

# Copeland Local Plan 2021-2038 Examination

## Hearing Statement on behalf of Story Homes (Respondent No. 79)

### Matter 15: Housing Allocations

**Issue: Whether the proposed housing allocations and broad locations are justified, effective and consistent with national policy?**

***Q15.2 Is the proposed distribution of housing set out in Policy SP H4PU consistent with the settlement hierarchy set out in Policy DS3PU? How were the proportions/amounts of development for each tier of the hierarchy of settlements arrived at?***

- 1.1 Story Homes is supportive of the proposed settlement hierarchy which focusses the distribution of new development to the four largest settlements in the Borough, comprising the 'Principal Town' and 'Key Service Centres'. These settlements are those which have the greatest range of services and facilities, including employment centres and transport infrastructure; as such, they should continue to be the primary focus for new development in the Borough.
- 1.2 Emerging Policy H4PU supports this by identifying that 40% of new residential development will be directed to Whitehaven and 30% to be distributed between Egremont, Cleator Moor and Millom. The remaining distribution of new residential development will be split between the Local Service Centres (17%), Sustainable Rural Villages (10%) and the Other Rural Villages (3%).
- 1.3 Paragraph 6.1.13 of Settlement Hierarchy and Development Strategy Paper Update (2022) notes that the targets quoted are not "ceilings" and additional development within those settlements should be supported where appropriate.
- 1.4 Story Homes is generally supportive of this percentage split. However, the figures set out in the table at Policy H4PU will need to be updated to reflect any amendments to the housing requirement figure as referenced in our Matter 4 Hearing Statement and the cross referred technical critique appended to the Regulation 19 consultation response.
- 1.5 The figures are also to be used as a minimum, or a starting point and should not be treated as a barrier to further delivery in particular settlements.

### Principal Town

- 1.6 It is noted that the overall distribution of new housing to Whitehaven (40%) has decreased by 5% when compared with the adopted Core Strategy (45%). The accompanying evidence base acknowledges this and states that "*the figure for Whitehaven has been reduced to enable the creation of the additional tiers to allow for development to take place in a number of additional villages*".<sup>1</sup>

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<sup>1</sup> Paragraph 6.1.8, Settlement Hierarchy and Development Strategy Paper Update (2022), CBC

- 1.7 Further detail is provided in the supporting text to Policy H4PU which confirms that the 40% figure *“is only a minimum target for Whitehaven and additional development over and above the 40% will be supported where it accords with the Development Plan”*.<sup>2</sup>
- 1.8 The same paragraph acknowledges that the size and structure of Whitehaven (which includes a number of opportunity sites) provides more scope for windfall development within its boundary than the other settlements within the Borough which may result in the 40% target being exceeded.
- 1.9 Whitehaven is the largest and most sustainable location in Copeland. It has 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. Story Homes is therefore supportive that the focus on the delivery of new homes in Whitehaven has been retained.
- 1.10 As discussed further below, the draft proposed housing allocation HWH6 (Land south of Waters Edge Close), as well as the land at Edgehill Park (formerly part of HWH3) are located to the south west of Whitehaven, on land owned by Story Homes, and are clearly suitable, available and achievable.

### **Key Service Centres and Local Service Centres**

- 1.11 Story Homes would emphasise that the geography of Copeland needs to be taken into account when directing growth to the identified Key Service Centres (KSC’s) and Local Service Centres (LSC’s) to ensure growth is as sustainable as possible.
- 1.12 Settlements such as Cleator Moor are well-connected to Whitehaven with the existing employment areas, making them key sustainable locations for growth.
- 1.13 Story Homes is supportive of the growth of Cleator Moor through the allocation of land to the east of Jacktrees Road (ref. HCM1). As identified below in respect of allocation HCM1, Story Homes control land to the east of Jacktrees Road. The land is suitable, available and achievable and would therefore assist in meeting identified needs within the Borough.

### **Policy H5PU - Allocation reference HWH3 Land at Edgehill Park**

#### ***Q15.3 What is the background to the site allocation? How was it identified and which options were considered?***

- 1.14 Policy H5PU relates to Housing Allocations and has incorporated alterations since the Preferred Options stage to justify updating certain allocations based on a change to the plan period as well as changes in circumstances.
- 1.15 This has included deletion or amendment based on evidence that shows sites are no longer deliverable or where full planning permission has been granted. This is justified on the basis that it ensures that housing needs can be met by a supply of allocations that are deliverable.
- 1.16 Story Homes acknowledges the requirement within the NPPF for Local Plans to be “effective” and to be “deliverable over the plan period”<sup>3</sup>. Story Homes therefore supports the continued review of allocated sites with a focus on deliverability and adopting a sustainable strategy based on evidence. The avoidable issues of under-delivery of housing can have major impacts including worsening affordability and a lack of affordable housing provision. It can also lead to pressure for windfall development in less sustainable locations.

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<sup>2</sup> Paragraph 13.6.6, PDLP, CBC

<sup>3</sup> Paragraph 35, NPPF (2021)

- 1.17 Whilst Story Homes is of the view that the removal of allocations which may not be deliverable is justified, the PDLP and supporting evidence has failed to fully set out the reasoning for amending allocations where full planning permission has been granted.
- 1.18 The Land at Edgehill Park was proposed as a draft housing allocation (ref. HWH3) and identified as a Key Regeneration Site capable of delivering 510 units in the Preferred Options draft of the Local Plan.
- 1.19 Policy H5PU identifies that Site Reference HWH3 has been reduced in size and yield to exclude SHLAA reference WS008a, which specifically relates to the land under the control of Story Homes. Story Homes objects to this change and is of the view that the approach is not justified by the NPPF or the PPG.
- 1.20 At the time of the Preferred Options consultation, site reference WS008a (the western part of HWH3) benefitted from extant outline planning permission for up to 335 new homes (ref: 4/13/2235/001) and a Reserved Matters application had just been submitted. As CBC are aware, this application (4/20/2474/0R1) for 335 dwellings including associated infrastructure was granted in April 2021, demonstrating that the site is suitable, available and achievable.
- 1.21 Story Homes is of the view that there is no justification for amending allocation HWH3 on the basis of securing full planning permission. The site remains undeveloped and is the subject of a time constrained planning permission with limited security beyond that. Retention as an allocation would provide flexibility for the landowner during uncertain times economically and politically.
- 1.22 The Reserved Matters application (4/20/2474/0R1) was only granted in April 2021, which is clearly within the amended plan period providing further justification for its retention as an allocation. Story Homes is of the view that if there is a concern within CBC that retaining the site as an allocation presents problems with the recording of completions and the potential for double counting, that there is a simple solution whereby delivery on allocations is recorded separately within housing monitoring evidence.
- 1.23 Story Homes is therefore of the view that the proposed change to allocation HWH3 and Policy H5PU is not justified through planning policy or the amendment to the plan period and may jeopardise the comprehensive regeneration of the local area which forms part of the wider Former Marchon Employment Opportunity Site.

## **Policy H5PU - Allocation reference HWH6 Land south of Waters Edge Close**

### ***Q15.3 What is the background to the site allocation? How was it identified and which options were considered?***

- 1.24 Land to the south of Water's Edge Close measures approximately 1.3ha in size and comprises a roughly square piece of brownfield land on the southwestern edge of Whitehaven, within the settlement boundary.
- 1.25 The site is proposed as a draft housing allocation (ref. HWH6) in draft policy H5PU (Housing Allocations) in the PDLP as capable of delivering 35 units. Gleeson Homes have secured full planning permission on the site for 40 dwellings (LPA ref. 4/20/2455/0F1) with the decision issued 30 March 2022.
- 1.26 Story Homes is supportive of this draft allocation.

## Policy H5PU - Allocation reference HCM1 Land at Jacktrees Road

### ***Q15.3 What is the background to the site allocation? How was it identified and which options were considered?***

- 1.27 The Jacktrees Road site is c.8.3ha in size and is owned by Story Homes. It comprises an unremarkable, roughly triangular parcel of land adjacent to the southwestern boundary of Cleator Moor.
- 1.28 The site is proposed as a draft housing allocation (ref. HCM1) in draft policy H5PU (Housing Allocations) in the PDLP as capable of delivering 127 units.
- 1.29 A detailed planning application for development of the whole allocated site is being prepared by Gleeson Homes and it is expected this will be submitted prior to commencement of the Examination Hearings.
- 1.30 The site is available, suitable and achievable, with a realistic prospect that the whole site could be delivered within the first five years of the plan period and therefore Story Homes wishes to express continued support for its allocation.

### ***Q15.11 What status do the broad locations identified at paragraph 13.8 have? Where are they identified?***

- 1.31 Section 4.2 of the Local Plan confirms that Broad Locations are areas where *“growth could be delivered if at the Local Plan Review stage, it becomes apparent that there are insufficient specific, deliverable sites to deliver the Local Plan Strategy”* and that this *“will depend on a number of factors such as land availability, statutory consultee comments and whether funding has been identified to bring forward the Whitehaven Relief Road etc”*. This section also includes a Key Diagram showing the location of the Broad Locations, all of which are outside the defined Settlement Boundary limits.
- 1.32 Policy CO2PU relates to ‘priorities for improving transport networks’ and confirms that the Council will support the allocation and safeguarding of land to deliver various schemes including the Whitehaven Eastern Relief Road. Consultation on the proposed road scheme took place in 2018, but the decision was subsequently made by National Highways not to take this forward as part of the Road Investment Strategy. It was suggested that the scheme would be unlikely to secure good value for taxpayers and there was strong competition amongst other proposals for the funding available. The timeframe for the delivery of the road is therefore uncertain and it should be noted that the Relief Road is identified in the Core Strategy (adopted in 2013) as one of three *“particular priorities which would be of great value to the locality”*, noting that *“the Eastern Relief Road/Bypass would improve conditions within the existing urban area of Whitehaven, but would also improve external linkages eastwards to other settlements and connect major traffic generators like Westlakes Science and Technology Park”*<sup>4</sup>.
- 1.33 The Stage 2 Infrastructure Delivery Plan makes reference to the Relief Road suggesting that *“the Council now hopes it will be included with the next Road Investment Strategy which cover the period 20250-2030”*<sup>5</sup>. Story Homes is supportive of the delivery of the Whitehaven Relief Road but has concerns about the lack of evidence which supports its delivery, coupled with the length of time this has been identified as a priority.
- 1.34 Whilst Story Homes also supports the identification of Broad Locations as being suitable for longer term growth, the restriction on the circumstance in which the sites will be considered suitable for

<sup>4</sup> Implications of Policy T1, Copeland Core Strategy

<sup>5</sup> Paragraph 4.5, Infrastructure Development Plan Stage 2 (2022)

development is not effective or consistent with the national policy. Story Homes therefore considers the reference to only coming forward as part of a Local Plan Review should be removed.

- 1.35 Policy DS4PU accepts that development that is well related to but outside of the settlement boundary of a town can be acceptable in circumstances where CBC is unable to demonstrate a five year supply of dwellings or where there has been previous under-delivery of housing against the requirement for 3 years or more. Story Homes considers that development at Broad Locations should be considered based on the same tests. It cannot be sound if other land outside of a settlement boundary has an increased prospect of gaining planning permission compared with a Broad Location, which CBC has considered potentially suitable for development in the future.
- 1.36 Story Homes also considers that a commitment to funding of the Whitehaven Relief Road could act as a trigger for long-term housing and employment sites within the Broad Locations to be brought forward. This would be dependent on the proposals being in accordance with all of areas of the Development Plan.

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