



# Settlement Hierarchy & Development Strategy Paper Update

Copeland Borough Council  
September 2021



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## 1. Introduction

1.1.1 Copeland Borough Council is in the process of producing a new Local Plan for the period 2021 to 2038. 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.

1.1.2 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.

1.1.3 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.

1.1.4 In 2020 the Council 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.

1.1.5 The findings of the review were discussed in the Development Strategy paper 2020 which informed the Preferred Options Draft of the Local Plan.

1.1.6 This document updates the 2020 Development Strategy Paper in light of responses made to the Preferred Options consultation (see Appendix F) and new evidence which has been produced since, including the latest village services survey carried out in June 2021. It also considers the latest NPPF produced earlier this year.

1.1.7 This document proposes a new settlement hierarchy and development strategy (known hereonin as the Proposed Hierarchy and Strategy), that differs slightly to the one set out in the Local Plan Preferred Options Draft (the PO Draft Hierarchy and Strategy).

## 2. Why do we need a development strategy?

2.1.1 Legally, Local Plans must be prepared with the objective of contributing to the achievement of sustainable development<sup>1</sup>. This means achieving and balancing economic, social, environmental objectives.

2.1.2 This is reflected in the NPPF 2021, paragraph 11, that includes a presumption in favour of sustainable development. For plan making this means that Local Plans should *"promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;"*.

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<sup>1</sup> Section 39(2) of the Planning and Compulsory Purchase Act 2004

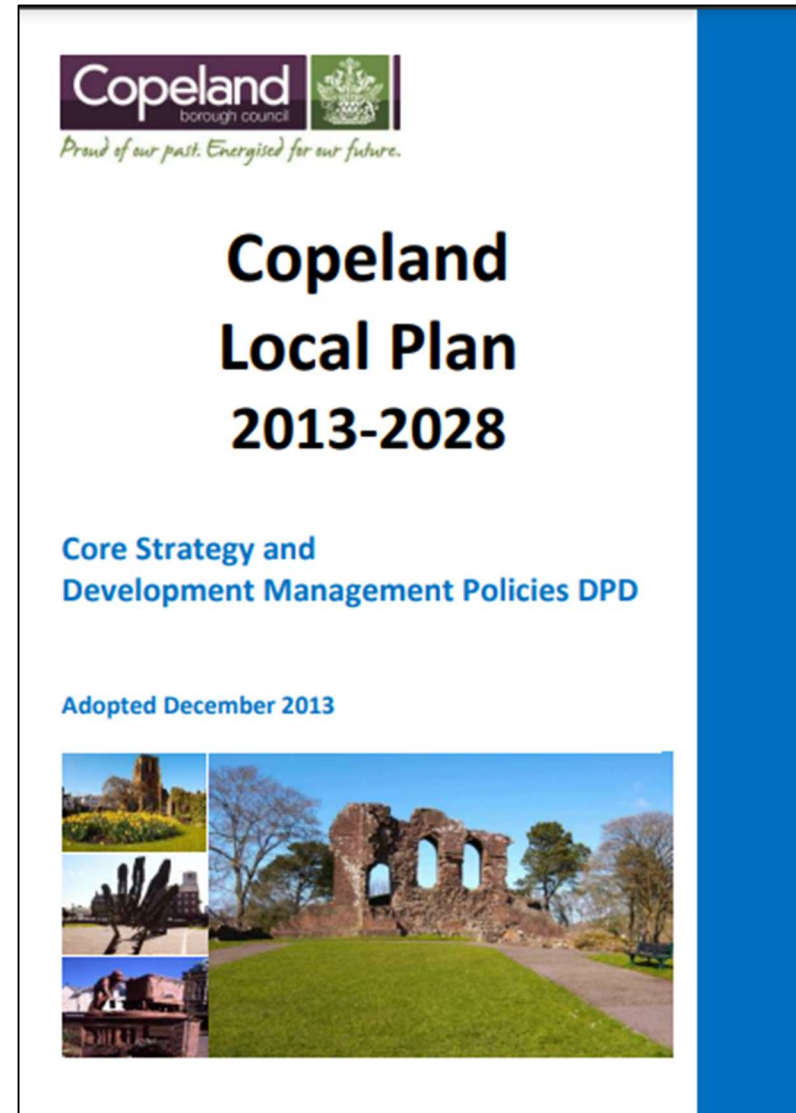
2.1.3 Councils must therefore consider what is sustainable in terms of *where* development is directed to (the hierarchy) and *how much* is delivered (the strategy).

2.1.4 In order to be found sound Local Plans must be positively prepared, justified, effective and consistent with national planning policy. The hierarchy and strategy must therefore be based upon up-to-date evidence, accord with the NPPF and be aspirational.

2.1.5 The NPPF contains a number of other key paragraphs which relate to strategic development and these are listed in Appendix A along with comments on how the proposed hierarchy and strategy helps achieve such aims.

# The Current Approach:

## Core Strategy and Development Management Policies DPD 2013-2028



### 3. The Current Core Strategy

3.1.1 The current approach (hierarchy and strategy) as set out in the Core Strategy<sup>2</sup> can be seen in Table 1.

3.1.2 This directs the majority of development across the 2013-2028 plan period to the Borough's four towns, Whitehaven, Cleator Moor, Egremont and Millom rather than spreading growth more thinly across the Borough.

3.1.3 It contains 3 tiers and identifies settlements within each, with all other settlements being classed as the open countryside. The proportion of development directed to each tier increases the higher up the hierarchy

3.1.4 A number of settlements form clusters, for example Arlecdon and Rowrah. This reflected the way the villages operated and functioned at the time and the connections between them.

3.1.5 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”.

3.1.6 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.

3.1.7 The current approach is however over 8 years old and pre-dates the latest NPPF. It is therefore considered important to review it through the development of the new Local Plan.

### 4. Delivery against the Core Strategy

4.1.1 In terms of housing, a requirement for 230 dwellings per annum is identified in the Core Strategy over the first 5 years. This increased to 300 dwellings per annum from year 6 onwards.

4.1.2 Table 2 below sets out how the housing requirement is divided up across each tier and highlights how many homes have been delivered against these targets.

4.1.3 It highlights that, in general, over the past three years, delivery has almost matched the targets in terms of the proportions of development by tier.

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<sup>2</sup> Page 23 of the Core Strategy

	Type and Scale of Development		
Classification	Retail and Services	Employment	Housing
<b>Principal Town:</b> <b>Whitehaven</b>	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.
<b>Key Service Centre:</b> <b>Cleator Moor;</b> <b>Egremont and</b> <b>Millom</b>	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.

*Table 1: Current Core Strategy Settlement Hierarchy and Development Strategy*



	Type and Scale of Development		
Classification	Retail and Services	Employment	Housing
<b>Local Centre:</b> Arlecdon/Rowrah; Beckermest; 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.
<b>Outside settlement boundaries:</b> 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 of Core Strategy).

*Table 1: Current Core Strategy Settlement Hierarchy and Development Strategy*

*Table 2: Housing Delivery against Core Strategy Hierarchy*

<b>Settlement Tier</b>	<b>Proportion of development (%)</b>	<b>Annual Housing requirement based on 230dpa<sup>3</sup></b>	<b>Annual Housing requirement based on 300dpa<sup>4</sup></b>	<b>Completions 2018/19</b>	<b>Completions 2019/20</b>	<b>Completions 2020/21</b>	<b>Average annual delivery over 3 year period<sup>5</sup>.</b>	<b>Proportion of development delivered over 3 year period (%)<sup>6</sup></b>
Whitehaven	At least 45%	105	135	52	73	63	63	45%
Key Service Centres	At least 30% (10% each)	69	90	32	34	64	44	31%
Local Centres	No more than 20%	45	60	31	32	14	26	19%
Elsewhere in Copeland	No more than 5%	11	15	3	1	15	7	5%
Total	100%	230	300	118	150	155	140	-

<sup>3</sup> This was the housing requirement for the first 5 years of the plan period post adoption in 2013

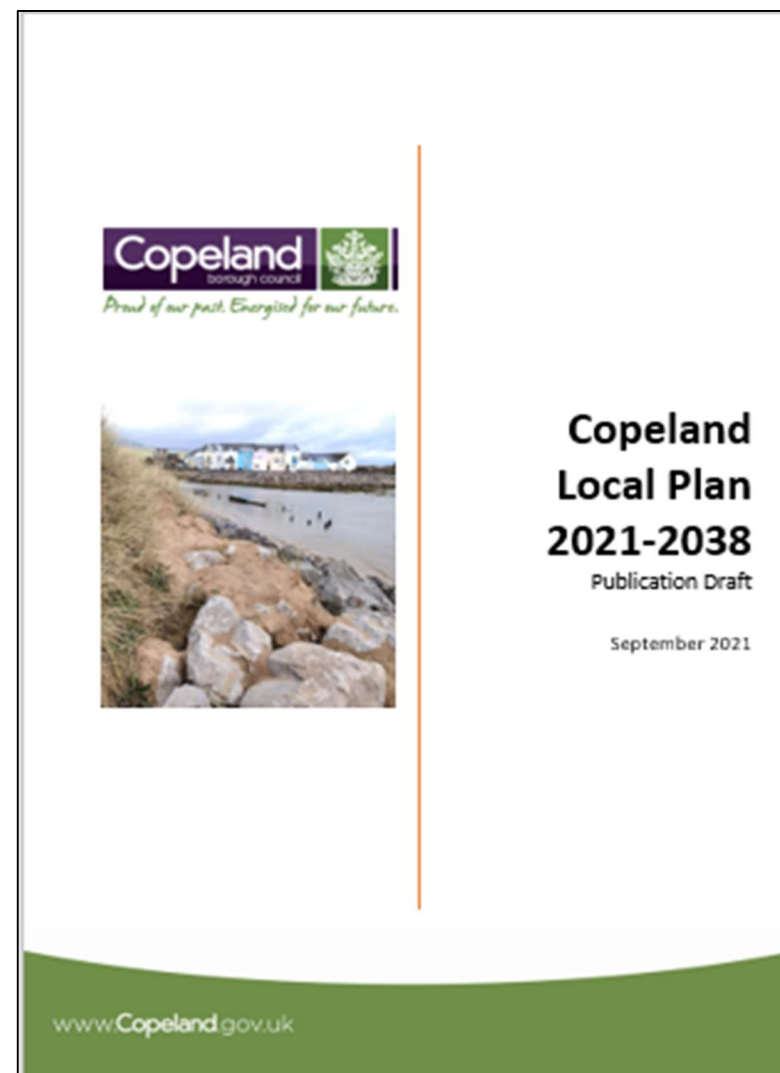
<sup>4</sup> This was the housing requirement for the remainder of the plan period upto 2028

<sup>5</sup> At 31<sup>st</sup> March 2021, figures rounded up

<sup>6</sup> Total average annual delivery divided by delivery by total. Please note figures may not total 100% due to rounding

# The Proposed Approach

## Emerging Copeland Local Plan 2021-2038



## 5. Justification for a new approach

5.1.1 A new approach is required given the age of the Core Strategy (which pre-dates the latest NPPF). A new approach also creates an opportunity to address some of the issues currently facing the borough based upon latest evidence of need.

### 5.2 Aims and Objectives

5.2.1 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.

5.2.2 It was acknowledged that any new Strategy must:

- Enable sustainable development and reduce the need to travel
- Be aspirational but deliverable
- Retain focus on developing the Borough's towns and ensuring that regeneration efforts (many of which are publicly funded) are not undermined
- Support an appropriate level of development within sustainable rural settlements to support rural services and communities.
- Provide an attractive offer to developers making Copeland a place people want to build and live in

- Encourage opportunities for social interactions, strengthening community cohesion in order to reduce social isolation
- 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.

5.2.3 The Council identified a development strategy and settlement hierarchy within the Local Plan Preferred Options Draft produced in September 2020 (See Appendix G). This covered a plan period 2017 to 2035 and was supported by the Development Strategy Paper 2020 which set out how the development strategy and settlement hierarchy was developed. It also identified the alternative options that were considered at the time and gave reasons why they were discounted.

5.2.4 The Council has considered responses to the Preferred Options draft and the latest evidence available, such as the Strategic Housing Market Assessment Update 2021 (SHMA). A brief summary of key responses to the Preferred Options Draft policies relating to the hierarchy and strategy are contained in Appendix A.

5.2.5 An overview of the latest evidence that has been considered when reviewing the current approach is outlined below. This has led to the development of a new hierarchy and strategy which will be discussed further on pages 12 onwards.

### 5.3 Evidence

5.3.1 When developing the proposed settlement hierarchy and strategy it was important to consider how the Borough currently functions.

5.3.2 Copeland contains four towns: Whitehaven, Cleator Moor and Egremont and Millom. Whitehaven is the largest town in the north of the borough, close to its border with Allerdale. Cleator Moor and Egremont are also in the north of the borough. Millom is located in the south of the Borough, close to its boundary with South Lakeland, and travel time by car or train between Millom and Whitehaven is approximately an hour.

5.3.3 The Borough also contains a large number of rural settlements ranging from larger villages containing a number of services to smaller, more isolated hamlets and dispersed groups of housing.

5.3.4 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 Millom<sup>7</sup>. The remainder lived in the borough's rural areas (a small proportion of which are within the National Park).

5.3.5 The population is broken down by age as shown in Table 3 below:

Table 3: Age Structure of Copeland 2020 (Nomis)

Age	Copeland	%	Cumbria	%	England	%
All Ages	68,041		499,781		56,550,138	
Aged 0 to 15	11,418	17	81,886	16	10,852,240	19
Aged 16 to 64	41,000	60	294,473	59	35,233,879	62
Aged 65+	15,623	23	123,422	25	10,464,019	19

5.3.6 As can be seen the proportion of the population aged over 65 in Copeland is higher than the national average. The population is also ageing faster than the national rate, further information regarding this is included in the Council's Strategic Housing Market Availability Assessment Update 2021.

5.3.7 Copeland is a self-contained housing market, with 78% of household moves (excluding long-distance moves) happening within its borders, and with job-containment and commuting within its borders confirming this. 48.3% of Copeland employees travel less than 10km to work.<sup>8</sup>

5.3.8 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.

<sup>7</sup>

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

<sup>8</sup> Cumbria Observatory

Table 4: *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

5.3.9 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.

5.3.10 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.

5.3.11 The Covid-19 pandemic has reiterated the importance of access to local services and facilities. Whilst goods and services can be accessed online, with increased

numbers of people working from home, face to face visits help maintain social cohesion and reduce social isolation.

5.3.12 Considering the above, the Council's proposed 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. Whitehaven and Millom are also well connected to neighbouring boroughs forming commuter gateways.

5.3.13 The 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. It is important that such villages can grow at an appropriate rate to help maintain existing communities, particularly as their population ages.

## 6. [New Development Strategy and Settlement Hierarchy](#)

6.1.1 Table 5 below identifies the proposed settlement hierarchy and development strategy; it is recommended that this approach is taken forward into the Publication Draft of the Local Plan following public consultation.

6.1.2 The proposed hierarchy contains five tiers of settlements and identifies the level of retail, employment and housing that would be supported in each.

6.1.3 The hierarchy contains several additional villages to the current Core Strategy hierarchy and settlements are also clustered differently in a number of cases based on

more up to date data regarding the physical connections between settlements.

6.1.4 The amount of development directed to each also differs to the Core Strategy, as does the overall requirement across the borough. The reasons for this are set out within the methodology section.

6.1.5 The basic housing need and growth figures are taken from the Strategic Housing Market Availability Update 2021. The basic need figure is the housing requirement i.e. the minimum amount of housing that needs to be delivered over the plan period. The growth figure is the level of housing needed to support economic growth identified in the borough over the plan period. This is the figure the Council will plan for over the plan period and is based upon information in the Employment Development Needs Assessment 2021.

6.1.6 The proposed approach has been developed in accordance with national planning policy. It minimises the need to travel and avoids isolated developments in the open countryside, thereby reducing the impact the Local Plan will have on climate change. It also accords with the NPPF by supporting the rural economy and maintaining sustainable rural communities by allowing them to grow by an appropriate scale.

6.1.7 The proposed approach also provides a framework for the Council to identify a range of deliverable sites for developers and local residents. The methodology for selecting sites is set out in the Site Selection section below.

6.1.8 The differences between the proposed approach, the approach set out in the Preferred Options draft (and Settlement Hierarchy and Strategy Paper 2020) and the current Core Strategy approach are identified in Appendix B.

Table 5: Proposed Settlement Hierarchy and Development Strategy (\* denotes a cross boundary settlement).

Hierarchy of Settlement	Definition	Employment	Retail	Housing Targets (basic need of 2533 net additional dwellings and total growth figure of 3400 net additional dwellings*) 2021-2038	Settlements	Settlement services score <sup>910</sup>
<b>Principal Town</b>	The largest settlement in terms of population by a considerable margin with the broadest range of day-to-day services including the West Cumberland Hospital, a number of secondary schools and an extensive choice of convenience and comparison goods stores and employment opportunities. Well connected to neighbouring Boroughs by public transport.	A range of employment types including: <ul style="list-style-type: none"> <li>• Expansion of existing businesses</li> <li>• New start-ups and incubator facilities</li> <li>• Digital businesses</li> <li>• Improvements and expansion of the existing tourism offer</li> <li>• Creation of new tourism opportunities</li> </ul>	Principal focus of new and enhanced retail, neighbourhood facilities and other main town centre uses (as defined in the National Planning Policy Framework) in Copeland	40%  1014 net additional dwellings  *1360 net additional dwellings minimum	Whitehaven	N/A
<b>Key Service Centres</b>	The Borough's towns are self-sufficient providing a wide range of services, including convenience and comparison stores, employment opportunities, schools and healthcare. They also	A range of small and medium scale enterprises including: <ul style="list-style-type: none"> <li>• Expansion of existing businesses</li> <li>• New start-ups and incubator facilities</li> <li>• Digital businesses</li> </ul>	Convenience and comparison shopping, and a range of other services to serve the settlement and surrounding communities	30% combined  760 net additional dwellings  *1020 net additional dwellings minimum	Cleator Moor Egremont Millom	N/A N/A N/A

<sup>9</sup> Scores are not given to the towns due to the large number and type of services they contain. Town Centre surveys are however carried out annually.

<sup>10</sup> See Appendix C for more detail regarding the settlement services scoring



# Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Definition	Employment	Retail	Housing Targets (basic need of 2533 net additional dwellings and total growth figure of 3400 net additional dwellings*) 2021-2038	Settlements	Settlement services score <sup>910</sup>
	act as service hubs for nearby villages.	<ul style="list-style-type: none"> <li>Improvements and expansion of the existing tourism offer</li> <li>Creation of new tourism opportunities</li> </ul>				
<b>Local Service Centres</b>	<p>These centres have a supporting role to the Borough's towns containing a broad range of services. Settlements operate independently to meet day to day needs or as a well-connected cluster, linked to a neighbouring town or village of a similar scale by a frequent public transport service and/or safe pedestrian routes a mile or less in length.</p> <p>Villages that scored 15 points or more in the Village Services Survey June 2021 or that form a cluster with a larger settlement</p>	<p>Small scale economic opportunities including:</p> <ul style="list-style-type: none"> <li>Conversion and re-use of existing buildings</li> <li>Improvements and upgrade of existing buildings and employment sites</li> <li>Improvements and expansion of the existing tourism offer</li> <li>Creation of new tourism opportunities</li> </ul>	<p>Principally concerned with the sale of food and other convenience goods, and the provision of services to serve the settlement in which they are located or clustered with</p>	<p>19% combined 482 net additional dwellings *646 net additional dwellings minimum</p>	Arlecdon & Rowrah	15
					Cleator (forming cluster with Cleator Moor)	11
					Distington & Common End	20
					Drigg & Holmrook	20
					Frizington	23
					Haverigg	17
					Seascale	24
					St Bees	22
					Thornhill	16
	Settlements which offer a limited number of	Small scale economic opportunity linked to:	Small scale retail and services appropriate to	8% combined	Beckermest	11

Hierarchy of Settlement	Definition	Employment	Retail	Housing Targets (basic need of 2533 net additional dwellings and total growth figure of 3400 net additional dwellings*) 2021-2038	Settlements	Settlement services score <sup>910</sup>
<b>Sustainable Rural Villages</b>	<p>services but which could support a limited amount of growth to maintain communities.</p> <p>Villages that scored between 10 and 14 points in the Village Services Survey June 2021</p>	<ul style="list-style-type: none"> <li>• Expansion of existing businesses</li> <li>• Re-use of existing buildings</li> <li>• Diversification of existing buildings that provide economic opportunity suitable to the role of a sustainable rural village</li> </ul>	<p>villages that will support and strengthen local community viability.</p> <p>The emphasis will be the retention of existing provision</p>	<p>203 net additional dwellings</p> <p>*272 net additional dwellings maximum</p>	Bigrigg	13
					Ennerdale Bridge*	11
					Moresby Parks	13
					Moor Row	10
					Lowca	10
					Parton	14
<b>Other Rural Villages</b>	<p>Smaller settlements which offer one or two key services but which are physically separated from settlements within a higher tier. Public transport and pedestrian links are poor therefore reliance is likely to be on the private vehicle. Limited development would enable future housing needs to be met and support existing local services.</p> <p>Villages that scored between 5 and 9 points in</p>	<p>Small scale economic opportunity linked to:</p> <ul style="list-style-type: none"> <li>•Expansion of existing businesses</li> <li>•Re-use of existing buildings</li> <li>•Diversification of existing buildings that provide economic opportunity suitable to the role of a rural village</li> </ul>	<p>Small scale retail and services appropriate to villages, that will support and strengthen local community viability</p> <p>The emphasis will be the retention of existing provision</p>	<p>3% combined</p> <p>32 net additional dwellings</p> <p>*76 net additional dwellings maximum</p>	Calderbridge*	9
					Hallthwaites	6
					Keekle	7
					Kirkland	6
					Kirksanton	
					Summergrove	5
					The Green	6

# Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Definition	Employment	Retail	Housing Targets (basic need of 2533 net additional dwellings and total growth figure of 3400 net additional dwellings*) 2021-2038	Settlements	Settlement services score <sup>910</sup>
	the Village Services Survey June 2021					
<b>Open Countryside</b>	Remaining parts of the Copeland Local Plan Area including smaller settlements or areas of sparse development not listed above.	Small scale economic opportunity linked to: <ul style="list-style-type: none"> <li>•Expansion of existing businesses</li> <li>•Re-use of existing buildings</li> <li>• Diversification of existing buildings that provide economic opportunity suitable to an open countryside location</li> </ul>	N/A	Rural exception sites only	All other settlements within the Copeland Local Plan Area.	-
<b>Rural Service Centres in Copeland under the jurisdiction of LDNPA</b>	Settlements within Copeland but outside the jurisdiction of the Copeland Local Plan.	Please see the Lake District National Park Local Plan for further information regarding this part of the borough.			Bootle Remaining part of Ennerdale Bridge Gosforth	-

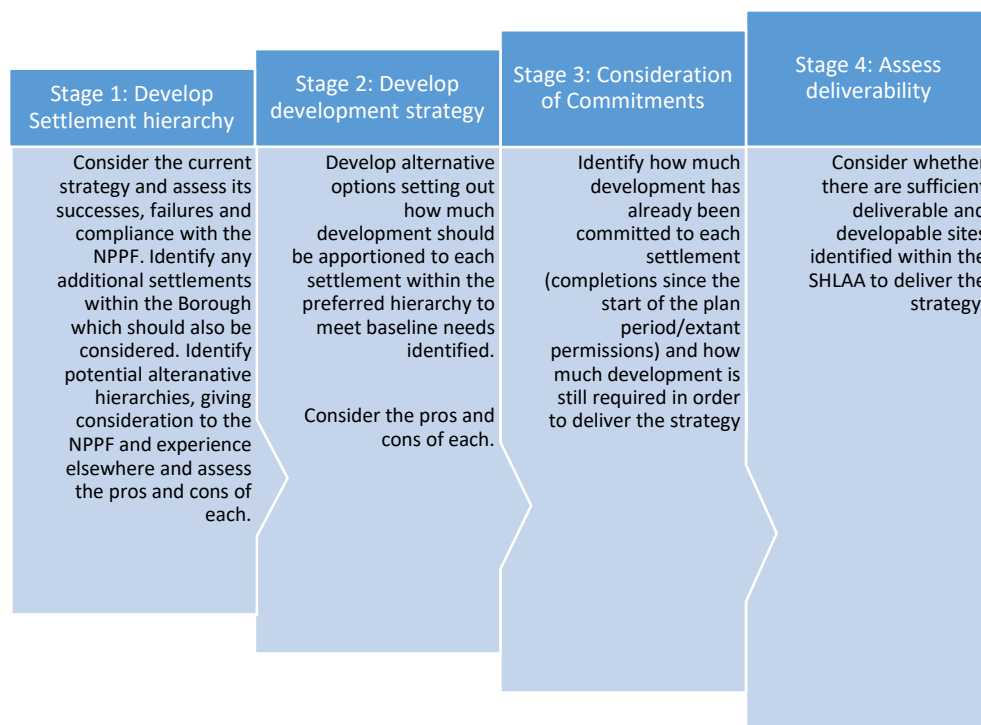
# Developing the Proposed Hierarchy and Strategy

## Methodology



## 7. Methodology: New Local Plan Hierarchy and Development Strategy

7.1.1 The flow chart below shows the stages the Council has followed when producing the settlement hierarchy and development strategy.



7.1.2 Whilst it is not a requirement for the Local Plan to contain a settlement hierarchy it is a useful means of

identifying the most sustainable settlements within the Borough by grouping those with similar features and functions.

7.1.3 Once a hierarchy has been developed, the next step of the process is 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 is committed to each tier (through extant planning permissions and a windfall allowance where appropriate), how much more would be required to meet the requirement (through allocations) and whether the strategy is deliverable taking into account constraints within the settlement (stages 3 and 4).

7.1.5 Stages 3 and 4 are undertaken when developing the Local Plan and will be informed by a housing trajectory which will be produced prior to the Publication Draft.

7.1.6 Experience and best practice from other local authorities is also considered, with particular focus being given to the settlement hierarchy within Lake District National Park Local Plan as two of settlements cross the boundary with the Park and are partly under the jurisdiction of the National Park Authority.

## 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 system<sup>11</sup>, 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 hierarchy. The Council considers a settlement, for this purpose, to be a hamlet, village or town that has a specific character, form and focus (e.g. nucleated or linear) and is more than a sporadic group of buildings within the open countryside.

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 1, page 7.

8.2.3 Each settlement within the Core Strategy hierarchy has a defined settlement boundary and areas outside of these boundaries, including smaller rural villages and hamlets are classed as the open countryside. As part of the development of the new Local Plan such boundaries will be reviewed and updated where necessary.

8.2.4 As Table 1, earlier in this report, 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.

8.2.5 A mapping exercise was then undertaken to identify other smaller settlements, which should also be considered and assessed. A full list of settlements considered can be found in Appendix C. An additional settlement (Goosebutts) was suggested in response to the Issues and Options consultation and was considered as part of the Summergrove settlement.

8.2.6 Where available, appeal decisions have also helped inform which settlements are included in the hierarchy and which are classed as open countryside. For example, Lamplugh was the subject of an appeal in July 2019<sup>12</sup> 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.” Given this decision, Lamplugh has not been included within the hierarchy and is classed as an open countryside location.

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<sup>11</sup> In accordance with para 15 of the NPPF

<sup>12</sup> App/Z0923/W/19/3225839



### 8.3 Options Considered

8.3.1 Table 6 below sets out the options that were considered as a means of organising settlements into a hierarchy. Option 1, which was identified as the Council's preferred option in the previous Settlement Hierarchy and Strategy document 2020 and continues to be so. This is discussed further in the methodology section below. Options 2a, 2b and 3 are discussed further in the previous Settlement Hierarchy and Development Strategy document, along with the reasons why they were discounted.

*Table 6: 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 2021 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 Option 1 was considered to be the most reasonable and would result in more sustainable patterns of development. When developing the option further 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 also 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 Further information regarding responses the Issues and Options consultation can be found in Appendix E, with full responses contained in the Local Plan Issues and Options Consultation Report.

8.4.5 Data from the latest Council's annual Village Services Survey (June 2021) was used to populate a scoring matrix and services were also mapped. This updates previous scoring used to support the hierarchy in the Preferred Options Draft which was based upon 2019 data (See Appendix G).

8.4.6 The services included and points assigned to them are shown in Table 7 below. This also sets out how the scoring methodology has changed between the proposed approach and the preferred approach in the previous Hierarchy and Strategy Paper 2020.

8.4.7 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 C.

8.4.8 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.

8.4.9 Taking into account good practice elsewhere, key services are weighted more heavily to reflect the fact that they are likely to be accessed by more people on a daily basis and thus have a greater impact on reducing the need to travel, particularly by less sustainable modes of transport.

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.

8.4.10 Greater weight has 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.

8.4.11 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.

8.4.12 A frequent bus service was previously 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.

8.4.13 This approach has been amended to take into account more flexible patterns of working. Under the latest scoring methodology, a frequent service is now considered to be one where the service runs from morning to evening and a number of options (busses) are available for going to and from the village throughout the day.

8.4.14 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. For this reason, a lower number of points are given for a frequent bus service than a frequent train service as they are more prone to changes.

8.4.15 The way points are awarded for employment uses have also changed. Points were previously given for individual businesses, other businesses and major employers, however this has been simplified and points are now only assigned where there is a major employer (i.e. a business park, an industrial estate or an employment allocation) within the settlement. The number of points awarded reflects how accessible the employment use is as set out in the table below.

Table 7: Village Services Scoring Criteria - Changes in Methodology

Service	Points Assigned (PO stage)	Points assigned (new approach)	Justification for change
Primary school with capacity	3	No change	N/A
Primary school close to or at capacity	2	No change	N/A
Playgroup/nursery	1	No change	N/A
Convenience store	3	No change	N/A
Post office	1	No change	N/A
Community centre/village hall	2	No change	N/A
Public house	2	No change	N/A
Library	2	No change	N/A
Employment (major)	3	2/1	Amended in light of comments received at preferred options stage. Points are now assigned only to major employers (e.g. industrial parks, commercial parks and employment allocations. 2 points are given where such a use is within 1 mile, safe walking distance of the settlement. 1 point is given if the use is within a mile but pedestrian/cycle links are poor.
Employment (business)	2	0	
Employment (individual)	1	0	Given the number of individual businesses and the fact that many people work from home, do not advertise on premises or allow members of the public to visit (increasing footfall), plus the high rates of business births and deaths, this criterion was removed from the scoring criteria.
Train station	3	3/2	This criterion did not reflect the fact that stations within the borough receive a different level of service. Some stations are served by all services (either as a standard or request stop) running along the line whilst others are only served by a small number. The criterion has therefore been amended so that 3 points are given where all trains on the route stop at the station and only 2 points are given where it is served by a limited

Service	Points Assigned (PO stage)	Points assigned (new approach)	Justification for change
			service. No points are given where the station is poorly connected to the settlement (i.e. where it is over a mile away and/or there is no continuous, lit pavement)
Frequent bus service to KSC	2	No change	Scoring remains the same, however the definition of frequent has been amended so that it now relates to those services that run from morning to evening and a number of options are provided for going to and from the village
Infrequent bus service to KSC	1	No change	
Place of worship	1	No change	N/A
Petrol filling station	1	No change	N/A
Children's outdoor play area (now formal open spaces)	1	No change	This criterion has been extended so a point is given for all types of formal open spaces (including parks, playgrounds, pitches, village greens, civic spaces) as they are equally important places for social interactions.
Gym/fitness centre/swimming pool	1	No change	N/A
Store (other including former A1, A2, A3 or A5 uses)	1	No change	N/A
Doctor	1	No change	N/A
Dentist	1	No change	N/A
Other community facility	N/A	1	New criteria reflecting the importance of other facilities such as youth clubs, theatres etc.
School hall providing community space where there is no community or village hall	N/A	1	New criteria reflecting the fact that in some villages where there is no formal community or village hall, many schools open up their halls for public use and events. This helps provide space for social cohesion.

### Identifying Settlement Clusters

8.4.16 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 as set out below.

### Pedestrian Links

8.4.17 Where a settlement is in close proximity to another and where there are safe and accessible pedestrian links between the two, then this would form a settlement cluster and could justify it being higher up the settlement hierarchy. Settlement clusters are identified in Table 5.

8.4.18 Safe and accessible pedestrian links are considered to be those which have a continuous pavement with street-lighting. The route must also be a reasonable distance, particularly given the fact that the Borough has an aging population.

8.4.19 When determining what constitutes a reasonable distance to walk, several documents were taken into account. These are shown in Table 8 below.

8.4.20 Planning for Walking is most up-to-date of the three documents listed 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 8: Guidance on Reasonable Walking Distances

Document	Link	Recommendation
<i>Statutory Guidance for Local authorities</i> (DfE, July 2014)	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf</a>	<p>Statutory walking distances:</p> <ul style="list-style-type: none"><li>• For children aged over the age of 5 but under the age of 8 the statutory walking distance is 2 miles</li><li>• For children aged over the age of 8 but under 16 the statutory walking distance is 3 miles.</li></ul> <p>Beyond these distances local authorities are required to provide free transport for all pupils of compulsory school age.</p>

		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.								
<i>Providing for Journeys on Foot</i> (Chartered Institution of Highways and Transportation (CIHT), 2000)	<a href="http://www.ciht.org.hk/en/knowledge/publications/index.cfm/providing-for-journeys-on-foot-2000.html">http://www.ciht.org.hk/en/knowledge/publications/index.cfm/providing-for-journeys-on-foot-2000.html</a>	<p>Suggests the following acceptable walking distance to schools. These distances are widely accepted as being acceptable for use in transport assessments.</p> <table><tr><td></td><td>Distance (metres)</td></tr><tr><td>Desirable</td><td>500</td></tr><tr><td>Acceptable</td><td>1,000</td></tr><tr><td>Preferred Maximum</td><td>2,000</td></tr></table>		Distance (metres)	Desirable	500	Acceptable	1,000	Preferred Maximum	2,000
	Distance (metres)									
Desirable	500									
Acceptable	1,000									
Preferred Maximum	2,000									
<i>Planning for Walking</i> (Chartered Institution of Highways and Transportation (CIHT) 2015)	<a href="https://www.ciht.org.uk/media/4462/ciht_-_planning_for_walking_document-12pp_v2_singles.pdf">https://www.ciht.org.uk/media/4462/ciht_-_planning_for_walking_document-12pp_v2_singles.pdf</a>	Advises that most people will only walk if their destination is less than a mile (1.6km) away. People are more likely to walk if the distance is around 800m or a 10 minute walk. This document identifies challenges which reduce the likelihood of people walking, such as fear of crime, highway safety etc.								

### Public Transport

8.4.21 As well as considering pedestrian links, public transport provision was also assessed when scoring settlements and considering whether they operated as a cluster.

8.4.22 The railway line through Copeland is an important link between settlements. When identifying settlement clusters consideration was given to whether they contained a train station, whether the station was *within* the settlement

or on the edge and how frequently the service 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 village, Green Road Station is poorly connected to it being

over a mile away from the main village with poor pedestrian links<sup>13</sup>.

8.4.23 Nethertown is also located on the railway line and consideration was given to whether it formed a cluster with Whitehaven. The station however is more than a mile away from the main settlement and access is via an unlit track. A limited number of services stop here (even as a request stop).

8.4.24 Given the above both Nethertown and the Green are considered to be standalone settlements and no points have been awarded for either station.

## 9. Stage 2 - Development strategy

9.1.1 The development strategy, set out in Table 5, identifies how much development should be directed to each tier of the hierarchy and whether such figures should be minimum or maximum requirements.

9.1.2 Where a figure is a minimum, additional development would be supported once the target has been met providing it accords with the Development Plan. Where a figure is a maximum, no further development will be permitted once the target has been met unless an exceptional case can be made.

9.1.3 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 a constraint limited

the amount of growth in a particular settlement, it can be delivered elsewhere within the tier.

9.1.4 The targets quoted in Table 5 for Key and Local Service Centre are also minimum figures and not “ceilings” therefore additional development within those settlements should be supported where appropriate.

9.1.5 Setting the targets within the lower tiers (Sustainable Rural Villages and Other Villages) 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.

### Post Preferred Options Changes

9.1.6 In terms of housing, the Strategic Housing Market Assessment Update 2021 has identified a need for a minimum of 2533 dwellings (149 per annum) over the plan period 2021-2038. This differs slightly from the previous requirement set out in the Preferred Options Draft which identified a need for 2520 dwellings (140 per annum) across the plan period 2017-2035.

9.1.7 The Plan period has changed to ensure a 15-year period is covered and as the requirement is based upon more up-to-date figures there is no longer a need to back date it.

9.1.8 To support economic growth, the SHMA Update 2021 recommends that the Council plans for 3400 dwellings (200 dwellings per annum).

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<sup>13</sup> The pavement between the station and the main settlement is only in place for part of the route and is unlit in part.

9.1.9 The growth figure is supported by an Employment Development Needs Assessment (EDNA) and an Employment Land Study (ELAS) which were produced in 2021. As well as identifying how much housing will be required to deliver economic growth, the documents also identify where employment land is best placed. The spread of employment uses across the Borough identified in Table 5 reflects the two documents.

9.1.10 The Council has also produced a Retail Study Update earlier in 2021 which has informed the strategy in terms of retail uses as set out in Table 5.

9.1.11 In terms of housing, the strategy divides the baseline and growth figures across the tiers as shown in Table 5. For ease the baseline and growth figures will be apportioned to each tier the same way across the plan period.

9.1.12 The proposed strategy continues to direct most development to the Borough's four towns, although the proportion of development directed to Whitehaven is 5% lower than at present under the Core Strategy<sup>14</sup>, but maintains the figure proposed in the Preferred Options Draft.

9.1.13 The figure for Whitehaven was been reduced to enable the creation of the additional tiers to allow for development to take place in a number of additional rural villages. It should be noted that the amount of development directed to Whitehaven is only a minimum figure and additional development will be supported in the town where it accords with the development plan.

9.1.14 The amount of housing development directed to the Key Service Centres remains the same as the Core Strategy and Preferred Options Draft.

9.1.15 In terms of the Local Service Centres, the amount of development directed to this tier has been reduced from 20% in the Preferred Options Draft to 19% in the proposed approach. This reflects the fact that the number of LSCs has fallen from 10 to 9, with Bigrigg now falling into a lower tier.

9.1.16 Several the villages within the tier, such as St Bees are relatively constrained and others, such as Frizington, have a shortage of developable sites, therefore there would be difficulties in meeting the earlier, higher target.

9.1.17 It should be noted however that the target for the Local Service centres is a minimum figure and should appropriate windfall development come forward within the villages this would be supported where it accords with the Development Plan.

9.1.18 In terms of the Sustainable Rural Villages, the amount of development directed to this tier has been increased from 7% to 8% reflecting the fact that the number of villages within the tier has increased from 6 to 7 with the addition of Bigrigg.

9.1.19 The number of settlements within the Other Villages tier has fallen from 9 to 7 as Nethertown and The Hill now fall into the open countryside category. The percentage of development directed to this tier remains the same as in the Preferred Options draft.

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<sup>14</sup> The 40% figure was also identified in the Local Plan Preferred Options Draft



## 9.2 Alternative Approaches

9.2.1 A number of alternative approaches to the development strategy were considered but discounted as the aims of the hierarchy and strategy set out earlier in this document were unlikely to be achieved. Such approaches were also unlikely to result in sufficient sustainable development being delivered to meet identified needs. Alternative approaches considered are set out in the previous Settlement Hierarchy and Development Strategy Paper 2020.

## 10. Summary

10.1.1 This document sets out what is considered to be the most appropriate settlement hierarchy and development strategy to support the new Local Plan. It differs to the current hierarchy and strategy within the Core Strategy and the approach set out in the Preferred Options Draft. It is however based upon up-to-date evidence, accords with the NPPF and will deliver the necessary development to support our towns and rural communities.

10.1.2 The hierarchy and strategy 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. The Council, following consultation, will then identify the most appropriate sites to deliver the strategy.

10.1.4 As part of the development of the next 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 the start of the plan period and future windfall developments.)

10.1.5 The following section of this document sets out the process for identifying the allocations within the emerging Local Plan.

# Site Selection

## Methodology

## 11. Site Selection

11.1.1 The following paragraphs outline how the draft housing and employment allocations in the emerging Local Plan have been identified and selected.

### 11.2 Identifying sites for housing

11.2.1 Sites were identified initially through the Strategic Land Availability Assessment (SHLAA) process which began prior to the production of the Issues and Options Draft.

11.2.2 The Council's latest SHLAA, produced in 2020, can be seen at the following link:  
[https://www.copeland.gov.uk/sites/default/files/attachments/shlaa\\_2020.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/shlaa_2020.pdf). An update is currently being produced and will be available alongside the consultation on the Publication Draft.

11.2.3 The purpose of the SHLAA is to assess the deliverability of sites. National Planning Practice Guidance (NPPG) (para 8) notes that "*the assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land.*"

11.2.4 Deliverable sites are those that are suitable, available and where development is achievable; this means that there must be a *realistic prospect* of housing being

delivered on the site within 5 years. The full definition is available in the NPPF Glossary document<sup>15</sup>.

11.2.5 Developable sites are those that are in a suitable location for housing development with a *reasonable prospect* that they will be available and could be viably developed at the point envisaged (in years 6+).

11.2.6 A number of calls for sites<sup>16</sup> were made where landowners or other interested parties were asked to submit sites for consideration through the SHLAA process. The Council also reviewed all land around existing settlements within the Core Strategy through a mapping exercise. A full list of sources is included in page 5 of the SHLAA.

### 11.3 Initial sift of sites

11.3.1 An initial sift of sites was made in 2019 and the following types of site were excluded from further assessment:

- Sites below a 0.25ha threshold
- Sites where a minimum of 50% falls within flood zones 2/3, where the remaining area outside of flood zones 2/3 is less than 0.25ha (with the exclusion of town centre regeneration sites that may be acceptable through appropriate design)

<sup>15</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>16</sup> 'Call for Sites' were issued in autumn 2008, summer 2009, spring 2011 to inform the Copeland Local Plan 2013-2028: Core Strategy. In addition, there was an opportunity to

submit new sites in response to the Site Allocation Policies Plan Preferred Options consultation in 2015 and in response to the Local Plan Issues & Options consultation in 2019 and Preferred Options Draft 2020.

- Sites within a SSSI, SPA, SAC, Ramsar
- Sites within an unsustainable and isolated location away from key services, (development would be contrary to Section 29 of the Planning and Compulsory Purchase Act which states that authorities preparing plans must do so “with the objective of contributing to the achievement of sustainable development” and National Planning Policy.)

11.3.2 Further information on the reasons for this and how the methodology was developed can be found in the SHLAA document.

#### 11.4 Assessing the Suitability of sites

11.4.1 Through the SHLAA process, constraints to delivery on all but the excluded sites were assessed through a combination of desk top studies and site visits by Council Officers. This enabled an assessment of likely suitability of the site and helped identify any mitigation that would be required if the site was taken forward for allocation. Information on the following was gathered and recorded in a SHLAA database:

- Site size, boundaries and location
- Current land use and character
- Land uses and character of surrounding area
- Physical constraints (e.g. access, contamination, topography, natural features of significance, location of infrastructure/utilities, landscape, including the impact upon

the setting of the Lake District National Park, mining history, mineral safeguarding areas etc)

- Potential environmental constraints including the presence of habitats and species, flood risk, geology etc
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed).

11.4.2 Consideration was also given to the following key evidence documents and in some cases, this resulted in the site being found unsuitable:

- Strategic Flood Risk Assessment (SFRA 2018)
- Copeland Open Space Study (OSA 2020)
- Draft Copeland Settlement Landscape Character Assessment SLCA (2020)
- EA Flood Maps
- Statutory Consultee Comments (e.g. Highways Authority, Lead Local Flood Authority, United Utilities etc).

#### 11.5 Assessing Availability

11.5.1 Where sites have been held in the Council’s database for more than five years landowners were contacted in 2019 to ensure their sites are still available and to collate additional information including timescale for delivery. Consideration was also been given to the presence of any legal or ownership impediments to development e.g. ransom strips etc. which may affect the availability of a site.

Sites which are unavailable were then categorised as being undeliverable.

11.5.2 The presence of a planning permission for an alternative use does not automatically render the site unavailable. The following reason(s) have been used to determine that a site is not available:

- The site is already in an active use
- The landowner has not indicated an intention to develop or sell the site for housing
- The site is in multiple ownerships
- There are ransom strips or existing tenancies

#### 11.6 Identifying draft allocations from deliverable and developable sites

11.6.1 Deliverable and developable sites were then assessed through the Sustainability Appraisal and Habitats Regulations processes. The SA assessed whether the development of the site would have a positive, negative, or neutral effect on sustainability objectives. The HRA identified whether development of the site was likely to cause significant effects on Natura 2000 Sites.

11.6.2 The SA and HRA process helped to highlight the most sustainable of the sites and identify those would cause potential harm to Natura 2000 sites if developed. The SA and HRA informed the Local Plan Preferred Options Draft which allocated the least constrained sites for housing to meet the identified need in each tier of the hierarchy.

#### 11.7 Moving from the Preferred Options

11.7.1 The Council has recently reviewed all responses received to the Preferred Options draft and any additional sites put forward for consideration as a potential allocation. New sites submitted have been subject to the same level of scrutiny as those within the SHLAA, unless they fell into one of the exclusion categories listed on the previous page.

11.7.2 A number of additional evidence documents, produced since the Preferred Options Draft, have also been reviewed. These include the draft Site Access Assessments, draft Ecological Assessments and a draft updated SFRA. In some cases, this new evidence has flagged up additional constraints and a small number of draft allocations are no longer considered deliverable.

11.7.3 The review of the Settlement Hierarchy has also reduced the amount of development needed in some villages, for example where a village has dropped down a tier. This means that the number of allocations that were proposed in the Preferred Options Draft are no longer required. When determining which allocations to take forward and which to remove, consideration was given to how well the site relates to the settlement and which has the least constraints.

11.7.4 A small number of sites that were proposed for allocation in the Preferred Options Draft have since gained planning permission. To avoid double counting when producing the housing trajectory, such sites will be removed from the allocations list as the principle of development has already been established through the application.

11.7.5 Contact has been made with the landowners of the remaining allocations to ensure they are still available. Where a site is no longer available it will not be taken forward as an allocation in the next draft of the Local Plan.

11.7.6 A short consultation focussed on any changes to the draft allocations under consideration is to be held in September/October 2021. All responses to this will be considered and will help inform the Publication Draft of the Local Plan, anticipated at the end of the year.

## 11.8 Identifying sites for Employment

11.8.1 In 2020 the Council produced a Copeland's Employment and Opportunity Sites document that identified a number of potential sites for employment uses from a number of sources. The document is available at the following link:

[https://www.copeland.gov.uk/sites/default/files/attachments/employment\\_opportunity.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/employment_opportunity.pdf)

11.8.2 Sources included the 2013 to 2028 Copeland Local Plan and Development Policies DPD, saved policies from the Copeland Local Plan 2001 to 2016, sites identified in the 2015 Preferred Options and sites submitted in the 2020 Call for Sites (non-residential).

11.8.3 A high-level assessment of the suitability of such sites for employment uses was carried out and the results are included within this document. Factors such as flood

risk, amenity impacts, landscape impacts, open space impacts, settlement character impacts, heritage and ecology impacts were taken into consideration.

11.8.4 Availability was also assessed using the criteria set out in paragraph 11.5 above.

11.8.5 The findings were used to inform a list of employment allocations within the Local Plan Preferred Options Draft.

11.8.6 This document was reviewed through the draft Employment Land Availability Study (ELAS) 2021 which identified which sites should be allocated for employment uses going forward taking into consideration issues such as demand and attractiveness to the market as well as the constraints listed above. The ELAS also confirmed the availability of sites following discussions with landowners.

# Appendices

## Appendix A: NPPF Review of Current Core Strategy Development Strategy and Proposed Development Strategy

NPPF Paragraph No.	What it requires	Current Core Strategy	Proposed Strategy
79	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.	<p>The proposed hierarchy and strategy assess the physical links between villages and the services within them and clusters them together where there are good, safe pedestrian routes and/or public transport links.</p> <p>The proposed hierarchy allows for some, appropriately scaled development within smaller villages with local services to allow them to grow and thrive.</p>
80	Planning policies and decisions should avoid the development of isolated homes in the countryside...	The Core Strategy directs development away from isolated locations.	The proposed hierarchy and strategy continue to avoid isolated homes within the open countryside.
92	Planning policies...should 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 other...are 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 attractive, well-designed, clear and legible pedestrian and cycle routes...enable and support healthy lifestyles, especially where	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.	<p>The new strategy identifies 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.</p> <p>It also directs development to settlements which already benefit from those facilities listed within the NPPF which support healthy lifestyles.</p>



NPPF Paragraph No.	What it requires	Current Core Strategy	Proposed Strategy
	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.		
105	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 plan-making and decision-making.	Public transport provision has changed since the Core Strategy was adopted in 2013.	The production of a new strategy has allowed the Council to gain a more up-to date picture of the existing public transport links between settlements. Points have been awarded to those villages that have public transport links.
153	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.	Climate change has become an increasingly important issue since the adoption of the Core Strategy and the issues listed in this paragraph will all be considered during the site selection process.	<p>The new strategy and hierarchy have a role to play in mitigating and adapting to climate change by ensuring new development is located in the most sustainable locations.</p> <p>Issues such as flood risk, biodiversity and landscapes are taken into consideration when defining settlement boundaries and allocating sites for development.</p>

NPPF Paragraph No.	What it requires	Current Core Strategy	Proposed Strategy
154	New development should be planned for in ways that...can help to reduce greenhouse gas emissions, such as through its location...	The Core Strategy does this by directing development to the towns villages that were best served by services at the time and avoiding isolated developments in the open countryside.	The new hierarchy and strategy will 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.

**Appendix B: Proposed Settlement Hierarchy and Housing Strategy Compared to Previous Versions**

Hierarchy of Settlement	Core Strategy Approach - Settlements	Net additional dwelling (NDA) target (% of borough requirement)	Preferred Options 2020 Approach - Settlements	Net additional dwelling (NDA) target (% of borough total, basic need, growth*)	Proposed Approach 2021 – Settlements	Net additional Dwelling (NDA) target (% of borough total, basic need, growth*)
<b>Plan Period</b>	<b>2013-2028</b>		<b>2017-2035</b>		<b>2021-2038</b>	
<b>Overall Requirements</b>			<b>Basic need of 2520 net additional dwellings Total growth figure of 3600 net additional dwellings</b>		<b>Basic need of 2533 net additional dwellings Total growth figure of 3400 net additional dwellings*</b>	
<b>Principal Town</b>	Whitehaven	45%	Whitehaven	40%  1008 nda  *1440 minimum	Whitehaven	40%  1014 nda  *1360 nda minimum
<b>Key Service Centres</b>	Cleator Moor	30% combined	Cleator Moor	30% combined	Cleator Moor	30% combined
	Egremont		Egremont	756 nda  *1080 nda minimum	Egremont	760 nda  *1020 nda minimum
	Millom		Millom		Millom	
<b>Local Service Centres</b>	Arlecdon & Rowrah	20% combined	Arlecdon & Rowrah	20% combined	Arlecdon & Rowrah	19% combined

# Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Core Strategy Approach - Settlements	Net additional dwelling (NDA) target (% of borough requirement)	Preferred Options 2020 Approach - Settlements	Net additional dwelling (NDA) target (% of borough total, basic need, growth*)	Proposed Approach 2021 – Settlements	Net additional Dwelling (NDA) target (% of borough total, basic need, growth*)
	Beckermert		Bigrigg	504 nda	Cleator (forming cluster with Cleator Moor)	482 nda
	Bigrigg		Cleator (forming cluster with Cleator Moor)	*720 nda minimum	Distington & Common End	*646 nda minimum
	Cleator		Distinton & Common End		Drigg & Holmrook	
	Distington		Drigg & Holmrook		Frizington & Rheda	
	Frizington		Frizington & Rheda		Haverigg	
	Haverigg		Haverigg		Seascale	
	Kirkland/Ennerdale Bridge		Seascale		St Bees	
	Lowca/Parton		St Bees		Thornhill	
	Moor Row		Thornhill		-	
	Moresby Parks		-		-	
	Seascale		-		-	

Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Core Strategy Approach - Settlements	Net additional dwelling (NDA) target (% of borough requirement)	Preferred Options 2020 Approach - Settlements	Net additional dwelling (NDA) target (% of borough total, basic need, growth*)	Proposed Approach 2021 – Settlements	Net additional Dwelling (NDA) target (% of borough total, basic need, growth*)
	St Bees		-		-	
	Thornhill		-		-	
<b>Sustainable Rural Villages</b>	Tier not included	N/A	Beckermest	7% combined	Beckermest	8% combined
			Calderbridge*	177 nda	Bigrigg	203 nda
			Ennerdale Bridge*	*253 nda maximum	Ennerdale Bridge*	*272 nda maximum
			Moresby Parks		Moresby Parks	
			Moor Row		Moor Row	
			Parton		Lowca	
			-		Parton	
<b>Other Rural Villages</b>	Tier not included	N/A	Hallthwaites	3% combined	Calderbridge*	3% combined
			Keekle	76 nda	Hallthwaites	76 nda
			Kirkland	*108 nda maximum	Keekle	*102 nda maximum
			Kirksanton		Kirkland	

# Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Core Strategy Approach - Settlements	Net additional dwelling (NDA) target (% of borough requirement)	Preferred Options 2020 Approach - Settlements	Net additional dwelling (NDA) target (% of borough total, basic need, growth*)	Proposed Approach 2021 – Settlements	Net additional Dwelling (NDA) target (% of borough total, basic need, growth*)
			Lowca		Kirksanton	
			Nethertown		Summergrove	
			The Green		The Green	
			The Hill		-	
			Summergrove		-	
<b>Open Countryside</b>	Elsewhere	5%	All other settlements within the Copeland Local Plan Area.	0%  Rural exception sites only	All other settlements within the Copeland Local Plan Area.	0%  Rural exception sites only

## Appendix C: Settlement Services Scores June 2021

Settlement/	Primary School with capacity <sup>17</sup>	Primary school at or close to	Convenience Store	Community centre/village hall	School hall with community use <sup>19</sup>	Library	Public House/social club	Formal Open Space <sup>20</sup>	Frequent train service <sup>21</sup>	Infrequent train service <sup>22</sup>	Frequent bus service <sup>23</sup>	Major Employer (Less	Major Employer (accessible) <sup>25</sup>	Post Office	Playgroup/nursery	Place of worship	Petrol Filling Station	Gym/Fitness Centre/Pool	Doctor surgery	Dental Surgery	Other Store/service <sup>26</sup>	Other Community Facility <sup>27</sup>	Village Total
Points Available	3	2	3	2	1	2	2	2	3	1	2	1	2	1	1	1	1	1	1	1	1	1	35
Arlecdon & Rowrah	✓	-	✓	✓	-	-	✓	✓	-	-	-	-	-	✓	-	✓	-	-	-	-	-	✓	15
Asby	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Beckermest	✓	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	11
Bigrigg	-	-	✓	✓	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	13
Braystones	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	✓	-	3
Calderbridge	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	-	✓	-	9

<sup>17</sup> 3 points given where the school has capacity according to the IDP Part 1 document

<sup>18</sup> 2 points given where the school is at or close to capacity according to the IDP Part 1 document

<sup>19</sup> A point given where the school offers a hall that is open to the public if the village does not have its own community centre/village hall. This data has been sourced directly from the school

<sup>20</sup> Managed open spaces within the village such as children's play areas, playing pitches, parks, village greens, civic spaces

<sup>21</sup> Where all train services passing through stop at the station (as standard or request stops)

<sup>22</sup> Where not all train services passing through stop at the station (even as request stops)

<sup>23</sup> Where the service runs from morning to evening and a number of options are provided for going to and from the village

<sup>24</sup> Where the employer (inc business parks and industrial estates) is within 1 mile of a settlement, but pedestrian/cycling links are poor

<sup>25</sup> Where the employer (inc business parks and industrial estates) is within 1 mile safe walking/cycling distance to a settlement

<sup>26</sup> A store that is open to the public such as a hairdresser, take-away, bakery, cafe etc. Excludes bed and breakfast facilities unless they have a take-away or public house element.

<sup>27</sup> For example, a youth club, theatre etc

Settlement hierarchy & Development Strategy Paper Update

Settlement/	Primary School with capacity <sup>17</sup>	Primary school at or close to	Convenience Store	Community centre/village hall	School hall with community use <sup>19</sup>	Library	Public House/social club	Formal Open Space <sup>20</sup>	Frequent train service <sup>21</sup>	Infrequent train service <sup>22</sup>	Frequent bus service <sup>23</sup>	Major Employer (Less	Major Employer (accessible) <sup>25</sup>	Post Office	Playgroup/nursery	Place of worship	Petrol Filling Station	Gym/Fitness Centre/Pool	Doctor surgery	Dental Surgery	Other Store/service <sup>26</sup>	Other Community Facility <sup>27</sup>	Village Total
<b>Points Available</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>35</b>
Cleator	-	-	✓	✓	-	-	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	11
Distington & Common End	✓	-	✓	✓	-	✓	-	✓	-	-	✓	-	✓	-	-	✓	-	-	✓	-	✓	✓	20
Drigg & Holmrook	-	-	✓	✓	-	-	✓	✓	✓	-	✓	✓	-	✓	-	✓	✓	-	-	-	✓	✓	20
Ennerdale Bridge	✓	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	11
Frizington	✓	-	✓	✓	-	✓	✓	✓	-	-	✓	-	✓	✓	✓	✓	-	-	-	-	✓	✓	23
Gilgarran	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Haile	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	3
Haverigg	✓	-	✓	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	✓	-	-	-	-	✓	-	17
Howgate	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	✓	-	4
Keekle	-	-	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	7
Kirkland	✓	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	6
Kirksanton	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Lamplugh	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	4
Low Moresby	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	1



Settlement/	Primary School with capacity <sup>17</sup>	Primary school at or close to	Convenience Store	Community centre/village hall	School hall with community use <sup>19</sup>	Library	Public House/social club	Formal Open Space <sup>20</sup>	Frequent train service <sup>21</sup>	Infrequent train service <sup>22</sup>	Frequent bus service <sup>23</sup>	Major Employer (Less)	Major Employer (accessible) <sup>25</sup>	Post Office	Playgroup/nursery	Place of worship	Petrol Filling Station	Gym/Fitness Centre/Pool	Doctor surgery	Dental Surgery	Other Store/service <sup>26</sup>	Other Community Facility <sup>27</sup>	Village Total
<b>Points Available</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>35</b>
Lowca	✓	-	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	-	-	-	-	-	-	✓	10
Middletown	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Moor Row	✓	-	-	-	✓	-	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	10
Moresby Parks	-	✓	✓	-	✓	-	✓	✓	-	-	-	-	✓	-	-	✓	-	-	-	-	-	-	13
Nethertown <sup>28</sup>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	1
Parton	✓	-	-	✓	-	-	-	✓	✓	-	✓	-	-	-	-	✓	-	-	-	-	✓	-	14
Pica	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Sandwith	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	4
Seascale	✓	-	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	-	✓	✓	-	✓	✓	24
St Bees	✓	-	✓	✓	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓	-	-	✓	✓	22
Summergrove	-	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	✓	5
The Green <sup>29</sup>	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
The Hill	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2

<sup>28</sup> Nethertown Station is outside of the village and pedestrian connections are poor therefore no points have been given for this service.

<sup>29</sup> Green Road station is outside of the village and pedestrian connections and poor therefore no points have been given for this service.

# Settlement hierarchy & Development Strategy Paper Update

Settlement/	Primary School with capacity <sup>17</sup>	Primary school at or close to	Convenience Store	Community centre/village hall	School hall with community use <sup>19</sup>	Library	Public House/social club	Formal Open Space <sup>20</sup>	Frequent train service <sup>21</sup>	Infrequent train service <sup>22</sup>	Frequent bus service <sup>23</sup>	Major Employer (Less	Major Employer (accessible) <sup>25</sup>	Post Office	Playgroup/nursery	Place of worship	Petrol Filling Station	Gym/Fitness Centre/Pool	Doctor surgery	Dental Surgery	Other Store/service <sup>26</sup>	Other Community Facility <sup>27</sup>	Village Total
Points Available	3	2	3	2	1	2	2	2	3	1	2	1	2	1	1	1	1	1	1	1	1	1	35
Thornhill	✓	-	✓	-	✓	-	✓	✓	-	-	✓	-	-	✓	✓	✓	-	-	-	-	-	-	16
Wilton	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0

**Appendix D- Village Bus and Train service data June 2021**

Please note that these services are subject to change.

Village	Bus Service	Train station	Notes
Arlecdon/Rowrah	-	-	
Asby	-	-	
Beckermest	-	-	
Bigrigg	30	-	Busses every half hour
Braystones	-	Yes	Barrow-Carlisle route. Limited services stop here.
Calder Bridge	-	-	
Cleator	-	-	
Common End	30	-	Busses every 15 minutes
Coulderton	-	-	
Distington	30	-	Busses every 15 minutes
Drigg	-	Yes	Barrow-Carlisle route. Full service
Ennerdale Bridge	-	-	
Frizington	30	-	Busses every half hour
Gilgarran	-	-	
Gosforth	-	-	
Haile	-	-	
Hallthwaites	-	-	
Haverigg	-	-	
Holmrook	-	-	
Howgate	30	-	Busses every 15 minutes
Keekle	30	-	Busses every half hour
Kirkland	-	-	
Kirksanton	-	-	
Lamplugh	-	-	
Low Moresby	-	-	
Lowca	1	-	Busses every half hour
Middleton	-	-	
Moor Row	-	-	
Moresby Parks	-	-	
Nethertown	-	Yes	Barrow-Carlisle route, only limited trains stop at this station. Station is more than a mile away from the village by an unlit track.
Parton	30,29,1	Yes	Barrow-Carlisle route. Full service

# Settlement hierarchy & Development Strategy Paper Update

Village	Bus Service	Train station	Notes
			1 is every half hour within Parton and 30 is every 15 Minutes and 29 is every half hour on the A595.
Pica	-	-	
Sandwith	-	-	
Seascale	-	Yes	Barrow-Carlisle Route. Full service
Silecroft	-	Yes	Barrow- Carlisle route. Full service
St Bees	-	Yes	Barrow-Carlisle route. Full service
The Green	-	Yes	Barrow-Carlisle Route. The station (Green Road) is more than a mile away from the village via an unlit route which is not continuous.
The Hill	-	-	
Thornhill	30	-	Busses every half hour
Wilton	-	-	

## Appendix E: Issues and Options Responses

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.

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.

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.

<b>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)</b>		
<b>Option no.</b>	<b>Option</b>	<b>Average ranking* (calculated from responses received)</b>
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.

<b>Question DS6: How should Employment, retail and housing development be distributed across the Borough? (Choose one option)</b>		
<b>Option no.</b>	<b>Option</b>	<b>Support for option (responses received)</b>
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.

## Appendix F – Preferred Option Summary of Responses to draft hierarchy and strategy policies

### Key

	Policy/ allocation received a number of comments, which may require significant changes
	Policy/ allocation received a small number of comments, such as wording suggestions, which may require alterations
	Policy/ allocation received little to no comment and will require few changes

Draft Policy (Local Plan Preferred Options Draft)	No. of Instances	Brief summary of comments received (full representations will be included within the Preferred Options Consultation Responses document that will be available alongside the Publication Draft)
<b>DS2PO: Settlement Hierarchy</b>	<b>147</b>	<ul style="list-style-type: none"> <li>Large number of objections, particularly from members of the public, relating to the scoring based approach to the settlement hierarchy, the clustering approach used and the placement of settlements in tiers of the hierarchy.</li> <li>Additional evidence required here, including a revised assessment of settlement services</li> <li>Developer support for revised strategy, particularly the additional tiers</li> </ul>
<b>E2PO: Location of Employment</b>	<b>6</b>	<ul style="list-style-type: none"> <li>Biodiversity should be given additional weight within policy</li> <li>Should be accessible by modes other than car, particularly active travel. Would benefit from clustering alongside other uses</li> </ul>
<b>R2PO: Hierarchy of Town Centres</b>	<b>0</b>	
<b>H4PO: Distribution of Housing</b>	<b>10</b>	<ul style="list-style-type: none"> <li>Suggestions that should remove reference to 'maximum' dwellings- is not in line with government aim to boost housing supply or the NPPF. Additional housing in lower tiers should be approved where they meet an identified need.</li> <li>Several concerns raised surrounding infrastructure provision and traffic</li> <li>Additional consideration should be given to locational advantages and the connections to larger, more sustainable settlements.</li> </ul>

**Appendix G : Settlement hierarchy and Settlement Services Scores - Preferred Options Draft 2020**

Hierarchy of Settlement	Settlements	Services Scores	Notes
Principal Town	Whitehaven	N/A	Service scores haven't been given to the towns in the Borough because of the number and range of services
Key Service Centres	Cleator Moor	N/A	
	Egremont		
	Millom		
Local Service Centres  Settlement/cluster which scores <b>15 points or more</b>	Seascale	25	
	Drigg & Holmrook	23 combined	
	Frizington & Rheda	22 combined	
	St Bees	20	
	Distington & Common End	18 combined	
	Haverigg	17	
	Arlecdon & Rowrah	17 combined	
	Thornhill	16	
	Bigrigg	15	
	Cleator	7	Cleator falls within this category 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 Villages  Settlement/cluster scores between <b>10 and 14 points</b>	Beckermest	12	
	Ennerdale Bridge	12	
	Moresby Parks	12	
	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 settlements prevent it from forming part of a larger cluster.

Hierarchy of Settlement	Settlements	Services Scores	Notes
Settlement/cluster scores between <b>5 and 9 points</b>	The Green	8	Poor pedestrian links between the village and surrounding settlements prevent it from 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 the village and surrounding settlements prevent it from being part of a larger cluster.
	Keekle	7	
	Kirksanton	6	
	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.
<b>Open Countryside</b>	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. <sup>30</sup>
	Braystones	4	Poor pedestrian links between the settlement and surrounding settlements prevent it from being part of a larger cluster.
	Sandwith	4	
	Low Moresby	3	

<sup>30</sup> 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”.

## Settlement hierarchy & Development Strategy Paper Update

Hierarchy of Settlement	Settlements	Services Scores	Notes
	Howgate	3	
	Haile	3	
	Middletown	2	
	Pica	2	
	Asby	0	
	Common End	0	
	Coulderton	0	
	Wilton	0	
	Gilgarran	0	
	Goosebutts	0	

