

**COPELAND LOCAL DEVELOPMENT FRAMEWORK**

**EXAMINATION OF CORE STRATEGY AND DEVELOPMENT  
MANAGEMENT POLICIES**

**BOROUGH COUNCIL  
STATEMENTS:  
MATTER 9**

**LOCALITIES IN COPELAND**

**March 2013**





**9.1. Do the Core Strategy policies provide sufficient direction for each locality the Council identifies in the Borough?**

- 9.1.1 The Core Strategy policies are specific to settlements or classes of settlement (along with defined locations outwith settlements, notably Westlakes and, as far as applicable, Sellafield). They are not specific to localities.
- 9.1.2 Section 8 describes how the strategy will apply to each locality, cross-referenced as far as feasible with the Locality Plans (which are a form of community plan produced by Locality partnerships, with a service-based focus which sits alongside Parish Plans). This section is not, in fact, integral to the Core Strategy and could easily have been produced as a separate document. It is there as a response to comments from the various elements of the locality planning function within the Borough – the Locality Partnerships (ward Councillors, Parish Councillors and other local representatives), and the Council’s Locality managers – and as an expression of the value the Borough Council attaches to this kind of working.
- 9.1.3 Two Parish Councils, Seascale and Millom Without, have made representations referring to local factors. In the case of Seascale the references are to matters of detail, and have been responded to positively where we can do so in a way relevant to the purposes of this plan. In the case of Millom Without, the Borough Council considers that the points raised, if included, would skew the plan by including a level of detail which could not be sustained across the whole plan area without making it much longer and too detailed. Discussions with Millom Without Parish Council indicate that they see these concerns as being suitable for taking forward in a Neighbourhood Plan, which the Borough Council is happy to support. Thus neither set of objections undermines the validity of the plan.
- 9.1.4 In conclusion, the Borough Council submits that the Core Strategy does provide adequate direction for each locality, even though its policies have a (legitimately) different focus, and that the Locality Section successfully illustrates how the Core Strategy will operate across the different areas of the Borough.

**9.2. Are indicative targets for housing provision and proposals for employment the most appropriate for each area?**

- 9.2.1 The indicative targets are settlement rather than area focused, though each locality either contains or is close to at least one of the towns (which equate to 'key service centres' in the terminology commonly adopted).
- 9.2.2 The figure for local service centres is an overall figure with no assumptions about individual settlements, where development will be determined by land availability and market attractiveness. It should also be noted that this figure is a quota rather than a target. It allows for an average of 84 dwellings per settlement over the plan period, but the supply as indicated in the SHLAA (Doc. 7.3) is 'lumpy', with sites identified in some villages but not others. It can therefore be assumed that site allocations will lead to some of these settlements having significantly more than that average, whilst others will attract 'windfall' development only.
- 9.2.3 Employment land supply is at present governed by sites already identified (as discussed under Issues 5.3 and 5.6). There is a surplus of land under current levels of 'take up', and enough land to meet the demand that can be anticipated under the nuclear-related growth scenario. There is also a reasonable distribution of sites across the Borough and in every locality, with land available in Egremont, Cleator Moor and Millom, plus small sites at Seascale, Distington, Frizington and the Beckermest Industrial Estate. This is the important point to note in this respect; the distribution is largely based on land already identified, and the distribution of that land fits well with the overall distribution of development – that is, concentrating on Whitehaven and the smaller towns – proposed by the spatial strategy. There has been, therefore, no need to generate a supply of sites to fulfil settlement- or locality-based targets, unlike the housing supply which has to be more deliberately managed.
- 9.2.4 The current supply is in and emerging demand likely to fall into, four categories:
- I. land in or close to Whitehaven, which, along with Westlakes, represents the bulk of supply and thus accords with the spatial strategy;
  - II. Westlakes Science and Technology Park, which is intended to attract a particular type and quality of development, and thus complements the general supply in and close to Whitehaven;
  - III. smaller sites in the three smaller towns, again broadly consistent with the spatial strategy and part of the general supply;
  - IV. rural 'windfall', which is not accounted for in the supply figure and not likely to make a major impact on the statistics, although it is allowed for in Policy ST2 as elucidated in Figure 3.2 and may well be highly significant in the small communities where it would happen.

- 9.2.5 To this can be added land within the Sellafield perimeter, adjacent within the Moorside site, and nearby at Beckermeth Industrial Estate. Other than Beckermeth (which is attracting companies related to the nuclear sector), this land is not counted within the supply, because it is not generally available. But it will generate jobs and have a multiplier effect causing demand for land elsewhere across West Cumbria including Copeland. It should be noted that Sellafield, by the largest concentration of employment in the Borough, is almost centrally located, easily accessible from the most populous areas and only twenty minutes from the most remote town, Millom, by train.
- 9.2.6 In summary, the levels of provision identified on a settlement basis, derived from Policy ST2 and paragraph 3.5.7, along with the more specific information elsewhere in the Core Strategy, provide for appropriate distribution of development across the Borough. Although there are no area targets as such, each locality is appropriately provided for.

**9.3. Is it clear how the Council's approach to dealing with changes in the nuclear sector will impact on each locality?**

- 9.3.1 It should first be said that there is a high level of awareness and understanding across the Borough of the role of the nuclear industry, its prospects for development and the likely consequences of development.
- 9.3.2 The economic and social impacts of Copeland's nuclear facilities are sub-region-wide. The same will be true of Moorside power station, whose potential impacts have so far only been very loosely defined. This is a strategic issue first and foremost, suitable for a Borough-wide approach linked to sub-regional strategy.
- 9.3.3 Having said that, we recognise that there are more localised impacts such as that on the landscape and the traffic congestion caused by commuting. The latter is being addressed by projects currently under development, including the movement of back office staff into Whitehaven and the development with the County Council of a strategy to increase 'park and ride' commuting (referred to in Policy ER1F), accompanying an upgrading of public transport access to Sellafield-related employment opportunities.
- 9.3.4 Sellafield occupies a prominent place visible from some distance in Mid- and West Copeland. But by virtue of its size and self-containedness, the impact of development within the site on its surroundings is limited. Policy DM5 aims to keep it that way by taking as strong a line as possible on developments that might have implications 'outside the fence'. It bolsters this by requiring community consultation (DM5G and H). There has been very little comment in representations on Policy ER1 and DM5, and almost all of that has been from regulators and statutory bodies..
- 9.3.5 The Low Level Waste Repository has a more specific position in the environment of mid Copeland and, although the facility is overseen by the County Council as mineral planning authority, its impact has been recognised by the agreement of the Nuclear Decommissioning Authority to financial support of the Copeland Community Benefit Fund. This is by its nature an inward looking facility, is a long-established 'given' in the locality and has a stable future much the same as its recent past. It does not, therefore, create any need as far as the Borough Council is concerned, for locality-based policy response, and the local community and its representatives have not suggested any.
- 9.3.6 It is also striking that the Locality Plans, as summarised in each relevant locality sub-section, make no direct reference to the nuclear industry (although references to traffic issues are influenced by conditions resulting from nuclear-related travel).
- 9.3.7 The Borough Council's conclusion is that the plan is as clear as it needs to be on this issue, primarily because it is difficult to identify locality-specific issues arising from the approach to the nuclear industry.

#### **9.4. Is there sufficient clarity regarding retail provision in the key centres?**

- 9.4.1 Policy ER9 'The Key Service Centres...' says that appropriate provision will be encouraged for retail and small scale tourism developments, backed up by physical improvements and, potentially, redrawing of towns centre boundaries.
- 9.4.2 This policy, as with all the development-oriented policies in the Core Strategy, flows from the spatial strategy and settlement hierarchy (Policy ST2 supported by Figure 3.2). Guidance for all levels of provision is set out in Figure 3.2 which refers to the Key Service Centre role as follows - "Range of comparison and convenience shopping. Emphasis will be on retention of existing provision. Mixed use development will be supported in principle".
- 9.4.2 Policy DM7 additionally gives an approach to considering non-retail development in town centres.
- 9.4.3 The Borough Council considers that to do more than this would be to risk being over-prescriptive and second-guessing the market. Given the size of the three towns, and the foreseeable level of market interest, we do not see any likelihood of inappropriate development slipping through. Indeed, short of a superstore big enough to threaten the viability of independent shops, which is not likely, it is difficult to see what kind of retail development would be unwelcome. (Note that the Retail Study (Doc. 6.5, para. 13.26 page 144) supports additional food shopping in Millom and elsewhere, to give a better borough-wide distribution of shops.)
- 9.4.4 The Borough Council therefore considers the plan to provide enough clarity, in an approach which is intended to be open and permissive.

#### **9.5. Are there any outstanding policy areas in the individual localities which the Plan does not address?**

- 9.5.1 None have been identified, and representations have not put forward any issues that the plan could properly address.
- 9.5.2 We are supported in this conclusion by the summaries of locality issues taken from each of the five Locality Plans, on pages 83, 96, 104, 113, 119 and 126. They do not identify any policy areas relevant to the Core Strategy that have not been covered.