





Settlement hierarchy and Development strategy Paper

Copeland Borough Council September 2020 Local Plan Preferred Options Draft - Settlement hierarchy Topic Paper

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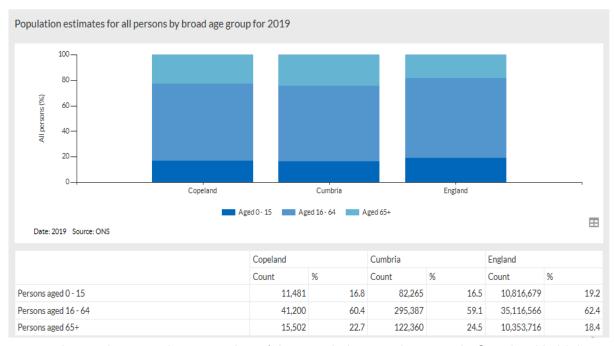
1. Introduction

- 1.1.1 Copeland Borough Council is in the process of producing a new Local Plan to cover the period 2017 to 2035. This will replace the current Core Strategy and Development Management Policies document 2013-2028. The Local Plan will include strategic and development management policies and will identify specific sites for development in the short term and broad locations for future growth.
- 1.1.2 In accordance with the National Planning Policy Framework (NPPF), Local Plans must support sustainable development and meet identified housing needs as a minimum. Producing a development strategy, based upon a settlement hierarchy, is a useful way of identifying the most sustainable parts of the Borough for development.
- 1.1.3 The Council has reviewed the current development strategy and settlement hierarchy in the Core Strategy in light of changes to the national planning system, the publication of new Council Strategies such as the Copeland Vision and Prospectus 2020 and recent evidence relating to the Borough's settlements.
- 1.1.4 This document summarises that review and concludes that a new hierarchy and strategy is required. It discusses the Council's preferred hierarchy and strategy and also considers a number of alternative options.
- 1.1.5 The Council's preferred approach continues to direct the greatest proportion of development to the Borough's four towns (Whitehaven, Cleator Moor, Egremont and Millom). These are the areas that have the greatest level of amenities, services, infrastructure and public transport provision. The preferred approach also recognises that there are additional rural settlements to those listed in the Core Strategy that provide a range of services and/or are well-connected to other supporting settlements by safe pedestrian routes and/or public transport.
- 1.1.6 The preferred hierarchy includes a greater number of tiers and settlements than the current hierarchy in the Core Strategy in order to support rural services and maintain rural communities.
- 1.1.7 It has been developed in accordance with national planning policy by minimising the need to travel and avoiding isolated developments, thereby reducing the impact the Local Plan will have on climate change. It also accords with the NPPF by supporting the rural economy, maintaining sustainable communities and providing a framework for the Council to identify a range of deliverable sites for developers and local residents.

2. Context - Copeland Borough

- 2.1.1 When developing the settlement hierarchy and development strategy it is important to consider how the Borough currently functions in order to deliver sustainable development, and ensure that residents have access to local services, local businesses are supported and existing sustainable communities are sustained.
- 2.1.2 Copeland is a predominately rural Borough, two thirds of which is covered by the Lake District National Park. The new Local Plan, and this document, relates to the parts of the Borough outside the National Park.
- 2.1.3 Copeland contains four towns: Whitehaven, Cleator Moor and Egremont are in the north of the Borough, with Whitehaven being close to its boundary with the neighbouring Borough of Allerdale. Millom is located in the south of the Borough, close to its boundary with South Lakeland.
- 2.1.4 The Borough also contains a large number of rural settlements ranging from larger villages containing a number of rural services to smaller, more isolated hamlets.
- 2.1.5 In 2019, Copeland had a population of 68,183 people; 25,088 lived within Whitehaven, 6,752 in Cleator Moor, 7,768 in Egremont and 7,223 in Millom¹. The remainder live in the Borough's rural areas.
- 2.1.6 The population is broken down as can be seen in Table 1:

Table 1: Population Estimates by age group 2019



- 2.1.7 As can be seen the proportion of the population aged over 65 in Copeland is higher than the national average. The Borough's population is also ageing faster than the national rate.
- 2.1.8 Copeland is a self-contained housing market, with 78% of household moves (excluding long-distance moves) happening within its borders, and with job-

¹ https://www.cumbriaobservatory.org.uk/population/report/view/9ce31944969f4bb4982968d126efb417/KSCWhi

- containment and commuting within its borders confirming this. 48.3% of Copeland employees travel less than 10km to work.²
- 2.1.9 Table 2 below shows commuting patterns to and from Copeland and shows that in terms of commuting the strongest links are with Allerdale to the north and Barrow-in-Furness to the south.

Table 2: Commuting Patterns to and from Copeland

	Work in Copeland, live in	Live in Copeland, work in	Net commute to Copeland
Copeland	22,371	22,371	0
Allerdale	5,468	3,473	1,995
Carlisle	365	544	-179
South Lakeland	347	409	-62
Barrow-in-Furness	705	526	179
Eden	172	389	-217
Rest North West	405	195	210
Rest UK	560	521	39
Mainly work at or from home	2,850	-	-
No fixed place	1,683	-	-
Offshore installation	68	-	-
Outside UK	44	-	-

Source: 2011 Census

- 2.1.10 The A595 is the principal route through the Borough which runs from north to south. The rail line, which runs along the Copeland coast, is also an important route connecting settlements within Copeland to neighbouring Districts and onwards to the West Coast Mainline.
- 2.1.11 The 2011 Census showed that 23.4% of the Borough's residents did not own their own vehicle (car or van). It is important that those relying upon public transport or other sustainable forms of transport are considered when developing the settlement hierarchy.

Copeland Borough Council

² Cumbria Observatory

3. The Current Core Strategy

- 3.1.1 The current approach in the Core Strategy directs the majority of development across the current plan period to the Borough's four towns, rather than spreading growth more thinly across the Borough.
- 3.1.2 At the time, this approach was felt to "best exploit opportunities for regeneration, make the best use of existing development and infrastructure in settlements and gives the opportunities for the enhancement of the quantity, quality and accessibility of new services and facilities".
- 3.1.3 It was also recognised that directing development to areas with a range of existing services and/or public transport provision would reduce the need to travel and help respond to and mitigate the effects of climate change.
- 3.1.4 The settlement hierarchy from the Core Strategy and the type and scale of non-nuclear development anticipated within each tier is shown in Table 3.

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Table 3: Current Core Strategy Development Hierarchy and Strategy

	1	Type and Scale of Develo	pment
Classification	Retail and Services	Employment	Housing
Principal Town: Whitehaven	Convenience goods, large supermarkets and comparison goods provision. Supporting a range of provision to meet the needs of Copeland and support Whitehaven's role as a tourist centre.	A range of employment types. Provide opportunities both for expansion and start-up, and encourage clusters of new business types. Support opportunities to improve and expand on the existing tourism offer in this area.	Allocations in the form of estate-scale development where appropriate and continuing initiatives for large scale housing renewal. This could involve extensions to the town's settlement boundary. Infill and windfall housing. Larger sites will require a proportion of affordable housing.
Key Service Centre: Cleator Moor; Egremont and Millom	Range of comparison and convenience shopping. Emphasis will be on retention of existing provision. Mixed-use development will be supported in principle.	Small and medium enterprises will be encouraged to set up and grow. Provide opportunities for expansion and start up, with focus on linkages to nuclear sector and tourism.	Moderate allocations in the form of extensions to the towns to meet general needs. Infill and windfall housing. Larger sites will require a proportion of affordable housing.

	Type and Scale of Development			
Classification	Retail and Services	Employment	Housing	
Local Centre: Arlecdon/Rowrah; Beckermet; Bigrigg; Cleator; Distington; Frizington; Haverigg; Kirkland/ Ennerdale Bridge; Lowca/Parton; Moor Row; Moresby Parks; Seascale; St Bees; Thornhill	Convenience shopping to meet day-to-day needs, which could include farm shops or similar. Emphasis will be on retention of existing provision.	Emphasis will be on retention. Expansion potential may include tourism in some places, generally limited by environmental constraints. New provision most likely to be provided through conversion/re-use of existing buildings or completion of sites already allocated.	Within the defined physical limits of development as appropriate. Possible small extension sites on the edges of settlements. Housing to meet general and local needs. Affordable housing and windfall sites.	
Outside settlement boundaries: All other parts of the Borough, including small villages and settlements and open countryside	Proposals involving small retail and service businesses appropriate to villages, and strengthening local community viability, will be considered sympathetically.	Employment predominantly linked to agriculture or forestry. Farm diversification schemes and tourism uses may be appropriate.	Development providing homes to meet the defined needs of the population, with need for rural/non-settlement location to be proven in each case (see 3.3.16-19).	

3.2 Delivery against the Core Strategy

- 3.2.1 In terms of housing, the requirement for the Borough identified in the Core Strategy over the first 5 years was 230 dwellings per annum. This increased to 300 dwellings per annum from year 6 onwards.
- 3.2.2 Table 4 below sets out how this requirement is divided up by each tier in the Core Strategy hierarchy and highlights how many homes have been delivered against these targets.
- 3.2.3 It highlights that, in general, a greater percentage of housing was delivered over the three year period in Whitehaven than anticipated (50% of all completions were in Whitehaven) and a greater number of homes were completed in the Local Centres than anticipated (21% were completed compared to a target of 20%). This suggests that there is a greater demand for housing in Whitehaven and the smaller villages than anticipated when producing the Core Strategy and that an alternative hierarchy and strategy should be considered going forward.

Table 4: Housing Delivery

Settlement Tier	Proportion of development (%)	Annual Housing requirement based on 230dpa ³	Annual Housing requirement based on 300dpa ⁴	Completions 2017/18	Completions 2018/19	Completions 2019/20	Average annual delivery over 3 year period ⁵ .	Proportion of development delivered over 3 year period (%) ⁶
Whitehaven	At least 45%	105	135	83	52	73	69	50%
Key Service Centres	At least 30% (10% each)	69	90	29	32	34	32	23%
Local Centres	No more than 20%	45	60	25	31	32	29	21%
Elsewhere in Copeland	No more than 5%	11	15	5	3	1	3	2%
Total	100%	230	300	142	118	150	137	-

 $^{^3}$ This was the housing requirement for the first 5 years of the plan period post adoption in 2013

⁴ This was the housing requirement for the remainder of the plan period

⁵ At 31st March 2020

⁶ Total average annual delivery divided by delivery by tier. Please note figures may not total 100% due to rounding

4. National Planning Policy Framework 2019

- 4.1.1 As well as considering whether the current Development strategy has been successful, it is also important to consider whether it aligns with the 2019 NPPF which was published following its adoption.
- 4.1.2 Legally Local Plans must be prepared with the objective of contributing to the achievement of sustainable development⁷. This means achieving and balancing economic, social, environmental objectives.
- 4.1.3 In order to be found sound Local Plans must be positively prepared, justified, effective and consistent with national planning policy.
- 4.1.4 Paragraph 20 of the NPPF, published in 2019, states that Local Plans should "set out an overall strategy for the pattern, scale and quality of development". Whilst there is no specific guidance on how to produce a development strategy, the development of a settlement hierarchy helps identify the most sustainable areas for development which then helps to determine the pattern and scale of development.
- 4.1.5 The NPPF contains a number of other key paragraphs which relate to development at a strategic level and these are listed in the table below along with comments on how the hierarchy and strategy can help achieve such aims.

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⁷ Section 39(2) of the Planning and Compulsory Purchase Act 2004

Table 5: Meeting NPPF requirements

NPPF Paragraph No.	What it requires	Comments on the current and future settlement hierarchy and development strategy
78	To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.	The Core Strategy does not give full consideration to the supporting role villages can have on neighbouring villages. The production of a new development strategy provides an opportunity to consider how settlements work together and whether they form part of a larger cluster with other settlements.
79	Planning policies and decisions should avoid the development of isolated homes in the countryside	The Core Strategy directs development away from isolated locations and the new strategy should continue this approach.
91	Planning policiesshould aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each otherare safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routesenable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	The current Core Strategy does not fully consider the physical links between settlements, such as whether there are safe and legible walking and cycling routes which link places and services together. For example, Lowca and Parton are considered as one combined settlement, however the physical access links between them are poor. The new strategy should identify pedestrian and cycling routes between settlements acknowledging that residents are more likely to walk and cycle between settlements where routes have a pavement or cycleway, that is well lit and of a reasonable distance.

NPPF Paragraph No.	What it requires Comments on the current and future settler hierarchy and development strategy	
		It should also direct development to settlements which already benefit from those facilities listed within the NPPF which support healthy lifestyles.
103	Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both planmaking and decision-making.	The production of a new strategy allows us to gain a more up-to date picture of the existing public transport links between settlements. This is particularly important as services are likely to have changed since the Core Strategy was adopted in 2013.
149	Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.	The new strategy and hierarchy has a role to play in mitigating and adapting to climate change by ensuring new development is located in the most sustainable locations. Issues such as flood risk, biodiversity and landscapes are taken into consideration when defining settlement boundaries and allocating sites for development.
150	New development should be planned for in ways thatcan help to reduce greenhouse gas emissions, such as through its location	The new hierarchy and strategy should help to reduce emissions by directing development to those settlements which already benefit from services, or which benefit from sustainable transport options, reducing the need to travel by private vehicle.

5. The Emerging Copeland Local Plan

- 5.1.1 The Council published the Local Plan Issues & Options Draft in November 2019 and this was the subject of an 8 week public consultation. A number of questions in the consultation document related to the development strategy and settlement hierarchy and these are set out below along with a summary of the responses received.
- 5.1.2 The following tables also set out how many respondents supported each particular option. Whilst the Council is under no obligation to take forward the most popular option, it is interesting to see that there is no one option which all respondents agreed was the most favourable.
- 5.1.3 The Council will run a public consultation on the Preferred Options Draft of the Local Plan between 21st September and 15th November. People will have the opportunity to comment on the preferred settlement hierarchy and development strategy throughout the consultation period.

	Question DS3: What type of settlement hierarchy should the Local Plan contain, if any? (Choose all applicable options)			
Option No.	Option	Support given to option (no. of responses)		
1	The settlement hierarchy contained in the Core Strategy remains appropriate and should be brought forward into the new Local Plan.	9		
2	Create an alternative settlement hierarchy which includes an additional category of Sustainable Villages.	2		
3	Create an alternative settlement hierarchy which includes two additional categories – Sustainable Villages and Other Small Settlements.	5		
4	Do not set out a settlement hierarchy and let the market decide where development is brought forward	5		
5	Support 'clustering' approach to sustainable development. This can be smaller settlements with easy, safe access to main towns and/or connecting villages that use or share services to perform a Service Centre role for a wider area	9		
6	Other option, please state	-		

Summary of Responses:

- The Borough's towns should remain the primary focus for development.
- Consideration needs to be given to constraints to delivery within settlements when producing the hierarchy.

Question DS4: How should the Local Plan define Sustainable Villages? (Choose all
applicable options)

Option no.	Option	Support given to option (no. of responses)
1	Settlements which contain a primary school and local shop, or are within 1 km safe walking distance of a primary school and convenience shop	8
2	Settlements that are within 1 km safe walking distance of a principal town, local centre or other settlement which contains a primary school and a convenience shop	5
3	Settlements that contain a railway station with a direct service to a principal town, local centre or other settlement which contains a primary school and/or convenience shop	2
4	Settlements that are served by a frequent bus service to a principal town, local centre or other settlement which contains a primary school and convenience shop	8
5	Settlements which have at least one key service or are within 1 km safe walking distance of another settlement which does	4
6	Other option, please state	-

Summary of Responses:

- Sustainability should not be determined by service provision, more local circumstances and local need.
- Need to consider proximity to other settlements and also employment opportunities, as well as settlement size and service provision
- Need to consider how the contribution of new homes can help support services and how settlements function together and support each other
- Need to clarify what is meant by "frequent" and acknowledge that bus services can be reinstated rather than just focussing on existing provision
- Definition of sustainable villages used by LDNP should be used
- Instead of defining sustainable villages, consider clusters within a 15 minute trip of all traditional services. Most people drive instead of walking.
- Access to sports and leisure facilities within 20 min journey by different modes of transport should be considered.

	Question DS5: If Sustainable Villages are identified in the Local Plan what should be the three priority services they should include? (Select three options only)			
Option no.	Option	Average ranking* (calculated from responses received)		
1	Convenience Shop store	1.64		
2	Post office	1.64		
3	Primary/infant/junior school	2.46		
4	Community centre/hall	2.81		
5	Place of worship	4.55		
6	Public house	4.36		
7	Library	3.18		
8	Doctor's surgery	1.72		
9	Dental Practice	2.27		
10	Nursery	2.73		
11	Other	-		

^{*} Lower score = more favoured

Summary of Responses:

- Provision of public transport should be taken into account as well as services
- The inclusion of all listed facilities is desirable
- Unreasonable today to include community halls, places of worship and public houses as necessary.
- The availability of libraries, doctor surgeries, dental practices and nurseries in each such village is commercially not viable or definitely not affordable.
- Sustainability may be dependent on the size of the settlement, the proximity to other settlements or a cluster of settlements. The Council should also consider the contribution that additional homes could make to support the service provision within these settlements.

Note: It is difficult to gauge which services are most valuable to the public due to the low number of responses received to this question, although it is clear is that each respondent ranked the services listed differently. It is worth noting however that of the 11 responses received to this question, all but two ranked convenience stores as their number 1 priority service.

	Question DS6: How should Employment, retail and housing development be distributed across the Borough? (Choose one option)			
Option no.	Option	Support for option (responses received)		
1	Continue with the proportions set out in the Core Strategy (45% Principal Town –Whitehaven, 10% each Cleator Moor, Egremont, Millom, 20% Local Centres, 5% elsewhere)	6		
2	Create an additional tier of sustainable villages and apportion 5% across those settlements (45% Principal Town – Whitehaven, 10% each Cleator Moor, Egremont, Millom, 20% Local Centres, 5% Sustainable Villages)	6		
3	Create two additional tiers of Sustainable Villages and Other Small Settlements and allow a small proportion of development in each of the two tiers (45% Principal Town – Whitehaven, 10% each Cleator Moor, Egremont, Millom, 20% Local Centres, 4% Sustainable Villages, 1% Other Small Settlements)	4		
4	Distribute development according to existing population splits	2		
5	Allocate proportions based upon evidence of need such as housing needs surveys etc.	0		
6	Distribute development according to environmental and infrastructure capacity	5		
7	Do not apportion development to specific settlements but consider applications on a site by site basis.	5		
8	Other, please state	4		

Summary of Responses:

Several responses received were from developers promoting land in particular settlements. This has influenced their responses in terms of what they feel is the most appropriate strategy. Responses are summarised below:

- Focus of delivery should remain on the towns as they have the greatest range of services and facilities, accommodating the Borough's key employment centre, as well as being well-connected by roads and public transport links.
- The smaller rural settlements in the Borough can accommodate only modest levels of additional housing development. This is due to the relative lack of demand in those locations and increased difficulties of building at scale in locations which are less accessible, and therefore less sustainable.
- Need to consider how settlements benefit from proximity to Whitehaven and the other towns as well as what services they have themselves.

- Suggestion that the percentage of growth in Millom should be increased above the Core Strategy amount and that it should be higher than that directed to Egremont and Cleator Moor to counter decline in the town.
- Allocation should not be arbitrary or formulaic but should be based on a case by case set of needs.
- Do not support the inclusion of an upper cap on any specific tier of the settlement hierarchy.
- Support for additional development in St Bees.
- Distributing development according to environmental and infrastructure capacity is considered the most appropriate option (option 7) whilst also having regard to the defined settlement hierarchy.
- Importance of demonstrating the strategy to be deliverable and viable over the plan period.

6. Aims and Objectives

- 6.1.1 Before developing options for the hierarchy and strategy, consideration was given to what they would need to achieve, taking into account the successes and failures of the current approach in the Core Strategy and national planning policy and guidance.
- 6.1.2 It was acknowledged that any new Strategy must:
 - Enable sustainable development
 - Be aspirational but deliverable
 - Retain focus on developing the Borough's towns and ensuring that regeneration efforts (many of which are publically funded) are not undermined
 - Support an appropriate level of development within sustainable rural settlements to support rural services
 - Provide an attractive offer to developers making Copeland a place people want to build and live in
 - Support other Council Documents such as the Corporate Strategy 2020-2024, Copeland Vision and Prospectus for Growth 2020 and the Copeland Housing Strategy 2018-2023.
- 6.1.3 The following sections of this document describe how the Council's preferred option for the development strategy and settlement hierarchy was developed. It also identifies the alternative options that were considered and gives reasons why they were discounted.

7. Methodology

- 7.1.1 The flow chart below shows the stages the Council has followed when producing the settlement hierarchy and development strategy. This document discusses stages 1 and 2 of the process in more detail.
- 7.1.2 Whilst it is not a requirement for the Local Plan to contain a settlement hierarchy it is considered to be a useful means of identifying the most sustainable settlements within the Borough by grouping settlements with similar features and functions.
- 7.1.3 Once a preferred hierarchy has been developed, the next step of the process is then to develop a strategy which identifies how much development should be directed to

- each group or "tier", with the most sustainable tiers at the top of the hierarchy being allocated more development than those at the bottom.
- 7.1.4 Consideration is then given to how much development has already been committed to each tier, how much more would be required to meet the strategy and whether this is deliverable taking into account constraints (stages 3 and 4). These stages are undertaken when developing the Local Plan and will be informed by a housing trajectory which will be produced prior to the Publication Draft.
- 7.1.5 Experience and best practice from other local authorities was also considered.

Figure 1: Stages of Development

Stage 1: Develop Settlement hierarchy	Stage 2: Develop development strategy	Stage 3: Consideration of Commitments	Stage 4: Assess deliverability
Consider the current strategy and assess its successes, failures and compliance with the NPPF. Identify any additional settlements within the Borough which should also be considered. Identify potential alteranative hierarchies, giving consideration to the NPPF and experience elsewhere and assess the pros and cons of each.	Develop alternative options setting out how much development should be apportioned to each settlement within the preferred hierarchy to meet baseline needs identified. Develop alternative options setting out how much of the additional growth should be apportioned to each settlement within the preferred hierarchy. Consider the pros and cons of each.	Identify how much development has already been committed to each settlement (completions since 2017/extant permissions) and how much development is still required in order to deliver the strategy	Consider whether there are sufficient deliverable and developable sites identified within the SHLAA to deliver the strategy.

8. Stage 1: Developing a Settlement hierarchy

8.1.1 Producing a settlement hierarchy is one of the most effective ways a Local Plan can contribute to the delivery of sustainable development. Identifying settlements where development will be supported also helps ensure that planning remains a genuinely plan-led system⁸, which helps provide certainty to both developers and local residents.

8.2 Defining settlements

- 8.2.1 The NPPF does not provide a definition of settlement for the purposes of developing a settlement hierarchy. The Council considers a settlement, for this purpose, to be a hamlet, village or town that has a specific character and form (e.g. nucleated or linear) and is more than a sporadic group of buildings in an isolated location.
- 8.2.2 The starting point when identifying settlements for consideration was the Core Strategy. Settlements contained within the Core Strategy Hierarchy are identified in Table 6 below. Each settlement in the hierarchy has a defined settlement boundary and areas outside of these boundaries, including smaller rural villages and hamlets are classed as the open countryside.
- 8.2.3 As Table 6 shows a number of settlements are paired together in the Core Strategy due to their proximity to each other. The links between paired settlements was reviewed when developing the new hierarchy and strategy.
- 8.2.4 A number of settlements also extend beyond Copeland Local Plan boundaries crossing over into the Lake District National Park. Consideration was given to the spatial strategy (Policy 02) in the emerging Lake District National Park Local Plan when determining where such settlements best fit within our hierarchy.
- 8.2.5 A mapping exercise was then undertaken to identify other smaller settlements, which should also be considered and assessed. Those identified are also listed in table 7 below. An additional settlement (Goosebutts) was suggested in response to the Issues and Options consultation and was therefore also assessed.

Table 6: Copeland Settlements Considered

Settlement	Core Strategy Designation	Population ⁹	Notes
Arlecdon/Rowrah	Local Centre	790	Currently dealt with as a single settlement in the Core Strategy
Asby	Not included in current Core Strategy hierarchy	Unavailable	
Beckermet	Local Centre	648	
Bigrigg	Local Centre	768	

⁸ In accordance with para 15 of the NPPF

⁹ Number of dwellings on council tax register (deductions made for second homes and vacant homes) multiplied by average household size. The populations shown include residents who live within the LDNP boundaries.

Settlement	Core Strategy Population ⁹ Designation		Notes	
Braystones	Not included in current Core Strategy hierarchy	Unavailable		
Calderbridge	Not included in current Core Strategy hierarchy	192	Partially within the LDNP	
Cleator Moor	Key Service Centre	6111		
Cleator	Local Centre	1256		
Common End	Not included in current Core Strategy hierarchy	Unavailable		
Coulderton	Not included in current Core Strategy hierarchy	Unavailable		
Distington	Local Centre	1515		
Drigg/Holmrook	Not included in current Core Strategy hierarchy	355		
Egremont	Key Service Centre	6638		
Frizington	Local Centre	2100		
Gilgarran	Not included in	Unavailable		
Goosebutts ¹⁰	current Core			
Haile	Strategy hierarchy			
Hallthwaites				
Haverigg	Local Centre	1071		
Howgate	Not included in	Unavailable		
Keekle	current Core Strategy hierarchy	211		
Kirkland/Ennerdale Bridge	Local Centre	423	Partially within the LDNP – Policy 2 of the new Local Plan identifies Ennerdale Bridge as a "village"	
Kirksanton	Not included in current Core Strategy hierarchy	Unavailable		
Lamplugh	Not included in current Core Strategy hierarchy	Unavailable	Several appeals consider the sustainability of Lamplugh – see paragraph below	
Low Moresby	Not included in current Core Strategy hierarchy	Unavailable		

⁻

 $^{^{\}rm 10}$ Suggested by consultee during the Local Plan Issues and Options consultation

Settlement	Core Strategy Designation	Population ⁹	Notes
Lowca/Parton	Local Centre	783	Currently dealt with as a single settlement in the Core Strategy
Middletown	Not included in current Core Strategy hierarchy	Unavailable	
Millom	Key Service Centre	6574	
Moor Row	Local Centre	929	
Moresby Parks	Local Centre	1198	
Nethertown	Not included in	Unavailable	
Pica	current Core Strategy hierarchy	Unavailable	
Sandwith		185	
Seascale	Local Centre	1964	
St Bees	Local Centre	1700	
Summergrove	Not included in	Unavailable	
The Green	current Core Strategy hierarchy		
The Hill			
Thornhill	Local Centre	1047	
Whitehaven	Principal Town	26880	
Wilton	Not included in current Core Strategy hierarchy	Unavailable	

8.2.6 Where available, appeal decisions have also helped inform which settlements are included in the hierarchy. For example, Lamplugh was the subject of an appeal in July 2019¹¹ where the inspector acknowledged that the settlement was "a dispersed pattern of development consisting of groups of dwellings within a rural setting". The Inspector concluded that "Due to the dispersed nature of Lamplugh, the spread of services and facilities around many settlements and the limited opportunities for travel other than by car, the proposed dwellings would be isolated from services and facilities."

8.3 Options Considered

8.3.1 Table 8 below sets out the options considered as a means of organising the settlements above into a hierarchy. Option 1, which is the Council's preferred option, is discussed further in section 8.5 below and Options 2a, 2b and 3 are discussed further in Appendix C.

¹¹ App/Z0923/W/19/3225839

Table 7: Settlement hierarchy Options Considered

Option No.	Option Description	Comments
Option 1	Score settlements based on the type of services within a settlement and its connectivity to other settlements in terms of public transport and safe walking links. Use the scores assigned to develop a settlement hierarchy spread over 5 tiers.	This is the Councils' preferred option. Spreading settlements over a greater number of tiers allows us to ensure the scale of development within each tier is appropriate to the sustainability of the settlement and the level of services it offers.
Option 2a &b	Score settlements based on the type of services within a settlement and its connectivity to other settlements in terms of public transport and walking links. Use the scores assigned to develop a settlement hierarchy spread over 4 tiers.	Limiting the number of tiers to 4 would mean that it was more difficult to ensure the scale of development was appropriate to the sustainability of the settlement as tiers would contain a larger number of settlements.
Option 3	Score settlements based on whether they have a primary school and/or convenience shop. Use the scores assigned to develop the hierarchy.	This option was not considered to be reasonable as it is more restrictive than the Core Strategy and does not consider how settlements can operate as clusters where a service in one settlement can be used by residents living in neighbouring settlements where they are well connected. This approach also does not take into account the fact that other services, such as public houses or village halls, are important in terms of sustaining communities and reducing social isolation. Allowing development in areas where there are such services also helps support such services.
Option 4	Continue with Core Strategy approach	This is not considered to be a reasonable option given that the approach was produced prior to the 2019 NPPF and doesn't completely align with it in terms of supporting rural communities, for the reasons set out in Table 6.
Option 5	Do not include a settlement hierarchy in the Local Plan	This is not considered to be a reasonable option as it would not lead to sustainable development and would therefore conflict with the NPPF. Housing development would likely be directed to the most attractive areas rather than those which were the most sustainable.

8.4 Developing the Preferred Settlement hierarchy

- 8.4.1 There are similarities in terms of the two approaches above (options 1 and 2) which were considered to be the only reasonable options. When developing these options consideration was given to:
 - The number and type of services and
 - Accessibility on foot and by public transport to other settlements with services (i.e. whether settlements formed a cluster)
- 8.4.2 Each of these factors will be discussed further in the following sections.

Service Provision

- 8.4.3 The NPPF recognises the importance of locating development close to services and facilities. This is highlighted in a number of recent appeals referred to within this document. It is also clear from the responses to the Issues and Options consultation, that some services are valued more highly than others. The responses also highlighted that consideration should also be given to additional services, rather than just schools and shops, such as sporting and health and fitness facilities. Following the consultation, officers compiled a list of services that were then taken into account when assessing the sustainability of a settlement.
- 8.4.4 The services included and points assigned to them are shown in Table 8 below. Taking into account good practice elsewhere, key services were weighted more heavily to reflect the fact that they are likely to be accessed by many people on a daily basis and thus have a greater impact on reducing the need to travel, particularly by less sustainable modes. Whilst some services are less likely to be used as frequently, or by as many people, they still have an important role to play in terms of reducing social isolation and reducing the need to travel.
- 8.4.5 Greater weight has been given to employment sites which have a wider, more strategic economic function. Greater weight has also been given to primary schools which have capacity for additional pupils, as there is no guarantee that additional capacity can be provided which may result in pupils having to travel elsewhere. Secondary schools have not been included in the scoring as they are all located within the Borough's towns and therefore travel by car (or school bus) from the rural villages is likely.
- 8.4.6 Points were assigned where there was at least one of the specific service; additional points were not given where there were more than one. For example, where the settlement had three convenience stores it would score the same number of points as a settlement which had one. The total points attributed to each settlement can be found in Appendix A
- 8.4.7 A frequent bus service is considered to be one which runs daily from the village and which would allow an employee living within the settlement to reach one of the Borough's towns by 9am and leave after 5pm. Bus service data is shown in Appendix B. Although flexible working patterns and working from home make access to employment less important, the fact that a resident can leave the village during the morning and arrive back in the early evening it is still considered to be a relevant factor. It is also accepted that rural bus services are prone to cancellation and reinstatement, however there is no guarantee that funding can be made available for new services and current availability data should therefore be used.

8.4.8 Data from the latest Council's annual Village Services Survey (September 2019) was used to populate a scoring matrix and services were also mapped. It is acknowledged that service provision may change over the plan period and the survey provides only a snapshot in time. However the new Local Plan will contain a policy to protect existing services and provision will be monitored through the Annual Monitoring Report. The Local Plan will also be reviewed at least every 5 years which will provide an opportunity to review the hierarchy and strategy.

Table 8: Service Scoring

Service	Points Assigned
Primary school with capacity	3
Primary school close to or at capacity	2
Playgroup/nursery	1
Convenience store	3
Post office	1
Community centre/village hall	2
Public house	2
Library	2
Employment (major)	3
Employment (business	2
Employment (individual)	1
Train station	3
Frequent bus service to KSC	2
Infrequent bus service to KSC	1
Place of worship	1
Petrol filling station	1
Children's outdoor play area	1
Gym/fitness centre/swimming pool	1
Store (other A1, A2, A3 or A5 use)	1
Doctor	1
Dentist	1

Identifying Settlement Clusters

8.4.9 It is acknowledged that settlements do not function in isolation and scoring each in terms of the services they offer would only provide a partial picture. Consideration

was therefore given to how settlements support each other and the physical links between them.

Pedestrian Links

- 8.4.10 Where a settlement is in close proximity to another which has more services and where there are safe and accessible pedestrian links between the two, then this would justify it being higher up the settlement hierarchy. Such settlement clusters are identified in red in Table 10 (Preferred Settlement hierarchy) below.
- 8.4.11 Safe and accessible pedestrian links are considered to be those which have a continuous pavement and street-lighting. The route must also be a reasonable distance, particularly given the fact that the Borough has an aging population.
- 8.4.12 When determining what constitutes a reasonable distance to walk, a number of documents were taken into account. These are shown in Table 9 below. Planning for Walking is most up-to-date of the three documents and suggests a mile is a reasonable distance that people would walk to access services. Safe pedestrian links identified between settlements were therefore measured to determine if they were a mile or less in length.

Table 9: Guidance on Reasonable Walking Distances

Document	Link	Recommendation
Statutory Guidance for Local authorities (DfE, July 2014)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf	Statutory walking distances: For children aged over the age of 5 but under the age of 8 the statutory walking distance is 2 miles For children aged over the age of 8 but under 16 the statutory walking distance is 3 miles. Beyond these distances local authorities are required to provide free transport for all pupils of compulsory school age. Para 22 states that the measurement of the statutory walking distances is not necessarily the shortest distance by road. It is measured by the shortest route along which a child may walk safely.
Providing for Journeys on Foot (Chartered Institution of Highways and Transportatio n(CIHT), 2000)	http://www.ciht.org. hk/en/knowledge/p ublications/index.cf m/providing-for- journeys-on-foot- 2000.html	Suggests the following acceptable walking distance to schools. These distances are widely accepted as being acceptable for use in transport assessments. Distance (metres)

Planning for Walking (Chartered Institution of Highways and Transportatio n (CIHT) 2015)	https://www.ciht.or g.uk/media/4462/ci ht planning_for_walk ing_document- 12pp_v2_singles.p df	destination is People are mo around 800m identifies chall	less than a mile ore likely to wal or a 10 minute lenges which re	I only walk if their e (1.6km) away. lk if the distance is walk. This document educe the likelihood of of crime, highway
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Public Transport

- 8.4.13 As well as considering pedestrian links, public transport provision was also assessed.
- 8.4.14 The railway line through Copeland is an important link between settlements. When considering whether settlements operate as a cluster consideration was given to whether it contained a train station, whether the station was *within* the settlement or on the edge and how frequently the train stopped there. For example, when considering whether the Green formed part of a cluster with Millom, the rail links were assessed. Whilst there are rail services to and from the Green, Green Road Station is poorly connected to the settlement being over a mile away from the main village with poor pedestrian links¹².
- 8.4.15 Nethertown is also located on the railway line and consideration was given to whether it formed a cluster with Whitehaven. Whilst the station is better connected to the settlement than at the Green, only a limited number of services stop here (even as a request stop).
- 8.4.16 Given the above, and the fact that they only contain a limited number of services, it is likely that trips into and out of these two settlements are likely to be by private vehicle. As such they are not considered to be appropriate locations for new development in general.
- 8.5 Settlement hierarchy the Preferred Option
- 8.5.1 The preferred settlement hierarchy contains 5 tiers (excluding the open countryside). Whitehaven remains as the Principal Town and the three other towns as Key Service Centres.
- 8.5.2 The Drigg/Holmrook cluster is identified as a new Local Service Centre given the combined number of services they share.
- 8.5.3 Whilst Cleator scores poorly in terms of services, it is well connected to Cleator Moor with safe pedestrian routes less than a mile long between the two. It therefore remains as a Local Service Centre.

¹² The pavement between the station and the main settlement is only in place for part of the route and is unlit in part.

- 8.5.4 Beckermet and Moor Row are Local Service Centres in the current Core Strategy but have moved down to the Sustainable Rural Village tier given their scores in terms of services.
- 8.5.5 Settlement clusters are identified in red and combined service scores are shown.

Table 10: Settlement hierarchy - Preferred Option

Higherepries	Cattlemante	Comisso	Notes
Hierarchy of Settlement	Settlements	Services Scores	Notes
Principal Town	Whitehaven	N/A	Service scores haven't been
Key Service Centres	Cleator Moor	N/A	given to the towns in the Borough
110, 2011100 00111100	Egremont	,, .	because of the number and
	Millom		range of services
Local Service	Seascale	25	3.000
Centres			
	Drigg &	23	
Settlement/cluster	Holmrook	combined	
which scores 15	Frizington & Rheda	22 combined	
points or more	St Bees	20	
	St Bees	20	
	Distington &	18	
	Common End	combined	
	Haverigg	17	
	Arlecdon &	17	
	Rowrah	combined	
	Thornhill	16	
	Bigrigg	15	
	Cleator	7	Cleator falls within this category
	Ciodioi	•	although it scores less than 15
			points as it forms part of a cluster
			with Cleator Moor as they are
			linked by a safe walking route.
Sustainable Rural	Beckermet	12	,
Villages	Ennerdale	12	
0 - 111 1/ - 1 1	Bridge		
Settlement/cluster scores between 10	Moresby	12	
and 14 points	Parks		
and 14 points	Calderbridge	10	
	Moor Row	10	Poor pedestrian links between
			the village and surrounding
			settlements prevent it from
			forming part of a larger cluster.
	Parton	10	Poor pedestrian links between
			Parton and Lowca prevent it from
			forming part of a larger cluster.
Other Rural Villages	Summergrove	9	Poor pedestrian links between
			the village and surrounding
Settlement/cluster			settlements prevent it from
scores between 5 and			forming part of a larger cluster.
9 points	The Green	8	Poor pedestrian links between
			the village and surrounding
			settlements prevent it from

Hierarchy of Settlement	Settlements	Services Scores	Notes
			forming part of a larger cluster. Station poorly linked to the village.
	Lowca	8	Poor pedestrian links between Lowca and Parton prevent them from forming part of a larger cluster.
	Kirkland	7	Poor pedestrian links between
	Keekle	7	the village and surrounding settlements prevent it from being
	Kirksanton	6	part of a larger cluster.
	Hallthwaites	6	Poor pedestrian links between the village and surrounding settlements prevent it from being part of a larger cluster.
	Nethertown	5	Poor pedestrian links between the village and surrounding settlements prevent it from being part of a larger cluster. Train service infrequent with only a limited number of services stopping at the station.
	The Hill	5	Poor pedestrian links between the village and surrounding settlements prevent it from being part of a larger cluster.
Open Countryside	Lamplugh	5	Although scoring 5 points, Lamplugh is not considered to be a settlement for the purposes of the hierarchy as it does not meet the definition set out in paragraph 8.2 above, being a sporadic group of buildings with no settlement form. Including the settlement in the hierarchy and directing development there would be contrary to previous appeal decisions relating to Lamplugh. ¹³
	Braystones	4	Poor pedestrian links between
	Sandwith	4	the settlement and surrounding settlements prevent it from being
	Low Moresby	3	part of a larger cluster.
	Howgate	3	
	Haile	3	

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¹³ Namely, APP/Z0923/W/19/3225839 and more recently, since the PO Draft has been published, APP/Z0923/W/20/3247256 where the inspector noted that Lamplugh is "a community of farmsteads and isolated dwellings that has developed over time with further additions of houses and bungalows...I find that the appeal site is not an accessible location for housing." And APP/Z0923/W/20/3247478 where the Inspector stated "I find that the appeal site is not suitable for housing having regard to accessibility to services and facilities".

Hierarchy of Settlement	Settlements	Services Scores	Notes
	Middletown	2	
	Pica	2	
	Asby	0	
	Common End	0	
	Coulderton	0	
	Wilton	0	
	Gilgarran	0	
	Goosebutts	0	

9. Stage 2 - Development strategy

- 9.1.1 The development strategy identifies how much development should be directed to each tier of the settlement hierarchy and whether such figures should be minimum or maximum requirements.
- 9.1.2 The benefit of distributing development by tier or category rather than settlement is that it makes the strategy more flexible to change, for example if an unexpected constraint was to limit the amount of growth a particular settlement could accommodate, it can be delivered elsewhere.
- 9.1.3 In terms of housing, the Strategic Housing Market Assessment has identified a need for a minimum of 2520 dwellings (140 per annum) over the 18 year plan period (2017-2035). In order to support economic growth however it recommends that the Council plans for 3600 dwellings (an additional 60 dwellings per year). Given this a decision had to be made whether to apportion the additional number of dwellings across the settlements in the same way as the baseline number of dwellings.
- 9.1.4 In terms of employment, the Council is producing an updated Employment Development Needs Assessment (EDNA) and Employment Land Study and these documents will identify how much employment land is required in the Borough and where this is best placed. The 2018 EDNA is available on the Council's website. The remainder of this document will only consider therefore the strategy for housing.

9.2 Development strategy (Housing) – Preferred Option

- 9.2.1 The proposed development strategy continues to direct the majority of development to the Borough's four towns. Whilst the proportion of development directed to Whitehaven is 5% lower than at present, this is a minimum requirement and additional development will be supported in the town where it accords with the development plan.
- 9.2.2 The strategy divides the baseline housing requirement over the tiers by the proportions shown in Table 11 below. The additional 1020 dwellings required to support economic growth is divided in the same way for ease.
- 9.2.3 In order to ensure that the strategy does not stifle development in the top tiers, it is suggested that the targets quoted in Table 11 are not "ceilings" and additional development within those settlements should be supported where appropriate.
- 9.2.4 Setting the targets within the lower tiers as maximum figures minimises the likelihood of sprawl into the open countryside and ensures the majority of development continues to be directed to the Borough's towns and Local Service Centres.

Table 11: Preferred Development strategy: Housing

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of housing by tier (2520/140pa)	Proportion/ amount of additional housing growth (1080/60pa)	Min/Max
Principal Town	Whitehaven	N/A	40% 1008 (56pa)	40% 432 (24)	Min
	Cleator Moor	N/A	30%	30%	Min

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of housing by tier (2520/140pa)	Proportion/ amount of additional housing growth (1080/60pa)	Min/Max		
Key Service Centres	Egremont Millom		756 (42pa)	324 (18pa)			
Local Service	Seascale	25	20%	20%	Min		
Centres Settlement/cluster which scores 15	Drigg & Holmrook Frizington &	23 combined 22	504 (28pa)	216 (12pa)			
points or more OR is well linked	Rheda St Bees	combined 20					
and physically connected to a Key Service	Distington & Common End	18 combined					
Centre by a safe	Haverigg	17					
walking route and/or frequent public transport	Arlecdon & Rowrah Thornhill	17 combined 16					
service	Bigrigg	15					
	Cleator (linked to Cleator Moor)	7					
Sustainable Rural	Beckermet	12	7%	7%	Max		
Villages Settlement/cluster	Ennerdale Bridge	12	177 (10pa)	76 (5pa)			
scores between 10 and 14 points	Moresby Parks	12					
To and 14 points	Calderbridge	10					
	Moor Row	10					
	Parton	10					
Other Rural Villages	Summergrove	9	3% 76 (5pa)	3% 32 (2pa)	Max		
	Lowca	8	το (ορα)	οΣ (Σρα)			
	The Green	8					
Settlement/cluster scores between 5 and 9 points	Kirkland	7					
	Keekle	7					
	Kirksanton	6					
	Hallthwaites	6					
	Nethertown	5					
	The Hill	5					
Open Countryside	Lamplugh	5	N/A (with the exception of	N/A (with the exception of rural	N/A (with		
	Braystones	4	rural exception	exception sites)	the exception		
	Sandwith	3	sites)	,	of rural		
	Low Moresby	3					

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of housing by tier (2520/140pa)	Proportion/ amount of additional housing growth (1080/60pa)	Min/Max
	Howgate	3			exception
	Haile	3			sites)
	Middletown	2			
	Pica	2			
	Asby	0			
	Common End	0			
	Coulderton	0			
	Wilton	0			
	Gilgarran	0			
	Goosebutts	0			

9.3 Alternative Approaches

9.3.1 A number of alternative approaches to the development strategy were considered but discounted as the aims of the hierarchy and strategy set out in section 6 were unlikely to be achieved. Alternative approaches are set out in Appendix D.

10. Summary

- 10.1.1 This document sets out what is considered to be the most appropriate settlement hierarchy and development strategy, in terms of housing, to support the Local Plan. It differs to the current hierarchy and strategy within the Core Strategy and is based upon up-to-date evidence.
- 10.1.2 The preferred hierarchy and strategy are in accordance with the NPPF and will provide clarity for communities and developers identifying where development should go and how much should be expected.
- 10.1.3 It is the role of the Strategic Housing Land Availability Assessment to identify deliverable and developable sites within the settlements identified. As part of the development of the new draft of the Local Plan, the Publication Draft, the Council will produce a housing trajectory that will demonstrate how the housing "targets" within the preferred strategy will be met (e.g. through a combination of housing allocations, sites with planning permission, completions since 2017 and future windfall developments.)

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11. Appendices

Appendix A - Settlement service scores

Location	Core Strategy Hierarchy	Primary School (3) Close to or at Capacity (2)	Playgroup/nursery provision (1)	Convenience store (3)	Post Office (1)	Community Centre/Village Hall (2)	Public House (2)	Library (2)	Employment (Walking distance) Major (3) Business (2) Individual (1)	Public Transport Train Station (3) Frequent Bus Route to KSC (2) Bus Route Infrequent (1)	Place of Worship (1)	Petrol Filling Station (1)	Children's Outdoor Play Space (1)	Gym/Fitness Centre/ Swimming Pool (1)	Store Other A1, A2, A3 or A5 use	Doctor (1)	Dentist (1)	Total Score
Arlecdon and Rowrah	Local Centre	3	1	3	1	2	2		1	2	1		1					17
Asby	Outside S/B																	0
Beckermet	Local Centre	3	1			2	2		1	2	1							12
Bigrigg	Local Centre			3		2	2		2	2	1	1	1		1			15
Braystones	Outside S/B									3					1			4
Calderbridge	Outside S/B					2	2		3		1	1	1					10
Cleator	Local Centre			3		2			1		1							7
Common End	Outside S/B																	0
Coulderton	Outside S/B																	0
Distington	Local Centre	3	1	3		2		2	1	2	1		1		1	1		18
Drigg	Outside S/B					2	2		3	3	1				1			12
Ennerdale Bridge	Local Centre	3				2	2			1	1		1		1			11
Frizington	Local Centre	3	1	3	1	2	2	2	2	2	1		1		1	1		22
Gilgarran	Outside S/B																	0
Goosebutts	Outside S/B																	0

Location	Core Strategy Hierarchy	Primary School (3) Close to or at Capacity (2)	Playgroup/nursery provision (1)	Convenience store (3)	Post Office (1)	Community Centre/Village Hall (2)	Public House (2)	Library (2)	Employment (Walking distance) Major (3) Business (2) Individual (1)	Public Transport Train Station (3) Frequent Bus Route to KSC (2) Bus Route Infrequent (1)	Place of Worship (1)	Petrol Filling Station (1)	Children's Outdoor Play Space (1)	Gym/Fitness Centre/ Swimming Pool (1)	Store Other A1, A2, A3 or A5 use	Doctor (1)	Dentist (1)	Total Score
Gosforth	National Park	3	1	3		2		2	1		1		1		1			15
Haile	Outside S/B					2					1							3
Hallthwaites	Outside S/B	3								2	1							6
Haverigg	Local Centre	2		3	1	2	2		2	2	1		1		1			17
Holmrook	Outside S/B			3	1	2	2					1	1		1			11
Howgate	Outside S/B						2			1								3
Keekle	Outside S/B					2	2			2			1					7
Kirkland	Local Centre	3								1	1		1					6
Kirksanton	Outside S/B					2	2		1	1								6
Lamplugh	Outside S/B		1	1		2					1							5
Low Moresby	Outside S/B		1							2								3
Lowca	Local Centre	3	1			2			1						1			8
Middletown	Outside S/B									2								2
Moor Row	Local Centre	3					2		2		1		1					9
Moresby Parks	Local Centre	2		3		2			3		1		1					12
Nethertown	Outside S/B								1	3					1			5
Parton	Local Centre	3				2				3			1		1			10
Pica	Outside S/B								1				1					2
Sandwith	Outside S/B						2			1					1			4

Location	Core Strategy Hierarchy	Primary School (3) Close to or at Capacity (2)	Playgroup/nursery provision (1)	Convenience store (3)	Post Office (1)	Community Centre/Village Hall (2)	Public House (2)	Library (2)	Employment (Walking distance) Major (3) Business (2) Individual (1)	Public Transport Train Station (3) Frequent Bus Route to KSC (2) Bus Route Infrequent (1)	Place of Worship (1)	Petrol Filling Station (1)	Children's Outdoor Play Space (1)	Gym/Fitness Centre/ Swimming Pool (1)	Store Other A1, A2, A3 or A5 use	Doctor (1)	Dentist (1)	Total Score
Seascale	Local Centre	3	1	3	1	2	2	2	3	3	1		1	1	1	1		25
Silecroft	National Park					2	2		1	3			1		1			10
St Bees	Local Centre	3	1	3	1	2	2		1	3	1		1	1	1			20
Summergrove	Outside S/B					2			3	2				1	1			9
The Green	Outside S/B					2	2		1	3								8
The Hill	Outside S/B					2			1	2								5
Thornhill	Local Centre	3	1	3	1	2	2			2	1		1					16
Wilton	Outside S/B																	0

Appendix B- Village Bus and Train service data 2019

Please note that these services are subject to change and may have been affected by service reductions caused by Covid19 restrictions.

Village	Bus Service	Train station	Notes
Arlecdon/Rowrah	31, 218	No	
Asby	31, 600	No	
Beckermet	30	No	
Bigrigg	14, 20, 30, x30	No	
Braystones	-	No	
Calder Bridge	30, 14	No	
Cleator	32, 32E, 87	No	
Common End	30, 31, 87, 300/301, 302, 600	No	
Coulderton	-	No	
Distington	30, 31, 87, 300/301, 302, 600	No	
Drigg		Yes	Barrow-Carlisle route
Ennerdale Bridge	217	No	
Frizington	218, X9, 21, 31, 31H, 32E, 217, 21	No	
Gilgarran	-	No	
Gosforth	14, 30	No	
Haile	-	No	
Hallthwaites	7	No	
Haverigg	M1, 7	No	
Holmrook	14	No	
Howgate	30, 31, 87, 300/301, 302, 600	No	
Keekle	X9, 21, 32	No	
Kirkland	217 - Wednesdays only	No	
Kirksanton	14, M3		
Lamplugh	217, 218	No	
Low Moresby	-	No	
Lowca	1	No	
Middleton	-	No	
Moor Row	-	No	
Moresby Parks	22	No	
Nethertown			Barrow-Carlisle route, only limited trains stop at this station
Parton	1	Yes	Barrow-Carlisle route
Pica	-	No	
Sandwith	-	No	
Seascale	14, 30	Yes	Barrow-Carlisle Route
Silecroft	-	Yes	Barrow- Carlisle route
St Bees	-	Yes	Barrow-Carlisle route
The Green	7	Yes	Barrow-Carlisle Route. The station (Green Road) is some distance from the village via

Village	Bus Service	Train station	Notes
			an unlit route which is not continuous.
The Hill	7	No	
Thornhill	30, 20, 87	No	
Wilton	-	No	

Appendix C: Settlement hierarchy – Alternative Options Considered

Option 2a

The following option uses the same scoring system as the preferred option, but groups settlements differently depending on their scores. It also contains only 4 tiers rather than 5 (exc. open countryside). Local Service Centres are those which score 10 points or more (compared to 15 points or more in the preferred option) with rural villages scoring between 5 and 9 points.

This option is considered to be unreasonable given the large number of settlements within the Local Service Centre tier. If development was divided pro-rata amongst the settlements within this tier they would likely receive less development than those in the lower tier which would lead to unsustainable development.

Settlement clusters are identified in red text

Hierarchy of Settlement	Settlements	Services Score
Principal Town	Whitehaven	N/A
Key Service Centres	Cleator Moor	N/A
	Egremont	
	Millom	
Local Service Centres	Seascale	25
	Drigg & Holmrook	23 combined
Settlement/cluster scores 10 points or more OR has	Frizington & Rheda	22 combined
some services and is well	St Bees	20
linked to a Key Service Centre by a safe walking	Parton	10
route or frequent public	Distington & Common End	18 combined
transport service.	Haverigg	17
	Arlecdon and Rowrah	17 combined
	Thornhill	16
	Bigrigg	15
	Moresby Parks	12
	Ennerdale Bridge	12
	Beckermet	12
	Calderbridge	10
	Moor Row	10
	Cleator (linked to Cleator Moor)	7 (although the settlement scores less than 10 it is well connected to Cleator Moor

Hierarchy of Settlement	Settlements	Services Score
		and therefore forms part of a larger cluster)
Rural Villages	Summergrove	9
	The Green	8
Settlement/cluster which	Lowca	8
scores 5-9 points.	Kirkland	7
	Keekle	7
	Kirksanton	6
	Hallthwaites	6
	Nethertown	5
	The Hill	5
Open Countryside (rural exception sites etc.)	Lamplugh	5 (Although scoring 5 points, Lamplugh is not considered to be a settlement for the purposes of the Hierarchy as it does not meet the definition set out in paragraph 8.2 above, being a sporadic group of buildings with no settlement form. Including the settlement in the hierarchy and directing development there would be contrary to previous appeal decisions relating to Lamplugh.) ¹⁴
	Braystones	4
	Sandwith	4
	Low Moresby	3
	Howgate	3
	Haile	3
	Middletown	2

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¹⁴ Namely, APP/Z0923/W/19/3225839 and more recently, since the PO Draft has been published, APP/Z0923/W/20/3247256 where the inspector noted that Lamplugh is "a community of farmsteads and isolated dwellings that has developed over time with further additions of houses and bungalows...I find that the appeal site is not an accessible location for housing." And APP/Z0923/W/20/3247478 where the Inspector stated "I find that the appeal site is not suitable for housing having regard to accessibility to services and facilities".

Hierarchy of Settlement	Settlements	Services Score
	Pica	2
	Asby	0
	Common End	0
	Coulderton	0
	Wilton	0
	Gilgarran	0
	Goosebutts	0

Option 2b

The following option uses the same scoring process, but settlements are grouped differently depending on their scores. This option also contains only 4 tiers rather than the preferred 5 (exc. open countryside). Local Service Centre are those which score 15 points or more, the same as the preferred option. Rural villages are those which score between 5 and 14 points.

This is considered to be unreasonable as it contains a large number of rural villages and does not effectively differentiate between those that have a range of services and those that have a limited number.

Settlement clusters are identified in red text.

Hierarchy of Settlement	Settlements	Services Score
Principal Town	Whitehaven	N/A
Key Service Centres	Cleator Moor	N/A
Centres	Egremont	
	Millom	
Local Service	Seascale	25
Centres	Drigg & Holmrook	23 combined
Settlement/cluster scores 15 points or above OR has some services and is well linked to a Key Service Centre by a safe walking route or	Frizington	22
	St Bees	20
	Distington	18
	Arlecdon & Rowrah	17 combined
	Haverigg	17
	Thornhill	16

Hierarchy of Settlement	Settlements	Services Score
frequent public transport service.	Bigrigg Cleator (linked to Cleator Moor)	7 (although the settlement scores less than 15 it is well connected to Cleator Moor and therefore forms part of a larger cluster)
Rural Villages	Moresby Parks	12
	Ennerdale Bridge	12
Settlement/cluster which scores 5-	Beckermet	12
14 points	Calderbridge	10
	Moor Row	10
	Parton	10
	Summergrove	9
	Lowca	8
	The Green	8
	Kirkland	7
	Keekle	7
	Kirksanton	6
	Hallthwaites	6
	Nethertown	5
	The Hill	5
Open Countryside	Lamplugh	5 (Although scoring 5 points, Lamplugh is not considered to be a settlement for the purposes of the Hierarchy as it does not meet the definition set out in paragraph 8.2 above, being a sporadic group of buildings with no settlement form. Including the settlement in the hierarchy and directing development there would be contrary to previous appeal decisions relating to Lamplugh.) ¹⁵

 $^{^{15}}$ Namely, APP/Z0923/W/19/3225839 and more recently, since the PO Draft has been published, APP/Z0923/W/20/3247256 where the inspector noted that Lamplugh is "a community of farmsteads and

Hierarchy of Settlement	Settlements	Services Score
	Braystones	4
	Sandwith	4
	Low Moresby	3
	Howgate	3
	Haile	3
	Middletown	2
	Pica	2
	Asby	0
	Common End	0
	Coulderton	0
	Wilton	0
	Gilgarran	0
	Goosebutts	0

Option 3

The following option scores settlements on the basis of them including a primary school and a shop. This option is considered to be unreasonable as it fails to recognise the value of other rural services and does not differentiate between villages with a number of services (e.g. Drigg) and those with a limited number (e.g. Pica).

Settlement clusters are identified in red text.

Hierarchy of Settlement	Settlements	
Principal Town	Whitehaven	
Key Service Centres	Cleator Moor	
	Egremont	
	Millom	
Local Service Centres	Seascale	
	Frizington & Rheda	
Settlements/clusters which contain both a	St Bees	
primary school and convenience shop. Clusters	Distington & Common End	
must be linked by safe walking routes and/or a	Arlecdon & Rowrah	
frequent public transport service.	Haverigg	
	Thornhill	
	Cleator (with Cleator Moor)	

isolated dwellings that has developed over time with further additions of houses and bungalows...I find that the appeal site is not an accessible location for housing." And APP/Z0923/W/20/3247478 where the Inspector stated "I find that the appeal site is not suitable for housing having regard to accessibility to services and facilities".

Hierarchy of Settlement	Settlements
	Moresby Parks
	Parton
Other rural settlements	Bigrigg
	Beckermet
Settlements/clusters which contain some	Drigg & Holmrook
services but don't contain both a primary	The Hill
school and a convenience shop. Clusters must	The Green
be linked by safe walking routes and/or a	Hallthwaites
frequent public transport service.	Moor Row
	Summergrove
	Keekle
	Kirkland
	Kirksanton
	Lamplugh
	Nethertown
	Braystones
	Sandwith
	Haile
	Low Moresby
	Howgate
	Middleton
	Pica
	Lowca
	Kirkland
	Ennerdale Bridge
Open countryside	Gilgarran
	Asby
Settlements with neither a school or	Common End
convenience shop	Coulderton
	Wilton
	Goosebutts

Appendix D: Development strategy - Alternative Options Considered

Option A

This option is based on the preferred hierarchy of 5 tiers of settlements and sees more housing development directed to Whitehaven and the Sustainable Rural Villages, and less to the Local Service Centres Other Rural Villages, than under the preferred option.

This option has not been taken forward as settlements within the Sustainable Rural Villages tier could receive the same amount of development as settlements that were Local Service Centres due to the numbers of settlements within each. This would lead to a less sustainable strategy.

Settlement clusters are shown in red. Pro-rata figures are shown for information only and would not form part of a housing requirement policy.

Development strategy - Alternative Option A

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of requirement by tier 2520/140pa)	Proportion/ amount of additional growth (1080/60pa)	Min/Max
Principal Town	Whitehaven	N/A	45% 1134 (63pa)	45% 486 (27pa)	Min
Key Service Centres	Cleator Moor Egremont Millom	N/A	30% 756 (42pa) Pro-rata per settlement: 252	30% 306 (18pa) Pro-rata per settlement: 102	Min
Local Service Centres Settlement/cluster which scores 15	Drigg & Holmrook Frizington &	23 combined 22	15% 378 (21pa) Pro-rata per settlement: 38	15% 162 (9pa) Pro-rata per settlement: 16	Min
points	Rheda St Bees Distington & Common End Haverigg Arlecdon & Rowrah Thornhill Bigrigg	20 18 combined 17 17 combined 16			
Out to invite	Cleator (linked to Cleator Moor)	7	00/	00/	
Sustainable Rural Villages	Beckermet Ennerdale Bridge	12	9% 227 (13pa)	9% 97 (5pa)	Max

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of requirement by tier 2520/140pa)	Proportion/ amount of additional growth (1080/60pa)	Min/Max
Settlement/cluster scores between	Moresby	12	Pro-rata per settlement: 38	Pro-rata per settlement: 16	
10 and 14 points	Parks Calderbridge	10	Settlement. 30	Settlement. 10	
	Moor Row	10			
	Parton	10			
Other Rural	Summergrove	9	1%	1%	Max
Villages	Lowca	8	25 (1-2pa)	54 (1pa)	
Settlement/cluster	The Green	8	Pro-rata by	Pro-rata by	
scores between 5 and 9 points	Kirkland	7	settlement: 3	settlement: 1	
and 9 points	Keekle	7			
	Kirksanton	6			
	Hallthwaites	6			
	Nethertown	5			
	The Hill	5			
Open	Lamplugh ¹⁶	5	N/A	N/A	N/A
Countryside	Braystones	4			
	Sandwith	4			
	Low Moresby	3			
	Howgate	3			
	Haile	3			
	Middletown	2			
	Pica	2			
	Asby	0			
	Common End	0			
	Coulderton	0			
	Wilton	0			
	Gilgarran	0			
	Goosebutts	0			

Option B

This option is based on the preferred settlement hierarchy of 5 tiers but sees a higher proportion of housing development distributed in total to the villages. The Principal Town would receive 40% of development, with the Key Service Centres only receiving 25% rather

 $^{^{16}}$ Whilst scoring over 5 recent appeals have indicated that the settlement is not an appropriate place for housing in general

than the preferred 30%. The lower two tiers would receive 15% of development, compared to 10% in the preferred strategy.

Whilst this option would help support rural communities and services, by allowing more development in the lower two tiers, it is considered to be less sustainable than the preferred option as it reduces the amount of housing directed to the Key Service Centres. These, along with Whitehaven, are the most sustainable parts of the Borough, featuring the greatest number of services. There are also concerns regarding the deliverability of this option given the limited number of deliverable sites within the lower two tiers.

Settlement clusters are shown in red. Pro-rata figures are shown for information only and would not form part of a housing requirement policy.

Development strategy: Alternative Option B

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of requirement by tier (2520/140pa)	Proportion/ amount of additional growth (1080/60pa)	Min/Max
Principal Town	Whitehaven	N/A	40% 1008 (63pa)	40% 432 (27pa)	Min
Key Service Centres	Cleator Moor Egremont Millom	N/A	25% 630 (35pa) Pro-rata per settlement: 210	25% 270 (15pa) Pro-rata per settlement: 90	Min
Local Service Centres	Seascale Drigg &	25	20% 504 (28pa)	20% 216 (12pa)	Min
Settlement/cluster which scores 15 points or more	Holmrook Frizington & Rheda St Bees Distington & Common End Haverigg Arlecdon & Rowrah Thornhill	20 18 combined 17 17 combined 16	Pro-rata per settlement: 50	Pro-rata per settlement: 22	
	Bigrigg Cleator (linked to Cleator Moor)	15			
Sustainable Rural Villages	Beckermet Ennerdale Bridge	12	10% 252 (14pa)	10% 107 (6pa)	Max
Settlement/cluster scores between 10 and 14 points	Moresby Parks Calderbridge	12	Pro-rata per settlement: 42	Pro-rata per settlement: 18	

Hierarchy of Settlement	Settlements	Services Scores	Proportion/ amount of requirement by tier (2520/140pa)	Proportion/ amount of additional growth (1080/60pa)	Min/Max
	Moor Row	10			
	Parton	10			
Other Rural Villages	Summergrove	9	5% 126 (7pa)	5% 54 (3pa)	Max
	Lowca	8			
Settlement/cluster scores between 5 and 9 points	The Green	8	Pro-rata by settlement: 14	Pro-rata by settlement: 6	
	Kirkland	7			
	Keekle	7			
	Kirksanton	6			
	Hallthwaites	6			
	Nethertown	5			
	The Hill	5			
Open Countryside	Lamplugh ¹⁷	5	N/A	N/A	N/A
	Braystones	4			
	Sandwith	4			
	Low Moresby	3			
	Howgate	3			
	Haile	3			
	Middletown	2			
	Pica	2			
	Asby	0			
	Common End	0			
	Coulderton	0			
	Wilton	0			
	Gilgarran	0			
	Goosebutts	0			

 $^{^{17}}$ Whilst scoring over 5 recent appeals have indicated that the settlement is not an appropriate place for housing in general