

Draft Neighbourhood Plan Informal Consultation 26 June – 31 July

Fifteen months after undertaking the initial public consultation to obtain the views on the town of residents, businesses and visitors to Penrith, Penrith Town Council published its draft Neighbourhood Development Plan (NDP) which, when approved, will become part of Eden's development plan and will be used by the District Council and Town Council to help determine planning applications.

An informal consultation on the draft Plan was carried out between 26 June and 31 July 2018 to confirm whether the draft NDP had covered all the issues raised by the public during the initial consultation during March and April 2017, and that the group had developed corresponding policies and supporting actions where these were applicable.

The consultation was publicised through regular press releases, a newsletter delivered to most households in the parish, through our social media and on our website.

The informal consultation was sent to: Cumbria County Council, Eden District Council, all Town Councillors, Eden District Council's Councillors representing Penrith Wards, Cumbria County Council's Councillors representing Penrith Wards, North Cumbria NHS Trust, Cumbria Clinical Commissioning Group, Cumbria Fire and Rescue, Cumbria Police, Cumbria Crime and Information Commissioner, Rory Stewart MP, Penrith BID, Penrith Industrial BID, Penrith Chamber of Trade, Eden Arts, Eden Valley Artistic Network, Eden Mencap, Cumbria Youth Alliance, Penrith Action for Sustainability, Cumbria Action for Sustainability, Churches Together, Ullswater Community College, Queen Elizabeth Grammar School, Askham Bryan College (Newton Rigg Campus), Centre for Sustainable Energy, Woodland Trust and Natural England.

The informal consultation was also sent to all the Community Groups and organisations invited to the initial consultation in 2017 who had agreed that we could retain their details under GDPR.

The Chairman of the Group attended meetings of Pategill Residents Association and Cumbria County Council's Eden Area Committee to present the document and will be attending meetings of Scaws Residents Association, Penrith WI, Penrith BID and Penrith Lions when appropriate to do so.

A total of 70 individual responses were received back, 67 from members of the public and 3 from organisations. The responses came back in hard copy, through Survey Monkey and via individual emails.

Comments Received

Positive Comments

The plan was a thoroughly detailed and balanced draft covering issues important to residents and with their wishes/needs at its heart.

Penrith Town Council are to be congratulated on what has been produced from the comments of the people.

The Plan seems to be a thoughtful, well put together document put together by people that know and care about the town

Overall impressed by the draft development plan and agree strongly with the issues and priorities identified, hope that any new developments (eg the New Villages) can be covered by this plan

I like the plan and am very supportive of what the Town Council is doing
I'd like to congratulate the Town Council on the plan.

The PNDP seems to be a thoughtful, well put together document by people who know and care about the town.

Policies 1, 2 and 3 are admirable.

Although the Masterplan isn't a statutory document, the PNDP should be futureproofed and cover any new development

Well drafted and put together. I'm happy about the emphasis on protecting those things that ensure quality of life for the people of Penrith. The plan recognises the need to protect the character and greenspaces from opportunistic and inappropriate development.

The NPPF states 'local planning authorities should avoid duplicating planning processes for non strategic policies where a Neighbourhood Plan is in preparation'. If the Masterplan for the Beacon goes ahead prior to the neighbourhood plan being in place it would make a mockery of the whole process.

I would like to thank the team that put together this clear, well written Neighbourhood Plan. The emphasis towards Penrith's environment through a well thought out plan to protect the precious green spaces in and around town is especially pleasing.

Thank you for such a thorough plan. Informative and clear.

The plan is well thought out, issues are clearly identified but it's weak on solutions.

I support the plan which shows great vision.

Issues Raised

As well as comments and issues raised by the public, there were specific issues raised by Eden District Council which are included at the end of the list.

Public Comment	PTC Response
Objective 1 – Sustainable Development	
<ul style="list-style-type: none"> ○ Any development should be in keeping with an historic market town and its historic buildings and environment protected. 	<p>Policy 5 addresses this concern.</p>
<ul style="list-style-type: none"> ○ Any development must be proportionate and sustainable. 	<p>The level of development for Penrith is set in the Local Plan for the period 2014 to 2032. Policy 1 seeks to ensure sustainable development in Penrith.</p>
<ul style="list-style-type: none"> ○ Any development should be in keeping with an historic market town and its historic buildings and environment protected. 	<p>Policy 5 addresses this concern.</p>
<ul style="list-style-type: none"> ○ Any development must be proportionate and sustainable. 	<p>The level of development for Penrith is set in the Local Plan for the period 2014 to 2032. Policy 1 seeks to ensure sustainable development in Penrith.</p>
<ul style="list-style-type: none"> ○ Sustainable and intelligent change is required if the town is to prosper in the future – this does not mean doubling the size. 	<p>The level of development for Penrith is set in the Local Plan for the period 2014 to 2032. Beyond this any growth is a matter for future reviews of the Local Plan.</p>

Public Comment	PTC Response
Objective 1 – Sustainable Development	
<ul style="list-style-type: none"> ○ Policy 4 Para 6.16 item 2 – add the words ‘a changing climate’ before ‘and new technologies’ 	<p>Policy 4 addresses accessibility and Item 2 addresses the need for homes to be adaptable to the requirements of occupants. Policies 1, 2 and 3 address the causes and consequences of climate change.</p>
<ul style="list-style-type: none"> ○ A well written design and access statement could cover most of these points and ‘tick the boxes’ without committing developers to anything concrete 	<p>A Design and Access Statement does not set planning policy. The PNDP seeks to set planning policies against which planning applications will be addressed. No change.</p>
<ul style="list-style-type: none"> ○ Conservation should not prevent innovative contemporary architectural and design proposals being considered. 	<p>We agree and would refer you to Policy 5 and the third point under Penrith New Streets: ‘... encourage good quality, innovative design.’</p>
<ul style="list-style-type: none"> ○ Social inclusion items 1-2 – this appears only to relate to housing developments and suggests that these would also only apply to major developments. Perhaps this aspect is better placed under Objective 2 Housing. Is there any intention to develop policies in other areas such as access to shops, public toilet provision etc. 	<p>Policy 4 addresses Accessibility and Social Inclusion in the context of sustainability and applies to all development.</p> <p>Access to shops and provision of public toilets are the remit of EDC and, unfortunately, are beyond the scope of this planning document. Please refer to Objective 9.</p>
<ul style="list-style-type: none"> ○ Penrith needs truly affordable housing and less large houses, more 1 and 2 bedroom 	<p>The recently completed Housing Need Survey confirms the requirement for more smaller properties. Affordability housing is defined in national planning policy and includes low cost home ownership and rental options. No change.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ There should be some reference to the desirability of houses and other buildings having the ability to generate electricity for the National Grid from PV panels. 	<p>Policy 3 addresses renewable energy and the requirement to meet energy requirements on site.</p>
<ul style="list-style-type: none"> ○ Houses need to be conveniently situated in relation to the town centre and public transport links within and beyond the town are important and need to be easily accessed. 	<p>The PNDP does not propose any new sites for housing allocation. The ELP 2014-2032 has identified sites, on the edge of the town, for new housing.</p>
<ul style="list-style-type: none"> ○ Is there a possibility of including making sure housing designs incorporate shade and the opportunity to get air flow when temperatures are high 	<p>We will amend Policy 2 to take account of this comment.</p>
<ul style="list-style-type: none"> ○ New developments should involve Housing Associations rather than solely/largely commercial developers. There are lots of successful models for co-operative housing developments 	<p>This Is not a matter for the NDP. Sites can be developed by commercial developers and housing associations separately or in tandem. The planning system cannot regulate this. No change.</p>
<ul style="list-style-type: none"> ○ There should be a policy retaining old sandstone walls as they are part of the characteristic of Penrith 	<p>We will amend Policy 5 to take account of this comment.</p>
<ul style="list-style-type: none"> ○ Could the conservation area be extended to cover the whole of Beacon Edge from the top of Fell Lane to Roundthorn 	<p>This is not a matter for the PNDP. Conservation Area designation is matter for EDC. Consider including as a Town Council Action.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ There should be greater emphasis on holding EDC to account on their regular breaches of their own policies on the New Streets Conservation area. It was created to safeguard the few remaining areas of original ground from unsuitable development. 	<p>Assuming the PNDP is adopted at referendum Policy 5 provides the framework to guide future development within or affecting the Penrith New Streets and the Penrith Conservation Area.</p>
<ul style="list-style-type: none"> ○ The large houses in the new streets do not easily meet housing needs being too large and poorly insulated with limited ability to improve. The gardens and trees which define these areas are already largely filled in or destroyed so what are we preserving. 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ Can the NDP include SPDs on sustainability (heating and insulation), minimum space standards for dwellings and for outside (play) space, at the moment the smallest new market houses in Penrith are not large enough to have a permanent dining table and chairs as well as a sitting area with TV etc. Not being able to sit to eat together as a family has long term implications for public health. 	<p>These matters are covered by Building Regulations and lie outside the scope of an NDP. No change.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ Private profit making companies are undertaking maintenance of general areas in new estates and pass on charges for maintenance, car parking etc to leaseholders and freeholders alike. These charges cause real problems to social landlords. 	<p>Comment noted. Not a matter for the NDP. No change.</p>
<ul style="list-style-type: none"> ○ Policy 6 Para 6.29 item 6 – it would be desirable to specify that outdoor spaces should wherever possible be drainable rather than sealed to minimise flash flooding risks. Can the allocation of car parking for 2-4 bedroom dwellings be cut. 	<p>Policy 1 covers measures to prevent flooding and the provision of sustainable urban drainage systems. CCC has produced a Cumbria Design Guide that sets the car parking standard adopted in the PNDP.</p>
<ul style="list-style-type: none"> ○ All new developments should encourage social interaction and have a nucleus where people can meet and congregate. 	<p>This important issue is covered by Policy 4, Item 1.</p>
<ul style="list-style-type: none"> ○ New builds including affordable housing should still be characterful and reflect local vernacular style – it currently looks like developers have carte blanche to do as they please to maximise profit. New development in Penrith should aim to be award winning and inspirational. 	<p>The issue was identified through the first consultation and Policy 6 has been developed to address design that reinforces local identity and local distinctiveness.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ The Eden Local Plan indicates that the housing should be concentrated in Penrith with much of this in large scale new developments. The PNDP doesn't make any reference as to whether it agrees with the construction – where is the evidence to say they are required. 	<p>The ELP 2014 to 2032 is a statutory document that allocates land for new development. It is on the point of adoption having been through a full consultation process. The PNDP must be in general conformity with the ELP 2014 to 2032.</p>
<ul style="list-style-type: none"> ○ PV panels should be incorporated into all new residential and commercial builds within the roof. 	<p>Policy 3 requires developers to provide renewable energy generation on-site. How this is achieved will be the subject of their planning application. Developers cannot be compelled to include such measures.</p>
<ul style="list-style-type: none"> ○ Should have a policy for all new housing to have provision for electric car charging 	<p>We will amend to take account of this comment but such measures can only be encouraged.</p>
<ul style="list-style-type: none"> ○ The need for care homes of varying types needs specific coverage particularly given the demographic. 	<p>Comment noted. No change to the PNDP.</p>
<ul style="list-style-type: none"> ○ I am fully aware and support the need for new housing around the town and agree that Penrith must share its responsibility for the national housing shortage however every effort should be made to retain the character of the town 	<p>Policy 6 has been developed to address design that reinforces local identity and local distinctiveness.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ New developments, however small, should include some green space and edible trees / bushes 	<p>Policy 1 requires the creation of new greenspaces and Policy 4 requires centralised open public spaces on new developments. PTC requests the planting of fruit trees on new developments.</p>
<ul style="list-style-type: none"> ○ Housing should be more spacious and less dense with areas of green space for children to play and adults to congregate 	<p>Densification of developments (p21. 3.2.10) has been identified as an issue. We are advised that this is, in part, a consequence of developers being required to build to higher standards of insulation and provide more infrastructure. Policies 1 and 4 (see above) address the provision of greenspaces.</p>
<ul style="list-style-type: none"> ○ Penrith does need increased housing stock but it needs social housing and starter home ie for couples, smaller families and single people. This is not what is being built, developers want 4/5 bedroom houses. There cannot possibly be such demand from within Penrith for this level of build. 	<p>Policy 7 acknowledges the housing needs of single people, young families, etc. The recently completed Housing Need Survey confirms the requirement for more smaller properties and the need for social housing.</p>
<ul style="list-style-type: none"> ○ There should be a moratorium on any new build until take up can be judged. Until all houses in one development are sold and occupied no other development should be given permission. At the current time there are 124 residential properties for sale in Penrith, some have been on the market for many months 	<p>The PNDP cannot introduce a moratorium – this is contrary to national and district planning policy. No change.</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ Needs to be more ambitious and get rid of unqualifiable words such as 'sustainable'. Need to look at affordability in cost and use. If new houses were build to Passivhaus standards energy costs would be a fraction reducing the need to add solar panels and seek to mitigate costs. This would make homes more affordable and thus available helping to solve some of the housing issues. 	<p>Sustainable development is defined in the NPPF. Policies 1 to 3 seek to set a local set of policies to ensure such development takes place in Penrith.</p> <p>Government sets house building standards through the Building Regulations..</p>
<ul style="list-style-type: none"> ○ How does affordability in Penrith compare with the national average? What can an average young person realistically afford to pay for a house. Can homes be built at this price? If not what can be done to provide a solution 	<p>House prices in Penrith are some 6 times average earnings locally as compared to 7.8 times Nationally (figure skewed by prices in the Southeast). Copeland is the most affordable district in NW England with a median house price that is 2.7 times median earnings. However, average earnings are higher too (Nuclear Coast effect). Copeland has the highest earning in relation to house prices</p>
<ul style="list-style-type: none"> ○ How can you balance the provision of affordable homes with a restrictive palette of materials using locally sourced stone/slate etc 	<p>The rationale is reduced running costs long term backed-up by the 2008 Climate Change Act and the draft National Policy Framework (2018) that passes into Law on 24th January 2018.</p>
<ul style="list-style-type: none"> ○ How can the housing type and mix be implemented? Is this meaningful? 	<p>Housing mix will be implemented through Local Plan Policy HS4 (ELP 2014 to 2032).</p>

Public Comment	Response
Objective 2 – Housing	
<ul style="list-style-type: none"> ○ Can the PNDP include policy and recommendations for the management of infrastructure in housing developments. 	<p>The management of infrastructure is beyond the scope of the PNDP which provides the planning policy framework for Penrith. Where developments are adopted the responsibility for infrastructure is with EDC and the implementation of Local Plan Policy DEV4 (ELP 2014 to 2032).</p>
Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ All the green and leisure spaces listed should be preserved 	<p>The PNDP aims to protect all leisure and green spaces. No change.</p>
<ul style="list-style-type: none"> ○ The Beacon is iconic and creates identity for Penrith. There is a huge range of wildlife – roe deer, badgers, red squirrels, lizards, tree-creepers, buzzards, sparrowhawks, woodpeckers, crossbills and many more ○ The Beacon is the only wooded open space and is used by walkers and runners ○ In protected green spaces can the Beacon be described as Beacon and Beacon Forest 	<p>The importance of Beacon Hill and Beacon Tower (definitions on OS Mapping) to the residents of Penrith is beyond doubt. We have listed the whole area for protection but as this represents a 'large tract of land' (over 300 acres) we need to build a very strong case (see above). Further, as the rear of Beacon Hill is private commercial forestry it will be challenging to build a case to protect it. The area of Beacon Hill visible from the town and its approaches is almost 114 acres but is accessible via a permissive footpath and is demonstrably important to the town.</p>

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ Can the Beacon be included in the protected leisure space as well. Beacon Forest has been regularly used for orienteering with the landowner's permission since 2008. Borderliners acquired permission to get the area professionally mapped and it is used by all ages including larger national events for over 1000 people. Scope for cycling tracks, bridle patch and other non intrusive activities. ○ Protect the Beacon and forest from development ○ The plan should include the whole Beacon and wooded area. Any development must be very carefully thought through and notice taken of Penrith Residents not leaders or councillors who don't live locally. ○ The Beacon and forest is the 'breath' of the town. – the Town Council should work with Lonsdale Estates and newly formed Friends of the Beacon to ensure that the use of the Beacon and Forest by the public is clarified and effectively developed without compromising the tranquillity and wildlife habitat of the area. 	<p>Beacon Hill does not meet the definition of a leisure space.</p> <p>Historic use of Beacon Hill for local and National events is good evidence of the importance of this greenspace to the economy of the town and the health of the community.</p> <p>Designation of an area as a Local Greens Space will protect it from inappropriate development (Policy 8).</p> <p>The back of Beacon Hill is commercial forestry to which, in theory, the public does not have access. A conifer plantation is not of 'local character' and its distance from the town means it cannot be considered 'in close proximity to the community'.</p> <p>The proposals in the draft Masterplan 2032 to 2050 have no weight as planning policy.</p> <p>PTC cannot remain impartial if it works with either of the recently formed groups.</p>

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ My family and friends have been daily users of the Beacon and woodland for 25+ years. Whilst there has been a permissive access, the landowners appear to tolerate unofficial use of the woodland away from the permissive path. Eg a pedestrian access point has been built next to the gate above the Roundthorn Hotel. It is used for commercial forestry and accommodates a number of masts which is more than enough intrusion. Any further development in this greenspace would tip the balance from countryside to parkland or suburban. ○ PN11 -Appendix IV – description is misleading more accurate to say '90% is planted with coniferous trees and 10% with native broadleaf trees'. ○ With permission of the landowner make use of the Beacon with route maps, nature trails, trip trails and a permanent orienteering course but non intrusive and no building. 	<p>The time period that access to Beacon Hill and Tower has been permitted is useful to the argument for designating the Tower, and at least a part of the Hill, as greenspace.</p> <p>Thank you. We need to verify these figures because commercial forestry does not comply with the NPPF definition of 'local in character'.</p> <p>The future use of Beacon Hill, other than access to the Tower and the view, is beyond the scope of the PNDP but your suggestions have been noted.</p>

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ Objection to making Beacon Hill a designated green space, the hill is in private ownership with limited public access and no designated public footpaths. Permissive paths do not make it special in terms of recreational value. ○ The view from Beacon Hill to Penrith and the Lake District Fells is limited to a single point – the Beacon itself which does not justify the designation as protected green space. The view of Beacon Hill from Castle Park is 1.7km distant and is not a particularly important view when experienced from within the conservation area. ○ Beacon Hill is not an important or key part of the surroundings from where the conservation areas of Penrith are experienced. 	<ul style="list-style-type: none"> ○ Noted however, public opinion is behind protecting Beacon Hill since it has been enjoyed by generations both as a place to walk and the backdrop to the town. ○ Penrith Castle is a Heritage site within Castle Park. The Beacon Hill is an iconic backdrop that forms a natural and defining Eastern boundary to the town. The view of the New Streets against this backdrop is considered important by residents and visitors. ○ Beacon Hill provides the only view of the conservation areas and the panorama from the Solway to the Northeastern Fells (World Heritage Site/National Park). Several organisations funded the felling of trees (late 2017) to open up the views to and from the Beacon Tower
<ul style="list-style-type: none"> ○ Objection is made to Policy 8 and the designation of PN11 as a Local Green Space 	<ul style="list-style-type: none"> ○ Noted. In acknowledgement of this, and other comments, we will reduce the area for designation and propose meeting with the landowners to discuss their plans. The part of Beacon Hill that is visible from the Conservation Area is not considered to be a significant tract of land as it forms a proportionate backdrop to the town.

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ The open area above Croft Terrace is used extensively by children, local residents and dog walkers. Great for blackberrying and wildlife including badgers, fox and deer, rabbits, field mice, heron etc. 	<p>This is useful additional information in support of the case for this land being demonstrably special and has been added to Appendix IV.</p>
<ul style="list-style-type: none"> ○ Cowraik Quarry needs to be added to the list of protected greenspaces 	<p>Cowraik Quarry is a SSSI so has protection already. No change.</p>
<ul style="list-style-type: none"> ○ The open green spaces and the Beacon are important to the health and wellbeing of residents. 	<p>The PNDP acknowledges this.</p>
<ul style="list-style-type: none"> ○ There are green corridor routes using Carleton Beck from Carleton to Scaws Wood, Scaws Field then up Fell Lane past the giant trees in Sandath to the Beacon. 	<p>The PNDP will be amended to identify green/wildlife corridors.</p>
<ul style="list-style-type: none"> ○ P10 6.2.5 – does the conservation area include the green space at the top of Croft Terrace, this space needs retained in perpetuity. 	<p>Yes. No change.</p>
<ul style="list-style-type: none"> ○ Brunswick Sq Gardens are listed as green space but they are not open to the public and belong to the residents of Brunswick Sq. Could these become public space, they are frequently empty whilst children play on nearby streets. Currently a wasted resource and poor for health and community cohesion. 	<p>Brunswick Square gardens are owned and maintained by the residents of Brunswick Square. Each household pays an annual fee for their upkeep.</p> <p>Area to be protected as a local green space..</p>

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> Objective 5 – can the point be made that open space, woods and fields, recreation grounds all make a huge contribution to wellbeing. 	<p>There is acknowledgement of this elsewhere in the Plan (Housing) but the link with wellbeing will be emphasised.</p>
<ul style="list-style-type: none"> Outdoor green space is essential for all and for children’s social and physical development (40% of Eden’s children entering reception are overweight) whilst 23.4% of Eden adults are inactive. 	<p>The plan acknowledges the importance of greenspace for recreation (Appendix IV).</p>
<ul style="list-style-type: none"> The cemetery is very popular with residents, the older part has its own charm and should be protected from the removal of old gravestones to allow space for new ones. 	<p>The cemetery is the responsibility of EDC - comment will be passed on to EDC.</p>
<ul style="list-style-type: none"> What is protected from ‘inappropriate development’ it implies some may be possible – could this be more prescriptive as to the sort of development 	<p>A designated Local Greenspace may be developed only when in accordance with national Green Belt policy.</p>
<ul style="list-style-type: none"> Why is Penrith Golf Club included in protected open space. Although there is a footpath through it general access is for members only. 	<p>The golf course is a sports facility as are other members only venues (e.g. rugby club, cricket club and Friars bowling club). All are listed for protection (Policy 9) because of their importance to elements of the community (relaxation, health, wellbeing).</p>
<ul style="list-style-type: none"> Scaws field should be classed as a community asset, it is used all day long every day by different parts of the community – greenspaces are good for recreation and mental health 	<p>Designation as a Local Greenspace will provide Scaws Field protection, from development and ensure that it continues to provide space for recreation and relaxation (Appendix IV).</p>

Public Comment	Response
Objective 3 - Green Spaces	
<ul style="list-style-type: none"> ○ All of the green spaces within the town are important but could the marginal land around the play area be increased slightly to allow for more wild flowers and increase the diversity – don't mow to the very edge. 	<p>Currently PTC only has ownership of Fairhill Playing Field. We have made note of this suggestion and will pass the comment to EDC.</p>
<ul style="list-style-type: none"> ○ The whole of the Beacon and the woodland is an area of outstanding natural beauty and should be classified as such 	<p>This is not matter for the NDP. No change.</p>
<ul style="list-style-type: none"> ○ The cemetery has public access but a high fence has been installed recently stopping access from the top of the cemetery to the footpath above. Provision of a gate or style at the top would allo more route choice for walkers. 	<p>The cemetery is managed by EDC. We have made note of this suggestion and will pass the comment to EDC</p>
<ul style="list-style-type: none"> ○ Current spaces are poorly maintained offer limited facilities and improvements are carried out by community groups. There is a need to consider how proposals will be delivered 	<p>Playing fields are mown regularly by contractors employed by PTC (Fairhill) and EDC (all other public spaces). Your comments have been noted and you are invited to contact PTC with specific details.</p>
Objective 4 – Culture & Leisure	
<ul style="list-style-type: none"> ○ Little mention of the arts. Penrith is full of local talented artistic people. Penrith needs to work more closely with them. 	<p>The arts are beyond the scope of the PNDP. However, we have identified the need for more community facilities (Policies 9 and 10) and the need for a large venue for concerts, theatre, exhibitions.</p>

Public Comment	Response
Objective 4 – Culture & Leisure	
<ul style="list-style-type: none"> ○ Rumour has it EDC wishes to build a private gym on Frenchfield – can this be protected as open greenspace. 	<p>The omission of Frenchfield was a clerical error that has been corrected.</p>
<ul style="list-style-type: none"> ○ The youth zone in Carlisle is a great facility but it is difficult to maintain all the facilities on offer because funding for staff was inadequate. 	<p>The Youth Zone was funded by local businessmen and is largely supported by grants. Currently Penrith does not have a venue for young people so does not qualify for any grants.</p>
<ul style="list-style-type: none"> ○ Leisure costs in Penrith are too high – use of the pool is more expensive than parts of London and the climbing wall entry fee has risen dramatically. 	<p>This was identified during the initial public consultation and is recorded under 3.4.2 (Key Issues).</p>
<ul style="list-style-type: none"> ○ Little focus on facilities for young people. Does not mention the importance of sites like guide, scout and cadet huts, the Bridge Café and the Gathering. Non are mentioned in protected community sites list and some are even listed for potential development despite high usage 	<p>The PNDP has recognised the lack of dedicated facilities for young people and PTC has stated that it would support a place-based youth facility in Penrith. The Bridge Cafe and Gathering are rented premises so cannot be offered protection through the PNDP.</p>
<ul style="list-style-type: none"> ○ The question of wet weather facilities and attractions should be addressed urgently for the wellbeing of Penrith’s residents and visitors 	<p>This comment has been noted.</p>

Public Comment	Response
Objective 5 – Wellbeing	
<ul style="list-style-type: none"> ○ Little mention of the arts. Penrith is full of local talented artistic people. Penrith needs to work more closely with them. 	<p>The arts are beyond the scope of the PNDP. However, we have identified the need for more community facilities (Policies 9 and 10) and the need for a large venue for concerts, theatre, exhibitions.</p>
<ul style="list-style-type: none"> ○ There should be safe cycle routes created to the schools and more should be made of being on the C2C route 	<p>Responsibility for highways in the town rests with CCC. EDC’s Penrith Transport Study (2015) identifies opportunities for cycleways.</p>
<ul style="list-style-type: none"> ○ Can anything be done to make cycling safer especially on Beacon Edge. It used to be a quiet road but is now a rat run linking Carleton and the A6. Lots of cars are parked along there as many houses don’t have driveways and there are no restrictions. 	<p>Responsibility for highways in the town rests with CCC. The initial consultation on the PNDP highlighted the problem with on-street parking in the New Streets Conservation Area and these comments have been forwarded to CCC.</p>
<ul style="list-style-type: none"> ○ What provision is being made to address loneliness in elderly residents of which Penrith has a high percentage. 	<p>Policy 4 addresses social inclusion and Policy 5 the need for more community facilities, i.e. in the future.</p>
<ul style="list-style-type: none"> ○ The designated cycleways in Penrith are abysmal and potentially dangerous. They often stop suddenly and are frequently ignored by car drivers eg the stretch along Ullswater Road where people leave the station. They feel like a token gesture. 	<p>We are aware that a number of cycle lanes end abruptly. Unfortunately highways are outside the control of both PTC and EDC. However, EDC’s Penrith Transport Study (2015) identifies opportunities for new and improved cycleways.</p>
<ul style="list-style-type: none"> ○ A date when the data was obtained from GPs should be included. 	<p>Added to the document – June 2018</p>

Public Comment	Response
Objective 5 – Wellbeing	
<ul style="list-style-type: none"> ○ How does Cumbria compare to the Cumbria and national average for patient/doctor ratio. How many more doctors (who are difficult to recruit) are required to sustain current ratios under existing town expansion plans 	<p>The average number of patients per full time GP ranges from 1000-2000 nationally. In Cumbria the average is 1:1283.</p> <p>Undoubtedly more GPs will be required in both the short and long term however there is a recruitment issue with GPs..</p>
<ul style="list-style-type: none"> ○ Penrith should have much better cycling provision. There is potential to describe Penrith as a cycling town but the Lands End – John O Groats route is unsigned and involves navigating busy roads. The plan should have a clear objective of linking the Town Centre with neighbouring villages with sections of cycle route on main roads. 	<p>EDC’s Penrith Transport Study (2015) identifies opportunities for cycleways. We will draw the attention of the appropriate authority to the shortcomings in the course and signage of the long distance route.</p> <p>The existing road network will have to be used, for the time-being, to access the villages. Highways England have some ideas for sections of the A66.</p>
<ul style="list-style-type: none"> ○ There is scope for an attractive full days walking route to be created linking the high points of the sandstone ridge from Penrith Beacon to Armathwaite although much of this is outside the TCs area it would be attractive to residents and visitors. Opportunities for walkers and runners to start their routes from the town are limited and the plan could specify routes where permissive paths could be established and leaflets produced. 	<p>Locations beyond the Parish of Penrith aside, the provision of walking routes is outside the remit of the PNDP.</p> <p>We will draw your suggestion to the attention of an appropriate department at either CCC or EDC.</p>

Public Comment	Response
Objective 5 – Wellbeing	
<ul style="list-style-type: none"> ○ Consider using land at Sandgate / Bus Station / Co-op for future community uses 	<p>Before a developer acquired the Co-op building PTC had identified an opportunity to use the groundfloor as a community hub.</p>
<ul style="list-style-type: none"> ○ Para 6.57 needs to consider disabled access such as dropped down pavements. Penrith is signed up to be a dementia friendly town but this isn't mentioned 	<p>EDC's Penrith Transport Study (2015) identifies opportunities for improvement to pedestrian access to the town. This aspect of the layout of the town falls outside the control of PTC and the remit of the PNDP however we will pass the comments to CCC.</p>
<ul style="list-style-type: none"> ○ Para 6.66 – confused about the aim, there seems to be confusion over which set of policies take priority. Is £1 for parking really realistic? 	<p>As responsibility for parking lies with EDC we propose engaging with them to make improvements to parking (6.67). Kendal offers longterm parking for £1 a day if you park before 8am.</p>
Public Comment	Response
Objective 6 – Education	
<ul style="list-style-type: none"> ○ Can PTC liaise with CCC to understand the wider picture of school provision and the difficulty of finding funding for new schools 	<p>Education provision is outside the control of PTC. However, PTC is keen to ensure that education meets the needs of employers. Following other comments this section of the PNDP is to be deleted.</p>
<ul style="list-style-type: none"> ○ Data capacity for all secondary and primary schools should be included. There should also be mention that some children attend primary schools outside Penrith by choice eg Stainton, Greystoke, Penruddock, Lazonby, Plumpton 	<p>Capacity of secondary schools provided (6.63 and 6.65). Following other comments this section of the PNDP is to be deleted.</p>

Public Comment	Response
Objective 6 – Education	
<ul style="list-style-type: none"> ○ The number of school leavers is forecast to fall over the next decade – contradiction to P25 3.6.1 	<p>The construction of new houses and the anticipated influx of young families is likely to result in an increase in pupil numbers. Following other comments this section of the PNDP is to be deleted.</p>
Objective 7 – Town Centre Parking	
<ul style="list-style-type: none"> ○ Make all parking included in the disk zone scheme 	<p>Not a land use planning matter. No change.</p>
<ul style="list-style-type: none"> ○ Should have a policy that electric car charging points are required in the town. 	<p>We will amend to include within PNDP policies.</p>
<ul style="list-style-type: none"> ○ Objective 7 – can reference be made to the work just started on the new parking study for Penrith 	<p>This will be documented.</p>
<ul style="list-style-type: none"> ○ Could the PNDP include a 'there and back' strategy – initially for the working day which goes beyond car parking and includes public transport to the outlying towns and villages. There is an alarming shortage of long-term cheap parking for commuters who work in Penrith. Please prioritise the provision of working day parking. 	<p>Car parking is under the control of EDC and public transport is managed by CCC. Practicalities of a 'there and back' strategy involving public transport that does not operate to meet the needs of commuters could be an issue. PNDP Group to consider as a possible Town Council Action – not a planning matter.</p>
<ul style="list-style-type: none"> ○ The lack of long stay affordable parking has resulted in an increase in cars on residential streets. 	<p>This issue was identified through the initial public consultation. Comment noted. No change. See comment above about long term parking costs.</p>

Public Comment	Response
Objective 7 – Town Centre Parking	
<ul style="list-style-type: none"> ○ The issue of parking for motorhomes with hook up (particularly in summer) needs to be addressed. The size of them when parked in residential streets is particularly frustrating 	<p>See Policy 13. Item 2. This as an opportunity to increase tourism spend in the town. Whilst PTC shares residents’ concerns regarding parking in residential streets is not a planning matter.</p>
<ul style="list-style-type: none"> ○ Is there not any more recent data to update Figure 5 on P26 to back up the statements. 	<p>The data is taken from the last National Census in 2011. An update will not be available until after the next Census in 2021.</p>
<ul style="list-style-type: none"> ○ Medium and long stay parking is a major problem particularly for those working in the town forcing many onto residential streets. 	<p>This issue was identified through the initial public consultation. This comment is noted. See comments above</p>
<ul style="list-style-type: none"> ○ para 6.67 pt 3 – CCC Highways should be included as a partner in garage discussions, this work has already started. 	<p>Comment Noted and will be added to para. 6.67.</p>
Public Comment	Response
Objective 8 – Traffic Management	
<ul style="list-style-type: none"> ○ The traffic management policy 14 should look at installing pedestrian crossing at Newcastle Building Society to the Skipton Building Society 	<p>This issue was identified through the initial public consultation (see 3.9.11) and PTC have raised this matter with CCC. We understand cost to be an issue.</p>
<ul style="list-style-type: none"> ○ Improvements at Kemplay Bank should be in the form of a tunnel or underpass so there is minimal impact on the vistas. The benefit would include removal of the traffic lights which add to the congestion and pollution. 	<p>The suggestion has been noted. However, Highways England has yet to announce its proposals for the dualling of the A66 and improvement to the Kemplay intersection. These plans are due to be released in December 2019.</p>

Public Comment	Response
Objective 8 – Traffic Management	
<ul style="list-style-type: none"> ○ There should be a rethink of the one-way system for traffic especially in relation to Middlegate. 	<p>Please see Policy 14. Earlier in the year PTC discussed improvements to Middlegate with CCC.</p>
<ul style="list-style-type: none"> ○ Park and ride is a good idea but Kemplay Bank is the wrong location. 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ A one-way system through New Streets etc is a good idea. 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ Through traffic should be diverted but tourists and visitors encouraged to park and stay – not sure how this can be achieved, the quirky layout of streets is part of the attraction of Penrith 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ The junction of Salkeld Rd /A6 is a pinch point. It is dangerous and traffic coming along Inglewood Road adds to the confusion. Beacon Edge is a rat run for vehicles and busier than ever. The junction with Salkeld Road is very wide, has poor road markings and is very dangerous for families and dg walkers crossing to Fairhill. 	<p>The concerns regarding the Salkeld Road will be drawn to the attention of CCC (Highways).</p>
<ul style="list-style-type: none"> ○ A one way system for new streets would not be a good ideas however banning large vans and vehicles from using the streets as rat runs should be enforced. 	<p>Comment noted. PTC will raise, with CCC, the suggestion of restricting certain types of vehicle other than for access.</p>
<ul style="list-style-type: none"> ○ Any traffic management proposals should come forward as a holistic strategic review of the town centre. 	<p>Comment noted. No change. CCC are currently updating the Saturn Model for traffic movement in and around Penrith.</p>

Public Comment	Response
Objective 9 – Town Centre	
<ul style="list-style-type: none"> ○ The biggest challenge to Penrith is to maintain the viability of the Town Centre that has depended on the success of retail shopping. It faces challenges as never before 	<p>Key Issues section and relevant parts of policy under section 9 to be revised to take account of this comment.</p>
<ul style="list-style-type: none"> ○ The plan doesn't pay sufficient attention to what town centres generally will look like in future when more people are shopping on line. What businesses will be in demand, what forms of recreation will attract people to towns, what will be there to attract tourists to the centre. 	<p>Key Issues section and relevant parts of policy under section 9 to be revised to take account of this comment.</p>
<ul style="list-style-type: none"> ○ Penrith is a market Town but doesn't have a thriving monthly market. 	<p>This is included as one of Policy 15's Town Council Supporting Actions.</p>
<ul style="list-style-type: none"> ○ Pedestrianisation of Market Sq is highly desirable. 	<p>Policy 15, Point 3 has been developed in recognition of this and similar opportunities.</p>
<ul style="list-style-type: none"> ○ New shop fronts have spoiled the town, Penrith should do like other towns and force shops to adopt much more old style low key signage. 	<p>Policy 15 (fourth bullet point) and Policy 16 have been developed to address this. Change p69, second bullet point to explore the potential of a shop front improvement scheme?</p>
<ul style="list-style-type: none"> ○ We should encourage independent shops. Empty retail units are unattractive 	<p>The Town Council agrees with these points and hopes to help address these, in part, through Policy 15's Supporting Actions. It should be noted planning can only manage development – it cannot differentiate between independent and multiple retailers.</p>

Public Comment	Response
Objective 9 – Town Centre	
<ul style="list-style-type: none"> ○ A market town without a farmers market – could it be held at the weekend with a much larger offering of stalls – why is Orton Farmers Market so popular 	<p>This is identified as an issue (3.9.10) and developed under Policy 15 as a Supporting Action.</p>
<ul style="list-style-type: none"> ○ Wet weather attraction needed but goes in hand with cheaper long stay parking 	<p>Identified as an issue under 3.11.5. The solution will require both an idea and funding.</p>
<ul style="list-style-type: none"> ○ Town approaches need improving. Important to retain red sandstone walls throughout town as they are an attractive feature of the town. 	<p>Policy 15 seeks to improve the gateways. Policy 5 seeks to protect heritage assets.</p>
<ul style="list-style-type: none"> ○ Would be better if the TIC was more central but this would mean less footfall to the north. Could this become a cultural area with galleries, quirky shops and a student run restaurant? 	<p>Issue identified through initial consultation and documented under 3.11.6. The implications for Middlegate need careful consideration.</p>
<ul style="list-style-type: none"> ○ No mention of litter and the provision of litter bins. Proposing Castlegate is made residential when 50% already is is a very poor response to such a significant issue and shows a lack of understanding and imagination. 	<p>Litter is not a planning matter. Street furniture is covered in Policy 15. Add as a Town Council Supporting Action</p> <p>Castlegate is on the periphery of the retail area and with empty shops in Middlegate, King Street, etc it makes sense to consolidate retail in the main retail streets and tidy-up Castlegate. Proposed as a Supporting PTC action.</p>
<ul style="list-style-type: none"> ○ Work of Town Council initiatives like the work on the Two Lions is not mentioned. 	<p>This is not a PTC initiative. It is a community initiative which was facilitated by the Town Council. Add to supporting text</p>

Public Comment	Response
Objective 9 – Town Centre	
<ul style="list-style-type: none"> ○ Paras 3.9.4 – 3.9.6 – How can we make the town 'unique' whilst at the same time making it vibrant and relevant to the modern consumer 	<p>This is a big question that PTC needs to address with Penrith BID and others (Policy 15 - Supporting Actions). In the PNDP we make suggestions for giving Penrith an identity as a 'food town' or centre for artisan shops.</p>
<ul style="list-style-type: none"> ○ The town centre needs to be mapped, the owners, occupiers and users and uses recorded and SWOT analysis carried out 	<p>To help inform the PNDP we mapped the retail areas and businesses (see Maps D, E, F) in the town centre. PTC are happy to work with the Chamber and BID to carry out such a SWOT analysis and develop strategy and policy for the PNDP.</p>
<ul style="list-style-type: none"> ○ Mapping at a much closer level, street by street is needed to enable closer scrutiny and development of local ideas and innovation 	<p>See response above.</p>
Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ Please can the PNDP include policy on how businesses may, or may not, extend beyond the employment sites specified in EDCs Local Plan. 	<p>Not a matter for the PNDP. This is dealt with by the ELP 2014-2032.</p>
<ul style="list-style-type: none"> ○ There should be a policy for PV panels on all new industrial buildings. 	<p>This cannot be a requirement. This is encouraged by Policy 3.</p>
<ul style="list-style-type: none"> ○ The issue of public transport has not been efficiently addressed, measures to address the challenges of car parking and traffic management should be developed in conjunction with encouragement of and provision for bus services. 	<p>Comment noted. The PNDP is a land use planning document and has limits to what it can say on public transport services. The PNDP puts forward a range of improvements to address these issues. No change.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ The cemetery chapel is a lovely building and deserves to be used by the community. 	<p>Comment noted. No change The Chapel is owned by EDC and is on the market, as far as we know it has not been sold for residential use</p>
<ul style="list-style-type: none"> ○ Penrith is no longer a market town, small businesses have been forced out by large supermarkets. Housing is being developed without thought to Drs (who can't recruit), schools or employment for residents 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ Protected views should include: across the old donkey field on the corner of Beacon Edge and Salkeld Rd, to the Lake District fells on Beacon Edge across Croft Terrace. Across Penrith from the footpath between Fell Lane and Roundthorn. The views from the back of Beacon forest across the Eden Valley 	<p>Protected views will be incorporated into the revised draft for consideration by the NDP Group.</p>
<ul style="list-style-type: none"> ○ What is the plan when the cemetery is full. 	<p>This query will be addressed to EDC - the burial authority.</p>
<ul style="list-style-type: none"> ○ A section at the beginning on the purpose of the document would be helpful ie why it is needed above the local plan, what is its relationship with the local plan and what will its relationship be with any other plan eg the Masterplan 	<p>This is dealt with in section 1, including Figures 2 and 3. No change..</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ AEDs on new developments should be compulsory. With increased housing comes increased residents and an increase in 999 calls. In new developments a retrospective AED is hard to place but if they were planned into the design it would make more sense. 	<p>Not a planning matter. But following representations from NWAS, a Supporting Town Council Town Council Action was included under Policy 10.</p>
<ul style="list-style-type: none"> ○ With food and farming so dominant not sure where graduate jobs can be created. Newton Rigg could run hotel management/catering courses to produce degrees of excellence – maybe in partnership with Kendal College – a catering outlet run by the students offering locally sourced and produced ingredients would be innovative and original. 	<p>We understand that Newton Rigg did offer a tourism course but it was seriously under subscribed. No change.</p>
<ul style="list-style-type: none"> ○ No mention of the IT industry. If there was a serviced business centre where self employed could congregate, have a coffee and exchange knowledge, skills and ideas it would be good. 	<p>Comment noted. Planning policy deals with broad land uses e.g. offices not individual sectors. Such uses are encouraged in appropriate locations through the Local Plan and the PNDP. Managed office space is provided through the commercial market. No change.</p>
<ul style="list-style-type: none"> ○ Penrith on a Plate and Penrith Goes Orange very small number of stalls – poor. 	<p>Comment noted. No change.</p>
<ul style="list-style-type: none"> ○ There needs to be reference to the need to ensure that Penrith benefits from high speed broadband, particularly for businesses in the town centre. 	<p>Comment noted. Not a planning matter. PTC supports this point. No change.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ Employment sites MUST be linked to the town centre the cycle and walking information provided with planning applications is utterly useless. 	<p>PNDP seeks to address this through Policy 1.5. NPG to consider further refinements.</p>
<ul style="list-style-type: none"> ○ EDC are already planning for 2050 with the Masterplan. Surprising that some of the really big issues are not better highlighted as real constraints / opportunities eg <ul style="list-style-type: none"> * Demographic changes (inc in elderly and reduction in younger age group has implications for housing employment and transport * changes to high street – internet shopping, rates etc so need to redesign the highstreet. * climate change end weather extremes * Masterplan * changes to national economy, Brexit etc, increased tax and less disposable income * move to electric cars and potentially driverless cars. * fuel poverty – one of the highest in England. 	<p>The PNDP must be in general conformity with the Eden Local Plan 2014-2032.</p> <p>The masterplan is a non-statutory plan and is not a consideration for the preparation of the PNDP.</p> <p>Many of these other issues are identified in the PNDP.</p> <p>No change based on these comments.</p>
<ul style="list-style-type: none"> ○ Surprised the plan doesn't start with some key data eg footfall over time in various parts of the town, usage of car parks, mapping of town centre 	<p>Various data sets are used throughout the PNDP and Appendices where relevant. EDC undertakes an annual Town Benchmarking Study that covers footfall but data not relevant to the PNDP. No change.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ The role of business in the vitality of the town is not given adequate weight, we would like to see further consultation with the businesses within the town centre and within the industrial estates. 	<p>The Chamber of Trade were represented on the NDP Group. Penrith BID were invited to send a representative to the NDP Group to help direct and form the PNDP. Their representative attended a single meeting only. Invitations to the meetings and copies of notes from meeting continued to be sent to the BID despite their non-participation. The Industrial BID had not been formed when the process of developing the NDP commenced. Indeed, the Industrial BID was not formed until earlier this year. Both BIDs were invited to comment on the draft plan</p>
<ul style="list-style-type: none"> ○ Why has the plan not included further detail on EDCs Masterplan. 	<p>The PNDP must be in general conformity with the Eden Local Plan 2014-2032. The masterplan is a non-statutory plan and is not a consideration for the preparation of the PNDP.</p>
<ul style="list-style-type: none"> ○ It would be good to see background documents demonstrating public consultation events, numbers attended/consulted when and where they were held, details of press releases / adverts / articles to provide evidence of an extensive and inclusive consultation process. 	<p>There is a section on consultation on the website that includes the initial consultation (survey and comments made). The formal consultation on the draft plan will include these comments. All press releases are also on the website. At submission a Consultation Statement will be produced.</p>
<ul style="list-style-type: none"> ○ Little mention of areas outside the built up areas of Penrith. It would be useful to have a proposals map to identify where it is intended policies will be applied. 	<p>NPG to consider further e.g. views, landscape, biodiversity.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ There is no mention of consultation with the Industrial Estates, we strongly recommend you contact the Industrial BID team. 	<p>The Industrial BID was not set up until this year. The BID were sent all the documentation by email on 28 June and asked to consider the document and provide comments. No comments have been received.</p>
<ul style="list-style-type: none"> ○ The document should have where we are today as a starting point and where we want to be in the future with how this can be achieved with clear goals and objectives. 	<p>The PNDP sets out the issues a Vision and objectives. No change.</p>
<ul style="list-style-type: none"> ○ Fronting with historical information and ending with maps showing the town today does little to engage the reader in what should be a forward thinking and dynamic document. 	<p>Comment noted.</p>
<ul style="list-style-type: none"> ○ Within the section on sustainable development there is no mention of business, employment or the high street outside the category of inclusiveness, each of these elements deserves to be considered as standalone items. The High Street could come under an expanded objective 9. 	<p>The section on sustainable development covers all development – no change.</p> <p>Objective 9 deals with the Town Centre. No change,</p>
<ul style="list-style-type: none"> ○ What should be done to prevent 'loss of business, loss of employment and loss of high street. 	<p>PNDP seeks to address these matters and complement the policies in the Eden Local Plan 2014-2032. No change.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ Para 3.8.4 – this is the only reference to industrial estates in the document. This is insufficient, why have no policies been developed in this respect. 	<p>This is addressed in the Eden Local Plan 2014-2032 – Policy EC2 and EC3. There is no need to duplicate this. No change.</p>
<ul style="list-style-type: none"> ○ Figure 8 – include a hyperlink to the Council website giving direct access to the map. 	<p>This can be included</p>
<ul style="list-style-type: none"> ○ More information is needed to show the NDP in the context of EDCs vision to 2050. 	<p>The PNDP must be in general conformity with the Eden Local Plan 2014-2032. The masterplan is a non-statutory plan and is not a consideration for the preparation of the PNDP.</p>
<ul style="list-style-type: none"> ○ Develop the background documents demonstrating an extensive and inclusive consultation process 	<p>The background documents, including the responses to the initial public consultation are to be found on PTC’s website under NP. The PNDP has been subject to a full and extensive consultation process.</p>
<ul style="list-style-type: none"> ○ Produce a detailed proposals map to identify where it is intended and under what circumstances policies will be applied 	<p>The PNDP includes a detailed Policies Map. No change.</p>

Public Comment	Response
Miscellaneous	
<ul style="list-style-type: none"> ○ Consider the development of policies for access and social inclusion within the town centre and other areas – access to shops, public toilet provision etc 	<p>The PNDP is a land use plan and seeks to address these issues through Policy 4. Public toilets are the remit of EDC.</p>
<ul style="list-style-type: none"> ○ Consider the introduction of a Community Infrastructure Levy to provide funding to fabric improvements within the conservation areas of the town. 	<p>Community Infrastructure Levy is a matter for EDC as the local planning authority. Further details can be found here: https://www.eden.gov.uk/planning-and-building/planning/infrastructure-planning-and-the-community-infrastructure-levy/</p>
<ul style="list-style-type: none"> ○ A wide ranging, holistic and strategic review of the town centre is required 	<p>PTC are happy to engage with and will be liaising with others on this issue.</p>
<ul style="list-style-type: none"> ○ Further mapping is required. 	<p>The PNDP includes a detailed Policies Map. No change.</p>

General comments from Eden District Council with the Town Council's responses and actions

1. As of 24th July 2018, if the Neighbourhood Plan [NP] will be submitted to the Council after 24th January 2019 all references to the National Planning Policy Framework [NPPF] should be to the 2018 version, and references to the 2012 version should be removed. See footnote 69 of the NPPF (2018).

PTC Response: **To revise PNDP to be in line with revised NPPF.**

2. A large portion of sections two and three should be moved to an appendix as background information and the contents page rearranged accordingly. Any information that is not necessary for the decision maker to determine planning applications should be removed from the main document.

PTC Response: **After discussion by NDP Group - No change. EDC may know all this but the rest of our audience may not.**

3. Including a summary of relevant evidence for each policy should be considered and cross referenced accordingly. See page 23 of Locality's Neighbourhood Plan's Roadmap

https://neighbourhoodplanning.org/wpcontent/uploads/NP_Roadmap_online_full.pdf

PTC Response: **To amend Background/Justification section of relevant policy where necessary**

4. It would be helpful if the policy text was more obvious, for example, in a text box or in bold font.

PTC Response: **To place policies in text box.**

5. References to the Core Strategy (including in the 'relevant district planning policy' sections and within the main body of text) should be removed. Although the Core Strategy is still the current development plan it is now only given minimal weight in decision making due to the advanced stage of the emerging Eden Local Plan 2014 to 2032 [ELP]. The removal of references to the Core Strategy does not necessarily need to wait until the adoption of the ELP.

PTC Response: **To amend as suggested.**

6. To avoid confusion refer to the Eden Local Plan 2014 to 2032 consistently throughout. Eden Local Plan 2032 is incorrect. An abbreviation (e.g. ELP or ELP 14-32) could be used and included in the list of abbreviations at the end.

PTC Response: **To amend as suggested.**

7. The NP identifies policies for the conservation and protection of the two conservation areas but does not include any policies relating to other heritage assets in the town. The NP could possibly consider objectives relating to

heritage tourism, which is mentioned in paragraph 3.11.3.

PTC Response: **To amend as suggested.**

8. Within in any appendix each page of the appendix should be identified as Appendix 1, 2 etc to assist in moving back and forth through the document. Where there is a reference to an appendix, table or a map, a page reference should also be included. Appendix should also be page numbered.

PTC Response: **To amend as suggested.**

EDC Policy/paragraph specific comments

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
2.25, 2.26 and 2.27	16	Remove 2.25 and swap the order of 2.26 and 2.27		To amend as suggested
3.1.1	19	The phrase 'development in Penrith that contributes to the following:' should be followed by a list of positive aspects that represent sustainable development and how they should be considered. At the moment you seem to be suggesting that development should contribute to traffic levels, use of fossil fuels, flooding, etc. The intro is a little confusing 'development ..etc' could be better phrased as 'sustainable development in Penrith ...etc'		To amend as suggested

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
3.2.3	20	You should state where the application site for the 110 home is located .i.e. at XXXXXX (application reference XX/XXXX)		To amend as suggested.
3.2.4	20	It would be useful to say what the undersupply average was as a comparison		To amend as suggested.
3.2.5	20	Eden Local Plan identifies that 50% of new housing For clarification.		To amend as suggested.
3.2.6	20	<p>Include the date these figures were calculated as they do change.</p> <p>Where does the figure 6.1 relate? Upon checking Appendix III none of the Penrith wards have a figure over 6 so how can the overall figure be 6.1? If this is the figure for Eden then it needs to say. In addition you should clarify what 6.1 represents and why it is either good or bad, possibly with reference to an Eden or County figure to enable the reader to see it in context.</p>		<p>Appendices carry dates. To add dates to text as suggested.</p> <p>A ratio of 'almost 6:1' is cited not a multiple of 6.1 times average earnings.</p> <p>Figures to be updated to reflect different sources. Eden figure of 6.1 times annual average earnings to be added as suggested.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
3.2.7	20	It would be useful to refer to County or National figures to enable the reader to see it in context.		To Amend as suggested. If such figures are available.
3.4	22	This section expresses the need for more indoor leisure facilities but none of the policies support such a facility. Proposals for a youth facility are supported but paragraph 3.4.2 suggests that something a bit more leisure orientated is needed.	Policy 9	To amend Policy P9.
3.4.6	23	'Map B' Where is map B? page reference required and this should be a consistent approach throughout the document.		Map B was included in appendices but to add a page number as suggested.
3.4.8	23	Appendix IV states for PS35 that there is fitness training equipment, surely this counts as an outdoor gym. Also if too few how many are required?		Purpose built outdoor exercise facilities are limited to Wetheriggs Country Park (outdoor gym) and Frenchfields (jogging track) both of which are to the southern end of the Town. To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
3.5.4/5	25	Reference is made to no or poor facilities – useful to comment what is required and why, to put statement in context.		To amend as suggested.
3.6.3	25	'If the proposed levels continue through to year 11, the school will be at capacity.' You've only stated the maximum (30) per class so inevitably the school will be at capacity if those levels are consistent throughout the school. Are there any projected figures that show the school will be over-capacity even after the expansion?	Policy 12	Housing growth in the Eden Local Plan 2014 to 2032 is likely to increase demand for school places over-and-above organic growth in population. To update figure if available.
3.7.1	26	Average number of cars per household but no reference to Eden or England to provide context. Also this should refer to 'cars or vans' as per the table following.		To amend 'cars' to read 'vehicles'. Figure 5 shows figures for Eden and England. To amend text as suggested.
3.7.9	27	If a lack of electric charging points is a problem perhaps the policy should reflect that in respect of existing car parks and where new car parking areas/private parking are proposed associated with new housing or commercial proposals.	Policy 13	No vehicle charging points in the town. To make proposals for fuel outlets, supermarket car parks, fast food outlets, Bluebell Lane and Drivers Lane car parks. To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
3.7.11	28	It is not clear why the town bus service is an issue for those without a car. Surely the bus service is a good thing. It may be an issue for those travelling to and from work or school as it does not run during peak times.		The issue is for those travelling to and from work or school as the services do not run during peak times – to make clearer.
3.8.5	29	Is there any evidence or further information about how a flyover will be environmentally and economically disastrous for Penrith? If it is disastrous, specify alternatives that should be considered in order to put statement in context.		This is a PTC comment. To remove as, to date, no formal consultation on treatment of the Kemplay junction.
3.9.1	30	'An increasing number of buildings are being constructed in other, often more incongruent materials.' This is a very subjective statement and it does not necessarily follow that materials other than red sandstone or stucco should be inappropriate. Furthermore, this conflicts with Policy 1 (point 4).	Policy 1	To include examples of good and bad design and use of materials.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
3.10.3	32	(Source: Action with Communities in Cumbria)date required		To reference latest data which suggests birth rate will level-off during the plan period.
3.10.6	32	If Penrith is '..an attractive location for both new and existing business.' Why is this not happening – If this is the case this should be built on and developed.		Is this not what the PNDP and Local Plan seek to do? Employment land to accommodate offices and factories/warehouses is not available on the three industrial estates.
3.10.7	32	Passenger flights are not due to commence until 2019 now.		To amend to Spring 2019 (latest date)
4.2	34	This paragraph is correct but may benefit from some additional information to ensure the status of local planning policy clear. Due to the advanced stage of the emerging local plan, the Eden Local Plan 2014 to 2032 is currently being used by planning officers in the determination of planning applications.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
4.3	34	Remove 'vision' and change date to '(present to 2050)'. Consultation now due to take place in September.		To amend as suggested.
4.4	34	New NPPF in force as from 24 July 2018 – see paras 28-30. Latest position is required.		To amend as suggested.
5	37	'By 2032, Penrith will be successful, etc.' implies that Penrith is not successful now or up until 2032. Rephrase is required along the lines of 'will continue to build upon its strengths to ensure that it...etc.'		Noted. We appreciate the point but believe that there is scope to make the town successful. While beyond scope of NDP, the Town should be attractive to new employers offering higher paid jobs. No change.
Objective 2	37	Amend to: 'To support high quality housing that retains Penrith's identity and encourages high levels of social interaction, meets housing needs and help grow the local population, especially young people.'		This removes "a level" and reduces intended emphasis. No change.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Objective 3	37	Amend to `protect green spaces that have been identified as being important to the local community from inappropriate development which erodes their character and essential quality		No change. This starts to become a policy rather than an objective,
Objective 7	38	The objectives should reflect aims for future development not the way the Town Council works. This objective would be better suited to the Town Council Actions section or reworded.		Objective to be re-written.
Objective 8	38	The objectives should reflect aims for future development not the way the Town Council works. This objective would be better suited to the Town Council Actions section or reworded.		Noted. The Town Council is a consultee on issues of traffic management and as such our objective is to work with the County and District Councils. No change.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Objective 9	38	The use of the word 'preserve' is not appropriate here as it literally means to keep things exactly how they are, whereas planning policy is about managing change and some historic or notable buildings may benefit from sensitive development. 'Conserve and enhance' is more appropriate as it means to protect from harm, loss or decay and reflects the approach of the NPPF. Also what is a notable building?		Change "preserve" to "conserve",

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 1	39	<p>The phrase 'development proposals should demonstrate, where it is practical for them to do so, that they have considered each of the following criteria' gives applicants significant opportunity not to meet the criteria or even not demonstrate that they have considered it. The above sentence could be replaced with the following: 'Development proposals should demonstrate that they meet all the following criteria';</p> <p>Or change second sentence to 'These measures should build in resilience and achieve development that is adaptable to meet the challenges of future climate change and socio-economic change through:' and delete third sentence (you may feel that point 2 and 5 need a slight rewording if this option is used). The second sentence to this policy indicates that the policy will address socio-economic change, however the criteria is very heavily weighted towards environmental matters.</p>		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 1, point 1	39	Include 'where practicable.'		To amend as suggested.
Policy 1, point 3	39	What is a small wind turbine – not defined and could be 18m high. Even small wind turbines are likely to be inappropriate within Penrith. Perhaps include 'in appropriate locations' or similar.		Point to be retained in policy with amended wording.
Policy 1, point 4	40	There may be some conflict with Policy 5, which requires the use of local materials which may not be possible to recycle.	Policy 5	Comment noted. No change.
Policy 1, point 5	40	This does not represent a clear instruction for applicants. Remove 'ability to' and replace 'maximises' with 'Maximise'.		To amend as suggested.
Policy 1, point 6	40	It is not clear what you are referring to here. Is it about construction materials? It may be difficult to assess the 'healthiness' of products – there would need to be more information possibly included in the background/justification section.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
6.4	40	Good Design? Both the NPPF and the ELP refer to 'High Quality Design'		Old NPPF referred to good and high quality – amend to bring in to line with new NPPF.
Policy 2	41	Remove 'requiring planning permission'. Only development that requires planning permission will need to adhere to planning policy.		To amend as suggested.
Policy 2, point 1	41	<p>Not all planning applications require Design and Access Statements. Where a DAS is required the developer will be required</p> <p>The ELP requires development to be of high quality design therefore we recommend replacing 'good' with 'high quality'.</p> <p>Does this criterion need to require the development to be sustainable development when Policy 1 already requires this.</p>		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 2, point 2	41	<p>'Low carbon targets' is vague; can this be expanded on in the background/justification text?</p> <p>We would suggest removing 'To help applicants' as it seems to cast doubt on whether applicants need to meet the BREEAM standards you suggest. Include where a pre-assessment or equivalent might be relevant (could be included in background section).</p>		To amend as suggested.
Policy 2, point 3	42	<p>The criteria referring to innovative design are quite limited. It should say 'this list is not exhaustive and some examples include:' is there any guidance that you could refer applicants to?</p> <p>It also appears that there was a fifth suggestion as 'and' is included after the final criterion rather than the penultimate.</p> <p>Some of the criteria are repeated in other policies</p>		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 2, point 3	42	<p>The criteria referring to innovative design are quite limited. It should say 'this list is not exhaustive and some examples include:' is there any guidance that you could refer applicants to?</p> <p>It also appears that there was a fifth suggestion as 'and' is included after the final criterion rather than the penultimate.</p> <p>Some of the criteria are repeated in other policies</p>		To amend as suggested.
Policy 2 point 4	42	It is not clear what 'levels' you are referring to here. If you are referring to point 2 then perhaps this should be included in that criterion. Clarification is required.		To amend as suggested.
Policy 3	43	It may be beneficial to expand upon what is considered to be practical or possibly viable in the background/justification text.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 4	45	<p>The criteria are probably not relevant to commercial development so change to 'To improve social inclusion, where appropriate, proposals for residential development should also:'</p> <p>It may be beneficial to elaborate on when it is not appropriate to improve social inclusion. Alternatively 'where appropriate' could be removed or replaced with 'where practicable' (or include this within the criteria).</p>		Policy 4 refers to all development – no change.
Policy 4, point 2	45	It is not clear how this criterion is relevant to the policy. It is also quite vague and would be difficult to assess applications against.		To re-word point 2.
Policy 5	46	Amend opening sentence to: 'Development within or affecting the setting of the Penrith Conservation Area should be designed to take account of the conservation and enhancement of the following:...'		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 5, point 2	46	There are quite a number of buildings over 2-storeys in Penrith Conservation Area, particularly in the town centre. The impact of the height of a building within the conservation area would be assessed but there may be circumstances where a building over 4-storeys is acceptable in the conservation area, so it is recommended that this is removed.		Agree that there are a number of period 3-storey buildings in the New Streets plus the rather brutal Voreda House. Do we want buildings over 4-storeys in the town?
Policy 5, point 3	46	Remove the word 'protect'		To amend as suggested.
Policy 5, point 4	46	Amend to 'use of local materials for example red sandstone, Westmorland/Burlington slate and timber'. This may conflict with Policy 1 (point 4) that encourages the use of sustainable building materials and may restrict high quality design.	Policy 1	To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 5, point 5	46	Update to include further clarity on the fenestration pattern and the types of windows that you wish to conserve in the conservation area.		To amend as suggested. Essentially we wish to see wooden sash windows replaced with wood framed sash windows, etc. Where UPVC fitted opportunity of application to replace to be taken to insist on wood.
Policy 5, point 7	47	<p>Remove 'Protection of'. This is a repetition as the first paragraph of the policy leads into this sentence with 'conserve and protect the following:'</p> <p>It is unclear how the suggested key views are relevant as Beacon Hill, Castle Park and the Northeastern Fells are not within the conservation area.</p> <p>We would suggest that the identification of key views should be addressed through the Conservation Area Appraisal. Alternatively, more information should be provided to indicate the type of development that would adversely impact each key view to guide developers, this may be best placed in an appendix and referenced here.</p>		<p>To amend as suggested.</p> <p>We are seeking to retain key views of identified locations from the town and its approaches. Beacon Hill is in the town and is iconic to Penrith.</p> <p>To add separate PNDP policy on views.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 5 (new streets)	47	Amend the opening sentence to: 'development proposals affecting the Penrith New Streets conservation area should where possible seek to: ...'		To amend as suggested preamble for Penrith CA – see Policy 5, point 7.
Policy 5, point 1 (new streets)	47	Beacon Fell is not within the conservation area and its significance to the conservation area should be assessed through the Conservation Area Appraisal.		Comment noted. The Beacon Hill forms the backdrop to the town. To add new policy on views.
Point 3	47	Replace good quality with high quality to reflect ELP and NPPF		Old NPPF referred to good and high quality – to amend to bring in to line with new NPPF.
Point 4	47	Amend to – 'Seek to retain vernacular architectural detailing.....within a high quality design proposal'. – a proposed extension may require the removal of a feature, which although overall is high quality, but would be contrary to policy.		To amend as suggested.
Policy 5, point 5 (new streets)	47	Should be worded to demonstrate that this only includes those gardens and spaces that contribute to the conservation and enhancement of the conservation area.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 5, final sentence	47	Amend to: 'Development proposals in and affecting the setting of both Conservation Areas will be required to describe the significance of any designated and nondesignated heritage assets affected and the likely impact of the development upon them. This should be done through the submission a heritage statement with the application.'		To amend as suggested.
Figure 9	49	The plan (figure 9) should include a key to identify which is the Penrith CA and which is the New Streets CA.		To amend as suggested.
6.25	50	<p>Town Centre Conservation Area? Is this the Penrith Conservation Area mentioned above – need to use a consistent term.</p> <p>This paragraph needs to more information to explain what is significant about the 'Penrith Story' and also how developers should 'give regard' to Drovers Lane.</p>		<p>To amend as suggested.</p> <p>Parentheses to be removed. Drovers Lane illustrates how housing in Penrith has developed over time.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
6.26	50	This does not provide any background information or justification to Policy 5 and therefore should be removed.		Add as a Town Council Supporting Action.
6.27	50	Amend to: 'To support high quality housing that retains Penrith's identity and encourages high levels of social interaction, meets housing needs and help grow the local population, especially young people.'	Objective 2	No change. See earlier response to Objective 2.
Policy 6,	51	Remove 'build and'. Planning can only secure high quality design, but build quality is controlled by Building Control. Could be high quality form and design.		To amend as suggested.
Point 3	51	Is this required? Within the neighbourhood plan area the only place new housing is supported by the local plan is within Penrith, and so new homes would be accessible to local services.		What about speculative planning applications on sites not allocated in the Local Plan? No change

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 6, point 6	51	<p>The car parking standards you have outlined could severely restrict residential development in the town centre. It is generally acknowledged in planning that fewer parking spaces are required in town centre locations due to the easy accessibility to amenities and public transport. This is supported by case law and as such it would be difficult to defend appeals for residential development in the town centre with parking below the standards set out.</p> <p>We would strongly suggest removing these standards or clearly state that the standards may not be appropriate in the town centre and identify where the 'town centre' boundary is.</p>		<p>Car parking standards are not intended to be applied to the town centre.</p> <p>To re-word as suggested.</p>
6.30/31	52	Reference to NPPF requires amendment to align with new NPPF 24 July 2018.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
6.32	52	This does not provide background information or justification to Policy 6 and should therefore be removed or moved to the Supporting Town Council Actions section.		Comment noted. This matter was raised as a concern during the initial public consultation. No change.
Policy 7	53	<p>It is not clear whether the priority should be for one and two bedroom properties for all the groups mentioned or just for the ageing population.</p> <p>The practicalities of providing one bedroom properties should be considered. If the evidence shows that one bedroom properties are needed then it is right to prioritise their provision but these are usually flats, which may not be appropriate in all areas of Penrith. This is something that could be acknowledged in the background text i.e. that in some locations it may be acceptable not to provide such properties.</p> <p>Remove 'with/without children'</p>		<p>To reference the Penrith Housing Need Survey (2018).</p> <p>There is an identified need for one-bedroom properties for both the young and the elderly.</p> <p>To delete reference to one and two bedroom properties.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8	55	<p>The evidence base (Appendix IV) for this section would benefit from further work. It should be borne in mind that the examiner may not be familiar with Penrith so it is important that you clearly show that each site meets the criteria of paragraph 77 of the old NPPF or the respective paragraph of the new NPPF. We have provided more detailed comments on specific sites, where appropriate, below but the following are some general comments regarding the evidence base:</p> <ul style="list-style-type: none"> • Where you are demonstrating that the site is in close proximity to the community it serves, a description of the address does not clearly prove this. A few comments about who generally uses the site and how far they travel to do so would be beneficial e.g. used by residents living in surrounding streets. • Where the site is described as a number of minutes from the town centre be specific that this is walking distance and not by car for clarity. 		We acknowledge that this requires more work. To improve the evidence base and add to Background/Justification section.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8 (Continued)	55	<ul style="list-style-type: none"> • Also consider whether this information is relevant, are the people who use this space travelling from the town centre? <p>It is not demonstrated that the sites are local in character. It may be beneficial to say whether they are an important aspect of the streetscape, use local materials (e.g. bounded by red sandstone walls), historically significant, etc.</p>		

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8, PN11	55	<p>At 125 hectares this is certainly an extensive area for a local green space designation and we do not agree that, in its entirety, the designation meets the criteria in paragraph 77 of the old NPPF or paragraph 100 of the new NPPF: <i>'where the green area concerned is local in character and is not an extensive tract of land.'</i></p> <p>The area to the north of the Beacon Tower is commercial forestry land, the owners of which do not encourage public access (there are signs alerting people that this is private land) although these are widely disregarded. This area of the Beacon cannot be considered local in character and therefore does not comply with either old or the new NPPF. In addition, the area to the rear of the beacon cannot be considered 'in close proximity to the community it serves' which is a further conflict with the requirements of the NPPF.</p>		<p>Based upon the comment from EDC, and on the advice of our Planning Consultant, NDP Group agreed, reluctantly, to define a smaller area of the Beacon Hill as Local Green Space i.e 40 hectares (100 acres) of the southern side of the hill that forms the iconic backdrop to the town.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8 PN 11 (cont)	55	<p>The area around the tower and between the tower and Beacon Edge is largely accessible to the public via a permissive footpath and well-used. This area is visible from many points in Penrith and we would suggest that this section alone could be suitable for Local Greenspace designation. However, any designation of the Beacon would conflict with the evidence base; Appendix IV states that Penrith Beacon is 'a valuable amenity with tourism potential.'</p> <p>Designating the Beacon as a Local Greenspace would only allow for development under special circumstances and could severely restrict any tourism potential.</p>		

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8 PN 11 (cont)	55	The Grade I listing of Beacon Tower would protect the immediate area from inappropriate development, such that would harm the setting of the Beacon Tower. It is likely that the listed building designation would serve a similar, although slightly less restrictive, purpose to Local Greenspace designation; perhaps allowing for some sensitive tourism development on this part of the Beacon, which is evidently desired. We would therefore suggest that the designation of Penrith Beacon as Local Greenspace is unnecessary.		
Policy 8, PN20	55	The evidence in Appendix IV does not show that this area is demonstrably special to the community. The criteria in paragraph 77 of the NPPF (or 100 of the new NPPF) require the green space to be of value to the community so this should be clearly demonstrated. If it cannot be evidenced that this area is special to community then it should be removed.		To improve the evidence base for this wooded area (green lung) in a densely populated residential area of the town

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8, PN22 and PN23	55	The evidence base for these two sites needs more information. It is not demonstrated that St Catherine's Churchyard is close to the community it serves, and both sites would benefit from further justification that they are demonstrably special to the local community.		To re-consider evidence base. To review Christchurch in the light of suggestions that this could become a community hub serving the North of the town.
Policy 8, PW27	55	'Unknown to many' does not demonstrate that it is valued by the community.		Unfortunate description. To re-consider evidence base.
Policy 8, PW33	55	The evidence suggests that this space is proposed for designation because it provides a useful access to the town centre. However, this is already a public right of way and therefore already protected. The area of land proposed for designation suggests that a larger area than the footpath will be protected but the evidence does not show why this larger area is special.		To remove as a Local Green Space

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 8, PW34	55	The evidence in Appendix IV does not show that this area is demonstrably special to the community. The criteria in paragraph 77 of the NPPF require the green space to be of value to the community so this should be clearly demonstrated. If it cannot be evidenced that this area is special to community then it should be removed.		To re-consider evidence base.
Policy 8, PS35	55	'Rather forgotten area' does not demonstrate that it is valued by the community.		Unfortunate wording. To re-consider evidence base.
Policy 8, PP47	55	'Used extensively by the public for walking and exercising dogs' would be better placed in the demonstrably special to community section.		To amend as suggested.
Policy 8, PP51 and PP52	55	Both sites would benefit from more information regarding their value to the local community.		To amend as suggested.
6.4.1/3	56	Refer to New NPPF paras 99-101		To amend as suggested.
Policy 8, relevant Planning Policies	56	Policies ENV1 and ENV4 of the Eden Local Plan 20142032 are also relevant here.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 9	57	<p>The first part of this policy is unlikely to be necessary as it is a repetition of Policy COM2 of the Eden Local Plan. Also, including sites that you have designated as local greenspace is slightly conflicting as development on those sites will only be allowed in special circumstances under Policy 8. However, Policy 9 would allow development if there is a strong social or economic justification and there is no longer a need for the facility. It is not clear what evidence there is for needing a youth facility. If evidence is available it would be beneficial to include further information clarifying what you mean by 'place-based', and also what might be considered to be significant adverse impacts. This further information could be included in the background section.</p>		<p>No change – without this reference policy is not clear.</p> <p>Young people congregate in car parks and public spaces because there is very little for young people other than cadets, scouts and guides. There is a need for a theatre/entertainment space not only for young people.</p>
6.4.8	58	Refer to New NPPF		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 10	59	<p>Remove 'where planning permission is required'.</p> <p>The second sentence of the policy needs to be more flexible to allow for circumstances where a community, health or education use is no longer viable. The policy as it is currently written may lead to buildings being left vacant and falling into disrepair if a community use does not wish to make use of the building, facing a change in circumstance or is no longer viable</p> <p>The reference to Policy COM1 of the Eden Local Plan should be removed as the criteria in COM1 relate to the change of use of facilities (which we have assumed you are referring to here) applies to rural facilities. The criteria should be included in Policy 10 if they are to apply to the facilities listed.</p>		<p>To amend as suggested.</p> <p>No change. This policy has same flexibility as ELP Policy COM1.</p> <p>Penrith lacks community facilities so it is unlikely the limited current facilities will fall into disuse.</p> <p>No change. Not clear without this reference.</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 10 (Continued)	59	<p>The Town Hall and Mansion House should be removed from the list because they are offices not community, health or education facilities, and are therefore not relevant to this policy.</p> <p>It should be considered whether it is appropriate to include Penrith Hospital in this policy. Should the hospital close it is very unlikely to re-open as a hospital. It is likely then to become vacant for a long period while the criteria for changing its use are met (i.e. marketed for sale in its current use) and could become an eyesore at the gateway to the town.</p> <p>Proposals for new and improved access to community facilities.....will be supported'. To check is it just the access that will be supported or is this meant to support new and improved community facilities.</p>		<p>Agreed not to include Town Hall and Mansion House.</p> <p>Noted. To remove.</p> <p>To amend to: "Proposals for new community facilities and improved access to existing facilities will be supported."</p>

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 11	61	<p>The first paragraph – need to clarify what is meant by 'walking and cycling facilities'. Are these the modal links between places, within the development or the infrastructure including crossings and cycle bays etc.</p> <p>The 2nd paragraph needs re-wording; it is not clear to what extent applicants should adhere to the criteria.</p>		To amend as suggested.
Policy 11, point 1	61	<p>It is not clear what is meant by open space corridors and watercourses, this should be expanded on in the background text.</p> <p>It is not reasonable to expect applicants to provide a link to watercourses when it is unlikely that there will be direct access to a watercourse from a development site.</p>		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 11, Point 2	61	It would be difficult to meet this criterion if the existing walking and cycling routes are outside the applicant's control. Is it the intention of the policy to require off-site works. Where is Map B? When found at the back not marked as map B. Consider putting maps beside the text for ease of use.		To amend as suggested. Suggestion noted. Clerical error in omitting reference from map.
Policy 11, Point 4	62	Use of sustainable materials' is not relevant to this policy and is covered in Policy 1. This should be removed.		To amend as suggested.
Policy 11, Point 5	62	This is not a planning matter		Disagree. No change.
Policy 11, Point 7	62	This is not relevant to the policy		Disagree. No change.
Policy 11, Final paragraph	62	This is not relevant within this policy as this function is controlled by CCC, who will consider this issue. Would be better dealt with in the background on basis of 'Town Council would seek to work with CCC to.....		To add as a Town Council supporting action.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 12	63	This policy is unnecessary as this is already the case. Cumbria County Council, as required by Section 14 of the Education Act 1996, must ensure it has secured the provision of sufficient primary and secondary school places for its area and as part of the consideration of any major planning application with improvements required through S106 Agreements.		In light of comment from CCC to delete section on Education. To delete.
6.62 point 1	63	Figures to substantiate this claim should be included in the evidence base. Be aware that if there was insufficient school provision the ELP would not have been found sound and would have been the subject of a sustained objection from CCC		In light of comment from CCC to delete.
6.63	63	See comments regarding paragraph 3.6.3		Delete.
6.64	63	This is a repetition of the policy wording. Should be removed.		Delete.
6.65	64	Current pupil numbers statistic needs a date.		Delete.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 13	64	This is not planning policy and would be better placed in the town council actions section. Alternatively the wording could be changed to 'Development proposals for the following will be supported' or something similar.		To add as a Town Council Supporting Action.
Policy 13,	64	Remove 'possibly using a greenfield site on the edge of town as a car park (e.g. Kemplay Bank adjacent to the A66)' as we don't want to discourage the use of a brownfield site if there is one available. Generally park and ride facilities are on the edge of town so there is no need to include 'on the edge of town'. Replace 'perhaps in conjunction with the Town Bus' with 'proposals should demonstrate that working in conjunction with the Town Bus has been considered' or similar.		Other than demolishing an occupied site on the edge of the town we are unaware of any brownfield sites that could accommodate a large long-stay car park. To amend as suggested. To add a Town Council Supporting Action.
Policy 13, point 2	64	This should be removed to the town council actions section. Policy EC4 of the ELP already allows camping and caravan sites subject to certain criteria.		To add as a Town Council Supporting Action.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
6.69	65	Is there any evidence the policy will solve these issues e.g. modelling, discussions with the County Council.		To amend to bring in to line with CCC response.
Policy 14	66	This is not planning policy and should be removed.		To re-write as a planning policy.
Policy 14, point 1	66	This is not something applicants will be able to control and should be removed. This could only be delivered through a Masterplan		To re-write as a planning policy
Policy 14, point 2	66	This is already addressed in Policy DEV3 of the ELP.		To re-write as a planning policy
Policy 14, point 3	66	This is a matter for Cumbria County Council to lead on.		To re-write as a planning policy
Policy 14, point 4	66	This is not something applicants will be able to control and should be removed and is an issue which is largely under the control of the CCC.		To re-write as a planning policy
Policy 15 Point 1	68	What are and where are the key gateways and through routes – there needs to be clarity (perhaps through a plan).		To map key gateways and through routes.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 15 Point 2	68	Need to clarify that this can only be achieved where it is under the control of the applicant or where it is relevant to the application submitted.		To amend as suggested.
Policy 15 Point 3	68	Remove 'possible pedestrianisation of areas in the town centre' as this is not something that applicants will be able to control.		To amend as suggested.
Policy 15, point 4	68	'is consistent in design and style' is unclear, what should it be consistent with? Maintenance is not a planning matter – 'can be easily maintained' may need further clarification or should be removed. Specify what clutter you are wishing to avoid.		To amend as suggested.
Policy 15 supporting town council actions	68	'To work with property owners and Eden District Council to re-designate Castlegate as residential.' More information is needed here as it is very unclear what this means or is hoping to achieve.		Castlegate is run-down. A pub and a couple of shops only. Aim is to concentrate the retail offering in the town centre to the benefit of all retail businesses. To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 16	72	Amend the opening sentence to: 'to maintain the quality, character and distinctiveness of Penrith town centre, the creation of new shopfronts and alterations to existing shopfronts should take account of the following criteria:'		To amend as suggested.
Policy 16, point 1 but not identified as point 1	72	Amend to: 'The scale and style of the existing building and any existing shopfront of the building. The overall aim should be to seek where possible, the retention and repair of existing historic features that contribute to the interest of the building and the street frontage.'		To amend as suggested.
Policy 16, point 2	72	Amend to: 'The size, detailing and materials of signage should respect the character of the building and the area within which it is located'.		To amend as suggested.
Policy 16, point 3	72	Amend to: 'Security grilles and shutters should be installed on internal aspects only'.		To amend as suggested.

Paragraph /Policy	Page	Comments	Cross ref. to paragraph /Policy	Penrith Town Council's response
Policy 16, point 4	72	Amend to: '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'.		To amend as suggested.