guide without any consultation or authority to designate that land from the owners. The design guide has been amended now and the maps showing the land in question have now been removed. Original copy scanned for your reference. It is quite obvious that whoever designated the land thought it was part of the larger field, which is under separate ownership and a boundary line is shown.</p> <p>I have had a trail of emails over several years both with Allithwaite Parish Council and SLDC. SLDC said we should have been consulted but the planning officer who may have had some contribution for that designation does not work for them any longer.</p> <p>The process in attending the Parish council meetings including public participation has not been easy. In my opinion all of these pages submitted for the Neighbourhood plan is beyond what can be taken into consideration by the council in the future especially when I was told that the council didn't have a steering group! It is quite clearly documented that there has been. I know that the SLDC are reviewing land designation in Allithwaite, in their Local Plan but this situation of Private land stolen from the rightful owners just because someone has designated it without our permission and no one will accept responsibility for it and no one can provide documents. I therefore request a direct meeting with the independent examiner as SLDC (Alistair McNeil and Damian Law) know exactly how we feel regarding this situation</p>

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Susan Jones		<p>Thanks to all who, on behalf of our communities, have developed the plan to this stage.</p> <p>P26, Policy AC3, List of views - can I suggest adding the view of Cartmel Priory from the Birkby/Templand footpath, views of Boarbank Clocktower from Templands Lane, and the views to sea from several roads and paths.</p>

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Sue Devlin		<p>Many thanks to the steering group and all others who have helped to put the AC Neighbourhood Plan and supporting documents together. It is a great body of work and will be of huge benefit to all who live in, work in, or visit, Allithwaite and Cartmel.</p> <p>My comments are all seeking modifications or corrections.</p> <p>1. The following comments refer to the Allithwaite and Cartmel Neighbourhood Plan (Submission Version, October 2022) (PDF 4.6MB / 60 pages).</p> <p>Modification: Section 2.1, Pages 23-24 show the SLDC Land Allocations Policies Map and key for Cartmel. In the interest of completeness, the document should include the equivalent SLDC Land Allocations Policies Map and key for Allithwaite.</p> <p>Corrections/Broken Links: Para 2.1.17, page 20 – the link to the SLDC Land Allocations Development Plan Document DPD - https://www.southlakeland.gov.uk/media/6179/01-local-plan_land-allocationsadopted-dec-2013.pdf. Para 2.1.22, page 20 – the link to Townscape Features Map in the Cartmel conservation area appraisal https://www.southlakeland.gov.uk/media/3911/cartmel-townscapefeaturesmap.pdf. Policy AC3, page 25 – the link to the Townscape Features Map and key in the Cartmel Conservation Area Appraisal https://www.southlakeland.gov.uk/media/3911/cartmel-townscapefeaturesmap.pdf. Para 2.2.12, page 33 – the link to the Local Green Space Assessment https://www.allithwaiteandcartmel.co.uk/neighbourhood-plan. Para 2.6.1, page 48 – the link to The Cartmel Township Initiative Report http://www.allithwaiteandcartmel.co.uk/news/cartmel-township-initiative.</p> <p>Corrections/Typo? Policy AC3, page 25 – there appears to be a typo “All new development should demonstrate that it takes preserves the landscape features and setting”.</p> <p>2. The following comment refers to the Design Code (October 2022) (PDF 3.7MB / 92 pages).</p> <p>Modification: Section 6. Site Specific Codes, pages 79-87 – these pages don’t include the remaining section of Site Name: LA1.3 - Land North of Jack Hill that lies to the north east of Holme Lane and is yet to be developed. This remaining section is in a prominent position at the entry point to Allithwaite and would benefit from the application of relevant codes to help guide its development.</p>

<p>Hannah Walker</p>	<p>Barton Willmore on behalf of Holker Estates</p>	<p>As a local landowner Holker Estates welcomes and supports the production of the NDP. It is clear that a significant amount of hard work and effort has gone into the drafting of this document. However, it is disappointing that the NDP does not consider the future development and infrastructure needs of local people in Cartmel and how these could be met. This would have ensured the NDP shapes, directs and helps to deliver sustainable development to protect the future vitality and viability of the village. Notwithstanding this, Holker Estates wishes to provide comments in relation to Policies AC2, AC3 and AC5 of the Submission NDP. Our response to each of the relevant policies is detailed below.</p> <p>Policy AC2 - Development within Cartmel Conservation Area and its setting</p> <p>Policy AC2 on page 21 of the NDP is applicable to new development within Cartmel Conservation Area and its setting. The last paragraph of the policy states:</p> <p>“The pattern of open spaces and landscape character in and around Cartmel should be retained. In particular, the fields separating the east and west part of the village and to the fields on the approach to the village that are in the foreground of ‘significant’ views should be safeguarded from inappropriate development through Policy LA1.10 of the SLDC Land Allocations DPD. These are designated as amenity or public spaces on the Land Allocations DPD Policies Map reproduced as Map 3.”</p> <p>As written, it is unclear which fields on the approach to the village are safeguarded from inappropriate development. The areas designated as amenity and public spaces on the Land Allocations DPD Policies</p> <p>Page 2 of 3</p> <p>Map that fall within the foreground of ‘significant’ views are the fields that separate the east and west part of the village the fields to the rear of Cartmel Priory School on Headless Cross.</p> <p>As the policy specifically refers to the designated amenity and public open spaces protected under Policy LA1.10 of the Local Allocations DPD for clarity and the avoidance of doubt for the decision-maker the wording of the policy should be amended as follows:</p> <p>“The pattern of open spaces and landscape character in and around Cartmel should be retained. In particular, the fields separating the east and west part of the village and to the rear of Cartmel Priory School that are in the foreground of ‘significant’ views should be safeguarded from inappropriate development through Policy LA1.10 of the SLDC Land Allocations DPD. These are designated as amenity or public spaces on the Land Allocations DPD Policies Map reproduced as Map 3.”</p> <p>[proposed changed highlighted in bold]</p> <p>Policy AC3 - Protecting and Enhancing Landscape Character around Allithwaite and Cartmel</p> <p>Paragraph 2 of Policy AC3 on page 25 states all new development should demonstrate that it preserves the landscape features and setting of Cartmel and Allithwaite. The need to preserve would effectively act as a conflict in meeting future development needs in the village that would effectively result in a moratorium on future development. On that basis we would propose that this part of the</p>
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		<p>policy is amended as follows: “All new development should demonstrate that it respects the landscape features and setting of Cartmel and Allithwaite...” [proposed changes highlighted in bold] Policy AC3 on page 26 of the NDP goes on to list locally significant views that the policy states should be preserved and not significant detracted from. It is not clear what analysis has been undertaken to inform these significant views and the reasons why these views are more significant than other views from public footpaths, rights of way, roadside or publicly accessible land within and outside Cartmel. Nonetheless, as per our comments above, the requirement to preserve significant views is only likely to act as an impediment to future development coming forward in the village. We, therefore, propose that this element of the policy relating to significant views is amended as follows: “Locally significant views that are visible from locations that are freely accessible to members of the general public (for example from a public footpath, right of way, roadside, or other publicly accessible land) are identified below and in paragraph 2.1.22. Development should take into consideration any adverse impact on these views through landscape appraisals and impact studies.” Policy AC5 – Protecting and Enhancing Green Infrastructure and Biodiversity Paragraph 2 of Policy AC5 states: “all development should avoid any impact from the loss of countryside, wildlife, and the natural environment and where avoidance is not possible mitigate or compensate for any impact...” This requirement is inconsistent with the paragraph 174 of the National Planning Policy Framework (NPPF). This states that planning policies should contribute to and enhance the natural environment by minimising impacts on and providing net gains in biodiversity. On that basis and in line with the requirements of paragraph 180a) of the NPPF we propose that this part of the policy is amended as follows: “all development should seek to minimise any impacts from the loss of countryside, wildlife and the natural environment and if significant harm to biodiversity resulting from the development cannot be avoided mitigation or compensation should be provided...”</p>

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	Lichfields on behalf of Bourne Leisure	<p>Object to Policy AC9, taking a restrictive approach to development as noted in paragraph 2.4.11 is in conflict with Policy CS4 of the Core Strategy and CS7.6 which seek to maintain and enhance the strength of tourism across the area and seek to create, enhance and expand tourists attractions and infrastructure. Also conflicts with Policies CS1, CS7.4 and CS7.6 that are broadly supportive of rural development and tourism outside key service centres, paragraph 1.12 of the NP which seeks to promote local development and paragraph 16 of the NPPF which states plans should be prepared positively. Restrictive approach does not meet basic conditions a and e as at odds with strategic framework and no regard to NPPF. Current policy does not allow for mitigation to be taken into account, recommend it is reworded to say 'The provision of new, or extensions to existing, caravans or chalet parks will only be supported where the any significant adverse impacts of the development proposed'. Suggest also criterion a and b should be combined / rewritten to comply with the NPPF framework "would not have an adverse impact (individually or cumulatively) on the countryside in terms of landscape character and visual amenity in terms of immediate or long-distance views taking into consideration "Is capable of being effectively screening by existing landform, . Trees or planting and/or the mitigation that can be achieved using landscape works such as bunding and planting. Bourne Leisure endorse the removal of reference to "units will be required to avoid a rigid pattern/. Criterion e conflicts with NPPF paragraph 110 and should therefore be rewritten as follows: 'Will not give rise to unacceptable significant impacts on the local road network, either through traffic generation from the site itself, or through cumulative impacts alongside other sites; and, . Criterion F is the last criterion and it includes an 'and' at the end, for the purposes of clarity it is suggested to delete the spare 'and'. Table 5 summarises the static caravans/holiday lodges in the NP area. The figure quoted for the Park should be 1,147 - see planning application SL/2022/0725.</p>

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	Lichfields on behalf of Bourne Leisure	<p>Policy AC1 includes the word 'detrimental', this is ambiguous and contrary paragraph 16 d of the NPPF. The opening paragraph should be rewritten as follows 'All new development will be expected to respond positively to the key attributes of the parish and local design features of the villages. Development will not be supported where is has a detrimental significant adverse impact on the character of the area in which it is located. All new development will be supported when it meets the following criteria, where relevant:... Not all of the criteria under Policy AC1 apply to all proposals, in all situations. As a result, using the words 'where relevant' in the opening paragraph provide a suitable and reasonable approach. Criterion a states 'Has taken account of the Allithwaite and Cartmel Parish Design Code.... according to paragraph 2.1.9 Cumbria County Council is currently reviewing the Design Code. Due to the early stage of the design code making process and considering changes to the Deign Code are still possible, it is considered only limited weight can be attached to the document. Criterion D uses the wording 'best features', this is subjective and the test should be deleted. The policy is adequate as it requires the context of the proposed development to be assessed. This will have to include the area's features and respond accordingly. Criterion E should be separated, the amenity of neighbours and the protection of views should not be linked within the same criterion. Suggest it is reworded - Demonstrates that consideration has been given to the amenity of occupiers of neighbouring properties and does not result in the loss of an area or view which makes a contribution to public amenity by virtue of its open space character, appearance, and function; and new criterion f Demonstrates that consideration has been given to the context of the area or landscape views which make a contribution to public amenity by virtue of its open space character, appearance, and function; and.. Current criteria F to H should be relabelled as g to i taking into account the addition of a new criterion at f. All of the policies need to be effective, unambiguous, set requirements that are appropriate in terms of planning law and policy, comply with basic conditions and will not undermine the approach to achieving sustainable development and the vision of the South Lakeland Core Strategy.</p>

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	Lichfields on behalf of Bourne Leisure	Policy AC3 includes the word 'preserves' this is onerous and not in general conformity with the NPPF. The second paragraph of the policy should be rewritten 'all new development should demonstrate that it takes preserves has taken into account the landscape features....Paragraph 3 uses the word 'detrimental' this exceeds the test required by local and national policy and is therefore not in general conformity with either, amend word ' detrimental ' and use ' significant ' instead.
	Lichfields on behalf of Bourne Leisure	Policy AC5 states 'development proposals should conserve and enhance biodiversity in the Neighbourhood Area. However, criterion E states 'demonstrate that developments protect and enhance biodiversity and important wildlife habitats.. For clarity criterion E should include conserve, not preserve. Policy AC5 states 'where relevant to the proposal under consideration, proposals for new development will be required to'.. it is considered that 'where relevant' should be replaced with 'where appropriate' for the purposes of clarity. Criterion A - Bourne Leisure endorses the inclusion of the potential for mitigation, however it is considered that the wording fails to distinguish between national and local designations. The draft criterion also duplicates the principle of Policy CS8.4 and is therefore not in general conformity with paragraph 16F of the Framework which requires plans to avoid duplication. This criterion should be removed.
	Lichfields on behalf of Bourne Leisure	The objective of this policy (AC6) is to reduce unnecessary lighting outside to maintain views of the night-time sky. Bourne Leisure supports protecting the night-time sky from light pollution. However, Bourne Leisure consider that the requirements of the policy can be conditioned and do not need to form part of the planning application.

	Lichfields on behalf of Bourne Leisure	<p>The language used in the draft vision statement for the NP area is considered to take a negative position towards development within the NP area. The word 'intrusive' is considered to be overly negative towards development and the vision should be worded to accord with paragraph 15 of the NPPF which states that up-to-date plans should provide a positive vision for the future. The following amendment will overcome this 'By 2032 Allithwaite and Cartmel will include two very different villages and a number of small rural settlements scattered throughout the countryside. New developments will respect the quality of the landscape has been protected from intrusive developments...' Draft objective 1 is onerous. The draft objective does not specify what it seeks to protect the built environment from. To ensure there is no ambiguity in the objective, it should be rewritten as follows: "To protect the built environment both in the villages and the wider countryside from significant adverse amenity impacts and raise awareness of Cartmel's Conservation Area."</p> <p>In terms of draft objective 2, 'inappropriate development' is ambiguous and subjective. There is no definition of inappropriate development within the draft NP. For clarity and consistency with the wording of paragraph 84(c) of the Framework, the draft objective should be rewritten as follows: "To protect locally significant green spaces and views both within the villages and in the surrounding countryside from inappropriate development development which does not respect is not sympathetic to the character of the locality."</p> <p>Draft objective 9 uses overly restrictive terminology about development and therefore not in general conformity with the SLCS or national policy. The draft objective is not in accordance with the basic conditions set out in the Act. This can be resolved as follows: "To ensure caravan and chalet parks are well contained in respect the landscape and where possible are set within a landscaped setting remain proportional to the size of the residential villages and hamlets."</p> <p>Draft objective 11 states: "To ensure the tourist economy grows in a way which supports and enhances the environment and does not adversely impact on traffic and parking issues."</p> <p>On the whole, Bourne Leisure endorses this objective in that it is one of the only references within the emerging NP that actively seeks to encourage and positively plan for the tourist economy. The reference and approach to traffic and parking can be refined to align with national guidance. All new development that is likely to have a material increase on vehicle movement is assessed in terms of highways impact. The threshold for refusing development is "severe" impact as set out at paragraph 111 of the Framework. This objective within the emerging ACNP should be consistent with national policy. Further, as set out elsewhere in these representations, the plan should be positively prepared and not</p>
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		<p>focused on an overly restrictive approach. Objectives should be aspirational but realistic. Taking a positive approach would help the NP look for opportunities to improve traffic and parking issues rather than simply focusing on the negatives.</p> <p>Section 2.4 within the draft NP relates to second homes, caravans and chalet parks. Directly under the heading, draft objectives 6 and 7 are mentioned, however the wording of the draft objectives is that of objectives 8 and 9. It is considered that there is a numbering mistake. For the purposes of clarity and to avoid confusion, we request that the numbering of the draft objectives that are listed in section 2.4 be updated.</p>

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	Lichfields on behalf of Bourne Leisure	The NP should be paused while the new authority forms and its Local Plan is prepared (that can take into consideration the stage reached and draft proposals in NP). If however the NP is progressed including the changes that we have explained and are necessary to ensure the NP is compliant with legislation and other policies then it should contain an explicit statement that it will be reviewed as soon as the new Local Plan is produced.
Nicola Elsworth	Homes England	Confirmed no representations to be made on the Submission Neighbourhood Plan
Andrew Leysens	United Utilities	Generally supportive of plan, but suggest amendments and additional wording to various policies in Neighbourhood Plan and Design Code. Provides detailed Water Efficiency in New Homes evidence summary paper.

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Andrew Leysens	United Utilities	<p>Support the reference to the climate emergency and carbon neutrality, like to encourage the Parish Council and LPA to consider further climate change policies/provision within policy, which focuses on sustainable surface water management and water efficiency. Seek change to Policy AC1, support the principle of criterion H but consider a more detailed policy relating to the sustainable management of foul and surface water in the neighbourhood plan. This could be included as an expansion of criterion H or a new policy reliant to drainage. Recommended wording ' Applications must be supported by a foul and surface water management strategy. Surface water proposals must follow the surface water hierarchy. Surface water will only be allowed to discharge to the public sewer as a last resort. Proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water/flooding is not deflected or constricted. Drainage must be considered early in the design process and linked to any strategy for landscaping and biodiversity. Major development will be required to incorporate sustainable drainage which is multi-functional in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. For any development proposal which is part of a wider development, foul and surface water strategies must be part of a holistic site-wide strategy. Applications must be accompanied by drainage management and maintenance plan including a plan for any watercourse management that is within/adjointing the site'</p>

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Andrew LeysSENS	United Utilities	<p>Water Efficiency - Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. Enclosed evidence prepared by Water Resources West to support adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. Recommend the inclusion of additional wording as an additional criterion to Policy AC1 - 'All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM 'Very Good' standard must be met as a minimum'.</p>
Andrew LeysSENS	United Utilities	<p>Biodiversity - welcome Policy AC5 which incorporates flexibility to allow for off-site provision of Biodiversity Net Gain. Keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure. The location of such infrastructure investment is often dependent on engineering circumstances. Our key operational sites such as treatment works and pumping stations are key infrastructure for the neighbourhood which may need to expand in the future to meet growth needs or respond to new environmental drivers. Keen to ensure that we do not sterilise land around such operational sites with BNG which could make it more difficult to meet future operational needs and necessitate infrastructure investment further into the countryside. This is supported by the planning practice guidance - Paragraph 023 1D: 8-023-20190721. For context we have a range of infrastructure within the Neighbourhood Plan area including Wyke Farm Wastewater Treatments Works which serves Allithwaite and Cartmel.</p>

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Andrew Leysens	United Utilities	Note criterion F of Policy AC9 which states ' will not give rise to any adverse impact on sewerage infrastructure'. Supportive of the policy noting that there can be practical issues associated the management of wastewater from caravan parks especially those that are operated on a temporary basis.

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Andrew Leysens	United Utilities	<p>Design Code - Welcome Code WD1 relating to water and drainage. Recommend it is supplemented by the above amendments relating to drainage and water efficiency. Welcome reference to understanding the 'Existing watercourses, existing flows of surface water across the site, and existing drainage systems' which 'must be taken into consideration and the drainage strategy should mimic natural drainage patterns as closely as possible'. Welcome the 2nd bullet point which states, 'Development in elevated positions should have careful consideration of its drainage impacts and the potential impact of surface water run-off. This is especially true in Allithwaite where there are more extreme level changes than in Cartmel'. The second bullet point should also give consideration to groundwater flows and the potential for ephemeral watercourses. Such matters can ultimately be determined in a hydrological assessment which considers site topography, naturally occurring flow paths from all watercourses and drainage systems including public sewers. Additional wording for inclusion ' Applicants will be required to undertake a hydrological assessment of the site which must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details'. Also request the specific consideration is given to the risk of sewer flooding via inclusion of the following ' The risk of flooding from any source must be considered. Applicants will be required to consult with the sewerage undertaker to confirm the nature and extent of any flood risk from sewers. This should confirm: a) if there are any sewer surcharge levels at the point of connection that could influence site design; b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding. This information will inform whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk</p>

Name	Organisation	Overview of representation
		<p>and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not an increased risk of sewer discharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer'.</p>

Name	Organisation	Overview of representation
Andrew Leysens	United Utilities	Design Code WD1 - welcome this element of the code, however, request it is renamed as 'flood resilient design' so that it incorporates all proposal and not only 'housing'. In the context of flood resilient design, there is some overlap with our above comments relating to Code WD1 - relating to water and drainage and therefore request that this is cross referenced in this section.
Andrew Leysens	United Utilities	Code EF1 - Eco Friendly Design - supportive of Code EF1 and the reference to rainwater harvesting. In accordance with the above comments recommend that this section cross references the neighbourhood development plan which we have recommended to you relating to water efficiency.