

## 1. Introduction

- 1.1 Cumbria is a county of significant opportunity. Its solid foundation of expertise and resource means the county has the potential to proactively support the “Levelling up” of the UK’s economy.
- 1.2 However, this potential can only be met if underpinned by appropriate and effective enabling infrastructure. This must be capable of meeting the needs of both rural communities and while addressing issues surrounding deprivation.
- 1.3 Removing barriers and unlocking potential is essential to delivery of local and national ambitions for clean growth and levelling up. This can only be achieved by improving the dialogue between local and central government and their representative bodies, and shifting responsibility, control, and resources closer to the localities. This is especially important with respect to creating or piloting innovative approaches to services and utilising technology to support businesses and communities.
- 1.4 A planned, aligned approach to national infrastructure investment, potentially led by the National Infrastructure Commission, could provide the clarity and certainty to support effective early engagement, efficient decision making and at pace delivery of the government’s ambitions for clean growth and levelling up in Cumbria and across the UK.

## 2. Cumbria’s Unique Offer and Experience

- 2.1 Cumbria sits at the heart of the UK, covering half the Northwest of England. It is renowned for its dramatic and protected landscape, its environmental assets and extensive natural capital. It is a world class visitor destination with good connectivity into the UK. It is also a recognised leader in nuclear and energy excellence and home to high value manufacturing capability supported by a highly skilled workforce, leading R&D facilities and a skills pipeline tailored to industry needs, underpinned by quality higher and further education provision.



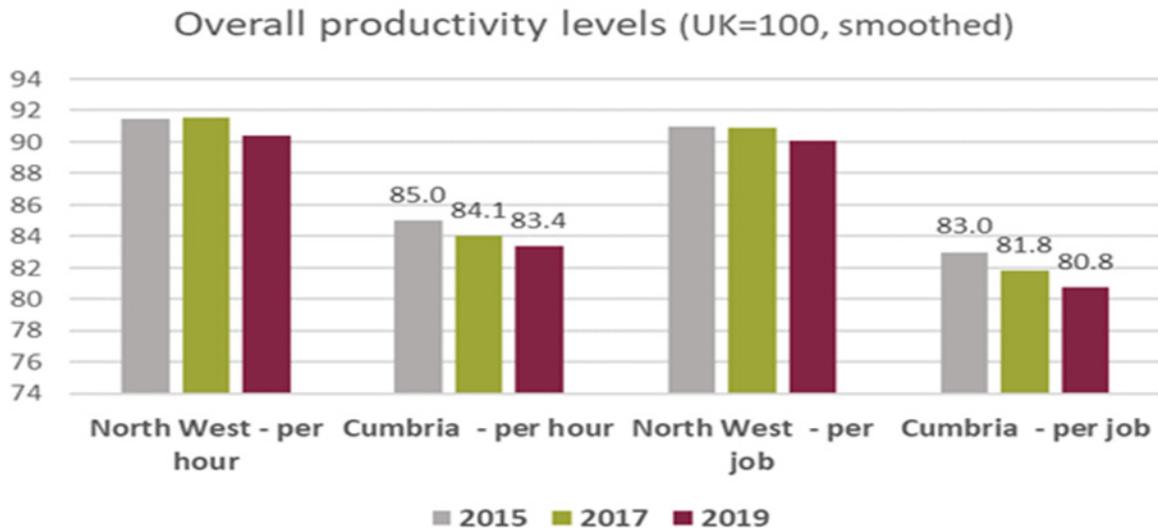
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- 2.2 The county enjoys a unique combination of assets and resources and coupled with its considerable size and relative sparsity of population, this means that there is genuine opportunity for development and growth.
- 2.3 Cumbria can use its unique position to lead in the delivery of the government's vision for green growth and levelling up and examples of developed opportunity areas where this could be employed include:
- Considerable experience in relation to nationally significant development proposals, including the development of offshore windfarms and a current proposal by National Highways to improve the A66 (A Project Speed Pilot and one of the largest infrastructure projects within the region).
  - Building on the county's position as a centre of excellence and innovation in the nuclear and energy sectors to host STEP and Small Modular reactors.
  - Capitalising on the county's appetite to act as a test bed for new technologies and pilot innovative approaches to issues.
  - Delivering 10,000 new homes to the south of Carlisle St Cuthbert's Garden Village to provide a high-quality sustainable community to the south of Carlisle, as well as opportunities to develop local green building skills and employment.
  - Utilising the county's physical environment, natural capital, and rural economy to develop a UK centre of excellence for farming, land management, clean energy and clarity around the role of natural capital.
  - Development of a county wide, multi modal transport offer, aligned to the approach set out in the Cumbria Transport Infrastructure Plan, to improve connectivity and support decarbonisation.
- 2.4 Given the significant opportunity within Cumbria and the solid foundation of expertise, skills and resource, the county is capable of supporting, and is ambitious to accommodate, growth. This can only be achieved through a planned aligned approach to national infrastructure planning, supported by improved dialogue between local and central government and their representative bodies with responsibility, control, and resources reallocated, closer to the localities in order to ensure informed and appropriate action to address Cumbria's rural infrastructure challenges.

### **3. Cumbria's Role In Clean Growth, Productivity Improvement and Levelling Up**

- 3.1 Cumbria has enormous potential, however, there are challenges. Cumbria's physical environment, existing land uses, and dispersed range of settlements have resulted in a polycentric economy that places significant demands and challenges upon the county's infrastructure. Although significant, these challenges are well understood and are not insurmountable. Indeed, addressing these challenges is essential in unlocking the full potential of the county to enable delivery of the government's ambitions for clean and inclusive growth.
- 3.2 CCC recognises the strategic challenges identified by the NIC but do not consider the nine specified challenges adequately reflect those that exist in rural geographies like Cumbria.
- 3.3 Cities and urban centres have benefited from a national policy drive for infrastructure investment and economic growth since the 80s. This has been successful in generating growth in many urban centres; however, this has often been at the expense of rural areas like Cumbria, driving population out of rural areas and resulting in economic, social, and environmental damage.
- 3.4 This is evident in Cumbria in the lack of population growth over the last 25 years, with projections indicating that, without intervention, there will be no growth in Cumbria's population by 2030. More specifically, an aging demographic means the working age population (aged 16-64) is projected to fall by around 15,000 in the next 10 years.
- 3.5 This decline in working age population is compounded by the county's geography. The large and dispersed nature of the population means that the small pool of higher-level skills (around 32% of 16-64 qualified to degree level), is spread thinly across the county, creating an issue for employers and in attracting people to live and work in Cumbria (Cumbria Local Enterprise Partnership Skills Report 2021).

3.6 CCC recognise the importance of urban investment and growth but challenge the need for that growth to be at the expense of other areas. The legacy of UK national infrastructure policy is a significant contributor to the lack of effective physical and digital connectivity across Cumbria's polycentric economic structure, which is limiting economic growth, productivity improvement, social inclusion and wellbeing and environmental opportunity. Business productivity in Cumbria is below national averages as shown below and levelling up of regional economies will require investment if under performance is to be addressed.



- 3.7 The policy focus on urban areas is unsustainable, and evidence of negative impacts can be seen in both urban and rural locations, with urban congestion forming one of the most significant and identified in the NIC challenges but no similar recognition of the rural challenges, particularly in relation to rural productivity.
- 3.8 CCC recommends a more balanced approach that begins with acknowledgment that urban congestion is not the only infrastructure challenge to levelling up and that improving infrastructure in rural locations like Cumbria is also crucial to delivering the government's ambitions, locally, regionally, and nationally for improving productivity.
- 3.9 Furthermore, CCC suggest that the lack of recognition of rural infrastructure challenges and the related barriers to the considerable potential for growth, indicates a lack of understanding of the economic, social, and environmental opportunities and barriers that exist in Cumbria. Removing barriers and unlocking potential is essential to achieving the government's national ambition for clean growth and levelling up. CCC believe that this can only be achieved by improving the dialogue with government and their representative bodies, and shifting responsibility, control, and resources closer to the localities.

#### 4. Recognising the Role of Cumbria's Natural Capital

- 4.1 Cumbria's abundant natural capital assets include grassland, mountains, moorland & heath, woodland, coastal margins, freshwater sources, arable land, wind, its tides, and clean air. These assets already contribute significantly to the county's world-renowned identity, its residents and visitors' health & well-being and the economy. The growing emphasis on climate change, net zero targets and levelling up presents an opportunity to develop this contribution and recognise the significant potential of Cumbria's natural capital as an economic, social, and environmental driver. This reemphasis is the first step toward realising the full potential of the economic dimension of green growth and the associated benefits for the county and beyond.
- 4.2 There are already examples of innovative management of natural capital in Cumbria, including catchment management, peatland restoration, woodland creation, and agricultural innovations. Coordinating this activity and catalysing public and private sector funding to generate investments that will significantly scale up these approaches are important next steps in further stimulating and facilitating green growth in Cumbria.
- 4.3 Mindful of our opportunities and experience, maximising the role of natural capital will require coherent regulation and clear and certain infrastructure planning, including public funding mechanisms and incentives for private investment.

- 4.4 At the heart of this will be opportunities for local areas to take a stronger role centred on the identification and prioritisation of investor ready natural capital opportunities that can be supported to scale up quickly; the development of opportunities to support almost investor ready natural capital opportunities and the provision of clear support to explore and develop innovative natural capital investment propositions.
- 4.5 It is recommended that this approach is underpinned by the following important principles:
- Firstly, investment in natural and living resources should always aim to enhance the underlying environmental assets.
  - Secondly, although investment should seek to reap benefits of 'at scale' development, it must reflect local needs, conditions, and interests.
  - Finally, financial return on investments must secure benefits for local communities.
- 4.6 Successful development of this area of Cumbria's economy should see environmental enhancement, social improvement and economic benefits for the county's residents, communities, visitors, and businesses. However, it can only succeed with the provision of appropriate government support, including direct funding.

## 5. The Need for Certainty

- 5.1 To unlock the full potential of Cumbria to deliver against the government's ambitions requires clarity and certainty for all stakeholders, including developers, businesses, local authorities, and communities. This must be done through a system wide approach to providing the resource and infrastructure that will enable and unlock clean, inclusive economic growth, not just in Cumbria but across the UK.
- 5.2 It is imperative that national infrastructure investment is planned and aligned to support the delivery of major schemes. Cumbria has experienced issues due to a lack of national infrastructure investment planning and alignment. For example, the recent west coast schemes for new nuclear generation at Moorside, decommissioning works at Sellafield and works to the Drigg Low Level Waste Repository all had rail capacity requirements. CCC worked with Network Rail to produce a business case that would enable line improvements and increase capacity to facilitate the proposals. The partnership working took around two years to secure the £8m investment needed for the next stage of work, which is ongoing. The overall lead in time is likely to be around five years.
- 5.3 Nationally led infrastructure planning and alignment could have seen the required works identified and progressed at a much earlier stage with less resource demands placed upon public and private sector partners. In this case, partners have been able to progress works, however, it will not always be possible to coordinate and progress at a local level without effective national planning and alignment to support. If this is not adequately addressed, it will continue to result in delay and potentially prevent investment and development of major schemes. And even with the progress of this business case, there is still doubt surrounding the provision of delivery funding and the critical certainty this brings.
- 5.4 A planned, aligned approach to national infrastructure investment, potentially led by the National Infrastructure Commission, is essential in providing the clarity and certainty that will support effective early engagement, efficient decision making and at pace delivery of the government's ambitions for clean growth and levelling up in Cumbria and across the UK.

## 6. Strategic Theme – Reaching Net Zero

### Decarbonising Electricity Generation

- 6.1 Cumbria is well placed to support the government's ambitions for decarbonising electricity generation with considerable relevant experience, expertise, skills, and resource, as well as a wealth of practical opportunities to apply this (para 4.3). However, the current capacity limitation of the electricity grid in Cumbria, and elsewhere in the UK, is a significant constraint. Work is planned to release further capacity in Cumbria from 2027. Additional investment and prioritisation of work could bring this forward to facilitate a greater contribution to the government's ambition of decarbonised electricity generation by 2035 and enable the establishment of related infrastructure such as Electric Vehicle Charging Networks.
- 6.2 CCC recommend that the NIC recognise grid capacity limitations as a significant challenge in the NIC Assessment and take the lead in planning and coordinating the investment and delivery of activity to release additional grid capacity within Cumbria, as a priority.

- 6.3 CCC also recommend that the NIC recognise the role of nuclear energy in providing a clean, stable supply of energy and the potential for innovative ways to deliver this, including STEP and Small Nuclear Reactors.

### Heat Transition and Energy Generation

- 6.4 Many of Cumbria's small, dispersed, rural communities are not on a gas network. Often these communities are made up of older properties that are difficult to retrofit insulation and alternative, greener, heating systems. The business case for heat networks in small rural communities are difficult to make and cost is a prohibitor both for individuals and investors.
- 6.5 Targeted support and investment to explore and develop solutions is required and CCC is working closely with partners across Cumbria and the Borderlands geography to identify and deliver improvements. However, the NIC and the government need to be aware of the constraints and the risk that some small rural communities may be 'left behind' in terms of the heat and energy options that are available to them and there is a real risk of fuel poverty for many. Targeted investment where commercial solutions are unviable will be required to ensure an inclusive approach that serves to 'close the gap' in these communities, which should include clear steps to assess and address fuel poverty.

## 7. Strategic Theme – Climate Resilience and The Environment

### Waste and the Circular Economy

- 7.1 CCC is working closely with partners, including the Cumbria Waste Carbon Reduction Partnership, a subgroup of the Zero Carbon Cumbria Partnership, which brings together 80 organisations from public, private and the third sector, to provide a sector-led approach towards reducing carbon within waste across the county and support achievement of national climate change targets. Achievements of targets will require significant reductions in the production of municipal and construction waste across the county. It will also place greater emphasis on the waste hierarchy; reduce, reuse, recycle, as although recycling is an important part of the waste hierarchy, in comparison to the reduction and reuse of materials, it produces the most carbon emissions.
- 7.2 Current recycling infrastructure across Cumbria would require considerable investment and expansion to accommodate increased rates of recycling. The NIC Assessment should provide a clear indication in any change of approach and any resulting increased pressure should be planned for and supported so that it can be accommodated.
- 7.3 However, CCC suggest that focusing on waste management and recycling with a view to increase the infrastructure to accommodate this, places too much emphasis on the lower rungs of the waste hierarchy. It is right to encourage and support a more circular economy and place greater emphasis on the reduction and reuse of waste. Active measures to support this would place less pressure on existing infrastructure and reduce the requirement for additional capacity.
- 7.4 There are some excellent examples of this within Cumbria, including the social enterprise; The Rebuild Site CIC, which has been established to redistribute excess building materials from housing projects, ensuring less construction waste is generated. This demonstrates that commercial opportunity exists within the promotion of a circular economy and forms an example of a local, green growth solution, developed with support from Cumbria's Social Enterprise network. CCC recommend that the NIC Assessment recognises the role of local solutions within the promotion of a circular economy and target support to nurture and encourage via national investment in small business and Social Enterprise networks.
- 7.5 CCC recommend that the overarching ambition of the NIC Assessment in relation to waste and the circular economy should support a system wide approach that addresses the full journey of waste from production to waste management. It should seek to inform the provision of appropriate legislation and infrastructure, and it should also allow incentives, education, promotion and support appropriate investment.

### Asset Management and Resilience and Surface Water Management

- 7.6 Cumbria is an essential supplier of water to Manchester and other urban areas and the county is often officially in drought during spring/summer due to this. In addition to this, Cumbria has experienced severe surface water flooding in recent years which has had a devastating impact on people, homes, businesses, and the landscape. In December 2015, Storm Desmond resulted in 5,200 homes flooded across Cumbria and Lancashire, 44 schools were closed, 792 bridges were destroyed and 400km of major road damage. Climate change is set to increase incidence of flooding and Cumbria's infrastructure requires bolstering to reduce the risk of further impact.

- 7.7 CCC recommend that the NIC Assessment acknowledges the importance of flood mitigation and sets out a clear approach to bolstering infrastructure to reduce fluvial, coastal and surface water flooding risk and impact.
- 7.8 CCC also recommend that the NIC Assessment includes a review of the current approach to asset management and surface water management to consider ownership and responsibilities and how these are coordinated across partners. A coordinated approach to infrastructure management and resilience-building should seek to align planning, funding, and development timelines for project delivery across the full range of partners involved in this process. This should include consideration of universal access to robust digital connectivity, which is essential to support this infrastructure and allow real time coordination of data and assets.
- 7.9 Currently, as it stands, priorities and timelines often don't align, and this will have implications for the effectiveness of future collaboration and efficiency of delivery.
- 7.10 In addition to improved coordination of partners, the availability of appropriate, accurate and consistently collected data would aid the ability to predict and manage infrastructure issues. This could form part of an ongoing maintenance process as well as alerting authorities to potential emergency events including surface water flooding, increasing the ability to react and respond early.
- 7.11 CCC recommend that the NIC Assessment considers currently available asset and surface water management data sources with a view to exploring mechanisms to improve the availability of appropriate, accurate and consistently collected data.
- 7.12 Cumbria has an abundance of natural capital and CCC are exploring, with partners, opportunities to utilise this in supporting asset management and reducing surface water flooding, whilst encouraging green economic growth, local skills development, biodiversity net gain and environmental enhancement.
- 7.13 CCC recommend that the role of natural capital as natural assets and important national infrastructure should have greater emphasis in the NIC Assessment to recognise the potential it offers and encourage innovation and investment.

## **8. Strategic Theme – Levelling Up**

### **Transport and Physical Connectivity**

- 8.1 Cumbria is an area of genuine opportunity for development and growth. Its location, size, access to resources and maturity of the visitor economy, manufacturing and energy sectors in the county mean there is the capacity and capability to facilitate, physically accommodate and lead on a range of large-scale projects that will contribute towards local, regional and UK wide economic growth.
- 8.2 However, the considerable size, sparsity of population and general rural nature of Cumbria means that there is an inherent need for people to travel further to access jobs and services and it can be difficult to deliver effective public transport solutions, given the low density of population.
- 8.3 Limitations associated with existing connectivity in the county mean that Cumbria's dispersed communities rely upon networks that lack resilience and vary significantly in quality and safety. The result is communities and employment locations that can be isolated, inaccessible, and potentially very vulnerable to disruption.
- 8.4 Travel is important: it is how we access services and opportunities but also how we interact and maintain social bonds. In rural areas like Cumbria with dispersed communities and a polycentric economy, reliable and convenient longer-distance travel is vital for social and economic outcomes.
- 8.5 Cumbrian partners are working hard to ensure we realise the full economic potential of the county and deliver against environmental, economic, and social responsibilities, now and in the future. However, this will require national level acknowledgment that the significant productivity improvement potential of the county cannot be unlocked using traditional models aimed at congested urban centres.
- 8.6 Cumbria has huge potential and great ambitions for delivering clean, inclusive growth. Provision of an effective, safe, resilient transport network, which supports genuine modal choice and includes an Electric Vehicle Charging Network, will be essential in unlocking this potential and delivering against social, economic, and environmental objectives at a local, regional, and national level.
- 8.7 CCC recommend that the NIC Assessment acknowledges the difficulties of establishing transport infrastructure across a large rural geography with dispersed, often small communities and advocates the need for a clear and consistent approach that recognises the value of investment in rural geographies.

- 8.8 It is also essential that the NIC Assessment does not reduce focus on strategic connectivity. The importance of this is now apparent within the Union Connectivity Review's finding and it is vital the Assessment presents the opportunity created by the UKNET and the role of enhanced infrastructure within it, including routes like the West Coast Mainline, A66, A69 and M6.
- 8.9 In this respect it is vital that the Assessment ensures opportunities created by HS2 are now maximised, including with the delivery of the new HS2 / West Coast Mainline link near Golborne; this is vital in achieving long-distance connectivity and cross border connectivity to Scotland. The importance of this is strongly highlighted within the January 2022 update to the HS2 business case; this explicitly highlights that without the Golborne Link; the strategic connectivity to Scotland and Cumbria HS2 is to provide would be curtailed. This outcome would be totally at odds with the original intentions of the scheme and that of the Union Connectivity Review.

## 9. Digital Transformation and Virtual Connectivity

- 9.1 The NIC Baseline Report indicates that digital and mobile connectivity across the UK is good.
- 9.2 As of the 17th of December 2021, 98.8 percent of properties across the UK can access fixed line broadband speeds of at least 10Mbps download with 96.9 percent able to access speeds of 30Mbps or more. However, in Cumbria access is far poorer, with fewer than 97 percent of properties able to access fixed line broadband speeds of at least 10Mbps download and only 94.3 percent able to access speeds of 30Mbps or more. Wireless connectivity is also poorer than across the wider UK with 99.3 percent of UK properties able to receive services from at least one mobile provider indoors compared to 97.4 percent of properties in Cumbria (thinkbroadband.com).
- 9.3 In addition, 4G coverage, as a percentage of indoor coverage for premises from four providers is 81.4 percent for the UK, whereas it is only 65 percent in Cumbria (Connected Nations and infrastructure reports - Ofcom).
- 9.4 There are several reasons for this, but the key barrier is the rural nature of the county and the small, disperse communities within it, which make the business case for investment in digital infrastructure for these areas difficult to secure. These small permanent populations do not reflect the 47 million visitors that Cumbria welcomes each year (Cumbria Tourism, Tourism in Cumbria 2019: Key Facts & Trends, 2020).
- 9.5 Cumbrian businesses, communities and visitors need high quality connectivity, mobile and fixed line, across Cumbria to support a range of activities, now and in the future, including:
- New patterns of home working
  - Inward migration and retention of working age population
  - Increased reach of small businesses
  - Access to education, training, health services and social support
  - Meeting the expectations of tourists and visitors
  - Keeping remote communities, businesses and visitors connected and informed in times of emergency e.g., storms
  - Safeguarding, and linking to the emergency services, visitors, agricultural workers and other service providers.
  - Carbon reduction
- 9.6 Establishing resilient, future proof, county wide digital infrastructure is a key challenge for digital transformation in Cumbria. It will require subsidy to secure the necessary investment. Without this, basic digital enablement will not be possible across the county and efforts toward digital transformation will create areas of digital exclusion working at odds with the government's levelling up agenda: expanding the gap rather than closing it.

- 9.7 CCC anticipate that the government's Project Gigabit Programme and Shared Rural Network Programme (SRN) will provide some improvements in coverage for Cumbria, and CCC, as part of the Borderlands Partnership, have formally requested that Cumbria and the Borderlands, is prioritised in the SRN programme. However, these programmes are unlikely to resolve the whole issue and it is essential not to lose sight of the current gaps in digital inclusion, which prevent communities utilising opportunities for digital connectivity to develop solutions to a range of economic, social and environmental challenges. These gaps will also not be addressed by the existing Ofcom Broadband Universal Service Obligation due to the high cost of delivering 4G or fixed line broadband to current not-spot locations and communities.
- 9.8 The NIC Assessment must include a long-term policy commitment to ensuring fully universal and robust digital connectivity, both fixed line and wireless, for all communities to unlock opportunities and support genuine levelling up.

## 10. Funding Policy and Business Case Criteria

### The Bidding Process

- 10.1 Infrastructure funding and the associated guidance is currently dispersed. Staying abreast of the schemes, their eligibility criteria and the related processes can be resource intensive for local authorities and partners. In addition, often the window for submission preparation is short (frequently shortened) resulting in tight deadlines without certainty. Furthermore, awards are often made for the short term (one to three years) with a further application required for continued funding, which is an additional demand on applicants' resources and an unnecessary element of uncertainty.
- 10.2 CCC suggest that the dispersed, somewhat uncoordinated, competitive framework for infrastructure funding is an inefficient use of local resources and the NIC Assessment should consider alternative approaches to managing and distributing funding. This should reflect a planned, aligned approach to national infrastructure investment, potentially led by the National Infrastructure Commission, supported by improved dialogue between local and central government and their representative bodies with responsibility, control, and resources reallocated, closer to the localities in order to ensure informed and appropriate action to address Cumbria's rural infrastructure challenges.

### Bid and Business Case Criteria

- 10.3 Bid and business case criteria are heavily weighted to favour urban settings, often using population and transport movement figures as the basis for benefit calculations. Value for Public Money (VFPM) measures for infrastructure project investment typically focus on direct economic benefits per pound invested. This approach ignores potential indirect and/or social benefits and, in rural areas, has historically resulted in the same communities being left behind. Greater flexibility with a stronger emphasis on needs, rather than just economic factors, within bid and business case guidance would improve this and it would be further supported by an increase in early and proactive dialogue with evaluators.
- 10.4 CCC recommend that the NIC Assessment reviews the investment models and approaches to delivery for future infrastructure programmes with a view to consider direct, indirect and opportunity outcomes of investment to ensure an inclusive approach for all communities.

## 11. Conclusion and Recommendations

- 11.1 Cumbria County Council positively support the Call for Evidence for the second National Infrastructure Commission Baseline Report and make the following comments, suggestions, and recommendations.
1. Given the significant opportunity within Cumbria and the solid foundation of expertise, skills and resource, the county is capable of supporting, and is ambitious to accommodate, growth and improvement. This can only be achieved through a planned aligned approach to national infrastructure planning, supported by improved dialogue between local and central government and their representative bodies with responsibility, control, and resources reallocated, closer to the localities in order to ensure informed and appropriate action to address Cumbria's rural infrastructure challenges.

2. CCC do not consider the nine specified challenges adequately reflect those that exist in rural geographies like Cumbria. The legacy of UK national infrastructure policy has resulted in a lack of effective physical and digital connectivity across Cumbria's polycentric economic structure, which is limiting economic growth, productivity improvement, social inclusion, wellbeing and environmental opportunity. This policy approach is unsustainable, and evidence of negative impacts can be seen in both urban and rural locations, with urban congestion identified as one in the NIC challenges but no similar recognition of the rural challenges. CCC recommends a more balanced approach in the NIC Assessment that acknowledges urban congestion is not the only infrastructure challenge to levelling up and that improving infrastructure in rural locations, like Cumbria, is also crucial to delivering the government's ambitions, locally, regionally, and nationally.
3. Removing barriers and unlocking potential is essential to achieving the government's national ambition for clean growth and levelling up. CCC believe that this can only be achieved by improving the dialogue with government and their representative bodies, and shifting responsibility, control, and resources closer to the localities.
4. A planned, aligned approach to national infrastructure investment, potentially led by the National Infrastructure Commission, is essential in providing the clarity and certainty that will support effective early engagement, efficient decision making and at pace delivery of the government's ambitions for clean growth and levelling up in Cumbria and across the UK to ensure the necessary infrastructure is in place to support local planning, policy and private investment.
5. CCC recommend that the NIC recognise the grid capacity limitations as a significant challenge in the NIC Assessment and take the lead in planning and coordinating the investment and delivery of activity to release additional grid capacity within Cumbria, as a priority.
6. CCC also recommend that the NIC recognise the role of nuclear energy in providing a clean, stable supply of energy and the potential for innovative ways to deliver this, including STEP and Small Nuclear Reactors.
7. The NIC and the government need to be aware of constraints and the risk that some small rural communities may be 'left behind' in terms of the digital, heat and energy options that are available to them. Targeted investment where commercial solutions are unviable will be required to ensure an inclusive approach that serves to 'close the gap' in these communities, which should include clear steps to assess and address fuel poverty.
8. Current recycling infrastructure across Cumbria would require considerable investment and expansion to accommodate increased rates of recycling. The NIC Assessment should provide a clear indication in any change of approach and any resulting increased pressure should be planned for and supported so that it can be accommodated.
9. It is right to encourage and support a more circular economy to place greater emphasis on the reduction and reuse of waste. Active measures to support this would place less pressure on existing infrastructure and reduce the requirement for additional capacity. CCC recommend that the NIC Assessment recognises the role of local solutions within the promotion of a circular economy and target support to nurture and encourage solutions via national investment in small business and social enterprise networks.
10. CCC recommend that the overarching ambition of the NIC Assessment in relation to waste and the circular economy should support a systems approach that addresses the full journey of waste from production to waste management. It should seek to inform the provision of appropriate legislation and infrastructure, and it should also allow incentives, education, promotion and support appropriate investment.
11. CCC recommend the NIC Assessment includes a review of the current approach to asset management and surface water management to consider ownership and responsibilities and how these are coordinated across partners. A coordinated approach to infrastructure management and resilience-building should seek to align planning, funding, and development timelines for project delivery across the full range of partners involved in this process.

12. CCC recommend that the role of natural capital as natural assets and important national infrastructure should have greater emphasis in the NIC Assessment to recognise the potential it offers and encourage innovation and investment. CCC also recommended that this is underpinned by the following important principles:
  - a. Firstly, investment in natural and living resources should always aim to enhance the underlying environmental assets.
  - b. Secondly, although investment should seek to reap benefits of 'at scale' development, it must reflect local needs, conditions, and interests.
  - c. Finally, financial return on investments must secure benefits for local communities.
13. CCC recommend that the NIC Assessment acknowledges the difficulties of establishing transport infrastructure across a large rural geography with dispersed, often small communities and advocates the need for a clear and consistent approach that recognises the value of investment in rural areas.
14. The NIC Assessment must include a long-term policy commitment to ensuring fully universal and robust digital connectivity, both fixed line and wireless, for all communities in order to unlock opportunities and support genuine levelling up.
15. CCC suggest that the dispersed, somewhat uncoordinated, competitive framework for infrastructure funding is an inefficient use of local resources, as well as reducing the potential for partnering with industry to tackle challenges in innovative ways, and the NIC Assessment should consider alternative approaches to managing and distributing funding.
16. CCC recommend that the NIC Assessment reviews the investment models and approaches to delivery for future infrastructure programmes with a view to consider direct, indirect and opportunity outcomes of investment to ensure an inclusive approach for all communities.
17. CCC recommend that the NIC Assessment retains a clear focus on strategic transport consideration including the potential creation of the UKNET. It also seeks to amplify the opportunity created by HS2 and the importance of the Golborne Link in promoting strategic rail connectivity between the UK and Scotland.