

COPELAND CORE STRATEGY & MANGEMENT POLICIES EXAMINATION

WRITTEN REPRESENTATION ON BEHALF OF HAMPTON INVESTMENT PROPERTIES LTD (HARWOOD CAPITAL) UNDER ISSUE 4

SUBMITTED BY MJN ASSOCIATES

1. Introduction

This representation seeks to register a clear objection to matters contained in the Core Strategy relating to the proposed review of settlement boundaries on the north side of the Local Centre of Cleator. Written representations in respect of this matter were submitted at the consultation stage and it has been established with the Programme Officer that a written submission on the matters of concern will be accepted. This is a written representation only.

2. Relevant matters

This representation is made under matter 4 - Strategic Policies and specifically paragraph 3.5.15 of the Core Strategy where it is proposed to review the development boundary of Cleator (north side).

3. Issues

Hampton Investment Properties Ltd (a subsidiary of Harwood Capital) own a significant holding at Cleator Mills, running to over 5ha. This is shown on the attached plan. Also shown is the existing settlement boundary as defined in the Adopted Local Plan (2001-2016). The majority of the land lies within the existing settlement boundary.

The land constitutes both the brownfield and greenfield land. The brownfield land includes a Victorian mill and 1960's north lights building together with car park/laydown areas and smaller buildings along the river Ehen frontage. The greenfield land, most of which constitutes an employment allocation, was purchased at commercial values from the former RDA (North West Development Agency) some years ago.

The brownfield site was formerly the production facility for Kangol Headwear prior to relocation to China. To the north of the land lie other derelict commercial structures which are not part of the Harwood land holding.

The owners have sought to develop this land over the last 5 years for a mix of commercial housing development. Currently the former factory brownfield land is marked as a positive SHLAA site as part of the evidence base for the Core Strategy.

It has been identified that a new access to this site is required for any redevelopment and a new point of access has been agreed with the Highways Authority. Parts of the site are subject to potential Flood risk and an FRA has been prepared and discussed in detail with the Environment Agency and there is an agreement in principle that the brownfield site is developable although further modelling is required. That FRA, carried out under the former PPS25 procedures, also passed an Exception and Sequential test with the LPA although in relation to the Sequential element it was noted that the SHLAA process was not complete at that stage even though documents included the current other SHLAA sites in Cleator.

At the same time a full development appraisal for developing out the site has been undertaken and discussed with Copeland. This clearly indicates that for a mixed use development a complete redevelopment of the site for both housing and employment uses was the only means by which the brownfield land could be developed, possibly including the other land ownership here (a willing partner).

A considerable amount of time and expense has been incurred to date by the owner to try and bring this site forward for development on a comprehensive basis.

It has been noted that the employment site here is not a priority for investment in the borough and the evidence base for the Strategy includes a the DTZ/GVA review of employment land. The Cleator site does not score highly in this regard and there is a case for suggesting a smaller employment site in this area based upon a clear lack of demand over the current Local Plan period and the last one.

4. Development in Cleator

The definition of Cleator as a Local Centre is not disputed although it is worth commenting that the boundaries of Cleator/Cleator Moor are somewhat blurred and are not discernible on the ground.

As a Local Centre Cleator, together with the other Local Centres, are expected to provide around 30% of development in the Borough. This is not disputed. From discussions with LPA regarding development at Cleator Mills a housing figure of 60-80 units has been suggested. On the issue of density and given the Exception and Sequential Test that the site here could be appropriately used for executive housing given the environmental qualities of the riverside setting (and providing a housing choice in short supply in the Borough) a development area in excess of the solely brownfield land may be required whilst still leaving an employment potential.

Under the current SHLAA apart from the brownfield Mill site the only other land for potential development is to the west off Floss Meadows, requiring the development of greenfield land with no discernible employment use. It is suggested that this site would offer little in the way of a comprehensive approach to development as suggested by the NPPF and would be an encroachment of the Cleator/Cleator Moor boundaries into open countryside.

On the basis that the growth targets for the Local Centre will be as quoted (60-80) provision for that can be made within the context of the existing settlement boundaries for that allocation without requiring greenfield land creep. It also offers the economics of development to deliver the required new infrastructure (new access) and the potential for redeveloping the remaining land for employment use in the plan period subject to demand. This is the only site in Cleator which can deliver a comprehensive approach to redevelopment.

On this basis the intent to review the development limits is objected to as the existing boundaries and allocations and SHLAA deliberations do not warrant such review.

Unless the LPA intend to increase housing allocations in the Centre way beyond 80 units there is no justification for settlement boundary review, and indeed the Core Strategy as written is unsound in this respect because it does not provide any reasoning for this to be necessary.

Indeed it has also ignored the evidence provided by the land owner here in relation to development potential, costs and opportunity for a comprehensive approach to redevelopment and reuse of brownfield land.

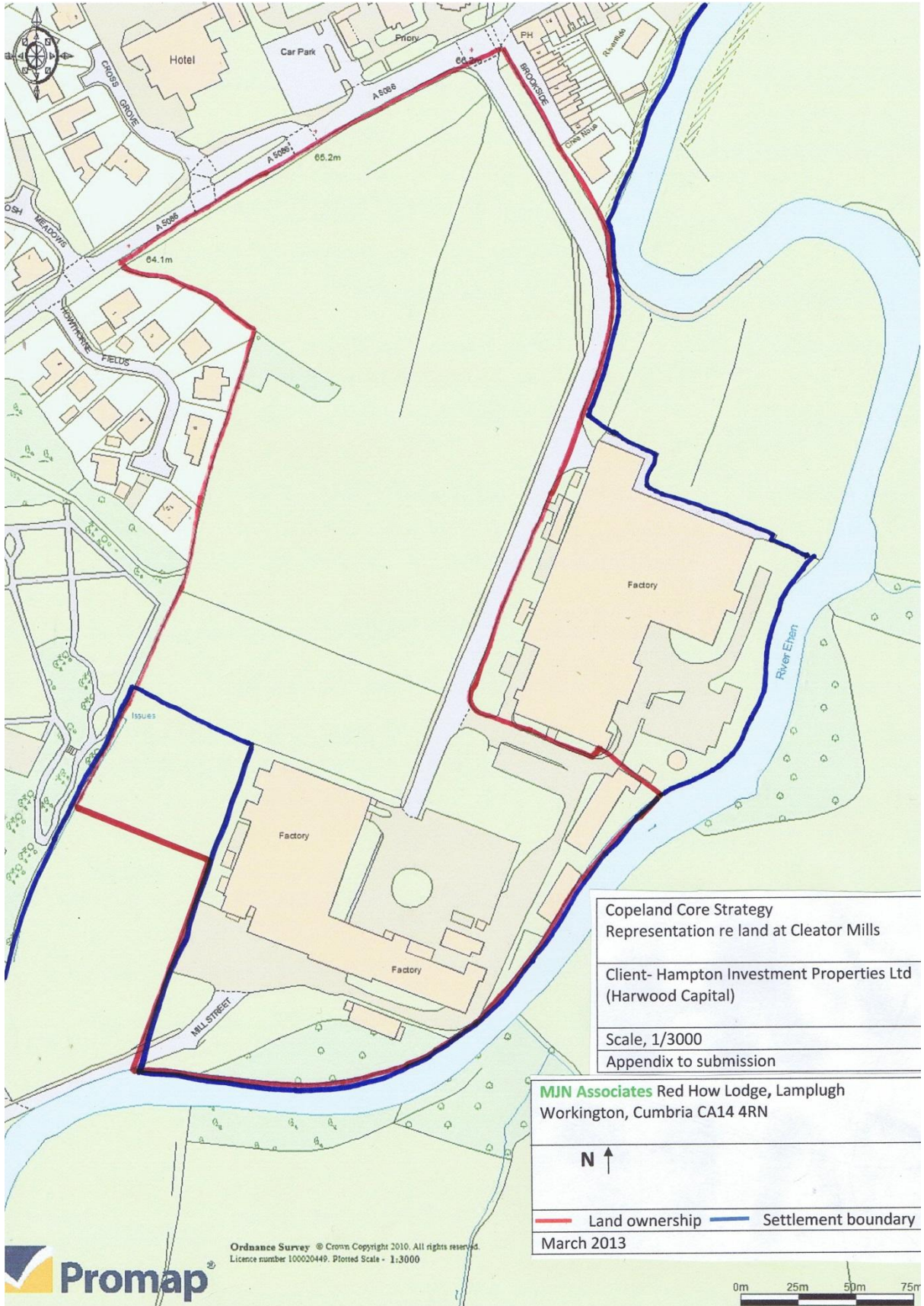
If there is insufficient incentive to develop here then the brownfield land will never be redeveloped leaving a major eyesore in this part of the Borough to the detriment of the local environment, economy and community. Maintaining the status quo in terms of boundary will avoid these negative impacts.

MJN Associates

13 March 2013

Appendices

Site Plan



Copeland Core Strategy
 Representation re land at Cleator Mills

Client- Hampton Investment Properties Ltd
 (Harwood Capital)

Scale, 1/3000
 Appendix to submission

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 Workington, Cumbria CA14 4RN



— Land ownership — Settlement boundary

March 2013

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