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on behalf of Brookhouse Group
Representor ID: 82

Examination of the Copeland Local Plan 2021-2038

HEARING STATEMENT – MATTER 3 DEVELOPMENT STRATEGY

Issue: Whether the development strategy is justified, effective and consistent with national policy
Relevant Policies: SP DS1PU; SP DS2PU; SP DS3PU; DS4PU

This Hearing Statement has been prepared by Barton Willmore, now Stantec on behalf of our Client Brookhouse Group. Our Client is an experienced national developer and investor, has several live projects in Cumbria, and has been working constructively with Copeland Council to promote housing allocation HM12, Moor Farm, Millom with a view to submitting a planning application on the site. Our responses to Matter 3 are made with reference to this allocation.

3.1 Is it necessary for Policy DS1PU to repeat the presumption in favour of sustainable development set out in the National Planning Policy Framework (the Framework)?

3.2 Does Policy DS2PU provide an effective framework to reduce the impacts of development on climate change? Has the potential effect of the policy on the viability of development been assessed?

3.3 Is there evidence to support the proposed higher National Housing Standard for water conservation and BREEAM rating of excellent in new non-domestic buildings as proposed in suggested Main Modification MA-LP14?

3.4 Is the methodology set out in the Settlement Hierarchy and Development Strategy Paper (updated) and Village Services Survey sound? Do they provide an appropriate basis to inform the settlement hierarchy in Strategic Policy DS3PU? How does it differ from the approach taken in the Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies (the Core Strategy) 2013?

1. We consider the methodology set out in the 2022 Settlement Hierarchy and Development Strategy Paper¹ for establishing the settlement hierarchy to be sound. It assesses settlements against the core planning principles that are important to enabling the delivery of sustainable development and supporting growth in both urban and rural locations as set out in the NPPF. Factors considered as part of the assessment include infrastructure, type and range of facilities, public transport, proximity to other settlements and employment opportunities. This provides an appropriate basis to inform the settlement hierarchy because it enables development to be apportioned appropriately towards each tier of the hierarchy.
2. In the case of Millom, the town is identified as a Key Service Centre in the adopted Core Strategy. Its role and function as described in Policy DS3PU has not changed during this period

¹ Document EB1

and we consider it to be justified and consistent with national policy for Millom to be retained as a Key Service Centre as one of the most sustainable locations for growth.

3.5 Does Policy DS3PU provide an appropriate Framework to guide development in the Principal Town, Key Service Centres, Local Service Centres, Sustainable Rural Villages and Rural Villages?

3. Policy DS3PU states the focus of housing development in Key Service Centres will be medium scale extensions, windfall and infill development. The range of development opportunities (including medium scale extensions) provides an appropriate framework to guide the type and size of housing development that will be suitable to support the role of Key Service Centres within the second tier of the hierarchy.

3.6 Is it clear the scale of development which will be allowed within each tier of the hierarchy? Does the level of growth proposed in each area reflect the housing and employment needs in the different parts of the Borough?

4. The scale of housing development proposed in each tier of the hierarchy is clearly set out in Policy H4PU. This distributes 30% of the growth towards Key Service Centres. Each of the three settlements should deliver growth to ensure the strategy for Key Service Centres is effective and meets local housing needs.
5. The allocation of our Client's site at Moor Farm (housing allocation HMI2) for 195 dwellings in Policy H5PU will make an important contribution to delivering the housing growth strategy for Key Service Centres set out in Policies DS3PU and H4PU. It will assist in meeting the identified need for larger market and affordable family homes in Millom, reversing the trend in population decline and will play a key role in retaining and attracting an economically active population that will support the economic and regeneration strategy for the town in line with the Vision and Strategic Objectives for the Borough. The site is also of a scale that is commensurate with the framework for Key Service Centres in Policy DS3PU, and it is the most suitable and deliverable site to support Millom's role as a sustainable location for growth.

3.7 Are the suggested Main Modifications to Policy DS3PU justified? Are they necessary in the interests of soundness?

3.8 What is the basis of the proposed settlement clusters?

3.9 Is the methodology for the review and definition of detailed settlement boundaries robust? Have the criteria and judgements used to inform the choice of settlement boundaries been applied consistently?

6. The methodology for the review and definition of settlement boundaries set out in Section 8.9 of Document EB1² is deemed to be robust. It reviews the existing boundaries on the adopted Policies Map and makes alterations to them to include the existing built form, to allow windfall sites, extant planning permissions, completed developments and draft allocations that currently fall outside the settlement boundary. We would expect the criteria and judgments used to inform the choice of settlement boundaries to have been applied consistently by the Council.

² Settlement Hierarchy and Development Strategy Paper

7. It is appropriate to review the settlement boundaries to incorporate allocations to ensure the Council has a deliverable supply of land to effectively deliver the growth strategies in line with the Vision, Strategic Objectives and Policies DS3PU and H4PU for each tier of the hierarchy over the Plan period.

3.10 Are the proposed settlement boundaries justified on the basis of proportionate evidence?

8. The proposed settlement boundary of Millom has been amended to allocate our Client's site at Moor Farm (housing allocation HMI2). This alteration is justified because the existing supply of 31 dwellings³ would not be sufficient to support the housing strategy for Key Service Centres set out in Policies DS3PU and H4PU, to address the identified need for high quality affordable and market family housing⁴ and would not align with the Strategic Objective to improve the housing market. The evidence base prepared to inform the site selection process demonstrates that HMI2 is the most suitable and deliverable site that is of commensurate scale to support sustainable growth in the town. Set in this context, the proposed extension to the development boundary to accommodate HMI2 is justified by proportionate evidence.
9. Notwithstanding the above, we note that the 'Green Wedge' designation strays ever so slightly into the settlement boundary and the southwest corner of HMI2 on the Proposals Map⁵. We expect that this is drafting error because the Settlement Landscape Character Assessment Study for Millom⁶ does identify the site as falling within the green wedge between Millom and Haverigg. In fact, it identifies the site as providing the opportunity to define the development edge. On that basis to provide clarity when applying policies in the Local Plan we propose a modification is made so that this designation only relates to open countryside outside of the development boundary and excludes any land within HMI2.

3.11 Will the settlement boundaries defined on the draft Proposals Map be effective in enabling further windfall sites to come forward to meet any residual housing need?

3.12 Does Strategic Policy DS4PU provide an appropriate basis to manage development within and adjacent to settlement boundaries and beyond in the open countryside?

10. Policy DS4PU states development within the settlement boundaries will be supported in principle where it accords with the Development Plan unless material considerations indicate otherwise. Our Client considers this to be an appropriate basis to manage development within the settlement boundary and we do not wish to comment on the remaining aspects of the policy.

3.13 Overall, is the development strategy justified? Does it represent an appropriate strategy when considered against the reasonable alternatives available? What alternative options were considered as part of the Plans preparation and why were they discounted?

11. Our Client considers the development strategy to be justified because it seeks to focus growth towards the most sustainable settlements in the Borough to support economic growth and the

³ Based on the supply figures set out at Tables 5, 6 and 7, Appendix E Publication Draft Appendices Document (Document CD2)

⁴ Document EB6 – Housing Needs Assessment 2020

⁵ Document CD3b

⁶ Document EB37

vibrancy of these town centres but also supports sufficient growth in the lower order settlements to support local needs and to sustain local amenities and employment opportunities in rural areas whilst also protecting natural assets. This strategy will ensure the Vision and Strategic Objectives for the Borough are achieved.

12. We note that paragraph 6.1.3 of the 2022 Settlement Hierarchy and Development Strategy Paper⁷ states a number of alternative strategies were considered. These alternative options are set out in Appendix C of the 2020 Settlement Hierarchy and Development Strategy Paper produced as part of the evidence base for the Preferred Options Local Plan. Our Client agrees that these options should be discounted on the basis they would not align with the development strategy to promote sustainable patterns of growth in line with paragraph 11a) of the NPPF. As such, the proposed strategy is considered to be the most appropriate when considered against the reasonable alternatives.

⁷ Document EB1